SOUTH CAROLINA
JUDICIAL BRANCH

State of South Carolina	In the Court of Common Pleas
County of: Horry	Fifteenth Judicial Circuit

Plaintiff(s): Thomas Edward Humphrey	Case No.
v.	2026 CP26 5005
Defendant(s): State of South Carolina, et al.	

Civil Action Coversheet

FILED
HORRY COUNTY
2026 JUN 23 P 2:48
RENEE N. ELVIS
CLERK OF COURT
HORRY COUNTY, SC

Submitted By:	Thomas Edward Humphrey
Address:	107 Middlesex Road, Apartment 5, Waltham MA 02452
SC Bar Number:	Plaintiff, In Propria Persona
Telephone #:	(617) 835 - 9319
Fax #:	
Other:	
Email:	ThyKingdomCome1322@gmail.com

SOUTH CAROLINA
JUDICIAL BRANCH

NOTE: The coversheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for the use of the Clerk of Court for the purpose of docketing cases that are NOT E-Filed. It must be filled out completely, signed, and dated. A copy of this coversheet must be served on the defendant(s) along with the Summons and Complaint. **This form is NOT required to be filed in E-Filed Cases.**

Docketing Information (Check all that apply)

***If Action is Judgment/Settlement do not complete**

- [x] **Jury Trial** demanded in complaint.
- [ ] **Non-Jury Trial** demanded in complaint.
- [ ] This case is subject to **Arbitration** pursuant to the Court Annexed Alternative Dispute Resolution Rules.
- [ ] This case is subject to **Mediation** pursuant to the Court Annexed Alternative Dispute Resolution Rules.
- [ ] This case is exempt from ADR. (Certificate Attached)

Note: Frivolous civil proceedings may be subject to sanctions pursuant to SCRCP, Rule 11, and the South Carolina Frivolous Civil Proceedings Sanctions Act, S.C. Code Ann. §15-36-10 et. seq. Under Protest and without prejudice. Subject to attached Declaration, incorporated by reference.

Submitting Party Signature: DH

Date: June 22, 2026

Nature of Action (Check one box below)

Contracts

- [ ] Constructions (100)
- [ ] Debt Collection (110)
- [ ] General (130)
- [ ] Breach of Contract (140)
- [ ] Fraud/Bad Faith (150)
- [ ] Failure to Deliver/Warranty (160)
- [ ] Employment Discrimination (170)
- [ ] Employment (180)
- [ ] Other (199)

Torts- Professional Malpractice

- [ ] Dental Malpractice (200)
- [ ] Legal Malpractice (210)
- [ ] Medical Malpractice (220)
- [ ] Notice of Intent Case No. [Fill in Notice of Intent Case Number]

____

- [ ] Notice File. Med Mal (230)
- [ ] Other (299)

Torts- Personal Injury

- [ ] Conversion (310)
- [ ] Motor Vehicle Accident (320)
- [ ] Premises Liability (330)
- [ ] Products Liability (340)
- [ ] Personal Injury (350)
- [ ] Wrongful Death (360)
- [ ] Assault/Battery (370)
- [ ] Slander/Libel (380)
- [x] Other (399)

Inmate Petitions

- [ ] PCR (500)
- [ ] Mandamus (520)
- [ ] Habeas Corpus (530)
- [ ] Other (599)

Real Property

- [ ] Claim & Delivery (400)
- [ ] Condemnation (410)
- [ ] Foreclosure (420)
- [ ] Mechanic's Lien (430)
- [ ] Partition (440)
- [ ] Possession (450)
- [ ] Building Code Violation (460)
- [ ] Other (499)

Judgments/Settlements

- [ ] Death Settlement (700)
- [ ] Foreign Judgment (710)
- [ ] Magistrate's Judgment (720)
- [ ] Minor Settlement (730)
- [ ] Transcript Judgment (740)
- [ ] Lis Pendens (750)
- [ ] Transfer of Structured Settlement Application Payment Rights (760)
- [ ] Confession of Judgment (770)
- [ ] Petition for Workers Compensation Settlement Approval (780)
- [ ] Incapacitated Adult Settlement (790)
- [ ] Other (799)

Administrative Law/Relief

- ☐ Reinstate Driver's License (800)
- ☐ Judicial Review (810)
- ☐ Relief (820)
- ☐ Permanent Injunction (830)
- ☐ Forfeiture- Petition (840)
- ☐ Forfeiture- Consent Order (850)
- ☐ Other (899)

Special/Complex/Other

- ☐ Environmental (600)
- ☐ Automobile Arb. (610)
- ☐ Medical (620)
- ☐ Pharmaceuticals (630)
- ☐ Unfair Trade Practices (640)
- ☐ Out of State Depositions (650)
- ☐ Motion to Quash Subpoena in an Out of County Action (660)
- ☐ Pre-Suit Discovery (670)
- ☐ Permanent Restraining Order (680)
- ☐ Interpleader (690)
- ☐ Other (699)

Appeals

- ☐ Arbitration (900)
- ☐ Magistrate- Civil (910)
- ☐ Magistrate- Criminal (920)
- ☐ Municipal (930)
- ☐ Probate Court (940)
- ☐ SCDOT (950)
- ☐ Worker's Comp (960)
- ☐ Zoning Board (970)
- ☐ Public Service Comm. (990)
- ☐ Employment Service Comm. (991)
- ☐ Other (999)

Effective January 1, 2016, Alternative Dispute Resolution (ADR) is mandatory in all counties, pursuant to Supreme Court Order dated November 12, 2015.

Supreme Court Rules Require the Submission of all Civil Cases to an Alternative Dispute Resolution Process, Unless Otherwise Exempt.

Pursuant to the ADR Rules, you are required to take the following action(s):

1. The parties shall select a neutral and file a "Proof of ADR" form on or by the 210th day of the filing of this action. If the parties have not selected a neutral within 210 days, the Clerk of Court shall then appoint a primary and secondary mediator from the current roster on a rotating basis from among those mediators agreeing to accept cases in the county in which the action has been filed.

2. The initial ADR conference must be held within 300 days after the filing of the action.

3. Pre-suit medical malpractice mediations required by S.C. Code §15-79-125 shall be held not later than 120 days after all defendants are served with the "Notice of Intent to File Suit" or as the court directs.

4. Cases are exempt from ADR under ADR Rule 3(b) upon the following grounds:

    a. Special proceeding, or actions seeking extraordinary relief such as mandamus, habeas corpus, or prohibition;

    b. Requests for temporary relief;

    c. Appeals;

    d. Post Conviction relief matters;

    e. Contempt of Court proceedings;

    f. Forfeiture proceedings brought by governmental entities;

    g. Mortgage foreclosures; and

    h. Cases that have been previously subjected to an ADR conference, unless otherwise required by Rule 3 or by statute.

5. Cases may also be exempt from ADR under ADR Rule 3(c) upon motion to and approval by the court.

6. In cases not subject to ADR, the Chief Judge for Administrative Purposes, upon the motion of the court or of any party, may order a case to mediation.

7. Application of a party to be exempt from payment of neutral fees due to indigency should be filed with the Clerk of Court prior to the scheduling of the ADR conference.

Please Note: You must comply with the Supreme Court Rules regarding ADR. Failure to do so may affect your case or may result in sanctions.

STATE OF SOUTH CAROLINA

COUNTY OF HORRY

Thomas Edward Humphrey,
Plaintiff, In Propria Persona,

v.

State of South Carolina, et al.,
Defendants.

IN THE COURT OF COMMON PLEAS
FIFTEENTH JUDICIAL CIRCUIT

Case No. ________________

DECLARATION OF CONDITIONAL ACCEPTANCE AND RESERVATION OF RIGHTS CONCERNING SCCA FORM 234 (CIVIL ACTION COVERSHEET)

TO THE CLERK OF COURT AND TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

1. **Declarant.** I, Thomas Edward Humphrey, am the Plaintiff in the above-captioned action, appearing in propria persona and sui juris, in the status, standing, and capacity declared throughout the Verified Petition filed contemporaneously herewith. Every declaration of status set forth in the Verified Petition is incorporated into this Declaration by reference as though fully restated herein, and nothing in SCCA Form 234 (the "Coversheet") alters, diminishes, or recharacterizes that status in any respect.

2. **Integration.** This Declaration is executed contemporaneously with, is physically attached to, is expressly referenced upon the face of, and is incorporated by reference into the Coversheet submitted with the Verified Petition. The Coversheet and this Declaration together constitute a single integrated instrument, and the Coversheet must be read, docketed, construed, and given effect only together with, and as qualified in its entirety by, this Declaration.

3. **Ministerial character of the Coversheet.** By its own express terms, the Coversheet "neither replaces nor supplements the filing and service of pleadings or other papers as required by law" and exists "for the use of the Clerk of Court for the purpose of docketing" cases that are not e-filed. The Coversheet is therefore a purely ministerial, administrative docketing instrument. It

is not a pleading, it is not evidence, it creates no substantive rights or obligations, and it is completed by the Plaintiff solely because the Clerk of Court requires it as a condition of accepting the Verified Petition for filing.

4. Conditional acceptance under protest. Plaintiff conditionally accepts the administrative requirement to complete and submit the Coversheet, and performs that ministerial act under protest and without prejudice, expressly reserving all rights, remedies, claims, defenses, objections, immunities, statuses, and standings, whether arising under the Constitution of the United States, the Constitution of South Carolina, the common law, or equity, none of which is waived, surrendered, abandoned, or compromised by the completion, execution, or submission of the Coversheet.

5. Express and limited invocation of judicial power. Plaintiff invokes the judicial power of this Court under Article V of the Constitution of South Carolina and this Court's inherent jurisdiction at common law and in equity for the sole and limited purpose of adjudicating the Verified Petition and granting the relief therein demanded. That express invocation, made in the Verified Petition itself, is the only invocation of authority Plaintiff makes, and it is made on the grounds, in the capacity, and upon the theories stated in the Verified Petition and no others.

6. No submission, consent, waiver, or presumption. The completion, execution, signing, or submission of the Coversheet, and the checking of any box thereon, does not and shall not constitute, evidence, imply, or be construed as: (a) consent or voluntary submission, in any way, shape, or form, to any jurisdiction, authority, rule, statute, code, regulation, administrative scheme, legislative scheme, policy, procedure, or requirement of any kind, whether known or unknown, beyond the judicial power expressly and narrowly invoked in Paragraph 5 above; (b) a waiver of any right, objection, claim, remedy, defense, status, or standing; (c) an election of any statutory remedy or statutory cause of action; (d) an admission of any fact, legal conclusion, or characterization; (e) consent to the recharacterization of the claims pleaded in the Verified Petition by reference to any taxonomy, category, code, or checkbox appearing on the Coversheet; or (f) the basis for any presumption of submission, consent, or waiver arising from the fact that the form was required or completed. Any such presumption, whether known or unknown, named or unnamed, is hereby expressly denied, rebutted, and negated ab initio.

7. Checkbox qualifications. The designation "Other (399)" under "Nature of Action" is selected solely because the Coversheet compels the selection of exactly one category and no listed category corresponds to claims grounded, as the Verified Petition is, in self-executing constitutional provisions, the common law, and equity. That selection is a docketing convenience for the Clerk and does not characterize, limit, convert, or recast any claim in the Verified Petition as a statutory tort or as any other statutory cause of action. The demand for trial by jury preserves Plaintiff's right under Article I, Section 14 of the Constitution of South Carolina and the common law, and does not waive the trial of equitable claims to the Court sitting in equity.

8. Alternative dispute resolution. Plaintiff declines participation in alternative dispute resolution as a matter of right. The Court-Annexed Alternative Dispute Resolution Rules and any related Supreme Court orders or codes are statutory in nature and presuppose a statutory civil capacity and voluntary participation in the public franchise of civil litigation. This proceeding is brought in a common law court of record sitting in equity, as established in the Verified Petition, and is governed exclusively by the substantive principles of common law and equity. Statutory rules seeking to regulate these proceedings have no application. This declination is asserted under the same protest and continuing reservation of rights set forth in Paragraph 6 above.

Nothing herein shall be construed as a motion for exemption, a request for permission, or an invocation of any statutory exception.

9. Supremacy of the Verified Petition. In the event of any conflict, inconsistency, or ambiguity between the Coversheet and the Verified Petition, the Verified Petition controls in all respects.

10. Continuing reservation. This conditional acceptance and reservation of rights is continuing in nature and extends to every administrative form, coversheet, designation, or ministerial filing requirement hereafter imposed in this action, unless and except to the extent expressly, specifically, and separately waived by Plaintiff in a signed writing identifying the particular right waived.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on June 22, 2026, at Watertown, Massachusetts.

TEH

Thomas Edward Humphrey,
Plaintiff, In Propria Persona
% 107 Middlesex Road, Apartment 5
Waltham, Massachusetts Republic [02452]
Telephone: (617) 835-9319
Email: ThyKingdomCome1322@gmail.com

STATE OF SOUTH CAROLINA,

COUNTY OF HORRY

Thomas Edward Humphrey
Plaintiff,

vs.

State of South Carolina, et al.
Defendant.

IN THE COURT OF COMMON PLEAS

SUMMONS

FILE NO 2026-CP-26-5005

TO THE DEFENDANT ABOVE-NAMED:

YOU ARE HEREBY SUMMONED and required to answer the complaint herein, a copy of which is herewith served upon you, and to serve a copy of your answer to this complaint upon the subscriber, at the address shown below, within thirty (30) days after service hereof, exclusive of the day of such service, and if you fail to answer the complaint, judgment by default will be rendered against you for the relief demanded in the complaint.

Conway, South Carolina

FILED
HORRY COUNTY
2026 JUN 2 P 2: 4
RENEE ELVIS
CLERK COURT
HORRY COUNTY, SC

Plaintiff/Attorney for Plaintiff

Dated: June 23, 2026

Address: 107 Middlesex Road, Apt. 5, Waltham, MA 02452

SCCA 401 (5/02)

STATE OF SOUTH CAROLINA

COUNTY OF HORRY

Thomas Edward Humphrey,
Plaintiff, In Propria Persona,

v.

State of South Carolina; Henry Dargan McMaster, Governor of South Carolina; South Carolina Department of Public Safety; Robert G. Woods IV, Director of the South Carolina Department of Public Safety; South Carolina Highway Patrol; Christopher N. Williamson, Colonel and Commander of the South Carolina Highway Patrol; Christopher A. Plyler, Corporal of the South Carolina Highway Patrol — *all officials sued in their individual and official capacities*; ABC Mobile Auto & RV Repair; and Does 1-20 (unknown agents, officers, or co-conspirators of the State of South Carolina, the South Carolina Department of Public Safety, or the South Carolina Highway Patrol),
Defendants.

IN THE COURT OF COMMON PLEAS
FIFTEENTH JUDICIAL CIRCUIT

Case No. 2026 CP260 5005

VERIFIED PETITION IN EQUITY AND AT COMMON LAW FOR REDRESS OF *ULTRA VIRES* TRESPASS TO CHATTELS, CONVERSION, AND DEPRIVATION OF CONSTITUTIONAL RIGHTS; FOR ENFORCEMENT OF EQUITABLE LIENS; AND FOR DECLARATORY, INJUNCTIVE, AND COMPENSATORY RELIEF

JURY TRIAL DEMANDED

VERIFIED UNDER OATH

PRELIMINARY STATEMENT

1. **COMES NOW**, Thomas Edward Humphrey, a natural living man and sovereign private individual, *sui juris*, not acting as a statutory "person" or public officer, petitioning this Honorable Court in my own right for redress of harm caused by the Defendants' unlawful actions. I assert my unalienable rights endowed by my Creator and secured by the Constitution for the United States of America and the South Carolina Constitution. I, Thomas Edward Humphrey, explicitly deny consent to any presumptions that I am a statutory "person," public officer, or domiciled on federal territory, and I demand that Defendants provide evidence on the record rebutting my private status, absent which their actions constitute an unlawful trespass upon my rights and a form of government identity

theft. This theft occurs when government actors kidnap my legal identity by presuming I am a statutory "person" or public officer subject to their jurisdiction without my voluntary consent, thereby converting my private, unalienable rights into revocable public privileges under franchise agreements I have not accepted. I explicitly state that I have not voluntarily invoked any franchise license number (e.g., SSN, driver's license) in connection with my private travel, nor have I domiciled on federal territory to subject myself to statutory jurisdiction. My actions, including the use of my mobile home for private, non-commercial purposes, do not constitute participation in any government franchise. Defendants must provide evidence of my express written consent to any franchise, as required by the Declaration of Independence and common law principles of sovereignty. I demand Defendants prove I lawfully occupy a constitutionally created public office per 4 U.S.C. § 72, absent which their actions constitute an unlawful trespass upon my private rights, conduct of the kind the legislature has recognized as harmful in 18 U.S.C. § 912, that statute being cited here solely as evidence of the public standard and not as a cause of action.

2. Central to this petition is the legal principle that all government authority derives from the consent of the governed, as articulated in the Declaration of Independence. No civil obligation or jurisdiction may be imposed upon a private individual without their explicit consent, a requirement the Defendants have failed to meet. My explicit denial of consent to statutory presumptions or franchises underscores the unlawfulness of their actions, rendering them a trespass upon my sovereign rights.

3. Furthermore, as a follower of Christ, I am bound by the Delegation of Authority Order from God, as articulated in the Holy Bible, which mandates that my domicile and

allegiance reside solely in the Kingdom of Heaven on Earth, not within any man-made government's jurisdiction. The Bible, as a trust indenture, forbids me from choosing a civil domicile under secular authority, as this would constitute idolatry and a violation of the First Commandment (Exodus 20:3-4). My legal status is that of a "transient foreigner" with respect to all earthly governments, immune from their civil jurisdiction absent my explicit consent. This biblical mandate reinforces my rejection of any statutory domicile or public office, aligning with my unalienable rights under the First Amendment and common law. I am commanded by God in Exodus 23:32-33: "You shall make no covenant [contract or franchise] with them [foreigners, pagans], nor with their [pagan government] gods [laws or judges]. They shall not dwell in your land [and you shall not dwell in theirs by becoming a 'resident' in the process of contracting with them], lest they make you sin against Me [God]. For if you serve their gods [under contract or agreement or franchise], it will surely be a snare to you." This divine injunction prohibits me from entering into any franchise or contract with the Defendants' government, preserving my separation from their jurisdiction and affirming my status as a sovereign individual accountable only to God's law.

GENERAL ALLEGATIONS COMMON TO ALL CAUSES OF ACTION

PARTIES

4. **Plaintiff:** Thomas Edward Humphrey, a private individual and state national, temporarily dwelling at 107 Middlesex Road, Apartment 5, Waltham, Middlesex County, Massachusetts Republic, Non-domestic.

5. **Private Status:** Plaintiff is a private individual, not acting in any public capacity, and asserts his unalienable rights under the Constitution. He is not a statutory "person," "taxpayer," "driver," or any other enfranchised entity subject to statutory regulations. The

government's attempt to treat me as a public entity without such consent constitutes identity theft, unlawfully converting my private rights into public obligations.

6. Furthermore, civil legal obligations toward government arise only through voluntary consent, such as participation in a franchise or establishment of a civil domicile. I have not consented to any such arrangement, expressly or implicitly, and demand that Defendants prove otherwise with evidence of my voluntary submission. Absent such proof, their assertions of authority over me violate the fundamental requirement for consent, as affirmed in *Hale v. Henkel*, 201 U.S. 43 (1906), which distinguishes natural persons' inherent rights from statutory duties requiring consent. All government franchises are voluntary contracts requiring explicit agreement, absent which any imposition upon me lacks lawful authority and constitutes an unlawful trespass upon my rights.

7. Plaintiff, Thomas Edward Humphrey, further asserts that he is a living, breathing, flesh-and-blood man, distinct from any artificial entity or corporate fiction such as "THOMAS EDWARD HUMPHREY." This distinction, recognized in *Hale v. Henkel*, 201 U.S. 43, 74-75 (1906), affirms that Plaintiff's inherent rights under common law—including the right to liberty and property—cannot be usurped by statutory presumptions absent his express consent. Defendants' failure to produce evidence of such consent renders their actions a trespass upon Plaintiff's sovereign status.

8. As a fiduciary of God under the Bible's trust indenture, I am prohibited from using labels or civil statutory statuses such as "citizen," "resident," or "taxpayer" to describe myself, as these imply consent to man-made franchises and contradict my exclusive allegiance to God's laws. My identity is defined solely by my covenant with God, not by the artificial

constructs of secular government. My legal status is that of a fiduciary and ambassador of God, a "foreign diplomat" exempt from earthly civil jurisdiction (Philippians 3:20; Psalm 47:7). My religious beliefs, protected under the Free Exercise Clause of the First Amendment, as interpreted in cases like *Church of Lukumi Babalu Aye v. City of Hialeah*, 508 U.S. 520 (1993), and *Burwell v. Hobby Lobby Stores, Inc.*, 573 U.S. 682 (2014), prohibit me from consenting to secular authority in a manner that conflicts with my faith. The Defendants' actions burden my free exercise of religion by attempting to impose secular jurisdiction without my consent.

9. **Public Status:** Plaintiff denies any public status or affiliation that would subject him to statutory regulations. He is not a public officer, statutory "taxpayer," or participant in any government franchise.

10. The Bible explicitly forbids Christians from participating in government franchises or benefits, as such participation nominates a secular "parens patriae" or "king" above God, constituting a sin against the First Commandment (Exodus 20:3-8). My refusal to engage in such franchises—e.g., Social Security, driver's licenses, or statutory citizenship—is a direct obedience to God's law, further affirming my private status.

Defendants:

- State of South Carolina: A sovereign state and separately registered legal entity.
- Henry Dargan McMaster, in his individual capacity and in his official capacity as Governor of South Carolina.
- South Carolina Department of Public Safety: A state department and separately registered legal entity within which the South Carolina Highway Patrol is housed.

- Robert G. Woods IV, in his individual capacity and in his official capacity as Director of the South Carolina Department of Public Safety.
- South Carolina Highway Patrol: A state law enforcement agency, a division of the South Carolina Department of Public Safety.
- Christopher N. Williamson, in his individual capacity and in his official capacity as Colonel and Commander of the South Carolina Highway Patrol.
- Christopher A. Plyler, in his individual capacity and in his official capacity as Corporal of the South Carolina Highway Patrol, the officer who initiated the stop, seizure, arrest, and impoundment described herein (Citation No. HC062423233340).
- ABC Mobile Auto & RV Repair: A company involved in the unlawful towing and impoundment of Plaintiff's mobile home.
- Does 1-20: Unknown agents, officers, or co-conspirators of the State of South Carolina, the South Carolina Department of Public Safety, or the South Carolina Highway Patrol, including without limitation the booking and detention personnel at the Horry County detention facility who participated in the strip search, biometric collection, and confinement described herein.

11. All public-official Defendants are sued in both their individual and official capacities, as designated above. The individual-capacity designation seeks to impose personal liability on each named Defendant for his own role in the wrongs alleged. Pursuant to *Hafer v. Melo*, 502 U.S. 21, 25–31 (1991), and *Kentucky v. Graham*, 473 U.S. 159, 165–66 (1985), a properly pleaded and proved individual-capacity claim renders the official personally liable, with any judgment running against his personal assets. As to Corporal Plyler, individual liability arises from his direct personal participation in the warrantless seizure of

June 24, 2023, including the stop, the forcible removal of Plaintiff from his dwelling, the arrest, the handcuffing, and the impoundment of Plaintiff's mobile home. As to Colonel Williamson and Director Woods, individual liability arises from their promulgation, ratification, and continued enforcement of the unconstitutional policy or custom under which Plyler acted, and from their deliberate indifference, after receipt of Plaintiff's repeated administrative notices, to a known and continuing pattern of unconstitutional seizures executed under their command. *Ashcroft v. Iqbal*, 556 U.S. 662, 676 (2009); *Shaw v. Stroud*, 13 F.3d 791, 799 (4th Cir. 1994). As to Governor McMaster, individual liability is pleaded in the alternative on a ratification theory, predicated on his receipt of Plaintiff's administrative notices identifying the unconstitutional pattern, the operational authority of the Office of the Governor to direct corrective executive action, and the absence of any such corrective action after notice. The *ultra vires* framing of each cause of action defeats any scope-of-employment defense under S.C. Code Ann. § 15-78-70(b), because conduct exceeding lawful authority is by definition outside the scope of employment for purposes of personal liability. The equitable liens asserted in Section V attach to each Defendant's interest in any benefit received or dominion exercised in connection with the wrongs alleged, in accordance with the substantive equitable principles governing this proceeding. The official-capacity designation, in turn, supports the prospective injunctive relief sought against the supervisory officers under *Ex parte Young*, 209 U.S. 123 (1908), as developed in Section VI. The foregoing individual-capacity framework is pleaded together with, and in no way limits, the direct liability of the State of South Carolina for the acts of its commissioned officers under the ancient common-law doctrine of *respondeat superior*, as recognized in this State at least since *Reynolds v. Witte*, 13 S.C. 5 (1879), in which the

South Carolina Supreme Court confirmed that the principal is liable in addition to the agent "not by reason of his consent to be liable, but by operation of law." The State's direct liability is a common-law and equitable obligation imposed by operation of law and is asserted independent of, and in addition to, the individual-capacity claims against the Officer Defendants, as developed in Section VI.

I. INITIAL CLAIM AND STANDING

Invocation of Equitable Jurisdiction; Court of Record Governed by Equity Principles; *Ubi Jus, Ibi Remedium*

12. Plaintiff invokes the inherent equitable jurisdiction of this Court and asserts that this constitutional common-law court of record is, and shall proceed as, a court governed by the substantive principles of equity. The warrantless seizure of Plaintiff's dwelling, the ongoing risk of repetition against Plaintiff and others similarly situated, the continuing cloud upon Plaintiff's title to and quiet enjoyment of his mobile home, and the dignitary and constitutional injuries that no monetary award can wholly repair, each call for the application of equitable principles and the issuance of such equitable relief as the conscience of the Court shall direct. A court of record proceeding under the common law possesses, by its constitutional nature, the full inherent equitable jurisdiction to administer the maxims and remedies of equity throughout the proceeding, and equity supplies the rule of decision as to each cause and as to the relief sought. 1 John Norton Pomeroy, *A Treatise on Equity Jurisprudence* §§ 220–221 (3d ed. 1905); *eBay Inc. v. MercExchange, L.L.C.*, 547 U.S. 388, 391 (2006); *Weinberger v. Romero-Barceló*, 456 U.S. 305, 312 (1982).

13. Equity will not suffer a wrong to be without a remedy. Where, as here, a State officer has seized a private dwelling without warrant, without consent, and without any

pre-deprivation hearing, the conscience of this Court, governed by equity, supplies the rule of decision and the corresponding remedy. The principle of *ubi jus, ibi remedium* is the oldest in the equity tradition and is preserved in the South Carolina Constitution itself, which provides that "All courts shall be public, and every person shall have speedy remedy therein for wrongs sustained." S.C. Const. art. I, § 9; 1 Pomeroy § 423 (3d ed. 1905); 1 Joseph Story, *Commentaries on Equity Jurisprudence* § 25 (14th ed. 1918).

A. Initial Claim

14. I, Thomas Edward Humphrey, bring this action under common law and constitutional guarantees for Trespass to Chattels, Conversion, False Arrest and False Imprisonment, and constitutional violations redressable directly under the Fourth, Fifth, and Fourteenth Amendments to the Constitution for the United States and Article I, Sections 3, 10, and 13 of the South Carolina Constitution. These constitutional provisions are self-executing: the right to be free from unreasonable search and seizure, the right to be secure in one's person and house, the right to due process before deprivation of liberty or property, and the right to equal protection are rights that preexist any legislative enactment and do not require a statutory vehicle for their enforcement in a court of equity. A court sitting in equity has always possessed inherent authority to redress violations of fundamental constitutional rights directly, independent of any statute. The legislature's recognition of a private right of action for such violations—reflected in 42 U.S.C. § 1983, cited here solely as evidence that the positive law acknowledges what equity has always provided, and not as a cause of action—confirms rather than creates this Court's authority to grant relief.

15. I claim that on June 24, 2023, at approximately 8:28 PM, while I was traveling southwest on South Kings Highway in Myrtle Beach, Horry County, South Carolina, in my private

mobile home for non-commercial purposes, Defendant Corporal Christopher A. Plyler of the South Carolina Highway Patrol, acting under color of law and without probable cause, a warrant, or my consent, initiated an unwarranted traffic stop, prevented me from rolling up my window, reached into my mobile home, unlocked the door, and physically removed me; placed me under arrest and in handcuffs for approximately ninety-six minutes; cited me for statutory offenses inapplicable to my private status (Citation No. HC062423233340); caused my private mobile home to be towed and impounded without a warrant; transported me to the Horry County detention facility, where I was strip-searched and confined in a small cell with five other men for approximately ten hours, and where my fingerprints and photographs were taken without my consent. These actions constitute government identity theft, whereby Defendants kidnapped my legal identity by presuming I am a statutory "person" or public officer subject to their jurisdiction without my consent, unlawfully converting my private property and person into a public "*res*" under a franchise I did not accept. This conduct violates my rights under the Fourth, Fifth, and Fourteenth Amendments to the United States Constitution and Article I, Sections 3, 10, and 13 of the South Carolina Constitution, as it subjected me to an unreasonable search and seizure, deprived me of liberty and property without due process, and denied me equal protection by arbitrarily imposing statutory duties absent evidence of my voluntary participation, as required by *Economy Plumbing & Heating v. United States*, 470 F.2d 585 (Ct. Cl. 1972).

16. Defendants seized my mobile home on June 24, 2023, without legal right, warrant, or due process, and detained it for approximately twenty hours—a total of 1,201 minutes, calculated from the 8:28 PM stop until I recovered it from impound at 4:29 PM the following day—before it was returned to me undamaged. Although my mobile home was

ultimately recovered, the deprivation was real and concrete: I was forcibly separated from my private dwelling and conveyance, denied the use and enjoyment of my property and my means of travel, and left without shelter for the duration of the seizure. The arrest, the ninety-six-minute handcuffing, the transport to the Horry County detention facility, the strip search that exposed my nakedness in violation of my religious convictions, the ten-hour confinement in an overcrowded cell, and the nonconsensual taking of my fingerprints and photographs each inflicted independent and serious injury upon my person, my liberty, my dignity, and my free exercise of religion, wholly apart from the deprivation of my property.

17. These actions—executed by Corporal Christopher A. Plyler under the command and supervisory authority of Colonel Christopher N. Williamson, Commander of the South Carolina Highway Patrol, and Robert G. Woods IV, Director of the South Carolina Department of Public Safety—demonstrate a willful disregard for my constitutional protections. Defendants have ignored my administrative notices and demands for redress, evidencing intent to harm. I rebut any presumption that Defendants acted with lawful authority, demanding evidence on the record of such authority, absent which their acts are *ultra vires* and void.

18. Furthermore, I assert that I am a "national" and "state national" as defined in 8 U.S.C. § 1101(a)(21) but not a statutory "citizen of the United States" under 8 U.S.C. § 1401, which pertains to those domiciled on federal territory subject to Congress's exclusive legislative jurisdiction (Article IV, § 3, cl. 2). This distinction, recognized in *United States v. Wong Kim Ark*, 169 U.S. 649 (1898), separates political nationality from civil status, the latter requiring voluntary domicile within the statutory "United States" (defined geographically

in 26 U.S.C. § 7701(a)(9) as federal territories, not the 50 states). As a "national," temporarily traveling through South Carolina at the time of the incident, I am not subject to the statutory jurisdiction that the Defendants have presumed. My status is that of a sovereign individual, not a statutory "person". or public officer, and the Defendants' actions—predicated on an erroneous assumption of my statutory citizenship—constitute an unlawful trespass upon my unalienable rights and a form of government identity theft, as they attempt to impose a civil status I have not voluntarily accepted.

19. My resistance to Defendants' unlawful actions mirrors the example of Jesus Christ, whose life began in defiance of Herod's decree (Matthew 2:13-15), demonstrating that obedience to God supersedes submission to unjust civil authority. As a Christian, I am compelled to obey God rather than men when man's law conflicts with divine law (Acts 5:29), further justifying my rejection of Defendants' presumed jurisdiction over my private travel and property.

Clarification of Appearance: *In Propria Persona*, Not Pro Se

20. Plaintiff appears before this Court *In Propria Persona*—in one's own proper person—as a living, flesh-and-blood man asserting private rights under common law and equity. This appearance is categorically distinct from appearing "*pro se*" as a self-represented statutory litigant subject to civil procedure rules designed for those who have accepted a public franchise. A "*pro se*" litigant is a statutory person who has chosen to represent himself within the statutory civil law framework rather than retain licensed counsel—and that designation carries an implicit acceptance of the court's statutory procedural rules and civil law jurisdiction.

21. Plaintiff makes no such acceptance. He appears as a private individual standing on common law and constitutional rights that predate any statute—asserting private rights that require no statutory vehicle for their enforcement in a court of equity. He is not a "person" within any civil franchise code absent his express, voluntary consent to that designation. Any reference to Plaintiff as "*pro se*" in these proceedings constitutes a misidentification that Plaintiff explicitly rejects.

22. This distinction is not a semantic preference. Capacity determines remedies. Plaintiff's capacity is private; his remedies are those of equity and common law; and the law governing his rights is the Constitution and the common law that preceded it—not the South Carolina Rules of Civil Procedure or any other statutory scheme that presupposes a public capacity Plaintiff has never voluntarily assumed.

Law Is a Precise Science; Grammatical Designation Carries Substantive Legal Weight

23. Law is a precise science. Every nuance of grammar, punctuation, capitalization, and nomenclature holds profound legal significance, capable of transforming the intent and legal effect of a document. Courts, counsel, and government officers operating within the legal system are fully aware of this precision—their training depends upon it. When a government actor consistently designates a living man by an all-capitals name, characterizes him as a "*pro se*" litigant, or separates his proper status designation from his name in a court caption, these choices are not typographical accidents. They are choices with legal consequences that professional actors in the legal system understand and deliberately make.

24. Plaintiff has direct evidence of this awareness from a parallel federal proceeding:

Humphrey v. Missouri State Highway Patrol, No. 2:24-cv-04054-SRB (W.D. Mo.), No. 24-2680 (8th Cir.). In that matter, when Plaintiff requested that the Assistant Attorney General correct the designation "*Pro Se*, plaintiff" to "Plaintiff, *In Propria Persona*," that request was met with active and sustained resistance. When the AAG ultimately agreed, he placed "*In Propria Persona*" in parentheses separating it from "Plaintiff," and then positioned "Plaintiff" below the signature block—twice subverting the correction despite having agreed to it. This is not inadvertence. It is the conduct of a trained legal professional who understands precisely what the designation means and deliberately resists its proper application.

25. Plaintiff places the State of South Carolina, the South Carolina Department of Public Safety, the South Carolina Highway Patrol, and all Defendants and their counsel on formal notice: any filing in this action that addresses Plaintiff by any name other than "Thomas Edward Humphrey"—with initial capital letters and lowercase letters, precisely as written—or that characterizes his appearance as "*pro se*" rather than "*In Propria Persona*," is addressed to a non-existent or wrong party and is void as to Plaintiff. All future filings must designate Plaintiff as: Thomas Edward Humphrey, Plaintiff, *In Propria Persona*. Failure to comply after this notice will be treated as further evidence of the deliberate identity conversion that forms part of the constitutional violations alleged herein.

26. This deliberate conversion is the modern operation of the ancient doctrine the civilians named *capitis diminutio maxima*—the greatest diminution of status, by which a living man's legal persona is reduced to a lesser thing. The rendering of a living man's name in all-capital letters, and the substitution of the agency designation "*pro se*" for the status designation "*In Propria Persona*," are the instruments of that diminution: they address, and

presume jurisdiction over, a statutory legal fiction—an artificial "person" capable of bearing franchise obligations—rather than the living man who bears unalienable rights and has consented to no franchise. Plaintiff does not appear as, and does not consent to be reduced to, that diminished fiction. He appears in his own proper person, with his status undiminished, and he rejects every presumption that the typographic and nominal conventions of the Defendants' filings may otherwise be taken to create.

B. Standing

27. **1. Private Capacity:** I am a living man appearing *In Propria Persona*, asserting private rights under common law and equity in my own proper person. I do not appear through or in connection with any association, organization, trust, corporation, or other entity, and I am not acting in any representational capacity. I do not consent to statutory jurisdiction or civil status (e.g., "taxpayer," "driver," "U.S. citizen" per 8 U.S.C. § 1401), preserving my unalienable rights to life, liberty, and property under the common law and constitutional guarantees. My standing arises from direct injury to my private property and person, including the denial of equal protection under the law, necessitating judicial redress absent administrative resolution.

28. My standing as a "national" and "state national" under 8 U.S.C. § 1101(a)(21), rather than a statutory "U.S. citizen" under 8 U.S.C. § 1401, is further affirmed by the legal principle that civil statutory obligations arise only through voluntary consent, such as establishing a domicile on federal territory or participating in a government franchise (e.g., Social Security, per 42 U.S.C. § 1301(a)(2)). The U.S. Supreme Court in *Hale v. Henkel*, 201 U.S. 43 (1906), distinguishes natural persons' inherent rights from statutory duties requiring

consent. I have not consented to such a domicile or franchise, and my status as a "non-resident non-person" with respect to the statutory "United States" (defined as federal territories, not states of the Union) exempts me from the Defendants' presumed jurisdiction. This status, outside Congress's legislative reach absent consent, reinforces my standing to seek redress for the Defendants' *ultra vires* acts.

29. As a sovereign private individual, my authority precedes that of the government, which derives its limited powers from the consent of the governed. The South Carolina Constitution itself affirms this first principle in Article I, Section 1: "All political power is vested in and derived from the people only." My civil status as a "person" under statutory law requires my express consent, which I have not given. The distinction between the inherent rights of a natural person and the statutory duties that attach only upon consent is recognized in *Hale v. Henkel*, 201 U.S. 43 (1906), and the principle that civil statutory regulations operate upon the franchise activity they regulate—and upon those who have voluntarily entered it—is confirmed in the *License Tax Cases*, 72 U.S. 462 (1866). Absent evidence of my consent to any franchise or statutory jurisdiction, I remain a "non-resident non-person" with respect to the Defendants' presumed authority, and their actions constitute an unlawful trespass upon my unalienable rights.

30. The Defendants' actions, by arbitrarily subjecting me to laws inapplicable to my private status, constitute an additional injury under the Fourteenth Amendment and Article I, § 3 of the South Carolina Constitution, further supporting my standing. Under the Standing to Sue Doctrine, as clarified in *Lujan v. Defenders of Wildlife*, 504 U.S. 555 (1992), I have standing because I have suffered a concrete and particularized injury—the unreasonable seizure of my person and my mobile home, my arrest and confinement, and the search of

my person—that is traceable to the Defendants' conduct and redressable by this Court through damages and injunctive relief.

31. As a believer under the Bible's trust indenture, my legal status is that of a fiduciary and ambassador of God, a "foreign diplomat" exempt from earthly civil jurisdiction (Philippians 3:20; Psalm 47:7). This status, recognized under the First Amendment and the Foreign Sovereign Immunities Act (28 U.S.C. § 1605), precludes Defendants from asserting authority over me absent my consent, reinforcing my standing as a sovereign individual injured by their *ultra vires* acts.

32. **2. Public Capacity (Lack Thereof):** I hold no public office, franchise, or statutory privilege subjecting me to Defendants' presumed jurisdiction. Their actions constitute a trespass on my private rights, not a lawful exercise of public authority. Moreover, any attempt by the Defendants to condition my constitutional rights on accepting a public status or participating in a government franchise violates the Unconstitutional Conditions Doctrine. As held in *Frost v. Railroad Commission*, 271 U.S. 583 (1926), and *Perry v. Sindermann*, 408 U.S. 593 (1972), the government cannot require individuals to surrender constitutional rights as a condition for receiving benefits or avoiding penalties.

33. Furthermore, I demand that Defendants prove I lawfully occupy a constitutionally created public office per 4 U.S.C. § 72. Absent such proof, their actions, in unlawfully presuming me to be a public officer without my consent, are of the kind the legislature has recognized as harmful in 18 U.S.C. § 912, that statute being cited here solely as evidence of the public standard and not as a cause of action. Defendants must provide evidence of such consent appearing on the record.

Capacity Determines Remedies: Plaintiff's Private Capacity Invokes Common Law

34. A foundational principle of equity holds that capacity determines remedies. When a private man petitions a court as a private man for redress of a private wrong done to his person and property, the applicable body of law is common law and equity—not civil statutory law. Civil statutes are substitutes for common law that operate on federal territory and upon government actors and those who have voluntarily assumed a public capacity. They are not the governing law for a private dispute between a living man and officers who exceeded their authority.

35. Plaintiff has not consented to any public office, franchise, or quasi-contractual relationship with the Defendants or with the State of South Carolina. The South Carolina Highway Patrol's attempt to apply Title 56 of the South Carolina Code to Plaintiff's private travel presumed a public capacity—statutory "driver," statutory "person," registered vehicle owner—that Plaintiff has never voluntarily assumed. That presumption is the root of every subsequent wrong: the stop, the seizure, the arrest, the handcuffing, the impound, the strip search, and the confinement. Civil statutes cannot be the measure of a wrong committed against a private person by officers who had no lawful authority to act against him.

36. The State Action Doctrine confirms that civil statutes are instruments for regulating those within the government's legitimate reach. Enforcing a commercial franchise statute against a private person who has not entered that franchise is *ultra vires*. It is not a lawful exercise of police power; it is an unauthorized private use of government force against a man who owed the government nothing and consented to nothing.

3. Defendants' Status:

- **State of South Carolina:** A corporate entity and public trust obligated to protect private property, acting through its agents in violation of its fiduciary duty.
- **Governor Henry Dargan McMaster, Director Robert G. Woods IV, Colonel Christopher N. Williamson:** Public officers responsible for state policy, command, and oversight of the South Carolina Department of Public Safety and the South Carolina Highway Patrol, liable for failing to prevent or correct constitutional violations by subordinates.
- **South Carolina Department of Public Safety and South Carolina Highway Patrol:** A state department and its law enforcement division, employing officers who exceeded their lawful authority by seizing Plaintiff's person and property without due process.
- **Individual Defendants:** Public officers acting in official and individual capacities, liable for ultra vires acts under color of law. Their oaths bind them to constitutional limits they knowingly breached.

37. **4. Injury in Fact:** I suffered concrete injuries from Defendants' actions: (a) the unreasonable seizure of my person and the warrantless seizure and approximately twenty-hour impoundment of my private mobile home on June 24–25, 2023; (b) false arrest and false imprisonment, including approximately ninety-six minutes in handcuffs and approximately ten hours of confinement at the Horry County detention facility; (c) an unlawful strip search of my person and the nonconsensual taking of my fingerprints and photographs; and (d) severe emotional and spiritual distress and the burdening of my free exercise of religion, all actual and particularized.

38. **5. Causation:** These injuries are directly traceable to Defendants' unlawful stop, seizure,

arrest, and search on June 24, 2023, by Corporal Christopher A. Plyler, under the command, supervision, and policies of Colonel Christopher N. Williamson, Director Robert G. Woods IV, and the State of South Carolina, together with the towing and impoundment of Plaintiff's mobile home by ABC Mobile Auto & RV Repair.

39. **6. Redressability:** This Court can remedy these injuries through compensatory damages for losses, injunctive relief to prevent further interference, and declaratory judgment affirming my rights.

40. **7. Rebuttal of Presumptions:** I explicitly rebut any presumption that I am domiciled on federal territory, subject to statutory jurisdiction, or a participant in any government franchise. Per the constitutional guarantee of due process, all such presumptions prejudicing my rights are void, and this Court must require evidence on the record to overcome my assertions of private status and injury. Defendants' failure to rebut my administrative notices further estops them from asserting such presumptions.

This Action Is Not Vexatious: Claims Are Grounded in Concrete Injury, Specific Wrongdoers, and Cognizable Legal Theory

41. Defendants may attempt to characterize this proceeding as frivolous or vexatious, relying on the fact that Plaintiff's legal posture departs from mainstream litigation conventions. The core claims—trespass to chattels, conversion, and deprivation of property without due process—are among the most settled causes of action in the common law. That they are pursued in their unadulterated common law form does not render them frivolous; it renders them historically prior to the statutory frameworks that codified what equity had always provided.

42. The concrete injury is not speculative: Plaintiff was stopped, seized, arrested, handcuffed, searched, and confined by a named officer on a specific date, at a specific location, and his private mobile home was seized and impounded without a warrant. The wrongdoer is identified by name and rank, and by citation number. The legal basis—common law trespass to chattels, conversion, false arrest, and false imprisonment, grounded in the Fourth, Fifth, and Fourteenth Amendments as self-executing constitutional law—is cognizable in the courts of South Carolina. *Lujan v. Defenders of Wildlife*, 504 U.S. 555 (1992), requires concreteness, particularity, traceability, and redressability. All four are satisfied.

43. Plaintiff is informed and believes that South Carolina has no statute that would bar a first-filed, meritorious action of this character on "vexatious litigant" grounds, and in any event no pattern of repeated frivolous filings exists. Any attempt to so characterize this action would be premature and would itself require a substantive merits finding that the petition's authorities, analysis, and documented facts do not permit.

Plaintiff Does Not Identify as a "Sovereign Citizen" — That Label Is an Oxymoron, Legally Undefined, and an Ad Hominem Deflection

44. Plaintiff anticipates that Defendants or this Court may characterize the legal theories advanced in this petition as "sovereign citizen" arguments. Plaintiff directly and specifically rejects that characterization on four independent grounds.

45. First, the term "sovereign citizen" is an oxymoron. A "citizen" is a person who owes allegiance to a state and is subject to its civil laws. A "sovereign" is not subject to the jurisdiction of any earthly authority. One cannot be both simultaneously. Plaintiff does not

use this term to describe himself and has never done so in any filing.

46. Second, the term is legally undefined. No court has produced a court-admissible legal definition capable of being applied to specific conduct and tested against specific facts. Its invocation as a ground for dismissal is not legal reasoning; it is a label used to avoid engaging the substantive merits of constitutional arguments. Where a government actor cannot define the term it invokes, it cannot prove that Plaintiff meets that undefined definition.

47. Third, Plaintiff does not assert supremacy over the law. He asserts equality under it. He consents to the criminal law and the common law—both of which apply to all equally and require a real injured party. What he does not consent to is the application of civil franchise statutes that require voluntary participation and that the government has not proven he ever voluntarily entered.

48. Fourth, the arguments in this petition are grounded in United States Supreme Court decisions—*Hale v. Henkel*, *Chisholm v. Georgia*, *Entick v. Carrington*, *Little v. Barreme*, *Crandall v. Nevada*, *Shuttlesworth v. Birmingham*, *Murdock v. Pennsylvania*, *Elrod v. Burns*—not in any ideology. Advocacy for the principle that government authority requires the consent of the governed is constitutionalism. Any dismissal by reference to a pejorative label rather than engagement with cited authorities is itself a denial of due process.

II. JURISDICTION AND VENUE

Establishment of a Common Law Court of Record

49. This Court, as a court of record proceeding under common law, independent of the

magistrate or judge, has jurisdiction to hear common law and equity claims involving constitutional violations by state actors, including violations of due process and equal protection under Article I, § 3 of the South Carolina Constitution. The Circuit Court is a court of general jurisdiction: Article V, § 11 of the South Carolina Constitution provides that "The Circuit Court shall be a general trial court with original jurisdiction in civil and criminal cases, except those cases in which exclusive jurisdiction shall be given to inferior courts." Unlike the federal courts, which possess only limited jurisdiction, the South Carolina Circuit Court is a court of general jurisdiction, and authorities premised on the limited jurisdiction of the federal courts are therefore inapposite to the question of this Court's subject-matter jurisdiction. Venue is proper in Horry County, where the events occurred, per S.C. Code § 15-7-30 and, to the extent cited as evidence of the recognized venue standard, S.C. Code § 15-78-100(b) (action against a governmental entity to be brought in the county in which the act or omission occurred). I invoke this Court's common-law and equitable jurisdiction, with final judgment on the facts reserved for a jury of my peers.

50. This Court must distinguish between my status as a constitutional "person"—a natural human endowed with unalienable rights—and any statutory "person" subject to legislative control, as clarified by the U.S. Supreme Court in *Hale v. Henkel*, 201 U.S. 43 (1906), which held that natural persons possess rights predating the state, distinct from artificial entities under statutory law.

This Court's Inherent Equitable Jurisdiction as a Common Law Court of Record Is Sovereign, Independent of Statutory Rules, and Expressly Preserved by the South Carolina Constitution

51. A common law court of record proceeds according to the principles of equity and the common law. Its proceedings are governed by equity, conscience, and natural law principles—not by the statutory procedural franchises layered upon the court system by legislative enactment. The South Carolina Constitution, Article V, § 11, vests in the Circuit Court original jurisdiction in all civil causes—a grant of general jurisdiction that exists independently of and prior to any statutory procedural code. The South Carolina Constitution further preserves, in Article I, § 9, the guarantee that "All courts shall be public, and every person shall have speedy remedy therein for wrongs sustained."

52. When Plaintiff invokes this Court's common law and equitable jurisdiction, he invokes a source of judicial authority that predates the South Carolina Rules of Civil Procedure and predates every statutory scheme that Defendants will cite in their defense. That source of authority is not derived from any legislature and is not subject to legislative modification without constitutional amendment. It is the ancient and inherent power of a constitutional common-law court of record, sitting as a court of conscience, to administer the substantive principles of equity and to do justice between parties according to those principles.

53. Plaintiff respectfully requests that this Court proceed in its capacity as a common law court of record and in equity, declining to apply statutory procedural rules as substantive bars to a hearing on the merits. Equity's maxim is unambiguous: equity will not suffer a wrong without a remedy—a principle the South Carolina Constitution itself enshrines in Article I, § 9. An officer of the State of South Carolina, without warrant, without consent, and without any demonstrable commercial nexus, seized a private man's person and his dwelling, arrested and confined him, and searched his body. That is the wrong equity was created to remedy.

The South Carolina Rules of Civil Procedure Are Statutory Civil Rules — Inapplicable to a Private Individual Appearing *In Propria Persona*

54. The South Carolina Rules of Civil Procedure—including the rules governing the form of pleadings under Rule 8 and motion practice—are statutory civil rules that apply to government instrumentalities, licensed attorneys, and litigants who have voluntarily accepted the court's statutory civil law framework by entering into the public franchise of civil litigation as a statutory person.

55. Plaintiff is a living, flesh-and-blood man appearing *In Propria Persona* in a common law court of record. He has not voluntarily consented to any public franchise or public office, has not accepted the designation of statutory "person" or "*pro se*" litigant, and has not submitted to the statutory civil law framework that the Rules of Court presuppose. His inherent rights under common law cannot be usurped by statutory procedural presumptions absent his express consent. *Hale v. Henkel*, 201 U.S. 43, 74-75 (1906).

56. To the extent Defendants invoke any South Carolina Rule of Civil Procedure as a basis for dismissal, Plaintiff objects: those rules apply to statutory litigants, not to a private individual appearing *In Propria Persona* under common law and equity. Where the Rules of Civil Procedure are a good guide for orderly proceedings, Plaintiff will endeavor to follow their form while reserving all substantive rights. Compliance with their form is not an admission of the statutory status they presuppose.

The Common-Law Court of Record Is Concurrently a Court of Inherent Equitable Jurisdiction

57. The common-law court of record Plaintiff has established in this proceeding is, by its constitutional nature, also a court of inherent equitable jurisdiction. The two doctrinal

traditions are complementary, not exclusive: a court of record proceeds according to the course of the common law, while equity supplies the rule of decision wherever the common-law remedy is silent or its remedy incomplete. South Carolina's merger of law and equity, effected by Rule 2 of the South Carolina Rules of Civil Procedure, unified the procedural forum but preserved both substantive traditions intact. This Court therefore possesses the full inherent equitable jurisdiction of a court of general jurisdiction under Article V, § 11 of the South Carolina Constitution, including the power to issue injunctive relief, declaratory relief, the imposition of constructive trusts and equitable liens, restitution and disgorgement, and such further equitable relief as the conscience of the Court shall direct, all as inherited from the traditional jurisdiction of the English Court of Chancery at the founding. S.C. Const. art. V, § 11; SCRCP 2; *Grupo Mexicano de Desarrollo S.A. v. Alliance Bond Fund, Inc.*, 527 U.S. 308, 318–19 (1999); 1 Pomeroy § 33; *Hecht Co. v. Bowles*, 321 U.S. 321, 329–30 (1944). Plaintiff therefore invokes this Court's common-law jurisdiction as a court of record, governed throughout this proceeding by the substantive principles of equity, with equity supplying the rule of decision as to each cause, each defense, and each remedy sought.

58. Plaintiff does not invite this Court to override any rule of law. He invokes the settled principle that equity supplements the law where the law is silent or its remedy incomplete: *aequitas sequitur legem*. The maxim does not subordinate equity to law; it confirms that, in a court governed by equity principles, equity follows the law where law speaks clearly and supplies the rule of decision where law is silent, incomplete, or inadequate to do justice. The relief sought herein lies wholly within the traditional powers exercised by the English Court of Chancery at the founding and inherited by this Court of general jurisdiction. 1

Pomeroy § 425; *Grupo Mexicano de Desarrollo S.A. v. Alliance Bond Fund, Inc.*, 527 U.S. 308, 318–19 (1999).

Conditional Acceptance of Service: Engagement for Efficiency Without Waiver of Reserved Rights

59. Plaintiff conditionally accepts the South Carolina Rules of Civil Procedure as the operational rules of practice in this proceeding, solely to promote the orderly, proper, and expeditious administration and furtherance of the cause, and agrees that the procedural mechanics of those Rules should be followed by all parties for those administrative purposes. This conditional acceptance is not, and shall not be construed as, a consent to be bound by any statute, code, regulation, or act of the State of South Carolina; an admission of any statutory status, capacity, domicile, or franchise; a waiver of any reserved constitutional, common-law, or equitable right; or a concession that this Court's authority over Plaintiff arises from anything other than the common-law and equitable jurisdiction Plaintiff has invoked. Plaintiff invokes the Rules for orderly process only; the substantive rule of decision throughout this proceeding remains the common law and equity, as pleaded.

60. Plaintiff's designation as Plaintiff *In Propria Persona* — rather than the misnomer "pro se" — is asserted advisedly. The distinction is not cosmetic; it identifies the capacity in which the man before this Court appears, and it has already provoked active resistance from government counsel in a parallel matter. Specifically, in a meet-and-confer telephonic conference relating to *Humphrey v. Missouri State Highway Patrol*, No. 2:24-cv-04054-SRB (W.D. Mo.), No. 24-2680 (8th Cir.), Plaintiff expressly requested that the Assistant Attorney General correct the proposed designation "Pro Se, Plaintiff" to "*In*

Propria Persona, Plaintiff," a request that encountered extreme resistance across the timestamps 00:01:09 – 00:06:33 and 00:11:58 – 00:15:49 of the recorded conference (audio available at `https://photos.app.goo.gl/A9VrAGuNWxzGEf499`). The Assistant Attorney General ultimately agreed to use the designation but nonetheless parenthesized "*In Propria Persona*," thereby visually severing it from "Plaintiff." At timestamp 00:15:33, the Assistant Attorney General specifically agreed to designate Plaintiff in the signature block as "Plaintiff, *In Propria Persona*," yet in the resulting filing once again physically separated "Plaintiff" from Plaintiff's designation of status by positioning "Plaintiff" below the signature block, set off by a space, isolating the capacity designation from the title. This manipulative and deceitful conduct, coupled with the strong resistance to a simple and elementary request, revealed much to Plaintiff about the nature of the government identity theft of which he complains. The same pattern has appeared in Plaintiff's dealings with the Massachusetts Attorney General's Office and the Cambridge Law Department: Plaintiff has repeatedly addressed both the all-capital-name and the pro-se misdesignation issues, yet opposing counsel persists in misidentifying Plaintiff and his status before the courts. The law is a precise science in which every nuance of grammar carries doctrinal weight, and Defendants are fully aware of this. Defendants will not recognize flesh-and-blood human beings; they will recognize and address only the all-capital corporate fiction of real living people's names, because to do otherwise would cause the house of wicked schemes to crumble. Plaintiff is not bound by their misnaming, their misdesignation, or their refusal to acknowledge his proper capacity and standing before this Court.

61. This conditional acceptance is the common law doctrine of engagement without

submission: a private individual may participate in a proceeding without thereby confirming the jurisdiction that his participation might otherwise be construed to imply. Just as a defendant who specially appears to contest jurisdiction does not thereby submit to it, a private individual who files responses and participates in hearings for the purpose of vindicating his private rights does not concede that he is a statutory person subject to civil franchise law. Plaintiff explicitly reserves all unalienable rights without prejudice at every step of this proceeding.

62. Plaintiff will file all opposition papers and responses to demurrers independently rather than through any joint-filing procedure that would create the appearance of mutual acceptance of a shared procedural framework. Nothing in this conditional engagement constitutes a waiver of Plaintiff's sovereign private status, his objection to this Court's exercise of statutory civil jurisdiction over his person, or any right, privilege, or immunity reserved at common law.

63. The Defendants cannot compel me into a statutory civil status without my consent, a principle rooted in the distinction between the inherent rights of a natural person and the statutory duties that attach only upon consent, as upheld in *Hale v. Henkel*, 201 U.S. 43 (1906). My invocation of this common law court of record affirms my sovereign capacity, free from statutory presumptions absent proof of my voluntary submission. I rebut any presumption that this matter falls under statutory or federal jurisdiction, demanding evidence on the record of my consent to such jurisdiction, absent which this Court must proceed under common law. This action involves only private rights under state common law and the South Carolina Constitution, precluding removal to federal court absent Defendants' proof of federal jurisdiction.

64. Defendants' actions constitute private business activity (e.g., theft under color of law), rendering Defendants personally answerable under the common law principle that a government officer who acts beyond his lawful authority steps outside the sovereign's protection and stands as a private wrongdoer. At common law, sovereign immunity has never shielded *ultra vires* conduct—the maxim that the King can do no wrong was never construed to immunize officers acting without authority, only those acting within a genuine grant of power. *Entick v. Carrington*, 19 Howell's State Trials 1029 (1765); *Little v. Barreme*, 6 U.S. 170 (1804). Defendants' acts—seizing Plaintiff's dwelling without warrant, without consent, and without any pre-deprivation process—fall entirely outside any lawful grant of authority and are therefore personal trespasses cognizable in this Court under its inherent common law and equity jurisdiction. The legislature's recognition that officers may be held accountable for *ultra vires* conduct, reflected in the public law codification at S.C. Code § 15-78-70(b) (an employee is not immune where his conduct "was not within the scope of his official duties or that it constituted actual fraud, actual malice, intent to harm, or a crime involving moral turpitude"), is cited here solely as evidence of that standard, not as the source of Plaintiff's right. All claims are supported by evidence and legal authority; any dismissal as "frivolous" without addressing these merits violates due process.

65. My right to invoke this common law court is further protected by the First Amendment, which guarantees my free exercise of religion, including the right to live solely under God's civil laws as found in the Bible. The U.S. Supreme Court has recognized that the Free Exercise Clause protects individuals from laws that substantially burden their religious practices, as in *Sherbert v. Verner*, 374 U.S. 398 (1963), and *Church of Lukumi*

Babalu Aye v. City of Hialeah, 508 U.S. 520 (1993). The principle has been most recently and most pointedly applied by the United States District Court for the District of Columbia in *Jordan v. Rubio*, No. 1:24-cv-01844 (TNM) (D.D.C. July 29, 2025) (McFadden, J.), which held that a federal agency's refusal to issue a passport to a religious objector who declined, on sincere religious grounds, to participate in the government's identity-enumeration scheme constituted a substantial burden on her religious exercise. The court framed the question as "passport or salvation" and confirmed that a person may not be "force[d] . . . to choose between following the precepts of her religion and forfeiting benefits, on the one hand, and abandoning one of the precepts of her religion . . . on the other hand," quoting *Thomas v. Review Board*, 450 U.S. 707, 716–17 (1981). The court further held, applying *Burwell v. Hobby Lobby Stores, Inc.*, 573 U.S. 682 (2014), that courts may not second-guess the sincerity or perceived reasonableness of a believer's religious convictions, observing: "It is not the role of the Court to correct that understanding by trying to prove her wrong." The same reasoning applies, in equal measure, to the conditions Defendants attempted to impose upon Plaintiff: surrender the religious conviction that the man before them stands under God's law alone, or forfeit the liberty of locomotion in his own dwelling. Here, the Defendants' actions directly interfere with my religious duty to reject secular jurisdiction, constituting a substantial burden on my free exercise. This right precludes Defendants from imposing secular statutory jurisdiction over me, as such imposition would interfere with my religious duty to obey God alone, prohibiting him from entering into covenanted obligations with civil authorities.

A Government Claiming Powers Beyond Those Delegated by the People Has Constituted Itself an Unconstitutional Civil Religion — *Torcaso v. Watkins*

66. The First Amendment's Establishment Clause prohibits the government from establishing religion. The United States Supreme Court in *Torcaso v. Watkins*, 367 U.S. 488 (1961), confirmed that this prohibition extends to any governmental claim to authority that operates by fiat rather than by the consent and delegation of the governed—the hallmark of religious rather than constitutional authority.

67. When a government claims powers superior to those of the natural person—powers not derived from and not limited by the people's voluntary delegation—it has entered the realm of an authority that demands submission without consent, obedience without justification, and compliance without accountability. That is the defining characteristic not of a limited constitutional republic but of a civil religion whose commands are self-authorizing.

68. A government that demands Plaintiff's compliance with a franchise statute without evidence of his consent is demanding submission that his faith specifically forbids. The Establishment Clause dimensions of *Torcaso* reinforce what the Free Exercise Clause already protects: the government may not demand unconditional submission to its authority as though that authority were divine rather than delegated. Where Defendants' enforcement rests on a presumption of jurisdiction that Plaintiff has specifically denied and that Defendants have not proven by evidence, their demand for compliance is indistinguishable from a demand for submission to an authority that claims to be beyond the requirement of proof. This protection is independently secured by the Free Exercise Clause of the First Amendment and by Article I, § 2 of the South Carolina Constitution, which provides that the General Assembly "shall make no law respecting an establishment of religion or prohibiting the free exercise thereof."

Clarification of *Torcaso v. Watkins*, 367 U.S. 488 (1961), and Its Proper Application to This Petition

69. Plaintiff cites *Torcaso v. Watkins*, 367 U.S. 488 (1961), and states its holding precisely so that the citation is applied only for the propositions it genuinely supports. *Torcaso* arose when the State of Maryland conditioned appointment to public office upon a declaration of belief in the existence of God, and refused to commission a notary public who would not swear the test oath. The Supreme Court held the requirement unconstitutional under the First Amendment, made applicable to the States by the Fourteenth Amendment, ruling that government may neither compel a person to profess a religious belief nor prefer theistic religions over those founded on different beliefs. Two features of the decision bear directly on this Petition: that the State may not exact a profession of belief as the price of recognition or liberty, and that a "religion," for constitutional purposes, is not confined to a belief in a deity.

> "We repeat and again reaffirm that neither a State nor the Federal Government can constitutionally force a person 'to profess a belief or disbelief in any religion.' Neither can constitutionally pass laws or impose requirements which aid all religions as against non-believers, and neither can aid those religions based on a belief in the existence of God as against those religions founded on different beliefs." *Torcaso v. Watkins*, 367 U.S. 488, 495 (1961).
>
> "Among religions in this country which do not teach what would generally be considered a belief in the existence of God are Buddhism, Taoism, Ethical Culture, Secular Humanism and others." *Torcaso v. Watkins*, 367 U.S. 488, 495 n.11 (1961).

70. From these holdings Plaintiff draws two propositions. First, the Establishment and Free Exercise Clauses forbid the government to compel any person to profess belief in, or to render unconditional submission to, a system of authority as the condition of his liberty. Second, because the Constitution recognizes that a religion need not rest upon belief in a

deity, a system that demands faith in its own supremacy—obedience by fiat, divorced from consent and delegation, and exempt from the ordinary requirement of proof—exhibits the defining features of a religion in the constitutional sense, even when it is secular in form. It is on this footing that Plaintiff asserts that a government claiming powers beyond those delegated to it has constituted itself an unconstitutional civil religion.

71. The South Carolina Constitution secures the same guarantee. Article I, Section 2 provides that the General Assembly shall make no law respecting an establishment of religion or prohibiting the free exercise thereof. Read together with *Torcaso*, that provision forbids the State to convert its civil authority into an object of compelled belief, or to demand of Plaintiff a submission that rests upon presumption rather than proof, and upon fiat rather than the consent of the governed.

72. Plaintiff anticipates that Defendants may object that *Torcaso* concerned only a religious test oath for public office and has no bearing on the enforcement of a vehicle statute. Plaintiff relies on *Torcaso* not for its particular facts but for the constitutional principles it announced: that government may not compel a profession of belief, that it may not prefer one system of belief over another, and that a non-theistic belief system is nonetheless a "religion" the Establishment Clause reaches. Plaintiff's free-exercise objection, set out elsewhere in this Petition and grounded in his sincerely held faith, is reinforced, not displaced, by the Establishment Clause dimension of *Torcaso*.

73. Applied to this controversy, *Torcaso* confirms that the Defendants may not lawfully demand Plaintiff's unconditional submission to a statutory authority that they have not proven applies to him, as though that authority were beyond the requirement of proof.

When the Defendants presumed jurisdiction over Plaintiff under Title 56 without evidence of his consent, and demanded his compliance notwithstanding his express denial, they treated their own authority as an article of faith rather than as a delegated and provable power. A demand for compliance compelled by presumption rather than by consent is precisely the establishment of authority as a compelled belief that *Torcaso*, the First Amendment, and Article I, Section 2 of the South Carolina Constitution forbid.

74. A "court of record" is defined as a judicial tribunal having attributes and exercising functions independently of the person of the magistrate designated to hold it, proceeding according to the course of common law, with its acts and proceedings enrolled for a perpetual memorial (Black's Law Dictionary, Fourth Edition, pp. 425-426). A court of record, by its nature, operates under common law, independent of the judge's personal discretion, with the jury as the ultimate arbiter of fact. The U.S. Supreme Court in *Chisholm v. Georgia*, 2 U.S. (2 Dall.) 419 (1793), recognized the sovereignty of the people as the foundation of judicial authority, reinforcing that this Court, as a court of record, derives its legitimacy from the sovereign Plaintiff and the jury, not statutory fiat.

75. The distinguishing feature of this common law court is its focus on enforcing private rights under equity, not public rights under statutory law. This Court must recognize the Plaintiff as a sovereign individual, not an artificial person subject to statutory control, per *Hale v. Henkel*, 201 U.S. 43 (1906), which distinguishes natural persons' unlimited contractual rights from corporations' statutory duties. Plaintiff's standing as a natural man invokes this Court's common law jurisdiction, independent of Defendants' presumed statutory authority.

Choice of Law

76. I declare the following governing choice of law in this dispute. This declaration ensures that common law and equity are enforced, avoiding any imputation of superior powers to any government or government actor in violation of the First Amendment:

77. The common law, the Bill of Rights, equity, and this Petition alone shall dictate the choice of law in this dispute.

78. The law governing a private individual's rights is the law of his domicile and the law of the place where the alleged wrong occurred. Under common-law conflict-of-laws principles, that law is determined by the nature of the parties and the situs of the wrong—Horry County, South Carolina—not by the federal definitions of "United States" or "State." The federal capacity rules of Federal Rule of Civil Procedure 17(b)(2) and (b)(3) govern capacity to sue or be sued in the federal courts and have no application to this proceeding; they do not operate to assign Plaintiff any status under federal law.

79. Plaintiff is not party to any government franchise, "benefit," or privilege, including but not limited to government employment, Social Security, Medicare, unemployment insurance, or the Internal Revenue Code, Subtitle A income tax ("trade or business" franchise).

80. This relationship does not involve a "federal question" within the meaning of 28 U.S.C. § 1331, nor any property of the national government under Article IV, Section 3, Clause 2, and presents no basis for removal to federal court. The claims set forth in this Petition arise under the common law, equity, and the Constitution as the source of antecedent private rights—not as a federal cause of action—and no federal question appears on the face of the well-pleaded Petition.

81. Plaintiff is not and was not domiciled or "resident" within any United States judicial district (28 U.S.C. Chapter 5), Internal Revenue District (26 U.S.C. § 7601), or federal territory during his interactions with Defendants.

82. Plaintiff was not present in the "State" (26 U.S.C. § 7701(a)(10), 4 U.S.C. § 110(d)) or the "United States" (26 U.S.C. § 7701(a)(9), (a)(10)) during his interactions with Defendants.

83. No federal law, including 26 U.S.C. § 7701(a)(39), 26 U.S.C. § 7408(d), or Federal Rule of Civil Procedure 17(b), applies to transport Plaintiff's legal identity to the District of Columbia. Plaintiff does not consent to represent any entity under these statutes.

84. Defendants, as Government Actors, are subject to this Court's common-law and equitable jurisdiction, with venue proper in Horry County.

85. This Petition has no illegal or injurious purpose and is brought solely to avoid compelled association with or contracting with any government, protected by the First Amendment and Article I, Section 10 of the Constitution.

86. Defendants' jurisdiction over Plaintiff requires evidence on the record of his voluntary consent. Absent such evidence, Defendants' actions constitute an unlawful assumption of authority over Plaintiff's private rights.

87. This choice of law ensures the dispute is governed solely by the common law and equity of South Carolina. Under South Carolina's settled choice-of-law rule of lex loci delicti, the substantive law of the place of the wrong governs an action sounding in tort; the wrong here occurred in Horry County, and South Carolina substantive law therefore supplies the rule of decision. *Boone v. Boone*, 345 S.C. 8, 545 S.E.2d 286 (2001). There being no

governing federal question, no federal common law displaces the substantive law of this forum. *Erie R.R. Co. v. Tompkins*, 304 U.S. 64 (1938).

Petitioning This Court *In Propria Persona* Does Not Constitute Consent to Statutory Jurisdiction

88. Defendants may assert that Plaintiff, by filing this Petition, has "consented to this Court's jurisdiction" and is therefore bound by the Court's statutory procedural rules and civil law framework. This argument is factually inaccurate and legally unsound.

89. Plaintiff appears before this Court *In Propria Persona* as a living man asserting private rights under common law and equity. By invoking this Court's equitable and common-law jurisdiction over a private wrong, Plaintiff reserved all unalienable rights and denied any presumption of statutory person status. The act of invoking a court's equitable and common-law jurisdiction to redress a private wrong is not a submission to the court's civil statutory rules. A court of equity has always proceeded according to the course of common law, not statutory civil procedure, when the party before it is a private individual asserting private rights.

90. Jurisdiction over the subject matter is established by the nature of the claim: trespass to chattels, conversion, and constitutional deprivation without due process. Jurisdiction over the person of a Defendant is established by the territorial fact of his acts within the county. Neither source of jurisdiction requires or implies Plaintiff's consent to be treated as a statutory person. Defendants must rebut this distinction on the record with evidence of Plaintiff's voluntary election into a public status—failing which the Court proceeds in its equitable and common-law capacity. Plaintiff retains his private status throughout these proceedings.

In Personam Jurisdiction Over Each Defendant; Substance Over Form

91. This Court's equitable jurisdiction acts upon the person of each Defendant whose conduct is alleged. Each officer Defendant resides or transacted official business within the State, each is amenable to personal service, and each is amenable to this Court's in personam equitable orders, including orders restraining further conduct in violation of Plaintiff's rights. Equity looks to substance rather than form: the relief Plaintiff seeks is to be measured by the wrongs alleged and the remedies available to redress them, not by formal labels affixed to the pleading. 1 Pomeroy, Equity Jurisprudence § 134 (equity acts in personam); id. § 378 (substance over form); *Pennoyer v. Neff*, 95 U.S. 714, 735 (1877).

The Sovereignty Paradox: The State Cannot Assert Sovereign Immunity While Denying the Individual's Sovereignty

92. Sovereign immunity rests on the premise that the State is sovereign. But sovereignty, as *Chisholm v. Georgia*, 2 U.S. (2 Dall.) 419 (1793), established, resides in the people—not in the government. The government is the agent; the people are the principal. When the government claims sovereign immunity, it borrows a quality that belongs to the people and asserts it on its own behalf. It cannot do so while simultaneously denying that the individual who is among the sovereigns from whom the government derives its status possesses sovereignty of his own.

93. The South Carolina Constitution, in Article I, § 1, declares that "All political power is vested in and derived from the people only," and the Declaration of Independence states that all men are created equal and that governments derive their just powers from the consent of the governed. If all political power derives from the people, and the government derives its authority from those equal persons, then the government's claim to sovereign

immunity must rest on the same foundation as the individual's claim to sovereign status, or it rests on nothing at all.

94. Plaintiff does not assert supremacy over the law. He asserts equality under it. He asks no more and no less than that the State be held to the same requirement it imposes on every private individual: the requirement of consent before obligation. If the State cannot be compelled to submit to a court's jurisdiction without its consent, then neither can Plaintiff be compelled to submit to a franchise statute without his. Defendants cannot have it both ways.

95. Under common law conflict of laws principles, the rights and obligations of private individuals are determined by reference to the nature of the parties and the place where the wrong was committed—not by reference to federal legislative definitions or federal procedural rules, which have no application in a common law proceeding in a South Carolina court. The wrong here was committed in Horry County, South Carolina, and the common law and equity of this State govern. The common law governing Plaintiff's private rights as a natural person inheres in his nature and status as a living man, not by virtue of any legislative assignment of status, which requires his voluntary consent to operate and which he has not given.

Statutory Civil Law Is Law Exclusively for Government Instrumentalities and Those Who Voluntarily Enter Public Franchises

96. Statutory civil law derives from "*publici juris*"—public rights—which are privileges and franchises created by the legislature for government actors, their instrumentalities, and those who voluntarily consent to enter a public franchise or office. Private persons, possessing absolute ownership over their body, labor, and property—*dominium* under

Roman law—are not subject to such statutes absent their express, voluntary, and informed consent. The Constitution protects private rights, and statutory civil law cannot impair those constitutional rights.

97. Law, properly defined, is a delegation of authority from the sovereign people to protect natural rights; it cannot create obligations upon private persons without consent. As Frederic Bastiat observed in The Law: "Law is the collective organization of the individual right to lawful defense." Law that purports to impose obligations upon a private individual who has not consented is not law properly so called but an act of force. Lysander Spooner's Natural Law confirms: natural rights inhere in the person by virtue of existence and precede any legislative enactment.

98. The United States Supreme Court confirmed this principle in the *License Tax Cases*, 72 U.S. (5 Wall.) 462 (1866), holding that civil statutory regulations operate upon those who engage in the franchise activity regulated—not upon private persons conducting their private affairs. Plaintiff did not engage in any commercial vehicle franchise activity on June 24, 2023. Defendants bear the burden of producing evidence on the record that Plaintiff voluntarily accepted the franchise. Absent such evidence, their enforcement was an ultra vires act of compulsion without legal foundation.

Clarification of *Hale v. Henkel*, 201 U.S. 43 (1906), and Its Proper Application to This Petition

99. Plaintiff relies upon *Hale v. Henkel*, 201 U.S. 43 (1906), at several points in this Petition. To ensure that the authority is applied with precision and is not vulnerable to mischaracterization, Plaintiff states what the decision actually holds. *Hale* arose from a federal grand jury investigation conducted under the Sherman Antitrust Act, in which a

corporate officer, served with a subpoena *duces tecum*, resisted production on Fourth and Fifth Amendment grounds. The Supreme Court resolved two questions of constitutional capacity. First, it held that the officer could not assert the Fifth Amendment privilege against self-incrimination on behalf of the corporation, because a corporation is a creature of the State and holds its books and papers subject to the State's reserved power of visitation. Second, it held that the Fourth Amendment nonetheless protects even a corporation against an unreasonable and indiscriminate subpoena. The decision therefore rests upon a single organizing principle directly material here: the categorical constitutional distinction between the natural individual, whose rights precede the State, and the artificial entity, which is created by and dependent upon the State.

> "[W]e are of the opinion that there is a clear distinction in this particular between an individual and a corporation, and that the latter has no right to refuse to submit its books and papers for an examination at the suit of the state. The individual may stand upon his constitutional rights as a citizen. He is entitled to carry on his private business in his own way. His power to contract is unlimited. He owes no duty to the state or to his neighbors to divulge his business, or to open his doors to an investigation, so far as it may tend to criminate him. He owes no such duty to the state, since he receives nothing therefrom, beyond the protection of his life and property. His rights are such as existed by the law of the land long antecedent to the organization of the state, and can only be taken from him by due process of law, and in accordance with the Constitution. Among his rights are a refusal to incriminate himself, and the immunity of himself and his property from arrest or seizure except under a warrant of the law. He owes nothing to the public so long as he does not trespass upon their rights." *Hale v. Henkel*, 201 U.S. 43, 74 (1906).

> "Upon the other hand, the corporation is a creature of the state. It is presumed to be incorporated for the benefit of the public. It receives certain special privileges and franchises, and holds them subject to the laws of the state and the limitations of its charter. Its powers are limited by law. . . . It would be a strange anomaly to hold that a state, having

> chartered a corporation to make use of certain franchises, could not, in the exercise of its sovereignty, inquire how these franchises had been employed, and whether they had been abused, and demand the production of the corporate books and papers for that purpose." *Hale v. Henkel*, 201 U.S. 43, 74-75 (1906).

100. Read properly, *Hale* establishes a distinction of status and capacity; it is not, by its own force, a freestanding exemption from taxation, licensing, or regulation. For the purposes of this Petition it stands for three propositions. First, the natural person possesses rights that "existed by the law of the land long antecedent to the organization of the [S]tate" and that the State may divest only "by due process of law." Second, because those rights are held by birthright rather than by legislative grace, they are presumed retained rather than presumed surrendered. Third, the artificial entity, by contrast, holds only such powers and privileges as its charter confers and remains answerable to the sovereign that created it. *Hale* does not itself decide who is, or is not, subject to a particular franchise statute. That question is governed by the authority Plaintiff cites alongside *Hale*—the *License Tax Cases*, 72 U.S. (5 Wall.) 462 (1866)—which limits the reach of a franchise statute to those who engage in the regulated franchise activity. *Hale* supplies the status premise, that Plaintiff is a natural person and not a creature of the State; the *License Tax Cases* supply the reach premise, that a franchise statute binds only franchise participants. Read together, the two authorities support the conclusion Plaintiff draws; neither is asked to bear that conclusion alone.

101. Plaintiff anticipates that Defendants may characterize the individual-rights language quoted above as dictum. That characterization does not assist Defendants. The passage states a constitutional first principle—that the rights of the natural person precede and constrain the State—which the Supreme Court has never repudiated and which is independently secured by the Ninth and Tenth Amendments and by Article I, Section 1 of the South Carolina

Constitution, declaring that "[a]ll political power is vested in and derived from the people only." The companion holding of *Hale*—that a corporate agent may not shelter the entity's records behind a personal privilege—was confirmed and extended in *Wilson v. United States*, 221 U.S. 361 (1911), and the individual-versus-collective-entity distinction drawn in *Hale* remains good law. Plaintiff invokes *Hale* only for the proposition it squarely supports: that his standing as a living man is not extinguished, and his retained rights are not converted into revocable privileges, by the unilateral operation of a statutory presumption.

102. Applied to this controversy, the two halves of *Hale* fall on opposite sides of the dispute. Plaintiff occupies the position of the natural individual: a living man, distinct from the artificial entity "THOMAS EDWARD HUMPHREY," engaged in private, non-commercial travel in his own conveyance, who "owes no duty to the [S]tate . . . to divulge his business" and who has accepted no franchise privilege in exchange for which a regulatory duty could attach. Defendants—the State of South Carolina and its instrumentalities and commissioned officers—occupy the position *Hale* assigns to the creature of the State: bodies that exist only by public charter, that exercise only delegated and enumerated powers, and that are therefore the parties properly required to show their authority and to produce, on the record, the lawful basis for their acts. *Hale* and the *License Tax Cases* together place the burden upon Defendants to produce evidence that Plaintiff voluntarily entered the franchise that Title 56 regulates. Absent that proof, the presumption that Plaintiff is a statutory "person" or public actor subject to Title 56 is precisely the impermissible conversion of an individual's antecedent rights into a creature-of-the-State status that *Hale* forecloses.

Venue

103. All disputes under this Petition shall proceed under common law and equity, not civil statutory law. This is a matter of private and not public rights, as distinguished in Black's Law Dictionary, Fourth Edition, pp. 425-426. The jury serves as the ultimate arbiter of fact on the common-law claims asserted. Statutory civil law regulates the public conduct of public officers; it does not reach the private rights asserted here. Venue is proper in Horry County, where the cause of action arose. S.C. Code § 15-7-30.

104. Constitutional tort claims arising from violations of self-executing constitutional provisions may be maintained directly in equity without a statutory vehicle. Where the Fourth, Fifth, and Fourteenth Amendments and the parallel guarantees of Article I, §§ 3, 10, and 13 of the South Carolina Constitution are the sources of Plaintiff's right—not any statute—the legislature's statutory liability framework does not foreclose the claim. The South Carolina Constitution declares in Article I, § 9 that every person "shall have speedy remedy" for wrongs sustained, and in Article I, § 23 that the provisions of the Constitution are "mandatory and prohibitory, and not merely directory."

The Bill of Rights Is Self-Executing: Constitutional Violations Are Directly Enforceable in Equity

105. The provisions of the Bill of Rights and the Fourteenth Amendment are self-executing: they require no enabling legislation and no statutory vehicle to create an enforceable right of action. The injury of having one's Fourth Amendment rights violated by a warrantless seizure is complete at the moment of the seizure, and the court's equitable power to remedy that injury is available from the same moment—independent of any statute, independent of any claims presentation requirement, and independent of any legislative scheme of

immunities the State of South Carolina may have enacted.

106. The Federal Tort Claims Act excludes constitutional violations from its scope—reserving them for direct judicial enforcement under principles established in *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971)—because constitutional torts are fundamental breaches of the social compact between the government and the people it was created to serve. The South Carolina Tort Claims Act, S.C. Code § 15-78-10 et seq., cited here solely as evidence of the public standard for officer accountability and not as the source of Plaintiff's right or remedy, similarly cannot immunize the State or its officers from direct constitutional claims; indeed, that Act expressly withholds immunity where an employee's conduct "was not within the scope of his official duties or . . . constituted actual fraud, actual malice, intent to harm, or a crime involving moral turpitude" (§ 15-78-70(b)) and expressly preserves the power of a court of equity "to enjoin unlawful acts committed by governmental entities" (§ 15-78-50(c)). No state statute can immunize conduct that the Constitution directly prohibits.

107. The claims asserted in this Petition are, fundamentally, constitutional deprivations: violations of the Fourth Amendment's prohibition on unreasonable search and seizure, the Fifth Amendment's due process guarantee, and the Fourteenth Amendment's equal protection clause, together with their parallels in Article I, §§ 3, 10, and 13 of the South Carolina Constitution, enforced directly against individual officers and against the State through the self-executing power of constitutional text. These claims do not pass through the South Carolina Tort Claims Act; they flow directly from the Constitution itself.

III. FACTUAL ALLEGATIONS

108. 1. On June 24, 2023, at approximately 8:28 p.m., I was traveling southwest on South Kings Highway in Myrtle Beach, Horry County, South Carolina, in my private mobile home for non-commercial purposes. Corporal Christopher A. Plyler of the South Carolina Highway Patrol, without probable cause or a warrant, initiated an unwarranted traffic stop, infringing my unalienable right to be left alone, on the asserted basis of the absence of properly displayed license plates and the absence of a driver's license—statutory requirements inapplicable to my private, non-commercial use. During this encounter, I explicitly withheld consent to any search, seizure, or statutory enforcement, a right protected under the Fourth Amendment and Article I, § 10 of the South Carolina Constitution. Corporal Plyler's disregard for my refusal and his subsequent actions—preventing me from rolling up my window, reaching into my mobile home, unlocking the door, removing me, arresting me, and causing my mobile home to be towed—constitute an unlawful exercise of authority absent my voluntary agreement, as no evidence exists of my participation in any government franchise or consent to their jurisdiction.

109. Specifically, Corporal Plyler demanded that I produce a driver's license, citing the provisions of Title 56 of the South Carolina Code of Laws, a statutory scheme applicable only to statutory "drivers" domiciled in the "United States" as defined in 26 U.S.C. § 7701(a)(9) (federal territories, not states of the Union). As a "national" and "state national" under 8 U.S.C. § 1101(a)(21), I am not such a "driver" or statutory "citizen" under 8 U.S.C. § 1401. Such civil statuses subject to statutes like Title 56 depend on domicile and voluntary participation in a public franchise, not mere physical presence or nationality. My private, non-commercial travel in my mobile home does not constitute a franchise activity subjecting me to statutory regulation, and the officer's insistence on applying this law to

me, despite my explicit assertion of my private status, demonstrates a willful misapplication of jurisdiction, rendering the seizure and arrest unlawful. This arbitrary application of commercial regulations to my private use denied me equal protection under the law, as it treated me differently from other private, non-commercial individuals not subjected to such enforcement.

110. Corporal Plyler issued Citation No. HC062423233340, charging me with four statutory offenses—driving without a license (first offense), operating a vehicle with a missing or incorrectly displayed license plate, operating an uninsured motor vehicle (first offense), and removing or affixing a license plate to conceal or misrepresent the identity of the owner—each of which presupposes a statutory "driver" and a registered "motor vehicle" within the public franchise, and none of which lawfully reaches a private man traveling in his private conveyance for private purposes absent his voluntary consent to that franchise.

111. The Defendants' actions were based on the false presumption that I am a statutory "driver" engaged in commerce, whereas my use was private and non-commercial, not subject to statutory regulation as a "non-resident non-person." This assertion is consistent with *Chicago Motor Coach v. City of Chicago*, 337 Ill. 200, 169 N.E. 22 (1929), affirmed by the Illinois Supreme Court and consistent with federal principles, which recognizes that the right to travel in one's private capacity is not subject to statutory licensing absent commercial activity. The right to travel, as recognized in *Crandall v. Nevada*, 73 U.S. 35 (1868), *Kent v. Dulles*, 357 U.S. 116 (1958), and *Shapiro v. Thompson*, 394 U.S. 618 (1969), protects my movement in my private capacity, further evidencing the unlawfulness of the Defendants' actions. The Defendants' failure to acknowledge my private status, absent evidence of my consent to a government franchise, renders their actions an unlawful

trespass upon my rights, as further affirmed by *Murdock v. Pennsylvania*, 319 U.S. 105 (1943), where the U.S. Supreme Court ruled that a state may not convert a secured liberty into a privilege subject to license without consent.

112. My refusal to comply with statutory licensing aligns with Christ's teaching that nothing rightly belongs to Caesar unless consented to (Matthew 22:21). The Bible prohibits Christians from rendering unto Caesar that which belongs to God—my liberty and property—absent a voluntary contract, reinforcing my lawful rejection of Defendants' authority over my private travel.

113. 2. When I declined to consent and asserted my rights, Corporal Plyler escalated. He prevented me from rolling up the window of my mobile home, reached his arm inside, unlocked the door from the interior, and physically removed me from my private dwelling and conveyance. At no point did I consent to his entry into my mobile home, to the search of my person or property, or to my removal. No warrant authorized any of these acts, and no exigency existed.

114. 3. Corporal Plyler placed me under arrest and in handcuffs, where I remained restrained for approximately ninety-six minutes. This restraint of my liberty was effected without probable cause that I had committed any offense cognizable against a private man, without a warrant, and over my express objection. The arrest and prolonged handcuffing created an atmosphere of fear and compulsion, deprived me of my liberty, and caused physical discomfort and emotional distress.

115. At common law and in equity, a foundational principle holds that the restraint of a person's

liberty without lawful justification is a wrong—false imprisonment—for which the law affords a remedy. The maxim *volenti non fit injuria*—to one who consents, no wrong is done—carries its necessary inverse: where the will has been overborne by force and the threat of continued confinement, no consent exists and no lawful justification arises. This principle predates any statute by centuries and is among the most settled doctrines of the common law.

116. The essence of the tort of false imprisonment consists of depriving a person of his liberty without lawful justification. *Jones v. City of Columbia*, 301 S.C. 62, 389 S.E.2d 662 (1990); *Thomas v. Colonial Stores, Inc.*, 236 S.C. 95, 113 S.E.2d 337 (1960). To establish false imprisonment, a plaintiff must show that the defendant restrained him, that the restraint was intentional, and that the restraint was unlawful. *Andrews v. Piedmont Air Lines*, 297 S.C. 367, 377 S.E.2d 127 (Ct. App. 1989). In *Jones*, the South Carolina Supreme Court held that whether an officer had probable cause to arrest a driver for operating an uninsured motor vehicle—where the driver was taken to jail and her vehicle impounded—was a question for the jury, and that the arrest could not be justified absent probable cause. The parallel to the present matter is exact: I was arrested on the asserted basis of statutory motor-vehicle offenses, taken to jail, and my mobile home was impounded, all without probable cause cognizable against a private man and without lawful justification.

No Quasi-Contract Arose from the Traffic Stop: Administrative Interaction Without Voluntary Consent Creates No Franchise Obligation

117. Defendants may assert that Plaintiff's participation in the June 24, 2023 traffic stop—his verbal responses and his physical presence—constituted conduct from which implied

consent to statutory jurisdiction may be inferred. This argument rests on a fundamental misunderstanding of the law of quasi-contracts.

118. Quasi-contracts arise from implied consent to public rights or franchises. They presuppose that the party had a genuine opportunity to decline participation and voluntarily chose not to. Plaintiff explicitly denied consent—verbally and through the totality of his conduct at the scene. No quasi-contractual obligation can arise from an interaction that Plaintiff affirmatively resisted at every point.

119. Quasi-contracts are unconstitutional when applied to private persons to impose statutory obligations without express consent. The equal protection guarantee precludes using the quasi-contract doctrine to convert a private man's presence at a traffic stop into a voluntary election into the Title 56 franchise. A doctrine designed to prevent unjust enrichment cannot be weaponized to enrich the government at a private man's expense by presuming his consent to regulations he never agreed to.

120. 4. Corporal Plyler caused my private mobile home to be towed and impounded by ABC Mobile Auto & RV Repair, without a warrant, without a hearing, and without my consent, leaving me without my dwelling and conveyance. ABC Mobile Auto & RV Repair acted in concert with the South Carolina Highway Patrol, specifically Corporal Christopher A. Plyler under the command and supervision of Colonel Christopher N. Williamson, Commander of the South Carolina Highway Patrol, and Robert G. Woods IV, Director of the South Carolina Department of Public Safety, to seize and detain my property. The seizure of my mobile home, effected without warrant or pre-deprivation process, constituted an unreasonable seizure of my effects and a deprivation of my property without

due process.

The Warrantless Seizure and Impoundment of Plaintiff's Private Dwelling Was Unreasonable and Without Lawful Authority

121. The seizure of Plaintiff's mobile home was not a lawful exercise of any impoundment authority—it was the warrantless taking of a private man's dwelling and conveyance.

Corporal Plyler initiated an unlawful seizure; ABC Mobile Auto & RV Repair, acting as the state's agent under joint-action doctrine, then took possession of Plaintiff's mobile home. A warrantless search or seizure is presumptively unreasonable under the Fourth Amendment and Article I, § 10 of the South Carolina Constitution absent consent or a recognized exception, neither of which existed here. *Katz v. United States*, 389 U.S. 347 (1967).

122. The wrongful retention of Plaintiff's property compounded the wrong. Plaintiff was deprived of his dwelling and conveyance for approximately twenty hours—a total of 1,201 minutes, calculated from the 8:28 p.m. stop on June 24, 2023, until Plaintiff recovered the mobile home from impound at 4:29 p.m. the following day, June 25, 2023. No hearing, no neutral review, and no magistrate stood between Corporal Plyler's field judgment and the seizure of Plaintiff's dwelling. Although the mobile home was ultimately returned undamaged, the deprivation of its use and enjoyment, and of Plaintiff's shelter, was real and complete for the duration of the seizure.

Plaintiff Invoked No Statutory Benefits and Waived No Constitutional Rights

123. The United States Supreme Court established in *Ashwander v. TVA*, 297 U.S. 288 (1936), that invoking the statutory benefits of a government program or franchise constitutes a

waiver of constitutional rights inconsistent with that franchise. The inverse is equally controlling: a private individual who invokes no statutory benefits waives no constitutional rights. Plaintiff had not registered his vehicle, had not obtained a driver's license, had not applied for insurance, and had not accepted any benefit associated with South Carolina's vehicle franchise. He had invoked nothing. He had waived nothing.

124. The Constitution does not permit the government to accomplish by threat and duress what it could not accomplish by direct command. Any act Plaintiff performed in connection with the stop, arrest, or impoundmentwas performed under compulsion and is void as a waiver of constitutional rights under both *Ashwander* and the established common law doctrine that an act compelled under duress is a nullity. *Brady v. United States*, 397 U.S. 742 (1970).

125. A private party becomes liable in common law—and as a participant in a constitutional violation—when it acts in concert with a government officer to deprive a private individual of his property without lawful authority. *Lugar v. Edmondson Oil Co.*, 457 U.S. 922 (1982); *Adickes v. S.H. Kress & Co.*, 398 U.S. 144 (1970). The test is joint action: whether the private actor and the state official acted in agreement or concert to accomplish the deprivation. Here, ABC Mobile Auto & RV Repair acted at the direction of Corporal Plyler, without warrant, without Plaintiff's consent, and without any pre-deprivation process. They were not bystanders; they were instruments of the wrongful taking.

126. ABC Mobile Auto & RV Repair is independently liable in common law conversion and trespass to chattels. Under the common law of South Carolina, conversion is the unauthorized assumption and exercise of the right of ownership over goods or personal

chattels belonging to another, to the exclusion of the owner's rights. *Gist v. Berkeley County Sheriff's Dep't*, 408 S.C. 314 (2014). One who exercises dominion over another's property with knowledge of the facts—or with knowledge sufficient to put a reasonable party on inquiry—is liable for conversion regardless of whether they originated the wrongful act. The fact that ABC Mobile Auto & RV Repair operated under the direction of Corporal Plyler does not insulate it from civil liability; a private party who participates in a wrongful deprivation of property cannot take refuge behind the orders of a state actor who himself lacked lawful authority.

127. Plaintiff retrieved his mobile home from the impound the day following the seizure, on June 25, 2023, at approximately 4:29 p.m. Property was returned undamaged. The only charge to which Plaintiff was subjected in connection with the unlawful impound was a daily storage fee assessed by ABC Mobile Auto & RV Repair. That charge was itself unlawful, having arisen entirely from a warrantless seizure conducted without any lawful authority, and it is therefore recoverable in this Court as restitution. Equity will not permit a wrongdoer to retain a benefit generated by his own wrong, and the storage fee — the only economic charge actually imposed — falls squarely within the equitable doctrine of disgorgement.

128. ABC Mobile Auto & RV Repair may attempt to obfuscate its liability by asserting that it was "just doing its job" under instruction from the State, or that a contract or arrangement with the State of South Carolina or with the South Carolina Highway Patrol bound it to participate in the seizure. No such argument has any legal traction. The law has never accepted instruction from a third party as a defense to the violation of another's rights. To plead that the State directed the wrong is to plead the very thing that, on Judgment Day,

will be addressed as "the devil made me do it" — it is the universal excuse of the wrongdoer and it has never relieved anyone of legal responsibility. A private person who acts as the hands and arms of an unlawful seizure is not made innocent by being asked to do so; he becomes a participant in the wrong, just as a person walking with another who breaks the law is held accountable by association. How much more so where the private actor is paid, is summoned for the specific purpose of completing the seizure, and physically takes possession of the seized property at the direction of the officer. Being instructed to break the law is no excuse for breaking the law; the perceived police powers and authority of the State do not, and cannot, immunize the private contractor who carries the wrongful conduct to completion. ABC Mobile Auto & RV Repair stands liable in its own right for the role it actually played in the deprivation of Plaintiff's property, and may not transfer that liability to its principal by invoking the principal's instruction.

129. The legal role of ABC Mobile Auto & RV Repair in the events of June 24–25, 2023 is independently established under the common law of agency. Whether ABC Mobile Auto & RV Repair operated pursuant to a pre-existing standing contract with the South Carolina Highway Patrol or the South Carolina Department of Public Safety for the towing of vehicles on official call — in which case it was a continuing agent of the State under the terms of that contract — or whether it was summoned ad hoc, on the specific occasion of this seizure and at the specific direction of Corporal Christopher A. Plyler, to remove Plaintiff's mobile home from the scene — in which case it became an agent of the State for the duration of and for the limited purpose of carrying that direction into effect — ABC Mobile Auto & RV Repair acted as an agent of the State of South Carolina for all purposes material to this Petition. As such, every act ABC Mobile Auto & RV Repair undertook in

connection with the seizure was undertaken under color of the State's asserted police authority; every charge it assessed in connection with the seizure was generated under that authority; and every consequence of those acts is properly traceable both to ABC Mobile Auto & RV Repair as the immediate actor and to the State as the principal whose direction the contractor carried out. Plaintiff pleads ABC Mobile Auto & RV Repair's liability in both capacities — as a private actor in its own right and as an agent of the State for the limited purpose of this seizure — without conceding that either capacity excuses or absorbs the other.

130. 5. Following my arrest, I was transported to the Horry County detention facility. There, I was subjected to a strip search conducted without probable cause, without a warrant, and without any individualized justification—a search that exposed my nakedness in direct violation of my sincerely held religious convictions (Genesis 3:7-10, 21). I was then confined in a small cell with five other men for approximately ten hours, in overcrowded conditions that caused severe emotional distress. During my detention, my fingerprints and photographs were taken without my consent.

131. The strip search of my person implicated my right to privacy and to be secure in my person under the Fourth Amendment and Article I, § 10 of the South Carolina Constitution. While *Florence v. Board of Chosen Freeholders,* 566 U.S. 318 (2012), recognizes limited authority to conduct searches incident to a lawful detention, that authority presupposes a lawful arrest and lawful detention in the first instance. Where, as here, the underlying arrest was unlawful—effected without probable cause cognizable against a private man—the search that followed was the fruit of that unlawful seizure and was itself unreasonable. The nonconsensual taking of my fingerprints and photographs constituted a further seizure of

my person and my identity without lawful authority.

132. The strip search worked an independent and grievous injury to my free exercise of religion. My faith holds the exposure of my nakedness before others to be a violation of divine command, as reflected in Genesis 3:7-10 and 3:21, where God clothed man and covered his nakedness. To be stripped and exposed without consent and without lawful justification was not merely a search—it was a desecration of a sincerely held religious conviction, protected under the Free Exercise Clause of the First Amendment and Article I, § 2 of the South Carolina Constitution, and recognized in *Church of Lukumi Babalu Aye v. City of Hialeah*, 508 U.S. 520 (1993).

133. 6. Plaintiff served Defendants with a True Bill, designated SCHP-RV062423-HTE, submitted on June 24, 2025, together with formal notice, affidavit, demand for redress, a subsequent final notice, and a notice of default with opportunity to cure. Despite being duly served, Defendants maintained a deliberate silence, failing to remedy the wrong or to provide any rebuttal to Plaintiff's claims. This silence, under the principles of common law and equity, constitutes an admission of the facts alleged in the notices and evidences Defendants' intent to harm. As fiduciaries bound by their oaths, Defendants' inaction constructively consents to the truth of Plaintiff's assertions, thereby strengthening his claims for redress. Defendants' deliberate silence invokes acquiescence and estoppel under common law, as affirmed in *Carmine v. Bowen*, 64 A. 932 (Md. 1906), confirming delivery of Plaintiff's declaration and fee schedule to the named officers. The same principle is independently recognized in equity as estoppel by silence where a duty to speak in the face of a known claim exists; a party who, having a duty to speak, remains silent across a substantial period is later estopped from raising defenses inconsistent with positions

implicit in that silence. 1 Pomeroy §§ 802–812 (equitable estoppel); *Heckler v. Community Health Servs., Inc.*, 467 U.S. 51, 59 (1984).

Federal Law Recognizes the Harm of Identity Conversion: The Public Standard Against Connecting a Living Man to a Statutory Fiction

134. Federal criminal law—cited here solely as evidence of the public standard the legislature recognized, not as a cause of action—confirms that connecting a living man to a statutory person, public office, or artificial corporate entity without his consent is recognized as harmful at the highest levels of American law. The following federal statutes establish that public standard:

135. **18 U.S.C. § 912 (Impersonating a Public Officer):** reflects the legislature's recognition that falsely representing a living man as a public officer or statutory agent constitutes a federal wrong.

136. **18 U.S.C. § 911 (Impersonating a U.S. Citizen):** reflects the legislature's recognition that designating a person as a statutory "U.S. citizen" carrying civil obligations without his consent constitutes identity fraud.

137. **18 U.S.C. § 654 (Conversion):** reflects the legislature's recognition that converting a person's private property or private identity to a public use without authorization constitutes a federal wrong cognizable as conversion.

138. **18 U.S.C. §§ 1028(a)(7) and 1028A (Identity Document Fraud and Aggravated Identity Theft):** reflect the legislature's recognition that using means of identification without the person's authorization in connection with an unlawful act constitutes among the most serious categories of identity-related federal wrong.

139. These statutes reflect the public standard that connecting a living man to a statutory identity without his consent causes a legally cognizable harm. Plaintiff cites them as evidence that the harm he has suffered—being presumed to be a statutory "driver," a "person" subject to Title 56, and a "*pro se*" litigant subject to statutory civil procedure—is recognized at the highest levels of federal law as the kind of harm warranting legal remedy.

140. 7. Plaintiff directed his True Bill and supporting notices to the responsible officers and custodians of the State of South Carolina, including Comptroller General Brian J. Gaines, Governor Henry Dargan McMaster, Colonel Christopher N. Williamson, Commander of the South Carolina Highway Patrol, and Robert G. Woods IV, Director of the South Carolina Department of Public Safety. These communications provided detailed accounts of the unlawful actions taken by the Defendants—specifically the South Carolina Highway Patrol—and Plaintiff's demands for redress. Under the notice doctrine, as established in *Mutual Life Insurance Co. v. Hilton-Green*, 241 U.S. 613, 622 (1916), notice to these agents imputes knowledge to their principal, the State of South Carolina, and its agencies, including the South Carolina Department of Public Safety and the South Carolina Highway Patrol. This notification eliminates any plausible deniability on the part of the Defendants and all named government actors, establishing their awareness of Plaintiff's claims and, consequently, their willful intent in any subsequent actions or failures to act. Their collective silence is not mere inaction—it is affirmative acquiescence in the deprivation.

All Claims Are Timely

141. The notice on which the foregoing supervisory-liability allegations rest was effected through two coordinated and contemporaneously documented vectors of service. First, Plaintiff caused a complete physical package — comprising the DECLARATION OF

RIGHTS VIOLATIONS AND DEMAND FOR DAMAGES executed under oath before a notary on June 24, 2025, the True Bill bearing reference SCHP-RV062423-HTE in the principal sum of $132,257,933.00, and supporting documentation — to be transmitted by United States Mail, certified, return receipt requested, under Certified Mail No. 9589 0710 5270 2303 1635 95, addressed to Brian J. Gaines, Comptroller General of the State of South Carolina, at 1200 Senate Street, #305 Wade Hampton Office Building, Columbia, South Carolina 29201, as the State's chief fiscal officer and the constitutionally designated custodian for fiscal claims against the State. United States Postal Service tracking confirms that the certified package was delivered to the front desk, reception area, or mail room at the addressee's office on June 28, 2025, at 8:44 a.m. The face of the served instrument bore an express TO: block identifying as intended recipients: (i) Henry Dargan McMaster, Governor of the State of South Carolina, 1100 Gervais Street, Columbia, South Carolina 29201; (ii) Christopher N. Williamson, Colonel and Commander of the South Carolina Highway Patrol, 10311 Wilson Boulevard, Blythewood, South Carolina 29016; and (iii) Robert G. Woods IV, Director of the South Carolina Department of Public Safety, 10311 Wilson Boulevard, Post Office Box 1993, Blythewood, South Carolina 29016. Service upon the Comptroller General as the State's fiscal agent, accompanied by a TO: block designating each of the named supervisory officers as intended recipient on the face of the instrument, constitutes constructive notice to each of them as a matter of agency law and as a matter of the State's own administrative practice. Notice to the agent is notice to the principal, and notice to the principal is notice to the agent. *Mut. Life Ins. Co. v. Hilton-Green*, 241 U.S. 613, 622 (1916). Second, on the same operative dates, Plaintiff transmitted the identical instruments by electronic mail to each of the named supervisory officers at the electronic addresses each office publishes as its official means of public contact, including without limitation governormcmaster@governor.sc.gov for Governor McMaster, hpheadquarters@scdps.gov for Colonel Williamson as the published address of the SCHP Commander, and the SCDPS Office of Public Affairs and related leadership addresses for Director Woods. These published electronic addresses are addresses each office holds out to the public as its official channel for receipt of correspondence; direct delivery to them is direct notice to the office. The electronic transmission was extended to the broader SCHP command staff, the Governor's Office, and the entirety of the South Carolina General Assembly, eliminating any plausible claim of nondelivery or unawareness within the responsible chains of command. Third, on August 5, 2025, after the True Bill's stated due date of July 26, 2025 had passed without rebuttal or response of any kind, Plaintiff served a FINAL NOTICE bearing the identical TO: block, transmitted by United States Mail, certified, return receipt requested, under Certified Mail No. 9589 0710 5270 2095 0715 73, with the associated return-receipt tracking number 9590 9402 9272 4295 2349 62, and contemporaneously by electronic mail to the same distribution; the United States Postal Service confirms that the mailed article was delivered on August 12, 2025, as reflected in the attached tracking record, and the requested return receipt has not, to the present date, been received by Plaintiff. The FINAL NOTICE expressly afforded Defendants until September 4, 2025 to rebut the underlying declaration with a sworn counter-affidavit answering point-by-point or to tender payment, and expressly stated that failure to do either would constitute conclusive admission of the matters not denied and would precipitate enforcement action. No counter-affidavit was ever served. No rebuttal of any kind was ever served. Each of Governor McMaster, Colonel Williamson, and Director Woods, having received the notices through both vectors and having failed to respond in any form across the period from June 28, 2025 through and beyond September 4, 2025, is charged with actual knowledge of the unconstitutional pattern alleged and with the deliberate choice not to correct it.

142. Although Plaintiff is not bound by, and does not invoke, any statute of limitations as the measure of his rights, the administrative procedural history of this matter independently establishes that his claims have been timely asserted under the most restrictive statutory measure any Defendant might invoke. The wrongs occurred on June 24–25, 2023. Plaintiff's sworn Declaration of Rights Violations and accompanying True Bill were served upon the State of South Carolina and the named Defendants on June 24, 2025, within the two-year period set by the South Carolina Tort Claims Act, S.C. Code Ann. § 15-78-110, for the perfection of administrative claims against governmental entities — that statute being cited here solely as evidence of the most restrictive measure the State has ever proposed for itself, and not as the source of Plaintiff's right or remedy. The Final Notice followed on August 5, 2025; the cure deadline expired on September 4, 2025; and this Verified Petition is filed within three years of the underlying wrongs, well within the three-year period the State has fixed for common-law actions of trespass, conversion, false arrest, and false imprisonment under S.C. Code Ann. § 15-3-530, that statute likewise being cited here solely as evidence of the public standard, not as the source of the right or remedy. Plaintiff's claims are therefore timely under every measure the State could possibly invoke against itself, in addition to being timely under the common-law and equitable measure of laches, as to which Plaintiff has at no point slept upon his rights.

143. 8. Plaintiff's claims are timely. The wrongs complained of occurred on June 24–25, 2023,

and this petition is filed within three years of that date. The common law causes of action asserted herein—trespass to chattels, conversion, false arrest, and false imprisonment—are governed by South Carolina's three-year limitations period for such actions, and this action is commenced within that period. Plaintiff proceeds in equity and at common law and does not invoke any statutory cause of action or statutory remedy; the statutes cited throughout this petition are cited solely as evidence of recognized standards and duties, not as the source of any right or remedy.

144. Equity has always afforded a remedy where a wrong has been done, and the South Carolina Constitution itself guarantees in Article I, § 9 that "every person shall have speedy remedy" for wrongs sustained. With respect to any pre-litigation notice function, the administrative notices Plaintiff dispatched—the True Bill SCHP-RV062423-HTE and the accompanying demand, final notice, and notice of default—each provided actual and constructive notice of the factual and legal basis of Plaintiff's demands. The government's receipt of those notices satisfied any substantive notice function that a claims procedure is designed to serve.

IV. LEGAL BASIS AND EVIDENCE OF UNLAWFUL AUTHORITY

THRESHOLD: Every Statutory Defense Defendants Will Raise Presupposes a Status Plaintiff Has Not Accepted and Therefore Fails at Its Threshold Premise

145. Before addressing the merits of any claim, the Court must confront a foundational threshold question: what is Plaintiff's legal status, and which body of law governs his rights and obligations? Defendants' anticipated defenses—a motion to dismiss for failure to state a claim under Rule 12(b)(6), SCRCP, sovereign immunity under the South Carolina Tort Claims Act, officer immunity under that Act, and preemption by Title 56 of the South

Carolina Code—each and every one of them presupposes that Plaintiff is a statutory "person" subject to South Carolina's civil law framework. That presupposition is the first premise of every defense. And it is a premise that Plaintiff has specifically, explicitly, and repeatedly denied.

146. A defense whose first premise is false fails at its threshold—not because the law it cites is wrong in the abstract, but because that law does not apply to the party before the Court. The South Carolina Tort Claims Act applies to persons who have accepted South Carolina's civil jurisdiction and proceed under that Act. Plaintiff has not; he proceeds in equity and at common law. Title 56's definitions of "driver" and "person" apply to those who have entered the vehicle franchise. Plaintiff has not. Officer immunity under the South Carolina Tort Claims Act applies to officers exercising lawful authority within the scope of their official duties; that Act expressly withholds immunity where an employee's conduct "was not within the scope of his official duties or … constituted actual fraud, actual malice, intent to harm, or a crime involving moral turpitude." S.C. Code § 15-78-70(b). Where the statute under which they acted does not apply to Plaintiff, their authority derived from it does not exist, and the immunity conditioned on its lawful exercise does not attach.

147. Defendants bear the burden of establishing the first premise their defenses require: that Plaintiff is in fact a statutory person who voluntarily accepted the civil franchise law they seek to apply. That burden can only be discharged by evidence of Plaintiff's voluntary and express consent to the franchise. Until that evidence is produced—which it cannot be, because no such voluntary consent exists—every statutory defense fails on its threshold premise.

No Heightened Pleading Standard Applies; The Petition's Allegations Suffice to Survive a Motion to Dismiss — *Leatherman v. Tarrant County*

148. The United States Supreme Court in *Leatherman v. Tarrant County Narcotics Intelligence & Coordination Unit*, 507 U.S. 163 (1993), unanimously rejected the imposition of a heightened pleading standard on claims alleging municipal liability. The Court held that requiring a plaintiff to plead detailed facts establishing the specific policy or custom causing the constitutional violation imposes a pleading standard that the rules do not support. South Carolina is a fact-pleading jurisdiction, and Rule 8(a), SCRCP, requires a short and plain statement of the facts showing that the pleader is entitled to relief. This petition far exceeds that standard.

149. On a motion to dismiss under Rule 12(b)(6), SCRCP, the question is whether, viewing the allegations in the light most favorable to the plaintiff, the petition states any cause of action. Defendants cannot prevail by arguing that Plaintiff has not yet produced evidence of the exact South Carolina Highway Patrol policy or custom. The facts alleged—that Corporal Plyler stopped Plaintiff's private conveyance for lacking franchise documentation, removed Plaintiff from his mobile home, arrested and handcuffed Plaintiff, caused the impoundment of Plaintiff's dwelling, transported Plaintiff to jail where he was strip-searched and confined, and that supervisory officers failed to respond to pre-litigation notices despite constructive knowledge of the enforcement pattern—plausibly allege a custom or policy of deliberate indifference to the constitutional rights of private non-commercial travelers. These factual allegations are more than sufficient to survive a motion to dismiss.

150. I assert claims under the common law for trespass to chattels and conversion due to the

wrongful interference with and dominion over my mobile home on June 24–25, 2023, and for false arrest and false imprisonment arising from the unlawful restraint of my liberty. Additionally, I assert that the Defendants' actions constitute government identity theft, as they unlawfully presumed I am a statutory "person" or public officer under a franchise without my consent, thereby violating my constitutional rights under the Fourth, Fifth, and Fourteenth Amendments, including my right to equal protection under the law. This theft occurs when government actors kidnap one's identity by imposing statutory duties without voluntary agreement, converting my private property into a public asset subject to their control. The U.S. Supreme Court in *Northern Pipeline Const. Co. v. Marathon Pipe Line Co.*, 458 U.S. 50 (1982), affirmed that statutory rights or privileges created by Congress "affect the exercise of judicial power" only when consented to, and absent such consent, such impositions encroach upon the judicial power reserved for Article III courts. My refusal to consent renders the Defendants' actions *ultra vires*.

151. Separate and distinct from the claim for conversion, Plaintiff asserts a claim for trespass to chattels under common law. Trespass to chattels is the intentional interference with the plaintiff's right to possession of personal property, causing harm to the possessory interest, without rising necessarily to the complete appropriation that defines conversion. *Gist v. Berkeley County Sheriff's Dep't*, 408 S.C. 314 (2014). The distinction matters here because trespass to chattels captures the wrongful interference with Plaintiff's right to use and enjoy his mobile home during the period of its seizure—even though the property was ultimately returned—whereas conversion addresses the wrongful exercise of dominion over the property to the exclusion of the owner's rights.

152. The harm element is satisfied by any actual impairment of the property's condition, quality,

or value, or by any deprivation of its use for a substantial time. The wrongful seizure and approximately twenty-hour deprivation of Plaintiff's sole dwelling and conveyance—during which he was also arrested, confined, and left without shelter—constitutes harm of a concrete and substantial kind, satisfying the required element. Both claims—conversion and trespass to chattels—arise independently under the common law, require no statutory cause of action, and are properly joined in this petition for equitable and common law redress.

153. Furthermore, as warned in *Pollock v. Farmers' Loan & Trust Co.*, 157 U.S. 429 (1895), "The present assault upon capital [private property] is but the beginning... until our political contest will become war of the poor against the rich," highlighting that the Defendants' seizure of my private property undermines the very foundations of government—private property and equality—which I seek to restore through this petition.

154. At common law, conversion is the wrongful exercise of dominion over another's personal property in a manner inconsistent with the owner's right of possession. *Gist v. Berkeley County Sheriff's Dep't*, 408 S.C. 314 (2014). Its elements are: (1) Plaintiff's ownership or right to possession at the time of the act; (2) Defendant's intentional act constituting a substantial interference with that right; and (3) resulting damages. All three are fully satisfied here. Plaintiff owned his mobile home and held absolute right to its possession. Corporal Plyler, acting under the command and supervision of Colonel Williamson and Director Woods, directed ABC Mobile Auto & RV Repair to remove that property by force and without warrant. Plaintiff was deprived of possession for approximately twenty hours before the property was returned.

155. Conversion and trespass to chattels are complete upon the wrongful exercise of dominion and the wrongful interference with possession. *Gist v. Berkeley County Sheriff's Dep't*, 408 S.C. 314 (2014). Here, the wrong was complete at the moment Corporal Plyler caused Plaintiff's mobile home to be seized and impounded without lawful authority, and the harm continued throughout the approximately twenty-hour period of wrongful detention until the property was returned.

156. The common law has always measured conversion damages by: (1) the fair market value of the property at the time and place of the wrongful taking; (2) interest running from that date; and (3) fair compensation for time and expense reasonably incurred in pursuit of the property. This measure—recognized for centuries in equity and at common law—is reflected in the public standard long recognized at common law, cited here solely as evidence of that standard and not as a statutory cause of action.

157. No man can dictate to another what his time is worth. Time is the single most precious commodity known to man — finite, irrecoverable, and the medium in which every other right is exercised. The right to set the price of one's own time, labor, and rights is itself a property right at common law and may not be subordinated to a unilateral valuation imposed by a stranger or by a State officer. Plaintiff exercised that right by setting, in advance and in writing, the lawful measure of compensation for the taking of any portion of his time, his labor, his rights, or his property, in the Fee Schedule annexed to the True Bill. The measure thus set is the measure Plaintiff has the right to enforce.

158. Furthermore, Plaintiff placed Corporal Plyler on direct, contemporaneous, verbal notice at the scene, before any substantive interaction occurred and before any rights were violated,

that Plaintiff did not consent to the stop, did not consent to the demand for credentials, did not consent to the search, did not consent to the arrest, and did not consent to the seizure of his dwelling. That non-consent is documented on video in its entirety. The fee schedule set forth in the True Bill is the price Plaintiff demanded for the taking of any of those rights or for any expenditure of his time in defending them from unlawful conversion. The common law requires only one thing as a prerequisite to commencement of an action against a wrongdoer: notice. Plaintiff fulfilled that prerequisite four times over: first, by direct verbal notice at the scene of the incident on June 24, 2023; second, by the True Bill submission of June 24, 2025; third, by the Final Notice of August 5, 2025; and fourth, by the Notice of Default following the September 4, 2025 cure deadline. Each successive notice particularized the wrongs alleged, the measure of damages claimed, and the avenue of cure available to Defendants. Each was met by silence. Having fulfilled every obligation and every prerequisite imposed by the common law upon one who would commence an action against a wrongdoer, Plaintiff is entitled to bring — and now brings — this common-law claim against the Defendants.

159. Where conversion is accompanied by conduct that is oppressive, fraudulent, or malicious—as here, where Plaintiff was arrested and handcuffed without lawful authority, his dwelling seized without warrant, and his person strip-searched, and where Defendants have ignored repeated administrative notices and demands for redress—a court of equity possesses inherent authority to award exemplary relief commensurate with the moral character of the wrong, entirely independent of any legislative grant. The legislature's recognition of this equitable principle—reflected in the common law of exemplary damages, cited here solely as evidence of the public standard, not as a cause of

action—confirms that even the positive law acknowledges what equity has always known.

The Requirement for Consent as a Prerequisite to Lawful Authority

160. The foundation of lawful government action lies in the consent of the governed, a principle enshrined in the Declaration of Independence. Civil statutes and obligations acquire the force of law only through voluntary consent, typically via domicile or franchise participation. Absent such consent, government actions lack legitimacy and constitute trespasses upon private rights, as well as identity theft by transforming the private individual into a public "straw man." In this case, the Defendants' seizure of my mobile home and coercion on June 24, 2023, were executed without my consent, express or implied, rendering them *ultra vires* and unlawful.

161. There are two methods of creating "obligations" that clarify the definition of "law": (1) God's law, which imposes duties through moral conscience, and (2) Man's law, which requires consent through contract or franchise. My refusal to consent to any franchise aligns with the biblical mandate in Ezekiel 20:18-19, affirming that Defendants' imposition of statutory obligations without my agreement violates both divine and constitutional law.

162. The U.S. Supreme Court in *Hale v. Henkel*, 201 U.S. 43 (1906), held that natural persons possess rights predating the state, which cannot be usurped without consent. Similarly, *Fong Yue Ting v. United States*, 149 U.S. 698 (1893), affirms that duties to government—such as taxation or statutory compliance—arise from reciprocal consent, absent which no obligation exists. I have consistently denied consent to any statutory franchise, including the "trade or business" franchise under 26 U.S.C. § 7701(a)(26), and have not established a domicile subjecting me to Defendants' jurisdiction. Non-consenting

individuals are classified as "sovereign" and "foreign" to the government's legislative reach, a status I claim here, as articulated in the consent of the governed principle of the Declaration of Independence.

The Constitutional Mechanism of Consent: Jurisdiction Arises Only Through the Voluntary Conversion of Private Property to Public Use

163. The constitutional mechanism by which government acquires legitimate jurisdiction over a person's property or conduct operates through a specific process: the voluntary conversion of private property or private activity into public property or public activity through the informed consent of the absolute owner. All public things derive from persons who formerly held private property and who voluntarily consented to call it public or donate it to a public use in exchange for the benefit of government protection.

164. The driver who applies for a South Carolina license, pays the registration fee, and carries the required insurance has voluntarily converted his private conveyance into a publicly-regulated vehicle. The government's jurisdiction over that driver is constitutionally grounded in his consent. Plaintiff has made no such conversion. His mobile home remains private property. His travel on June 24, 2023, was private activity—non-commercial, non-franchised, and not offered to any public use.

165. Corporal Plyler's stop was an attempt to assert jurisdiction over property and activity that Plaintiff had never voluntarily made public—the constitutional equivalent of asserting title to property one has never purchased, inherited, or received as a gift.

Clarification of *Fong Yue Ting v. United States*, 149 U.S. 698 (1893), and Its Proper Application to This Petition

166. Plaintiff cites *Fong Yue Ting v. United States*, 149 U.S. 698 (1893), and states what the decision holds, and what it does not, so that the citation is applied only for the proposition it genuinely supports. *Fong Yue Ting* arose under the Geary Act of 1892, which required Chinese laborers to obtain certificates of residence and authorized the deportation of those who did not. The Supreme Court held that the power to exclude and to expel aliens is an incident of national sovereignty committed to the political branches, and that deportation under the Act is not criminal punishment requiring a judicial trial. Plaintiff does not cite *Fong Yue Ting* for that holding, which concerns the federal immigration power and has no application to him. Plaintiff cites it for the law-of-nations reasoning by which the Court explained the foundation of a resident's civil obligations: the doctrine of domicile and allegiance.

> "This right to protect persons having a domicile, though not native-born or naturalized citizens, rests on the firm foundation of justice, and the claim to be protected is earned by considerations which the protecting power is not at liberty to disregard. Such domiciled citizen pays the same price for his protection as native-born or naturalized citizens pay for theirs. He is under the bonds of allegiance to the country of his residence, and, if he breaks them, incurs the same penalties. He owes the same obedience to the civil laws. His property is, in the same way and to the same extent as theirs, liable to contribute to the support of the Government. In nearly all respects, his and their condition as to the duties and burdens of Government are undistinguishable." *Fong Yue Ting v. United States*, 149 U.S. 698 (1893).

167. The Court grounded these civil duties—obedience to the civil laws, and the liability of property to contribute to the support of the Government—not in mere physical presence, but in domicile. And it held, following Vattel and the settled law of nations, that domicile is itself a matter of intention and consent, not of accident:

> "This right of domicile . . . is not established unless the person makes sufficiently known his intention of fixing there, either tacitly or by an express declaration." *Fong Yue Ting v. United States*, 149 U.S. 698 (1893) (quoting E. de Vattel, Law of Nations).

168. Two propositions material to this Petition follow. First, the civil obligations of a resident—including the liability of his property to contribute to the support of the Government—arise from domicile, the chosen and consensual seat of a person's legal relations, and not from his transient bodily presence within a jurisdiction. Second, allegiance and protection are reciprocal: the duties of the civil law are the consideration a domiciled person renders in return for the protection he has elected to receive. One who has not established domicile, and who has therefore neither claimed that protection nor consented to that relation, does not stand in the position the Court described and does not owe the correlative civil duties.

169. Plaintiff anticipates that Defendants may object that *Fong Yue Ting* is an immigration decision upholding the deportation of aliens and is therefore inapposite. The objection mistakes the use to which the case is put. Plaintiff does not rely on its holding concerning the immigration power; he relies on the Court's own articulation of the domicile-and-allegiance principle, which the Court treated as settled law of nations applicable to all persons, citizen and alien alike. That principle is the same one reflected in the statutory framework discussed elsewhere in this Petition—the distinction between political nationality and the domicile-based civil status keyed to the geographic "United States," 26 U.S.C. § 7701(a)(9)—and in the rule that civil status follows the consensual fixing of domicile rather than transient presence.

170. Applied to this controversy, *Fong Yue Ting* confirms that the civil obligations the

Defendants sought to impose under Title 56 depend upon a jurisdictional predicate that Plaintiff never supplied. Plaintiff was, at the time of the incident, a transient traveler passing through South Carolina in his private conveyance; he had not made sufficiently known any intention of fixing a domicile within the State, by tacit act or express declaration, and he claimed no protection and accepted no franchise in return for which the duties of the civil law could attach. The Defendants' presumption that his mere presence subjected him to Title 56 inverts the rule of *Fong Yue Ting*, which fixes civil obligation to domicile and consent rather than to transient presence, and supplies no lawful basis for the enforcement complained of.

A. Citizenship Status and Its Implications

171. The distinction between constitutional and statutory citizenship is central to this case. As a "national" and "state national" under 8 U.S.C. § 1101(a)(21), I am not a statutory "citizen of the United States" under 8 U.S.C. § 1401, which applies to those domiciled in the geographical "United States" (federal territories per 26 U.S.C. § 7701(a)(9)). The U.S. Supreme Court in *United States v. Wong Kim Ark*, 169 U.S. 649 (1898), recognized that political status (nationality) is distinct from civil status (domicile), the latter governing obligations under statutory law. Statutory citizenship is a franchise status, voluntarily assumed through domicile on federal territory or participation in government privileges (e.g., Social Security, per 42 U.S.C. § 1301(a)(2)), and is not imposed on those born in states of the Union absent consent.

172. My "non-resident non-person" status places me outside Congress's exclusive legislative jurisdiction (Article IV, § 3, cl. 2), and I have not elected a federal domicile by accepting franchises. The Defendants' failure to recognize this distinction—presuming me to be a

statutory "citizen" or "person" under Title 56 of the South Carolina Code—renders their actions *ultra vires*, as they lack jurisdiction over me as a "non-resident non-person" with respect to the statutory "United States." This misapplication constitutes government identity theft, unlawfully converting my constitutional status into a statutory fiction without my voluntary agreement, violating *Hale v. Henkel*, 201 U.S. 43 (1906), and *Fong Yue Ting v. United States*, 149 U.S. 698 (1893), which affirm that statutory duties require reciprocal consent, as articulated in the consent of the governed principle of the Declaration of Independence.

173. The same constitutional-versus-statutory distinction governs the meaning of the word "State." I was, at the time of the incident, a traveler and transient person merely passing through South Carolina in my private mobile home, not domiciled within any state or territory, and not domiciled within, and having not elected into, the statutory "State" as that term is defined within the regulated and franchise contexts in which civil codes operate. Federal law itself recognizes that "State" is a defined term whose statutory meaning is broader, and different in kind, than the constitutional sovereign: for the purposes of the diversity statute, for example, "State" is defined to include the territories and the District of Columbia. See 28 U.S.C. § 1332(d)(10) and (e). A private traveler passing through in his own conveyance, invoking the common law and the constitutional liberty of locomotion, stands outside the statutory "State" in the same way that a "national" stands outside the statutory "United States." The Defendants' presumption that my transient presence within South Carolina's geographic borders placed me within the statutory "State" for purposes of the Title 56 franchise confuses the constitutional sovereign with the statutory defined term, and supplies no lawful basis for imposing franchise obligations upon me absent evidence

of my voluntary election into any domiciliary status or franchise participation.

174. Plaintiff's distinction between political nationality and domicile-based civil status rests on the text of the governing statutes and on the Supreme Court's own recognition that the term "United States" is not monovalent. As the Court explained in *Hooven & Allison Co. v. Evatt*, 324 U.S. 652, 671–72 (1945): "The term 'United States' may be used in any one of several senses. It may be merely the name of a sovereign occupying the position analogous to that of other sovereigns in the family of nations. It may designate the territory over which the sovereignty of the United States extends, or it may be the collective name of the states which are united by and under the Constitution." Congress has legislated against precisely that distinction: it defines a "national of the United States" to include "a person who, though not a citizen of the United States, owes permanent allegiance to the United States," 8 U.S.C. § 1101(a)(21), separately from a "citizen of the United States," 8 U.S.C. § 1401; and in the revenue laws it defines "United States," "when used in a geographical sense," to mean "only the States and the District of Columbia," 26 U.S.C. § 7701(a)(9), with "State" construed to "include the District of Columbia," *id.* § 7701(a)(10)—definitions that correspond to Congress's exclusive legislative authority over federal territory under Article IV, § 3, cl. 2. These are the binding sources of the political-versus-civil distinction on which Plaintiff relies. Plaintiff rests that distinction on nothing broader than the statutory text and the Court's recognition in *Hooven* that the same words bear different meanings in different legal contexts; he does not contend that his nationality places him beyond the reach of all law, only that civil obligations follow domicile and consent rather than transient presence.

Clarification of *United States v. Wong Kim Ark*, 169 U.S. 649 (1898), and Its Proper

Application to This Petition

175. Plaintiff cites *United States v. Wong Kim Ark*, 169 U.S. 649 (1898), at several points in this Petition, and states its holding precisely so that the citation is applied only for the proposition it genuinely supports. *Wong Kim Ark* arose when the United States denied reentry to a man born in San Francisco to Chinese parents who were lawful, domiciled residents of the United States, contending that he was not a citizen. The Supreme Court rejected that contention and held that a child born within the territory of the United States, in the allegiance and under the protection of the country, is a citizen of the United States under the Citizenship Clause of the Fourteenth Amendment. In reaching that holding, the Court examined at length the English common-law rule of *jus soli* and the law of allegiance, and it framed citizenship as arising from two sources, and two only: birth and naturalization.

> "The fourteenth amendment affirms the ancient and fundamental rule of citizenship by birth within the territory, in the allegiance and under the protection of the country, including all children here born of resident aliens, with the exceptions or qualifications (as old as the rule itself) of children of foreign sovereigns or their ministers, or born on foreign public ships, or of enemies within and during a hostile occupation of part of our territory, and with the single additional exception of children of members of the Indian tribes owing direct allegiance to their several tribes." *United States v. Wong Kim Ark*, 169 U.S. 649, 693 (1898).

176. Two features of the Court's reasoning bear directly on this Petition. First, *Wong Kim Ark* distinguishes nationality, which is a political status arising by birth within the allegiance of the sovereign, from naturalization, which is a civil status conferred only under the authority and in the forms of law. Second, the Court grounded its holding in status concepts—allegiance, protection, and the lawful domicile of the resident parents—rather

than in the bare geographic happenstance of physical presence. The decision therefore recognizes, as a matter of constitutional structure, that the political incidents of nationality and the civil incidents of status are conceptually distinct, even where they coincide in the same individual.

177. Plaintiff cites *Wong Kim Ark* for that distinction, and for nothing broader. The governing statutes track the very same division. The immigration laws define a national of the United States to include "a person who, though not a citizen of the United States, owes permanent allegiance to the United States," 8 U.S.C. § 1101(a)(21), separately from a "citizen of the United States," 8 U.S.C. § 1401; and the revenue laws define the "United States" geographically to mean the federal territories, 26 U.S.C. § 7701(a)(9), consistent with Congress's exclusive legislative jurisdiction over such territory under Article IV, § 3, cl. 2. Read together with these provisions, *Wong Kim Ark* supports the proposition that nationality—political allegiance—and the civil status that fixes a person's statutory obligations—keyed to domicile within a particular jurisdiction—are distinct, and that the latter does not arise from transient physical presence alone.

178. Plaintiff anticipates that Defendants may invoke *Wong Kim Ark* for the converse point—that birth within a State of the Union itself makes one a citizen of the United States—and may argue that the case defeats Plaintiff's status assertions. It does not. Plaintiff does not dispute the holding of *Wong Kim Ark*, and he does not deny his own nationality or his citizenship in the political sense. He cites the case for the narrower and undisputed principle that nationality is analytically distinct from the domicile-based civil status that subjects a person to a particular body of statutory civil law. The question presented in this action is not whether Plaintiff is a citizen, but whether his transient

presence on a South Carolina highway—without domicile, and without the voluntary acceptance of any franchise—converted him into a statutory "person" subject to Title 56. *Wong Kim Ark*, which fixes status by allegiance and domicile rather than by momentary presence, supports Plaintiff on that narrower question.

179. Applied to this controversy, *Wong Kim Ark* confirms that Plaintiff's political status as a "national" and "state national" under 8 U.S.C. § 1101(a)(21) is a matter of birth and allegiance, while the civil obligations the Defendants sought to impose depend upon a separate jurisdictional predicate: domicile within, or voluntary election into, the statutory "State" and "United States," or participation in a regulated franchise. Plaintiff, traveling privately and transiently through South Carolina without domicile and without franchise participation, supplied no such predicate. The Defendants' presumption that Plaintiff's mere presence rendered him a statutory "citizen" or "person" subject to Title 56 confuses the political status that *Wong Kim Ark* addresses with the domicile-based civil status that it does not, and that the governing statutes require.

Federal Confirmation: Franchise Statutes Reach Only Those Who Participate in the Regulated Franchise — *License Tax Cases*

180. The United States Supreme Court in the *License Tax Cases*, 72 U.S. 462 (1866), confirmed that civil statutory regulations operate upon the franchise activity they regulate—not upon private persons outside that activity. The regulatory reach of a civil franchise statute extends precisely as far as the franchise extends—no further.

181. Title 56 of the South Carolina Code is, in its operative provisions, a civil franchise statute. It regulates the use of public roads for commercial and quasi-commercial purposes, requiring registration, licensing, and insurance of those who use those roads as

drivers—persons who have accepted the state's franchise. A private individual traveling in his own conveyance for purely private, non-commercial purposes has not accepted this franchise and is not subject to its terms.

182. When Corporal Plyler applied Title 56 to Plaintiff's private, non-commercial travel, he applied a commercial franchise statute to a person outside the franchise. That application was unauthorized at its source. It was not a mistake of degree—it was a mistake of kind, applying a law in a domain where it had no operative reach.

183. The principle that a franchise statute reaches only those who have accepted the franchise is reinforced by the Supreme Court's unconstitutional-conditions jurisprudence, which forbids the State from achieving by condition what it could not command directly. In *Frost & Frost Trucking Co. v. Railroad Commission of California*, 271 U.S. 583 (1926)—a case arising, as this one does, from the State's regulation of the use of its public highways—the Court held that even where the State may withhold a privilege altogether, it may not grant that privilege upon the condition that the recipient surrender a constitutional right; for if it could, "the constitutional guaranties, so carefully safeguarded against direct assault, are open to destruction by the indirect, but no less effective, process" of unconstitutional conditions, such that those guaranties "may thus be manipulated out of existence." *Id.* at 593–94. South Carolina may not, consistent with *Frost*, condition Plaintiff's pre-existing liberty to use the public way upon his surrender of his private status and his entry into the Title 56 franchise.

184. The boundary of regulatory reach is the boundary between public and private right that the Court drew in *Munn v. Illinois*, 94 U.S. 113, 139–40 (1876): property becomes subject to

public regulation only where it has been "dedicated by the owner to public uses," or where "the use of [it] was granted by the government, or in connection with which special privileges were conferred"; "unless the property was thus dedicated … the property was not affected by any public interest so as to be taken out of the category of property held in private right." Plaintiff dedicated nothing, accepted no governmental grant, and conferred upon himself no special privilege; his conveyance therefore remained, in *Munn*'s own terms, "property held in private right," outside the regulatory reach Title 56 asserts. And because Title 56 operates through defined terms—"driver," "person," "vehicle"—its reach is fixed by those definitions: "It is axiomatic that the statutory definition of the term excludes unstated meanings of that term." *Meese v. Keene*, 481 U.S. 465, 484–85 (1987); *accord Stenberg v. Carhart*, 530 U.S. 914, 942 (2000). A private traveler who falls outside those definitions is not reached by the statute that employs them.

Vehicle Registration Is the Act of Converting a Private Conveyance into Public Property; Plaintiff's Unregistered Conveyance Was Categorically Outside the Impoundment Scheme

185. Vehicle registration is not merely an administrative formality. It is the constitutional act by which a private individual voluntarily converts his private conveyance into public property subject to state oversight, regulation, and the full commercial franchise scheme of Title 56 of the South Carolina Code. By submitting a registration application, paying fees, affixing state-issued license plates, and accepting the state's certificate of title, the vehicle owner places his conveyance within the stream of publicly-regulated commerce and consents to the entire body of rules governing that stream.

186. Plaintiff performed none of these acts. His mobile home bore no state-issued license plates because he had not registered it—because registration is a voluntary act of franchise

participation that Plaintiff explicitly declined. The absence of plates was the accurate and visible expression of his private status. A conveyance that has not been registered has not been converted from private property to public property. It remains, in the constitutional sense, entirely private.

187. The impoundment scheme established by Title 56 of the South Carolina Code applies only to registered vehicles brought within the public franchise. It does not and cannot apply to a private conveyance that has never been submitted to registration. Corporal Plyler's initiation of the impoundment based on the absence of license plates was an attempt to apply impoundment authority to a vehicle that fell outside the statute's jurisdictional predicate. That application was *ultra vires* from its inception.

Equity Abhors a Forfeiture: The Impoundment Operated as a De Facto Forfeiture and Is Subject to the Anti-Forfeiture Maxim

188. Where impoundment of a private vehicle operates in substance as a forfeiture — extracting fees as a condition of return and exposing the property to risk of conversion if unredeemed — equity scrutinizes the operation with the maxim that equity abhors a forfeiture. The maxim does not bar lawful regulatory action, but it requires that the substance of the deprivation not exceed the lawful predicate, and that the conditions of return be no more onerous than necessary to vindicate the State's legitimate interest. The impoundment of Plaintiff's dwelling here functioned as a forfeiture in substance — Plaintiff was compelled to surrender fees as a condition of recovering his own home, and his dwelling was exposed to permanent loss if the redemption price were not paid. Equity will not enforce that operation against a private man who never entered the franchise the impoundment scheme presupposes. 1 Pomeroy §§ 433–460 (relief against forfeiture); *Peirce v. Hoffman*, 6 N.J.

Eq. 14 (1846). *Bennis v. Michigan*, 516 U.S. 442 (1996), is not to the contrary. *Bennis* sustained a statutory abatement forfeiture of property that had been used to commit a crime, entered after a judicial proceeding; it did not address, and does not authorize, a warrantless seizure of the kind complained of here. In this case there was no crime, no judicial forfeiture proceeding, and no pre-deprivation or post-deprivation hearing of any kind. Plaintiff's objection is precisely to the seizure and retention of his dwelling without any process at all—a question *Bennis* did not reach.

Title 56 Fails Every Criterion of Real Law as Applied to Plaintiff's Private Non-Commercial Travel — The Twelve Criteria

189. To distinguish authentic law—which a court of common law and equity is bound to enforce—from a franchise or civil statutory privilege that requires consent, Plaintiff offers the following twelve-criterion test derived from Frederic Bastiat's *The Law*, Lysander Spooner's *Natural Law*, and the constitutional law of this republic. Every authentic law satisfies all twelve criteria. Any enactment that fails one or more is not law in the constitutional sense but a franchise operating only upon those who consent.

190. **CRITERION 1 — Universality:** Real law applies equally to all persons without distinction of class, status, or civil office.

191. **CRITERION 2 — Delegability:** Real law cannot authorize the collective to do what no individual member could do alone. No individual can delegate a right he does not himself possess.

192. **CRITERION 3 — Harm-Based Standing:** Real law cannot punish a private individual for an innocent action that neither constitutes a crime nor produces measurable, demonstrable harm to another.

193. **CRITERION 4 — No Private Wealth Redistribution:** Real law cannot compel the redistribution of wealth between two private parties.

194. **CRITERION 5 — Non-Interference with Private Contracts:** Real law cannot impair the right of contract between private parties absent a commercial nexus or injury to a third party.

195. **CRITERION 6 — Non-Interference with Private Property:** Real law cannot interfere with the use, enjoyment, or control of private property so long as that use injures no one. Any such interference is, at common law, a trespass.

196. **CRITERION 7 — Territorial Rather Than Status-Based Attachment:** Rights and obligations under real law attach to land and physical presence, not to civil status labels such as "taxpayer," "citizen," "resident," or "driver."

197. **CRITERION 8 — Corrective, Not Preventive Operation:** Real law provides a remedy after injury occurs. Any enactment requiring advance compliance as a condition of exercising a natural right before any injury has occurred is a franchise requiring consent, not law.

198. **CRITERION 9 — Not Dependent on Consent of Those Regulated:** Real law does not acquire force from the consent of those against whom it is enforced. Licensing, registration, and franchise participation are contracts, not law.

199. **CRITERION 10 — Does Not Include Compacts Between Persons and Government:** Rights that are unalienable cannot be contracted away even with consent.

200. **CRITERION 11 — Cannot Be Voluntary:** Real law is not voluntary—it is universally binding on all within its proper reach.

201. **CRITERION 12 — Does Not Include Franchises, Licenses, or Civil Statutory Codes:**

Franchises, licenses, and civil statutory codes derive all of their operative force from consent expressed through voluntary choice of civil domicile or participation in a regulated activity.

202. Title 56 of the South Carolina Code, as applied to Plaintiff's private non-commercial travel on June 24, 2023, fails Criteria 1, 2, 3, 6, 7, 8, 9, and 12. It applies only to statutory "drivers" who accepted the franchise; it punishes Plaintiff for activity that injured no one; it operated preventively rather than correctively; and it derives its operative force entirely from a franchise that Plaintiff has not entered. Corporal Plyler's enforcement was therefore not enforcement of law. It was *ultra vires* compulsion without legal foundation.

Franchise Enforcement Without Consent Is Structural Compulsion: The Commercial Analogy

203. The structural defect of Defendants' enforcement theory is most clearly exposed by a commercial analogy. Imagine a private business whose franchise agreement applies only to those who have voluntarily entered the business's premises and accepted its terms. Now imagine that business's employees rushing into the public street, stopping a passerby, placing him in restraints, and charging him for failing to purchase the business's product—a product he never agreed to buy, never wanted, and walked past without entering the business at all.

204. No one disputes that such conduct would violate the most fundamental principles of contract law, property law, and personal liberty. The business's franchise terms apply only to those who voluntarily enter the franchise. A passerby who has not entered creates no obligation. Any physical compulsion would be tortious assault and false imprisonment.

205. Title 56 of the South Carolina Code is precisely such a franchise agreement. Plaintiff had not entered that franchise on June 24, 2023. He was traveling privately and non-commercially in his own conveyance without any commercial nexus. Corporal Plyler, acting as enforcement agent of the state's franchise scheme, stopped a private passerby and compelled compliance with franchise terms that passerby had never accepted. The fact that Plyler was a government officer rather than a private business employee does not change the constitutional structure: it was compulsion without contractual basis, trespass without authority, and conversion without right.

C. Evidence of Ultra Vires Acts

206. The seizure and coercion show actions without legal basis, exceeding authority under Title 56 of the South Carolina Code, which applies only to commercial "drivers," not private travelers. The Constitution is law for government, not the people, and statutory civil law regulates only government instrumentalities and officers, not private persons absent consent. My affidavit details coercion and refusal of my private status, negating lawful consent (*Brady v. United States*, 397 U.S. 742 (1970)). These actions demonstrate a willful disregard for my constitutional protections.

Sovereign Immunity Is Forfeited When the Government Alienates Unalienable Rights — *United States v. Lee*

207. Sovereign immunity attaches to the sovereign acting lawfully. A government that acts to alienate the unalienable rights of a private individual is not acting as the sovereign at all; it is acting as a trespasser wielding power without legitimate authority. In that posture, it forfeits the immunity that would otherwise attach to lawful governmental conduct.

208. The rights at issue here—the right to liberty of movement, the right to be secure in one's person and property against unreasonable seizure, the right to due process before deprivation of one's dwelling—are designated "unalienable" precisely because they cannot lawfully be stripped without consent. A government officer who strips a man of his dwelling without warrant, without hearing, without consent, and without any commercial nexus bringing that man within the statute's reach, has not exercised sovereign power. He has committed a trespass. The State's immunity does not follow him into that act.

209. *United States v. Lee*, 106 U.S. 196, 220-221 (1882), is dispositive: "No man in this country is so high that he is above the law. No officer of the law may set that law at defiance with impunity. All the officers of the government, from the highest to the lowest, are creatures of the law and are bound to obey it... Shall it be said that the courts cannot give remedy when the Citizen has been deprived of his property by force, his estate seized and converted to the use of the government without any lawful authority?" The answer the Supreme Court gave in *Lee* is the same answer this Court must give here: no.

210. SCHP policies allowed officers to act beyond their authority, breaching their fiduciary duty.

D. Mens Rea and Destruction of Plausible Deniability

211. Defendants, as public officers and fiduciaries, had a legal and moral duty to respond to my notices. Their deliberate silence not only violates this duty but also, under established common law principles, constitutes an admission of the facts therein. As fiduciaries, their failure to act or respond amounts to constructive fraud and estoppel, precluding them from denying the truth of my claims. This silence, coupled with their actions, demonstrates a

knowing and intentional violation of my rights, as affirmed in *In re Grand Jury Subpoena*, 341 U.S. 123 (1951). Defendants' silence further invokes estoppel by acquiescence under settled common law principles, barring them from denying Plaintiff's claims absent evidence to the contrary.

212. At common law, a government officer acting beyond the scope of his lawful authority has never enjoyed personal immunity for the trespasses that result. The common law did not recognize a defense of reasonable belief in the lawfulness of an *ultra vires* act—an officer who seizes private property without a warrant or lawful authority is a trespasser, and his belief in the propriety of his conduct is no defense to a claim in trespass or conversion. *Entick v. Carrington*, 19 Howell's State Trials 1029 (1765), established that no officer may justify an unauthorized seizure by claiming he acted in good faith under color of authority. *Little v. Barreme*, 6 U.S. 170 (1804), confirmed that an officer acting beyond a lawful grant is personally liable regardless of good faith.

213. No grant of authority — lawful or otherwise — authorized Corporal Plyler to coerce a private individual's compliance with statutory commands by physically preventing him from rolling up his own vehicle window, by reaching into the vehicle and unlocking the door, by physically extracting him from his mobile home, by handcuffing him, or by directing the warrantless removal of his dwelling without pre-deprivation hearing. These acts are trespasses on their face. The common law has never required Plaintiff to overcome any immunity doctrine to obtain redress for a naked trespass upon his person and property.

214. The notification to government officials, including Comptroller General Brian J. Gaines, Governor Henry Dargan McMaster, Colonel Christopher N. Williamson, and Director

Robert G. Woods IV, establishes the Defendants' willful intent and eliminates any claim of ignorance. Plaintiff directly notified these officers, providing each with a detailed account of the Defendants' unlawful actions and his demands for redress. Their failure to respond or intervene, despite direct and exhaustive notice, reflects a deliberate intent to allow the violations to persist, implicating the broader governmental structure of the State of South Carolina.

215. Supervisory liability attaches under common law and constitutional tort doctrine where a supervising officer: (1) was personally involved in the constitutional deprivation; (2) set in motion a series of acts by others which he knew or reasonably should have known would cause the constitutional injury; or (3) knew of a subordinate's unconstitutional conduct and acquiesced in it by failing to act. Colonel Christopher N. Williamson, as Commander of the South Carolina Highway Patrol, established or maintained the policies, customs, and training under which Corporal Plyler operated, and his failure to respond to Plaintiff's administrative notices constitutes deliberate indifference to a known deprivation. Robert G. Woods IV, as Director of the South Carolina Department of Public Safety, bore ultimate supervisory authority over the South Carolina Highway Patrol and an independent duty to ensure that its officers acted within lawful authority; his failure to intervene constitutes acquiescence in the wrong. Supervisory failure to respond to Plaintiff's administrative demands constitutes institutional ratification.

216. The supervisory liability standard applied in the Fourth Circuit, whose case law governs constitutional tort claims arising in this jurisdiction, is set forth in *Shaw v. Stroud,* 13 F.3d 791, 799 (4th Cir. 1994), which holds a supervisory officer personally liable where the plaintiff establishes that the supervisor had "actual or constructive knowledge" that his

subordinate "was engaged in conduct that posed a pervasive and unreasonable risk of constitutional injury," and that the supervisor's response was "so inadequate as to show deliberate indifference to or tacit authorization of the alleged offensive practices." This standard is fully consistent with *Ashcroft v. Iqbal*, 556 U.S. 662, 676 (2009), which forecloses pure respondeat superior in constitutional tort cases but expressly preserves personal liability for the supervisor's own deliberate, knowing acquiescence in subordinate misconduct. The standard is satisfied here as to each of the three named supervisory Defendants by the operative facts pleaded in the preceding paragraphs: each was identified by name as an intended recipient on the face of Plaintiff's administrative notices; each was served, through the Office of the Comptroller General as State fiscal agent and through his own published official electronic mail address, with the True Bill, the Declaration of Rights Violations, and the Final Notice; each received the notices across two rounds of service spanning more than nine weeks; and each maintained complete silence in the face of repeated, particularized, and unanswered demands for correction. Colonel Williamson, as Commander of the South Carolina Highway Patrol, received Plaintiff's sworn Declaration of Rights Violations and the supporting True Bill identifying, with specificity, the warrantless seizure of June 24, 2023; the false arrest; the warrantless extraction from Plaintiff's mobile home; and the strip search at the Horry County detention facility. Colonel Williamson held the operational authority, after notice, to investigate the conduct of his subordinate Corporal Plyler, to discipline, to retrain, to issue corrective orders to the SCHP command staff, to circulate the substantive defects in the enforcement pattern Plaintiff identified, and to make Plaintiff whole. He did none of these things. He maintained complete silence in the face of two rounds of formal notice and a third notice of default. The harm is not that Colonel Williamson failed to halt the seizure as it occurred — he had no contemporaneous knowledge of it; the harm is that, having received full and particularized notice of the unconstitutional conduct of an officer under his direct command, he chose to ignore the notice, to leave the wrong uncorrected, and to leave Plaintiff without redress. That deliberate post-notice silence is, in equity, ratification of the underlying wrong, and it imposes upon Colonel Williamson a personal liability independent of, and in addition to, the liability arising from his command relationship with Corporal Plyler. Director Woods, as Director of the South Carolina Department of Public Safety, received the identical notices and bore the institutional authority — after notice — to direct the South Carolina Highway Patrol to investigate, to discipline, to retrain, to reassign, and to issue agency-wide corrective guidance preventing the recurrence of the pattern Plaintiff identified, and to make Plaintiff whole. He did none of these things. His silence is, in equity, agency-wide ratification, and it imposes a personal liability commensurate with the institutional authority he holds and elected not to exercise. Governor McMaster, as chief executive officer of the State of South Carolina with constitutional authority to direct executive-branch policy and to require accountability of subordinate executive officers, received the same notices, undertook no corrective action of any kind, and stands in the same posture of post-notice silence amounting to ratification. Each supervisory Defendant's post-notice silence is not mere inaction; it is the deliberate choice that *Shaw* identifies as the substantive predicate for personal supervisory liability. Pursuant to *Hafer v. Melo*, 502 U.S. 21, 25–31 (1991), the resulting individual-capacity judgments run against the personal assets of each supervisory Defendant who is shown to have satisfied the *Shaw* standard on the proof at trial.

Monell Municipal Liability: The SCHP's Institutional Enforcement Pattern and Supervisory Silence Establish a Custom of Deliberate Indifference

217. Municipal and institutional liability under *Monell v. Department of Social Services*, 436 U.S. 658 (1978), attaches where a constitutional deprivation results from an official policy, a longstanding custom, or deliberate indifference to known constitutional risks. The June 24, 2023 seizure was the institutional application of the SCHP's standard enforcement policy: stop any vehicle without franchise documentation, demand franchise credentials, arrest for non-production, impound the vehicle. This is the SCHP's uniform approach to every vehicle on every public road.

218. The institutional pattern is established by: (1) the June 24, 2023 seizure executed by Corporal Christopher A. Plyler under the command, supervision, and policies of Colonel Christopher N. Williamson, Commander of the South Carolina Highway Patrol, and Robert G. Woods IV, Director of the South Carolina Department of Public Safety; (2) the uniformity of the enforcement approach applied across South Carolina by SCHP officers acting under identical training and standing orders; and (3) the complete failure of supervisory defendants—including the Commander of the South Carolina Highway Patrol and the Director of the South Carolina Department of Public Safety—to respond to Plaintiff's notices despite actual delivery. Supervisory silence constitutes deliberate institutional ratification of the enforcement pattern.

219. Moreover, the SCHP's failure to train its officers on the constitutional distinction between private travel and commercial driving—between franchise participants subject to Title 56 enforcement and private individuals who have not entered the franchise—constitutes the failure-to-train basis for municipal liability identified in *City of Canton v. Harris*, 489 U.S.

378 (1989). The SCHP's failure to train its officers to recognize this distinction is the custom or policy that caused Plaintiff's injury on June 24, 2023.

220. Where a constitutional violation arises from an official policy or custom, or from a supervisor's deliberate indifference to a subordinate's known misconduct, supervisory liability is established. *Monell*, *supra*. Plaintiff's notices, served by certified mail and confirmed delivered, gave each supervising Defendant actual and constructive notice of the alleged violations and of the deprivation. Their collective silence is not mere inaction—it is affirmative acquiescence, which at common law and in equity operates as adoption of the wrongful conduct and personal liability for its continuation. Under *Mutual Life Insurance Co. v. Hilton-Green*, 241 U.S. 613, 622 (1916), this notice imputes knowledge to the State, rendering their inaction a willful act.

221. The Defendants' willful intent aligns with the biblical assertion that all civil rulers, absent divine authority, represent Satan rather than God (Luke 4:5-7). Their refusal to acknowledge my God-given rights and their persistence in enforcing man-made laws over me reflect a satanic usurpation of authority, further evidencing their *mens rea* and *ultra vires* conduct.

E. Fraudulent Statutory Presumptions

222. Plaintiff asserts that Defendants' application of Title 56 of the South Carolina Code to his private, non-commercial travel is fraudulent, lacking lawful foundation. As in *Chrysler Corp. v. Brown*, 441 U.S. 281, 305 n.23 (1979), where no organic act supported the agency's asserted authority, Defendants lack statutory authority over Plaintiff absent his consent. Such presumptions are void under the Due Process Clause and *Fuentes v. Shevin*, 407 U.S. 67 (1972). The void-for-vagueness doctrine renders Defendants' application of

Title 56 unconstitutional as applied, as it fails to provide fair notice to a person of ordinary intelligence that private, non-commercial travel requires licensing, inviting arbitrary enforcement.

223. The Bible prohibits Christians from engaging in presumptions (Proverbs 18:13), and Defendants' reliance on fraudulent statutory presumptions to assert jurisdiction over me violates both God's law and constitutional due process, rendering their actions void *ab initio*.

224. The infirmity of the Defendants' position is not merely that their presumption is mistaken; it is that a presumption of this kind cannot lawfully bear the weight the Defendants place upon it. A line of United States Supreme Court authority spanning more than a century holds that a legislatively created presumption offends the Due Process Clause when it shifts the burden of proof onto the party against whom it is directed, when it lacks a rational connection between the fact proved and the fact presumed, or when it denies that party a fair opportunity to rebut it.

225. The Court stated the rule directly in *Western & Atlantic Railroad Co. v. Henderson*, 279 U.S. 639, 642–44 (1929): "A statute creating a presumption that is arbitrary, or that operates to deny a fair opportunity to repel it, violates the due process clause of the Fourteenth Amendment. Legislative fiat may not take the place of fact in the judicial determination of issues involving life, liberty, or property." The same principle controlled in *Heiner v. Donnan*, 285 U.S. 312, 329 (1932), where the Court struck down a conclusive statutory presumption as "an attempt, by legislative fiat, to enact into existence a fact which here does not, and cannot be made to, exist in actuality," reaffirming that the Court

had "held more than once that a statute creating a presumption which operates to deny a fair opportunity to rebut it violates the due process clause." And in *Vlandis v. Kline*, 412 U.S. 441, 446 (1973), the Court reaffirmed that "permanent irrebuttable presumptions have long been disfavored under the Due Process Clauses," collecting *Tot v. United States*, 319 U.S. 463 (1943), and *Leary v. United States*, 395 U.S. 6 (1969). The rule is foundational: "a constitutional prohibition cannot be transgressed indirectly by the creation of a statutory presumption any more than it can be violated by direct enactment. The power to create presumptions is not a means of escape from constitutional restrictions." *Bailey v. Alabama*, 219 U.S. 219, 239 (1911).

226. These authorities apply with full force here. The Defendants' enforcement of Title 56 against Plaintiff rested entirely on a presumption—that Plaintiff is a statutory "person" who had accepted the vehicle franchise—for which the Defendants offered, and can offer, no proof. That presumption supplied the very jurisdictional fact the Defendants were required to establish; it shifted onto Plaintiff the burden of disproving a status he never assumed; and it was applied at the roadside with no opportunity of any kind to rebut it. Under *Western & Atlantic*, *Heiner*, *Vlandis*, and *Bailey*, a presumption that performs those functions cannot satisfy due process. The burden of establishing the jurisdictional predicate rests, and remains, on the party who invokes it. *Cf. Basso v. Utah Power & Light Co.*, 495 F.2d 906, 909 (10th Cir. 1974) ("the party invoking the jurisdiction of the court has the duty to establish that [jurisdiction] does exist," and "there is a presumption against its existence").

Key Legal Principles Supporting the Plaintiff's Claims

227. 1. **Equality as Freedom's Foundation:** The Plaintiff's freedom hinges on equal treatment,

which the Defendants denied by targeting him without cause.

228. 2. **Consent Requirement:** Franchises and statutory duties require the Plaintiff's consent, which he never gave, rendering the Defendants' actions unlawful.

229. 3. **Justice as Being Left Alone:** Justice, defined as the right to be left alone (Olmstead v. United States, 277 U.S. 438 (1928)), was violated by the Defendants' interference with the Plaintiff's lawful private travel.

230. 4. **Burden of Proof:** The Defendants must prove their authority, a burden they have not met, admitting the Plaintiff's claims by default.

231. These principles, grounded in both federal and South Carolina law, demonstrate that the Plaintiff's actions are lawful and that the Defendants' conduct is not, entitling him to redress for their violations of equal protection and equal treatment.

EQUITY MAXIMS GOVERNING THIS PROCEEDING

He Who Seeks Equity Must Do Equity — Plaintiff's Affirmation of the Maxim

232. Plaintiff comes before this Court of equity affirming, without qualification, the principle that he who seeks equity must do equity. Plaintiff's invocation of this Court's equitable jurisdiction is conditioned upon his own willingness to be bound, in his own conduct toward Defendants, by the same standards of equity and conscience he asks this Court to apply to them. Plaintiff is, and at all times has been, prepared to abide by every equitable obligation that adheres to his pursuit of the remedies sought herein — including, without limitation, the obligations of candor, of clean dealing, of forbearance from any inequitable advantage, and of submission to such conditions, restorative orders, or accountings as the Court in its conscience may impose as a condition of the equitable relief he seeks. 1 Pomeroy §§ 385–388; *Precision Instrument Mfg. Co. v. Automotive Maintenance Mach.*

Co., 324 U.S. 806, 814–15 (1945). Plaintiff makes this affirmation not as a concession that any sum is in fact owing by him to Defendants — none is owing, the underlying citation was *ultra vires* and void at its source — but as a categorical commitment that no equitable defense premised on the doctrine of doing equity is available to Defendants on this record. Plaintiff stands ready to submit to any equitable accounting this Court may direct as a condition of the relief he seeks, and reserves no inequitable advantage of his own.

Plaintiff Comes With Clean Hands; Defendants Cannot

233. Plaintiff comes before this Court with clean hands. His conduct on June 24, 2023 — operating his own conveyance for his own private purposes upon a public way — was lawful, peaceful, and harmed no person. Defendants by contrast cannot come with clean hands: they have refused to respond to administrative notices identifying the conduct now sued upon; they have continued the policies and customs that produced this seizure; and they assert immunity for acts that exceeded any lawful authority. Equity is not bound to assist a litigant whose hands are unclean, and that doctrine here favors Plaintiff and burdens Defendants. 1 Pomeroy §§ 397–399; *Precision Instrument*, 324 U.S. at 814–15; *Keystone Driller Co. v. General Excavator Co.*, 290 U.S. 240, 244–45 (1933).

Equitable Tolling: Defendants' Conduct Tolls Any Limitations Period

234. To the extent any limitations period applicable to any claim alleged herein might otherwise operate to bar that claim, Plaintiff invokes the doctrine of equitable tolling. Defendants' silence in the face of administrative notice, their refusal to provide a forum for pre-deprivation hearing, and their continuing assertion of authority to repeat the conduct alleged has tolled any limitations period that might otherwise apply. *Holmberg v. Armbrecht*, 327 U.S. 392, 396–97 (1946); *Glus v. Brooklyn E. Dist. Terminal*, 359 U.S.

231, 232–33 (1959); 2 Pomeroy §§ 917–919 (laches/limitations interaction).

FIRST CAUSE OF ACTION (Trespass to Chattels)

235. Plaintiff re-alleges and incorporates by reference each of the foregoing paragraphs as though fully set forth herein.

236. The elements of trespass to chattels are (1) Plaintiff's possession of, or right to immediate possession of, personal property; (2) Defendants' intentional interference with, or dispossession of, that property without consent or lawful authority; and (3) resulting deprivation of use or harm. Each element is satisfied by the conduct alleged above, including the warrantless seizure and approximately twenty-hour impoundment of Plaintiff's private mobile home.

The Comprehensive Legislative Framework Does Not Displace Common Law Trespass Where Officers Act Without Any Statutory Authority

237. Where a legislature comprehensively occupies a field of liability, courts may hold that common law actions within that field are displaced. But that doctrine presupposes that the government actor's challenged conduct falls within the field occupied by the statute. No provision of Title 56 of the South Carolina Code occupies the field of liability for a SCHP officer who unlawfully applies commercial franchise regulations to a private individual who has not consented to any franchise, has not engaged in commercial activity, and has no civil domicile triggering that statute's reach.

238. The Government Claims Act, cited here solely as evidence of the public standard for officer accountability, was not designed to immunize conduct that lies outside the scope of any lawful authority. *Entick v. Carrington*, 19 Howell's State Trials 1029 (1765),

established that no statutory framework can provide post-hoc authorization for a trespass that lacked legal authority at its inception. *Little v. Barreme*, 6 U.S. 170 (1804), confirmed that a good-faith belief in the propriety of an *ultra vires* act does not insulate an officer from personal liability.

Equitable Supplement: Constructive Trust on the Trespass Count

239. Where, as here, a common-law trespass to chattels has resulted in Defendants' temporary dispossession and use of Plaintiff's property, the equitable doctrine of constructive trust, available in this equity-governed proceeding, impresses a trust upon any benefit Defendants derived from the wrongful possession, including but not limited to any fees, charges, or assessments collected in connection with the impoundment, and by directing restitution thereof to Plaintiff. 1 Pomeroy §§ 1044–1053 (constructive trusts arising from wrongful acquisition); *id.* § 155 (constructive trust where retention would be unconscionable); *Beatty v. Guggenheim Exploration Co.*, 225 N.Y. 380, 386, 122 N.E. 378, 380 (1919) (Cardozo, J.).

Specific Recovery of Unique Chattels: The Dwelling

240. Although Plaintiff's mobile home was ultimately recovered, the dwelling is unique personal property — it is Plaintiff's residence — and its temporary loss inflicted injury that a court governed by equity remedies by specific equitable relief rather than by money alone. The doctrine of specific delivery of unique chattels is a settled equitable remedy applied to chattels of peculiar character or those serving as a residence, and is invoked here as a substantive equitable remedy available in this proceeding. 1 Pomeroy §§ 185, 1402 (specific delivery of unique chattels); 2 Joseph Story, *Commentaries on Equity Jurisprudence* §§ 708–710 (14th ed. 1918); *Burr v. Bloomsburg*, 101 N.J. Eq. 615, 138 A.

876 (1927). The inadequacy-of-legal-remedy predicate is therefore independently satisfied as to the dwelling, regardless of any post-deprivation recovery.

SECOND CAUSE OF ACTION (Conversion)

241. Plaintiff re-alleges and incorporates by reference each of the foregoing paragraphs as though fully set forth herein.

242. The elements of conversion are (1) Plaintiff's ownership of, or right to possession of, personal property; (2) Defendants' wrongful exercise of dominion or control over that property inconsistent with Plaintiff's rights; and (3) resulting deprivation. Each element is satisfied by the conduct alleged above, including the seizure, towing, and impoundment of Plaintiff's mobile home and its withholding from Plaintiff.

Equitable Accounting and Disgorgement on the Conversion Count

243. In addition to the legal remedies for conversion, Plaintiff invokes the Court's equitable jurisdiction to order an accounting of any sums Defendants or their assigns received in connection with the wrongful dominion exercised over Plaintiff's mobile home, including towing fees, storage fees, and any administrative charges, and to order restitution and disgorgement of such sums to Plaintiff. Where the wrongdoer has profited by the wrong, equity strips the profit and restores it to the injured party. 1 Pomeroy §§ 1421–1424 (equitable accounting); Restatement (Third) of Restitution and Unjust Enrichment §§ 39–40 (Am. Law Inst. 2011); *Sheldon v. Metro-Goldwyn Pictures Corp.*, 309 U.S. 390, 399 (1940). This equitable remedy reaches ABC Mobile Auto & RV Repair as a reachable equitable defendant in possession of any sums collected in connection with the unlawful impound.

THIRD CAUSE OF ACTION (False Arrest and False Imprisonment)

244. Plaintiff re-alleges and incorporates by reference each of the foregoing paragraphs as though fully set forth herein.

245. The elements of false arrest and false imprisonment are (1) Defendants' restraint or detention of Plaintiff; (2) that was intended; and (3) that was unlawful — without Plaintiff's consent and without lawful authority or justification. Each element is satisfied by the conduct alleged above, including Plaintiff's handcuffing, arrest, and confinement following the stop of June 24, 2023.

Injunctive Supplement to False Arrest Damages

246. Beyond the legal remedy of compensatory damages, Plaintiff seeks equitable relief restraining the policy or custom under which his arrest was effected, namely the practice of detaining motorists at the point of a license-or-registration stop beyond the period reasonably necessary to address the predicate violation. In a court governed by equity, the substantive remedy of injunction is the appropriate response where money damages will not, alone, prevent recurrence of the wrong. *eBay*, 547 U.S. at 391; *Winter v. NRDC*, 555 U.S. 7, 20 (2008); 1 Pomeroy §§ 1338–1342 (injunction to restrain continuing wrong); *cf. City of Los Angeles v. Lyons*, 461 U.S. 95 (1983) (distinguishing factual posture). The injunctive relief sought here is narrowly framed to address the recurring custom under which Plaintiff's arrest was effected, and to which Plaintiff remains personally exposed by virtue of Defendants' continuing assertion of authority to repeat the conduct alleged.

B. Constitutional Violations

FOURTH CAUSE OF ACTION (Violation of the Fourth Amendment and Article I, § 10 — Unreasonable Search and Seizure)

247. Plaintiff re-alleges and incorporates by reference each of the foregoing paragraphs as though fully set forth herein.

248. The Fourth Amendment to the Constitution for the United States and Article I, § 10 of the Constitution of South Carolina secure the right to be free from unreasonable searches and seizures. A warrantless search or seizure is presumptively unreasonable unless a recognized exception applies. As alleged above, the seizure of Plaintiff's person and mobile home, and the search of Plaintiff's person, were effected without a warrant and without any applicable exception.

Fourth Amendment & Article I, § 10: Unlawful Search and Seizure

249. The seizure on June 24, 2023, constitutes an unlawful trespass upon my private property and person, violating my right to be left alone under the Fourth Amendment and Article I, § 10 of the South Carolina Constitution. These acts, executed without a warrant or probable cause, exceed any lawful authority, as affirmed by *Soldal v. Cook County*, 506 U.S. 56 (1992), which holds that seizures of property without due process infringe the Fourth Amendment. The U.S. Supreme Court has consistently held that warrantless seizures are presumptively unreasonable under the Fourth Amendment, as in *Katz v. United States*, 389 U.S. 347 (1967), and *Florida v. Royer*, 460 U.S. 491 (1983). The Defendants bear the burden of proving an exception to the warrant requirement, which they have not done.

250. The Defendants' actions further violate the principle that franchises and statutory obligations, such as those implied by the use of a driver's license or vehicle registration, require my express consent, as articulated in *Murdock v. Pennsylvania*, 319 U.S. 105

(1943), which holds that a state may not convert a secured liberty into a privilege and exact a license fee for its exercise. Absent evidence of my voluntary participation in any government franchise, the seizure of my mobile home infringed my private property rights, which the government cannot impair without consent.

251. Under the common law, a detention of the person is lawful only when grounded in articulable facts giving rise to a reasonable and particularized suspicion that a wrong has been committed—not mere inference or presumption. *Terry v. Ohio*, 392 U.S. 1 (1968); *Delaware v. Prouse*, 440 U.S. 648 (1979). Corporal Plyler's sole stated basis for the stop was the absence of license plates. The absence of a plate on a vehicle that the officer had no independent basis to presume was engaged in commercial activity does not, under common law principles of reasonable conduct, justify the detention of a private individual exercising his right to travel. *Florida v. Royer*, 460 U.S. 491 (1983). The stop was constitutionally defective at inception, and every act flowing from it—the removal from the mobile home, the arrest, the impound, the search—is tainted by that initial unlawful contact.

Strict Scrutiny Applies: Any Government Burden on the Fundamental Right to Travel Must Serve a Compelling Interest by the Least Restrictive Means

252. The right to travel is a fundamental right. *Shapiro v. Thompson*, 394 U.S. 618 (1969); *Kent v. Dulles*, 357 U.S. 116 (1958). Any government statute that substantially interferes with its free exercise is subject to strict scrutiny: the government must demonstrate a compelling governmental interest, achieved by the least restrictive means available.

253. The Title 56 of the South Carolina Code, as applied to Plaintiff's private non-commercial

travel, fails strict scrutiny on both elements. On the first element: the State has no compelling interest in requiring a private individual not engaged in commercial activity, who has not applied for a franchise, to carry a driver's license, register his conveyance, or maintain insurance. The compelling interests typically associated with vehicle regulation have no application to a private individual making private use of his own conveyance.

254. On the second element: even if the State could articulate a compelling interest, Title 56 as applied here was not the least restrictive means. Corporal Plyler's first and only option was stop, detain, and impound—the most intrusive possible response. He made no inquiry into whether commercial use was occurring, afforded Plaintiff no opportunity to demonstrate his private status, and considered no less restrictive alternative. A strict scrutiny analysis Defendants must survive is one they cannot pass.

The Unconstitutional Conditions Doctrine: The Government May Not Condition the Exercise of One Constitutional Right on the Surrender of Another

255. The unconstitutional conditions doctrine is among the most firmly established principles in American constitutional law: the government may not condition the exercise of a constitutional right on the surrender of another constitutional right, or on compliance with arbitrary requirements that burden the right's exercise without serving a compelling governmental interest. *Sherbert v. Verner*, 374 U.S. 398 (1963); *Soldal v. Cook County*, 506 U.S. 56 (1992); *Shuttlesworth v. Birmingham*, 394 U.S. 147 (1969).

256. Applied here: Corporal Plyler conditioned Plaintiff's right to travel freely—a fundamental constitutional right—on Plaintiff's production of a state-issued driver's license and vehicle registration. These are franchise documents available only to those who have voluntarily

entered South Carolina's vehicle franchise. Demanding them from a private traveler who has not entered the franchise conditions the exercise of a fundamental right on the acceptance of a commercial franchise obligation.

257. The right to travel without a license and the right to be secure in one's property against warrantless seizure are both constitutional rights Plaintiff held on June 24, 2023. Corporal Plyler's stop and demand conditioned the exercise of both on compliance with franchise requirements Plaintiff had no obligation to meet. The resulting arrest and impoundment were applications of the unconstitutional conditions doctrine in its most direct form: a government officer using physical force to extract franchise compliance that the Constitution forbids conditioning on the exercise of fundamental rights.

FIFTH CAUSE OF ACTION (Violation of the Fifth Amendment and Article I, § 3 — Due Process)

258. Plaintiff re-alleges and incorporates by reference each of the foregoing paragraphs as though fully set forth herein.

259. The Fifth Amendment to the Constitution for the United States and Article I, § 3 of the Constitution of South Carolina forbid the deprivation of life, liberty, or property without due process of law. As alleged above, Plaintiff was deprived of liberty and property without the notice, hearing, or other process that was due.

Fifth Amendment & Article I, § 3: Due Process

260. Deprivation of property without due process or just compensation, as the seizure lacked any pre-deprivation hearing or compensation. The Due Process Clause requires that individuals be given notice and an opportunity to be heard before being deprived of

property, as held in *Mullane v. Central Hanover Bank & Trust Co.*, 339 U.S. 306 (1950), and *Mathews v. Eldridge*, 424 U.S. 319 (1976). The Defendants provided no such process before seizing my mobile home, violating the due process guarantee of Article I, § 3 of the South Carolina Constitution and the Fifth and Fourteenth Amendments.

261. The weight of the private interest against which the government's procedure must be measured is not abstract here—it is concrete and severe. Plaintiff's mobile home was his dwelling and conveyance. Its seizure deprived him of shelter and mobility for the duration of the impound, while he was simultaneously arrested, handcuffed, transported to jail, strip-searched, and confined. The private interests at stake in this case sit at the apex of what due process protects: not a mere financial interest, but liberty of the person, freedom of movement, and the sanctity of the home—interests that equity has protected against arbitrary government interference since before the founding, weighed against the government's interest and the risk of erroneous deprivation.

The Four Elements of Due Process Were Entirely Absent; Their Loss Constitutes Irreparable Harm Per Se

262. The fundamental elements of constitutional due process, as articulated in *Holden v. Hardy*, 169 U.S. 366, 389 (1898), and consistently reaffirmed, require four conditions before any deprivation of life, liberty, or property: (1) reasonable notice calculated to apprise the affected party of the impending action; (2) a genuine opportunity to be heard before the deprivation is executed; (3) the absence of unrebutted presumptions operating against the party's rights; and (4) an impartial decision-maker separate from the enforcement officer. *Mullane v. Central Hanover Bank & Trust Co.*, 339 U.S. 306, 314 (1950).

263. All four elements were absent on June 24, 2023. Plaintiff received no prior notice. He was afforded no opportunity to be heard before his mobile home was removed. The officer proceeded on the presumption that Plaintiff was a statutory "driver"—a presumption Plaintiff explicitly rebutted at the scene by direct verbal notice and again after the incident through certified-mail notice—yet the presumption was never tested before the deprivation was executed. And the decision-maker was the same officer who made the initial stop: no magistrate, no hearing officer, no neutral arbiter of any kind.

264. The loss of constitutional freedoms—including the due process right to be heard before deprivation of one's home—constitutes irreparable harm as a matter of law, for even minimal periods of time. *Elrod v. Burns*, 427 U.S. 347, 373 (1976). Monetary damages alone cannot fully restore the deprivation of liberty Plaintiff suffered during his arrest and confinement; cannot undo the indignity of the unlawful strip search; and cannot remedy the prospective threat that the same enforcement pattern will recur unless affirmatively enjoined.

265. The government's administrative convenience in proceeding without a pre-deprivation hearing cannot justify the seizure of a man's dwelling and the restraint of his person without any neutral review, any opportunity to be heard, and any check on the officer's unilateral field judgment. Article I, § 3 of the South Carolina Constitution guarantees that no person shall be deprived of life, liberty, or property without due process of law, and seizures affecting a person's dwelling and liberty implicate an intersection of property and liberty interests that demands heightened judicial attention. The complete absence of any pre-deprivation process—no notice beyond the officer's on-scene declaration, no hearing, no neutral review, no opportunity for Plaintiff to contest the seizure before it was

executed—rendered the seizure constitutionally defective on its face under both federal and South Carolina due process standards.

The Impoundment Scheme as Applied Constitutes a Bill of Attainder: Punishment Without Trial

266. Article I, § 10 of the United States Constitution prohibits any state from passing a bill of attainder—a legislative act that inflicts punishment on an individual or group without the benefit of a judicial trial. Article I, § 4 of the South Carolina Constitution likewise provides that "No bill of attainder, ex post facto law, law impairing the obligation of contracts ... shall be passed." The prohibition reflects the Framers' understanding that punishment without trial is the most fundamental form of governmental tyranny.

267. The Title 56 of the South Carolina Code's impoundment scheme, as applied to Plaintiff, operates as a functional bill of attainder. The scheme works as follows: an officer seizes a vehicle based on the absence of franchise documentation; the owner is given no immediate judicial review; release is conditioned on franchise compliance; if the owner does not comply within a statutory period, the vehicle is deemed abandoned and auctioned. The permanent loss of the vehicle is imposed entirely through an administrative process with no judicial trial, no finding of guilt of any criminal offense, and no adjudication of whether the franchise requirements lawfully applied to the owner.

268. What is being punished is not the commission of a crime. No victim has been harmed. What is being punished is the non-exercise of a franchise: the failure to register a vehicle, obtain a license, and carry insurance. Imposing the permanent loss of property as the consequence of non-participation in a commercial franchise, through an administrative process that bypasses judicial trial entirely, is the structural equivalent of a bill of attainder

applied to franchise non-participants. The impound yard is not a regulatory mechanism—it is a *de facto* prison for property, holding a private man's dwelling hostage to his franchise compliance, with the final sanction of permanent confiscation if he refuses. The Constitution expressly prohibits this in Article I, § 10.

SIXTH CAUSE OF ACTION (Violation of the Fourteenth Amendment and Article I, § 3 — Equal Protection)

269. Plaintiff re-alleges and incorporates by reference each of the foregoing paragraphs as though fully set forth herein.

270. The Fourteenth Amendment to the Constitution for the United States and Article I, § 3 of the Constitution of South Carolina guarantee the equal protection of the laws. As alleged above, Defendants subjected Plaintiff to treatment not imposed upon others similarly situated, without constitutionally sufficient justification.

Fourteenth Amendment & Article I, § 3: Denial of Equal Protection

271. Denial of equal protection by failing to rebut my affidavit with a counter-affidavit, admitting facts by silence (*Carmine v. Bowen*, 64 A. 932 (1906)), and arbitrarily applying commercial regulations to my private travel, treating me differently from others without rational basis. The same principle of silence-as-acquiescence is recognized in equity as estoppel by silence where a duty to speak exists, an independent and complementary basis for the same conclusion. 1 Pomeroy §§ 802–812; *Heckler v. Community Health Servs., Inc.*, 467 U.S. 51, 59 (1984).

Violation of Equal Protection and Equal Treatment

272. The principles of equal protection and equal treatment are foundational to the rule of law,

enshrined in both the United States Constitution and the South Carolina Constitution. These principles mandate that the government treat all individuals equally under the law, without arbitrary discrimination or selective enforcement. In this case, the Defendants' actions violated these principles by arbitrarily applying statutory regulations to the Plaintiff, Thomas Edward Humphrey, despite his private, non-commercial status, and by treating him differently from others similarly situated without any rational basis.

Equal Protection Under the Fourteenth Amendment and Article I, § 3 of the South Carolina Constitution

273. The Equal Protection Clause of the Fourteenth Amendment prohibits states from denying any person within their jurisdiction the equal protection of the laws. Similarly, Article I, § 3 of the South Carolina Constitution guarantees that all individuals are entitled to equal treatment under the law. As stated in *Hurtado v. California*, 110 U.S. 516, 535-536 (1884), "[L]aw . . . must be not a special rule for a particular person or a particular case, but . . . 'the general law . . .' so 'that every citizen shall hold his life, liberty, property and immunities under the protection of the general rules which govern [ALL OF] society.'" These protections ensure that the government cannot arbitrarily impose burdens or restrictions on one individual while exempting others in similar circumstances.

274. In this matter, the Defendants' actions in seizing the Plaintiff's private mobile home on June 24, 2023, and coercing him under duress constitute a clear violation of his right to equal protection. Specifically, the Defendants applied commercial regulations, such as those under Title 56 of the South Carolina Code, to the Plaintiff's private, non-commercial use of his mobile home. This arbitrary enforcement treated him differently from other private individuals who are not subjected to such regulations for their non-commercial

activities. There is no rational basis for this differential treatment, as the Plaintiff's actions—using his mobile home for private, non-commercial travel—did not involve any commercial enterprise or public activity that would justify the imposition of statutory requirements. His conduct is lawful under the common law and constitutional guarantees, as he has not consented to any government franchise or statutory jurisdiction that would subject him to such regulations. Under the Equal Protection Clause, as interpreted in *Romer v. Evans*, 517 U.S. 620 (1996), and *City of Cleburne v. Cleburne Living Center*, 473 U.S. 432 (1985), government actions that treat individuals differently must be rationally related to a legitimate state interest. The Defendants' selective enforcement against me lacks any such rational basis, as it is based on an erroneous presumption of my status rather than any legitimate governmental objective.

275. The U.S. Supreme Court has long held that classifications or differential treatment by the government must have a rational basis. In *Reed v. Reed*, 404 U.S. 71 (1971), the Court struck down a law that preferred men over women as estate administrators, finding no rational basis for the distinction. Similarly, in *Village of Willowbrook v. Olech*, 528 U.S. 562 (2000), the Court recognized "class of one" equal protection claims, where an individual is intentionally treated differently from others similarly situated without a rational basis. The Defendants' arbitrary application of statutory regulations to my private, non-commercial use of my mobile home denies me equal protection by presuming a civil status I have not consented to, a violation recognized in *Reed v. Reed*, 404 U.S. 71 (1971). The "class of one" equal protection theory recognized in *Village of Willowbrook v. Olech*, 528 U.S. 562 (2000), affirms my right to equal treatment absent evidence of my voluntary submission to statutory jurisdiction. As a constitutional "person" distinct from a statutory

"individual," my rights under the Fourteenth Amendment and Article I, § 3 of the South Carolina Constitution shield me from such unequal treatment. Here, the Defendants' selective enforcement against the Plaintiff constitutes such a violation, as they have singled him out for treatment that others in identical circumstances—private, non-commercial travelers—do not face. The Plaintiff's use of his mobile home is a lawful exercise of his unalienable right to liberty and property, protected under the Declaration of Independence and the Constitution, and he has not consented to any statutory burdens, including the class-of-one equal protection theory recognized in *Village of Willowbrook v. Olech*, 528 U.S. 562 (2000).

Equal Protection as a Structural Ceiling on Government Authority: The State Cannot Exercise Greater Power Over an Individual Than That Individual Has Over Himself

276. Equal protection is conventionally understood as a non-discrimination rule: similarly situated persons must be treated similarly. That understanding is correct but incomplete. Its deeper structural implication is this: if all persons are equal under the law, then no government can possess authority exceeding the authority of any individual person who comprises it. The government can have no power that was not delegated to it by the people. And since no individual has the right to compel his neighbor to register his property, purchase insurance he does not want, or submit to detention absent evidence of a wrong committed, neither can the government exercise those powers absent the affected individual's consent.

277. This is not a novel proposition. The Declaration of Independence states it plainly: governments are instituted to secure pre-existing rights, deriving their just powers from the consent of the governed. A government that acts beyond the powers so delegated acts

without just power—it acts as a private wrongdoer wielding force without authority. Equal protection, understood in its full structural dimension, means that the government stands under the same law as every other person: it may not take what it has no right to take, compel what it has no right to compel, or presume what it has no right to presume.

278. Applied here: Corporal Plyler had no individual right—and therefore the State of South Carolina through him had no delegated right—to demand that Plaintiff produce a driver's license, register his property, carry insurance he had not contracted for, or submit his dwelling to seizure without a warrant, without consent, and without a hearing. These acts require prior authority, prior process, or prior consent. None existed.

A Government of Delegated Powers Cannot Possess More Authority Than the Individual Human Being Who Did the Delegating — *Chisholm v. Georgia*

279. The United States Supreme Court in *Chisholm v. Georgia*, 2 U.S. 419 (1793), established the most fundamental structural principle of American constitutional government: sovereignty resides in the people, not in the state. Governments are mere agents with delegated authority—they possess only those powers the sovereign people have chosen to entrust to them. This principle has a logical corollary of decisive importance: a government of delegated powers cannot possess more authority than the individual human being who did the delegating.

280. No individual has the right to compel his neighbor to register his personal conveyance with a government agency, purchase insurance he does not want, or produce a government-issued license before traveling. Because no individual possesses that right, no individual could have delegated it to the government. A right that was never held by any individual member of the sovereign people could never have been transferred to their

collective agent. The South Carolina Highway Patrol's enforcement of registration, licensing, and insurance requirements against a private individual who has not accepted those franchise obligations is therefore an exercise of power that no member of the sovereign people ever possessed or could have delegated.

281. This analysis answers the question Defendants cannot answer without self-contradiction: if sovereignty resides in the people and the government is the people's agent, how can the agent possess authority the principal never had? The answer is that it cannot. The South Carolina Highway Patrol does not derive its police power from some source beyond the people; it derives it entirely from the people's delegation. Where that delegation was never made—because no individual held the right in the first place—the agency's action is not an exercise of police power. It is trespass.

Hurtado and Gulf, C. & S.F. R. Co.: True Law Is a General Rule of Universal Application; Courts Have an Imperative Constitutional Duty to Enforce Equality of Rights

282. The United States Supreme Court in *Hurtado v. California*, 110 U.S. 516, 535-536 (1884), articulated the constitutional standard for what qualifies as genuine law: a general law that governs all of society equally, ensuring that every citizen holds life, liberty, property, and immunities under the same protective rules, applicable uniformly to all persons without discrimination of class or status. A special rule for a particular class—one that imposes burdens on some while exempting others—is not law in the constitutional sense. It is a classification, and classifications that burden the exercise of fundamental rights receive the most searching judicial examination.

283. *Gulf, C. & S.F. Railway Co. v. Ellis*, 165 U.S. 150 (1897), carried this principle further: no

duty rests more imperatively upon the courts than the enforcement of those constitutional provisions intended to secure that equality of rights which is the foundation of free government. The equal protection guarantee is not a preference or a guideline—it is a constitutional imperative, and courts that fail to enforce it have abdicated their most fundamental function.

284. Title 56 of the South Carolina Code, as used against Plaintiff, does not apply equally to all—it applies only to those who have voluntarily entered the vehicle franchise. Enforcing it against Plaintiff while exempting those who have obtained franchise documentation is not equal application of law. This Court has an imperative duty under *Gulf, C. & S.F. Railway* to enforce the equality principle. A statute that applies only to franchise participants cannot be enforced against a non-participant without violating the constitutional guarantee that the law govern all equally.

285. The equal protection guarantee of Article I, § 3 of the South Carolina Constitution similarly prohibits arbitrary discrimination, requiring the government to treat individuals equally unless there is a legitimate justification for differential treatment. The Defendants' actions lack any such justification, as they have failed to provide evidence that their enforcement was based on a rational or lawful distinction. Their silence in response to the Plaintiff's administrative notices further admits the absence of any lawful basis.

Lawfulness of the Plaintiff's Actions

286. The Plaintiff asserts that all his actions, including the use of his mobile home for private, non-commercial purposes on June 24, 2023, are lawful and do not constitute participation in any government franchise or statutory scheme. As a private individual, he has not

consented to any statutory jurisdiction, nor has he engaged in any activity that would subject him to commercial regulations under Title 56 of the South Carolina Code. His right to travel and use his property privately is a natural right protected under common law and the Constitution. The U.S. Supreme Court in *Chicago Motor Coach v. Chicago*, 169 N.E. 22 (1929), recognized that the right to travel in one's private capacity is not subject to statutory licensing absent commercial activity.

287. The Plaintiff's refusal to present a driver's license or register his mobile home under statutory schemes is lawful, as he is not a "driver" engaged in commerce but a private traveler exercising his fundamental rights. The Defendants' attempts to enforce such statutes against him are unlawful and violate his constitutional rights, as they lack evidence of his express consent to any franchise. The United States Supreme Court in the *License Tax Cases*, 72 U.S. 462 (1866), confirmed that statutory franchise regulations apply only to those who voluntarily enter the regulated franchise, not to private individuals asserting common law rights, aligning with the Plaintiff's position.

Demand for Equal Treatment and Rebuttal of Presumptions

288. The principle of equal protection requires that the Plaintiff be treated equally under the law, without arbitrary discrimination or selective enforcement. As a matter of right, the Plaintiff demands to be treated equally under the laws. The Defendants must provide evidence that their actions were based on a rational and lawful distinction, or else their conduct must be deemed a violation of his rights. Absent such evidence, their actions are *ultra vires* and void, as they exceed the lawful authority granted to them under both state and federal law.

289. The Plaintiff explicitly rebuts any presumption that he is subject to statutory jurisdiction or

that he has consented to any government franchise. The burden is on the Defendants to prove, with evidence on the record, that such jurisdiction applies to him. Their failure to respond to his notices estops them from asserting such presumptions, as silence in the face of a duty to respond constitutes consent under common law (*Carmine v. Bowen*, 64 A. 932 (1906)). Absent proof, their actions constitute an unlawful trespass upon his private rights and a violation of the constitutional guarantee of equal protection, as affirmed in *Fuentes v. Shevin*, 407 U.S. 67 (1972), requiring due process before deprivation of rights. This common-law principle is complemented and confirmed in equity by the doctrine of estoppel by silence where a duty to speak in the face of a known claim exists. 1 Pomeroy §§ 802–812; *Heckler v. Community Health Servs., Inc.*, 467 U.S. 51, 59 (1984).

SEVENTH CAUSE OF ACTION (Infringement of the Right to Travel and the Liberty of Locomotion)

290. Plaintiff re-alleges and incorporates by reference each of the foregoing paragraphs as though fully set forth herein.

291. The right to travel and the liberty of locomotion are fundamental rights. A governmental burden upon a fundamental right is subject to strict scrutiny and must be narrowly tailored to serve a compelling governmental interest. As alleged above, Defendants burdened Plaintiff's right to travel by means that cannot survive that scrutiny.

***Crandall v. Nevada*: The Right to Travel Is a Right of National Citizenship That No State May Tax, License, or Exact Compliance With as a Condition of Exercise**

292. The foundational authority for the right to travel in American constitutional law is *Crandall v. Nevada*, 73 U.S. 35 (1868), in which the United States Supreme Court struck down Nevada's tax on persons leaving the state, holding that the right to travel between

states is a right of national citizenship attaching to every American as a direct consequence of the constitutional compact. The Court held that no state may impose a tax, license fee, or other financial exaction as a condition of exercising this right, because the right itself precedes and supersedes any state's power to regulate it.

293. Crandall established that the right to travel is not a privilege granted by the state—it is a right that exists independent of the state. A state that imposes a financial precondition to the exercise of this right acts in direct conflict with this constitutional guarantee. The licensing fees, registration fees, insurance premiums, towing fees, and storage charges imposed in connection with the June 24, 2023 seizure are precisely the categories of financial exaction that *Crandall* prohibits: charges extracted from a private traveler as a precondition to the exercise of the fundamental right of locomotion.

294. *Murdock v. Pennsylvania*, 319 U.S. 105 (1943), confirmed and extended *Crandall*'s principle: a municipality may not impose a license tax on the exercise of a constitutional right. No government may make the free exercise of a fundamental constitutional right the subject of a licensing requirement, a registration fee, or an insurance mandate. As applied to Plaintiff's private non-commercial travel, Title 56 of the South Carolina Code's licensing, registration, and insurance requirements are precisely such exactions. Under *Crandall* and *Murdock*, they cannot be constitutionally applied to private non-commercial travel by a person who has not voluntarily entered the vehicle franchise.

The Right to Travel Without a License Is Clearly Established Law — *Shuttlesworth v.*

Birmingham

295. The United States Supreme Court in *Shuttlesworth v. Birmingham*, 394 U.S. 147 (1969), established clearly that a person may not be required to obtain a license before engaging in a constitutionally protected activity. Where a licensing requirement operates as a prior restraint on the exercise of a fundamental right—including the right of free movement—the requirement is presumptively unconstitutional absent a showing of immediate threat to public safety that cannot be addressed by less restrictive means.

296. A driver's license, as a precondition to operating a private conveyance for private purposes, is a prior restraint on the exercise of the fundamental right of locomotion. As applied to a private traveler not engaged in commercial activity, it violates *Shuttlesworth*'s holding as directly as a permit requirement for a peaceful march violates the First Amendment.

297. On June 24, 2023, Corporal Plyler stopped Plaintiff's vehicle for the sole stated reason that it lacked a state-issued license plate. He then arrested Plaintiff for failure to produce a driver's license. There was no immediate threat to public safety. There was no evidence of erratic operation, impairment, excessive speed, or any conduct justifying a stop even under *Terry v. Ohio*. The stop and arrest were based exclusively on the absence of franchise documentation from a private traveler who had presented no threat to any person. Under *Shuttlesworth* and *Crandall*, the licensing demand was itself the constitutional violation—not a lawful prerequisite that Plaintiff failed to meet.

The Right of Locomotion Is a Pre-Existing Common-Law and Constitutional Liberty

That Precedes Any State Licensing Scheme

298. The SCHP citation issued to Plaintiff on June 24, 2023, and the seizure of Plaintiff's private mobile home that flowed from it, rest entirely upon an unchallenged presumption: that the operation of a wheeled conveyance upon a public highway requires the prior permission of the State. That presumption is constitutionally infirm. The right of locomotion — the right of a free person to move from place to place upon the public ways — is not a privilege granted by the Legislature. It is a pre-existing liberty older than the State that purports to license it, recognized at common law, preserved by the Ninth Amendment to the United States Constitution, recognized in the liberty secured by Article I, § 3 of the South Carolina Constitution—which provides that no person shall be "deprived of life, liberty, or property without due process of law"—and protected by the Fifth and Fourteenth Amendments as a component of the "liberty" no State may deny without due process of law.

299. The United States Supreme Court has affirmed this principle across more than a century and a half of constitutional jurisprudence. The foundational authority cited above in *Crandall v. Nevada*, 73 U.S. (6 Wall.) 35 (1868), held that the freedom of movement is implicit in the structure of national citizenship and may not be conditioned by the State. In *Kent v. Dulles*, 357 U.S. 116, 125–26 (1958), Justice Douglas, writing for the Court, declared: "The right to travel is a part of the 'liberty' of which the citizen cannot be deprived without due process of law under the Fifth Amendment." In *Shapiro v. Thompson*, 394 U.S. 618, 634 (1969), the Court applied strict scrutiny to a statute that penalized the exercise of the right to travel, holding that any classification serving to penalize that right must satisfy a compelling governmental interest. In *Saenz v. Roe*, 526 U.S. 489, 500–03

(1999), the Court reaffirmed that the right to travel rests on multiple constitutional foundations, including the Privileges or Immunities Clause of the Fourteenth Amendment, and is among the "privileges of citizens of the United States." And in *Aptheker v. Secretary of State*, 378 U.S. 500, 505–06, 520 (1964), the Court warned: "Once the right to travel is curtailed, all other rights suffer, just as when curfew or home detention is placed on a person." Justice Douglas added: "Free movement by the citizen is of course as dangerous to a tyrant as free expression of ideas or the right of assembly and it is therefore controlled in most countries in the interests of security ... The ticketing of people and the use of identification papers are routine matters under totalitarian regimes, yet abhorrent in the United States."

300. The authorities cited herein are cited solely as evidence of the pre-existing common-law and constitutional right of locomotion, not as the statutory source of Plaintiff's cause. Plaintiff does not invoke Title 56 as the source of his right to travel; Title 56 is the target of this constitutional challenge, not the vehicle of recovery. Plaintiff proceeds in equity and at common law, and cites these authorities as legislative and judicial recognition of the liberty he possessed before any statute purported to regulate it.

Mode of Conveyance and the Common-Law Recognition of Automobile Travel as an Incident of the Right of Locomotion

301. At common law, the right of locomotion was understood to include the right of the citizen to choose his own mode of conveyance. The public highway was, in the words of the Delaware Superior Court in *Simeone v. Lindsay*, "open in all its length and breadth to the reasonable, common, and equal use of the people," regardless of whether the traveler proceeded by foot, by horse, by carriage, by wagon, or by any other vehicle. The Supreme

Court of Kansas, in *Swift v. City of Topeka*, 23 P. 1075, 1077 (Kan. 1890), declared the principle with unusual force: "Each citizen has the absolute right to choose for himself the mode of conveyance he desires ... whether it be by wagon or carriage, by horse, motor or electric car, or by bicycle." The court described that right of free choice of conveyance as belonging to the "alphabet of fundamental rights of the citizen."

302. When the automobile emerged at the turn of the twentieth century, courts uniformly recognized that the new technology did not diminish the underlying liberty. In *House v. Cramer*, 112 N.W. 3, 4 (Iowa 1907), the Iowa Supreme Court held that automobile owners possessed the same rights to the use of public highways as travelers proceeding by horse or carriage. In *Liebrecht v. Crandall*, 126 N.W. 69, 70 (Minn. 1910), the Minnesota Supreme Court declared: "There can be no question of the right of automobile owners to occupy and use the public streets of cities or highways in rural districts." Justice Brandeis, writing for the United States Supreme Court in *Buck v. Kuykendall*, 267 U.S. 307, 314 (1925), suggested that the right to travel by automobile could itself constitute a Fourteenth Amendment privilege or immunity. And the Mississippi Supreme Court, in *Teche Lines, Inc. v. Danforth*, 12 So. 2d 784, 787 (Miss. 1943), declared that "the right to travel on public highways was a fundamental liberty."

303. These authorities are not historical curiosities. They are the original common-law and judicial recognition of the very liberty the State of South Carolina now purports to license. The automobile is, in the words of *Swift*, simply one of the modes of conveyance among which the citizen "has the absolute right to choose for himself." Plaintiff's private, non-commercial use of his private mobile home for his own travel falls squarely within the right of locomotion these authorities recognize. No commercial use, no carrier-for-hire

activity, no employment of the highway as an instrumentality of trade brought Plaintiff within any franchise Title 56 may lawfully reach. He was a free man traveling upon the public way — the precise activity these authorities, and the constitutional liberty they evidence, protect.

The Licensing Presumption Underlying the SCHP Citation Cannot Survive Strict Scrutiny

304. The SCHP citation that served as the predicate for the seizure of Plaintiff's mobile home rests upon a single, unexamined presumption: that Title 56 of the South Carolina Code's licensing scheme applies, as a matter of constitutional right, to the private, non-commercial travel of a free person upon the public highway. That presumption has never been tested in this case against the constitutional standard the right of locomotion demands. When a statute burdens a fundamental liberty, the presumption of constitutionality yields, and strict scrutiny applies. See *Shapiro v. Thompson*, 394 U.S. at 634. Under strict scrutiny, the State must demonstrate: (a) a compelling governmental interest; (b) that the regulation is narrowly tailored to advance that interest; and (c) that the regulation employs the least restrictive means available. *Aptheker*, 378 U.S. at 508. The State has carried none of these burdens with respect to the licensing presumption that underlies the citation issued to Plaintiff.

305. The licensing presumption is not narrowly tailored. It does not distinguish between commercial drivers operating common carriers for hire — the historical and constitutionally sustainable subject of state licensing power — and private persons traveling for their own purposes in their own conveyances. It does not distinguish between persons whose conduct on the highway has been demonstrated to present a particularized risk and persons against whom no such showing has been made. It is, in operation and

effect, a blanket prior-permission requirement imposed upon the exercise of a fundamental liberty by every adult in the State, irrespective of individualized risk or commercial nexus. A regulation that conditions the exercise of a fundamental liberty upon the universal acquisition of a State permit, without individualized determination of risk and without commercial nexus, is the paradigmatic prior restraint. The Constitution does not prohibit all prior restraints, but it prohibits unjustified ones, and the State bears the burden of justification.

306. Nor is licensing the least restrictive means of advancing whatever safety interest the State asserts. Targeted enforcement of demonstrably dangerous conduct — reckless driving, driving under the influence, the deliberate operation of an unsafe vehicle — directly addresses the actual sources of highway danger and does so without conditioning the underlying liberty of locomotion upon prior State permission. Engineering, infrastructure design, vehicle safety standards, and traffic-rule enforcement all address risk at the point at which it arises, rather than at the point at which the citizen seeks to exercise his liberty. Each of these alternatives operates with less burden upon the fundamental right and with at least equal effectiveness in advancing the State's asserted interest. The licensing presumption, by contrast, burdens millions of free travelers in order to address risks posed by a comparatively small number of dangerous actors — the definition of an over-inclusive regulation that strict scrutiny forbids.

Congressional Admissions Defeat the Safety Justification for the Licensing Presumption

307. Whatever residual force the safety justification for the licensing presumption may once have possessed has been defeated by the legislative findings of the United States Congress itself. In the Driving for Opportunity Act of 2021, S. 998, 117th Cong. § 2 (2021),

Congress — the very sovereign whose member States operate the licensing schemes here at issue — made formal findings on the public record of the United States that constitute admissions against interest of the highest authority. Those findings establish, by the State's own legislative voice, that the licensing scheme does not, in operation, serve the safety justification offered for it.

308. Congress found, expressly: that "driving a vehicle is an essential aspect of the daily lives of most people in the United States" and "is often required to access jobs and healthcare, take care of family, get groceries, and fulfill other basic responsibilities"; that "[i]n many small cities, towns, and rural areas that do not have public transportation and ridesharing alternatives, driving is often the only realistic means of transportation"; that "[i]n the United States, millions of Americans have had their driver's licenses suspended for unpaid court fines and fees"; that "[a] person whose driver's license is suspended or revoked for unpaid fines and fees will often find it more difficult to earn a living and therefore pay the debt owed to the government"; that "most driver's license suspensions are not based on the need to protect public safety"; that "[i]n the United States, 40 percent of all driver's license suspensions are issued for conduct that was unrelated to driving"; and that "Seventy-five percent of those with suspended licenses report continuing to drive." Driving for Opportunity Act of 2021, S. 998, 117th Cong. § 2 (2021).

309. These are not the assertions of a private litigant. They are the formal, on-record findings of the United States Congress. They establish, by legislative admission, that the suspension and enforcement mechanisms of state licensing schemes are not, in operation, narrowly tailored to advance the safety interest the State invokes. The American Association of Motor Vehicle Administrators acknowledged, in materials Congress incorporated into its

findings, that "broadly restricting licenses for violations unrelated to an individual's ability to drive safely may do more harm than good." And the Harvard Law School Criminal Justice Policy Program, in a report Congress credited, concluded that license suspensions for unpaid fines may constitute "one of the most pervasive poverty traps for poor people assessed a fine that they cannot afford to pay," and observed further that "License suspensions may also be unconstitutional if the license was suspended before the judge determined the defendant had the ability to pay the criminal justice debt."

310. When the State's own legislative findings establish that the regulatory mechanism is not, in operation, tailored to the interest it claims to serve, the State has not merely failed to carry its burden under strict scrutiny — it has affirmatively admitted, on the legislative record, that the burden cannot be carried. The licensing presumption upon which Corporal Plyler's June 24, 2023 citation rests therefore lacks the constitutional foundation that the presumption of constitutionality, properly understood, would require it to possess. The citation, predicated upon that presumption, is constitutionally infirm at its root. The seizure of Plaintiff's private mobile home, predicated in turn upon that citation, is constitutionally infirm as a derivative matter of the infirmity at the foundation. This conclusion does not displace or substitute for the *ultra vires* theory, the trespass and conversion theories, or the unalienable-rights and equitable-lien theories pleaded elsewhere in this Petition. It fortifies them. The SCHP citation lay outside the lawful authority of the officer who issued it; the licensing presumption upon which it rested cannot survive strict scrutiny; and the seizure that followed cannot stand upon either foundation, severally or together.

EIGHTH CAUSE OF ACTION (Enforcement of Equitable Liens)

311. Plaintiff re-alleges and incorporates by reference each of the foregoing paragraphs as though fully set forth herein.

312. An equitable lien arises where, in equity and good conscience, particular property should be held to secure a claim or to prevent unjust enrichment. As alleged above and below, the wrongful conduct of each Defendant gives rise to the equitable liens asserted herein.

V. EQUITABLE LIENS AND REQUEST FOR ENFORCEMENT

313. **The Debt:** The State of South Carolina and its relevant agents are all responsible for the debt of True Bill SCHP-RV062423-HTE in the amount of $132,257,933.00 (One Hundred Thirty-Two Million Two Hundred Fifty-Seven Thousand Nine Hundred Thirty-Three and 00/100 Dollars) in gold or silver minted coins of the United States, per Plaintiff's Fee Schedule; a single obligation for which they share liability. It is one debt with multiple responsible parties—the State of South Carolina as the primary debtor and the agents as co-debtors.

314. Plaintiff asserts equitable liens against the following Defendants, based on their failure to rebut Plaintiff's administrative notices, thereby admitting liability for unlawful actions including property seizure and rights violations.

The Equitable Lien Does Not Depend on the Fee Schedule Alone — It Arises from the Wrongful Detention and the Resulting Unjust Enrichment

315. Anticipating the argument that a self-created fee schedule cannot constitute an enforceable contract or generate a legally cognizable equitable lien, Plaintiff clarifies: the equitable lien asserted herein does not rest exclusively on the contractual theory of the Fee Schedule. It rests, independently and primarily, on principles of equity that predate any statute and that

a court of equity has always had authority to enforce.

316. First: a court of equity imposes a lien wherever a party has wrongfully taken, detained, or converted another's property and equity demands that the wrongdoer's assets answer for the harm. *Barnes v. Alexander*, 232 U.S. 117, 121 (1914). Where Defendants unlawfully seized Plaintiff's person and his sole dwelling, arrested and confined him, and searched his person without lawful authority, equity impresses a lien on those Defendants' assets commensurate with that harm. The source of the lien is the wrong, not the piece of paper that announced Plaintiff's intent to enforce. Second: the Fee Schedule is relevant not as a self-enforcing contract but as evidence of the itemized harm Plaintiff suffered and the notice given to Defendants that their continued conduct would be treated as a trespass on ascertainable terms. Third: the maxim *nemo ex suo delicto meliorem suam conditionem facere potest*—no one may profit from his own wrong—operates as an independent source of equitable relief.

317. Plaintiff retrieved his mobile home from impound on June 25, 2023 — the day following the seizure. The only charge Plaintiff was required to pay in connection with the unlawful impound was a daily storage fee assessed by ABC Mobile Auto & RV Repair. That charge, having been generated entirely by and through the original trespass, was itself unlawful and is recoverable in this Court as restitution. An officer who initiates an unlawful seizure cannot empower a towing company to generate, by intermediate dominion over the property, any legally cognizable charge against the owner of the seized property; the taint of the unlawful seizure attaches to every charge arising from it, and equity will not permit the wrongdoer to retain the benefit thus generated.

1. Defendant Henry Dargan McMaster

318. Plaintiff asserts an equitable lien on all assets, both real and personal, owned by Defendant Henry Dargan McMaster, to secure the debt of $132,257,933.00 (One Hundred Thirty-Two Million Two Hundred Fifty-Seven Thousand Nine Hundred Thirty-Three and 00/100 Dollars) in silver minted coins of the United States. This lien arises from Defendant's failure to rebut Plaintiff's administrative notices constituting an admission of liability for the debt detailed in True Bill SCHP-RV062423-HTE and Plaintiff's Fee Schedule.

2. Defendant Robert G. Woods IV

319. Plaintiff asserts an equitable lien on all assets, both real and personal, owned by Defendant Robert G. Woods IV, to secure the debt of $132,257,933.00 (One Hundred Thirty-Two Million Two Hundred Fifty-Seven Thousand Nine Hundred Thirty-Three and 00/100 Dollars) in silver minted coins of the United States. This lien arises from Defendant's failure to rebut Plaintiff's administrative notices constituting an admission of liability for the debt detailed in True Bill SCHP-RV062423-HTE and Plaintiff's Fee Schedule.

3. Defendant Christopher N. Williamson

320. Plaintiff asserts an equitable lien on all assets, both real and personal, owned by Defendant Christopher N. Williamson, to secure the debt of $132,257,933.00 (One Hundred Thirty-Two Million Two Hundred Fifty-Seven Thousand Nine Hundred Thirty-Three and 00/100 Dollars) in silver minted coins of the United States. This lien arises from Defendant's failure to rebut Plaintiff's administrative notices constituting an admission of liability for the debt detailed in True Bill SCHP-RV062423-HTE and Plaintiff's Fee Schedule.

4. Defendant Christopher A. Plyler

321. Plaintiff asserts an equitable lien on all assets, both real and personal, owned by Defendant Christopher A. Plyler, to secure the debt of $132,257,933.00 (One Hundred Thirty-Two Million Two Hundred Fifty-Seven Thousand Nine Hundred Thirty-Three and 00/100 Dollars) in silver minted coins of the United States. This lien arises from Defendant's failure to rebut Plaintiff's administrative notices constituting an admission of liability for the debt detailed in True Bill SCHP-RV062423-HTE and Plaintiff's Fee Schedule.

5. Defendant State of South Carolina

322. Plaintiff asserts an equitable lien on all assets, both real and personal, owned by Defendant State of South Carolina, to secure the debt of $132,257,933.00 (One Hundred Thirty-Two Million Two Hundred Fifty-Seven Thousand Nine Hundred Thirty-Three and 00/100 Dollars) in silver minted coins of the United States. This lien arises from Defendant's failure to rebut Plaintiff's administrative notices constituting an admission of liability for the debt detailed in True Bill SCHP-RV062423-HTE and Plaintiff's Fee Schedule.

6. Defendant South Carolina Department of Public Safety

323. Plaintiff asserts an equitable lien on all assets, both real and personal, owned by Defendant South Carolina Department of Public Safety, to secure the debt of $132,257,933.00 (One Hundred Thirty-Two Million Two Hundred Fifty-Seven Thousand Nine Hundred Thirty-Three and 00/100 Dollars) in silver minted coins of the United States. This lien arises from Defendant's failure to rebut Plaintiff's administrative notices constituting an admission of liability for the debt detailed in True Bill SCHP-RV062423-HTE and Plaintiff's Fee Schedule.

7. Defendant South Carolina Highway Patrol

324. Plaintiff asserts an equitable lien on all assets, both real and personal, owned by Defendant South Carolina Highway Patrol, to secure the debt of $132,257,933.00 (One Hundred Thirty-Two Million Two Hundred Fifty-Seven Thousand Nine Hundred Thirty-Three and 00/100 Dollars) in silver minted coins of the United States. This lien arises from Defendant's failure to rebut Plaintiff's administrative notices constituting an admission of liability for the debt detailed in True Bill SCHP-RV062423-HTE and Plaintiff's Fee Schedule.

8. Defendant ABC Mobile Auto & RV Repair

325. Plaintiff asserts an equitable lien on all assets, both real and personal, owned by Defendant ABC Mobile Auto & RV Repair, to secure the debt of $132,257,933.00 (One Hundred Thirty-Two Million Two Hundred Fifty-Seven Thousand Nine Hundred Thirty-Three and 00/100 Dollars) in silver minted coins of the United States. This lien arises from Defendant's failure to rebut Plaintiff's administrative notices constituting an admission of liability for the debt detailed in True Bill SCHP-RV062423-HTE and Plaintiff's Fee Schedule.

326. These equitable liens secure Plaintiff's interest in the Defendants' assets, both real and personal, for the full amount of the debt, totaling $132,257,933.00 (One Hundred Thirty-Two Million Two Hundred Fifty-Seven Thousand Nine Hundred Thirty-Three and 00/100 Dollars) in silver minted coins of the United States. These liens arise under common law principles of equity, based on the Defendants' admissions of liability through their failure to respond to Plaintiff's administrative notices, which establish the debt as liquidated damages owed to Plaintiff. Under the doctrine of equitable liens, as recognized in *Deckert v. Independence Shares Corp.*, 311 U.S. 282 (1940), and *Barnes v. Alexander*,

232 U.S. 117 (1914), a court may impose a lien on property to secure a debt or obligation when justice requires it. Here, the Defendants' admissions through silence and their unlawful actions justify the imposition of such liens.

NINTH CAUSE OF ACTION (State Liability in Equity and at Common Law: Respondeat Superior, Indemnification, and Duty to Defend)

327. Plaintiff re-alleges and incorporates by reference each of the foregoing paragraphs as though fully set forth herein.

328. Plaintiff alleges, in addition and in the alternative, that the State of South Carolina is answerable in equity and at common law for the acts of its commissioned officers undertaken under color of its authority, as set forth below.

VIII. STATE LIABILITY IN EQUITY AND AT COMMON LAW FOR THE ACTS OF COMMISSIONED OFFICERS; DECLARATORY JUDGMENT THAT THE STATE OF SOUTH CAROLINA IS REQUIRED, AT COMMON LAW AND IN EQUITY, AS FURTHER EVIDENCED BY THE LEGISLATURE'S CODIFICATION AT S.C. CODE §§ 15-78-40 AND 15-78-70, TO ANSWER FOR ANY JUDGMENT ENTERED AGAINST ITS COMMISSIONED OFFICERS FOR ACTS DONE UNDER COLOR OF ITS AUTHORITY

Preliminary — Source of Right and Use of Statutory Citations

329. Plaintiff invokes this Section, and brings this Petition as a whole, in equity and at common law. The State of South Carolina's obligation to answer for the acts of its commissioned officers, undertaken under color of its authority, arises from the ancient equitable maxim *qui facit per alium facit per se* (he who acts through another acts himself), from the common-law doctrine of *respondeat superior* as applied to public principals who commission agents under color of their authority, and from the principle in *United States v.*

Lee, 106 U.S. 196, 220–21 (1882), that the public fisc, on whose behalf an officer purports to act, may not retreat behind sovereign immunity when its agent has trespassed upon the rights of a private citizen. The South Carolina Constitution, Article I, § 9 — guaranteeing that every person "shall have speedy remedy" for wrongs sustained — is declaratory of, not the source of, the absence of any common-law sovereign-immunity bar to suit against the State; the South Carolina Tort Claims Act, S.C. Code § 15-78-40 and § 15-78-50(c), is declaratory of, not the source of, the pre-existing common-law and equitable duties identified herein. Each statute referenced in this Section is cited solely as legislative recognition and evidence of the pre-existing duty, not as the source of Plaintiff's cause or the statutory grant authorizing this suit. Plaintiff does not invoke the South Carolina Tort Claims Act, S.C. Code § 15-78-10 *et seq.*, as the source of his right to recover; he proceeds in equity and at common law, and cites these provisions solely as evidence of the standard of public accountability the Legislature has acknowledged.

330. Sovereign immunity, properly understood, is not a blanket exemption from accountability; it is a doctrine that protects *de jure* government in the lawful exercise of its delegated function of securing the rights of the governed. It has no application where the government acts to alienate the very unalienable rights it was instituted to secure. A government that takes a private man's person and property without lawful authority is not exercising the function immunity protects—it is abandoning it. In that act it forfeits the immunity, because immunity attaches to the office faithfully exercised, not to the officer who turns the office against the rights it exists to protect. The State Action Doctrine confirms the obverse of the same principle: civil statutes and the powers they confer are instruments for regulating those within the government's legitimate reach—government actors and those

who have voluntarily entered the public franchise—not private persons who have not. When the State, through its commissioned officers, directs those instruments against a non-consenting private man, it steps outside the protected sphere, and the immunity that would shield a lawful exercise of authority does not shield the trespass that this conduct in truth was.

A. Scope-of-Employment Allegation Pleaded in the Alternative

331. Plaintiff alleges, in addition to and in the alternative of all other allegations in this Verified Petition, pursuant to the long-established common-law and equitable right to plead in the alternative under Rule 8, SCRCP, that all conduct of the public-official Defendants — Henry Dargan McMaster, Robert G. Woods IV, Christopher N. Williamson, and Christopher A. Plyler (collectively, the "Officer Defendants") — alleged herein was undertaken within the scope of their respective commissions as officers and agents of the State of South Carolina for purposes of triggering the State's common-law and equitable *respondeat superior* liability (as further evidenced by the State's answerability codified at S.C. Code § 15-78-40). At the moments of the acts and omissions alleged herein, each Officer Defendant was: (a) physically present on, or operating through the official infrastructure of, the State of South Carolina, the South Carolina Highway Patrol, or the offices of the South Carolina Department of Public Safety; (b) using state-issued equipment, systems, credentials, vehicles, uniforms, badges, and authority, including without limitation SCHP-issued patrol vehicles, citation books, badges of office, and the official seal of the State of South Carolina; (c) acting during the time and in the place where each Defendant was commissioned by the State of South Carolina; (d) purporting to act with the authority their respective offices conferred and styling their conduct as official

action of the State of South Carolina, including the issuance of an SCHP citation to Plaintiff, the arrest of Plaintiff, the dispatch of an SCHP officer to seize Plaintiff's private mobile home, and the supervisory authorization of the seizure; and (e) actuated, in some measure, by a purpose to administer and enforce South Carolina law as the State has commissioned them to do — even if that purpose was illegitimately directed, even if the acts exceeded the lawful authority of their offices, and even if the acts were directed against the very constitutional interests the offices exist to protect.

B. Distinguishing Scope-of-Employment from Ultra Vires Analysis

332. The allegations in this Section are not inconsistent with Plaintiff's allegations elsewhere in this Verified Petition that Defendants' conduct was *ultra vires*, non-judicial in character, fell outside the legitimate functions of office, and was undertaken without lawful authority. The two doctrinal inquiries operate on different axes and test different questions. The *ultra vires* inquiry under *United States v. Lee*, 106 U.S. 196, 220 (1882), and *Larson v. Domestic & Foreign Commerce Corp.*, 337 U.S. 682, 689–90 (1949), examines whether the officer's act was within his lawful authority — if not, the act is the act of a private trespasser and personal liability attaches in trespass at common law. The scope-of-employment inquiry under the common-law doctrine of *respondeat superior* (as recognized in *Armstrong v. Food Lion, Inc.*, 371 S.C. 271, 639 S.E.2d 50 (2006), and *Lane v. Modern Music, Inc.*, 244 S.C. 299, 136 S.E.2d 713 (1964)), by contrast, examines the officer's relationship to the principal at the moment of acting — whether the act was performed within the territorial, temporal, and instrumentality perimeter of the commission, and was actuated in some measure by a purpose to serve the principal, regardless of whether the act was a lawful exercise of the office. These inquiries can, and frequently do, yield different answers

regarding the same conduct.

333. South Carolina law recognizes that a master answers for the acts of his servant committed within the scope of employment, and that conduct may fall within that scope even where the servant misuses or exceeds the authority entrusted to him, so long as the act was done in furtherance of the master's business. *Armstrong v. Food Lion, Inc.*, 371 S.C. 271, 639 S.E.2d 50 (2006); *Lane v. Modern Music, Inc.*, 244 S.C. 299, 136 S.E.2d 713 (1964). The test looks to whether the servant was about the master's business and acting within the scope of his commission at the time of the act, not to whether the particular act was authorized or lawful. An officer who exceeds or abuses the authority of his office while engaged in the enforcement activity he was commissioned to perform acts within the scope of that commission for purposes of the State's vicarious liability, even as the same conduct is *ultra vires* for purposes of his personal liability in trespass.

334. Plaintiff alleges, accordingly, that the conduct of the Officer Defendants was simultaneously: (a) *ultra vires*, without lawful authority, and outside the legitimate functions of office for purposes of analyzing personal officer liability in trespass at common law and the absence of any sovereign-immunity bar; and (b) within the scope of each Officer Defendant's commission for purposes of triggering the State of South Carolina's common-law and equitable *respondeat superior* liability for the resulting injury (as further evidenced by the State's answerability codified at S.C. Code § 15-78-40). There is no contradiction between these two characterizations. The first speaks to whether the individual officer is personally liable as a private trespasser; the second speaks to whether the State of South Carolina, having commissioned the conduct under color of its authority, must answer for the resulting judgment in equity and at common law. They are

independent questions governed by independent doctrinal frameworks and they operate together to ensure both that the constitutional and common-law injury alleged is vindicated against the responsible individual officers and that it is remedied through the public fisc on whose behalf the conduct was undertaken.

C. Direct Vicarious Liability of the State of South Carolina in Equity and at Common Law

335. At common law and in equity, a principal who commissions an agent to act under color of its authority answers in its own right for the injuries that agent inflicts within the scope of the commission. *Qui facit per alium facit per se*. The South Carolina Legislature has codified and declared this pre-existing common-law and equitable answerability at S.C. Code § 15-78-40, which provides that the State is liable for its torts "in the same manner and to the same extent as a private individual under like circumstances." The statute is cited here solely as evidence and legislative recognition of the pre-existing duty, not as the source of Plaintiff's right to recover. The State of South Carolina, named as a defendant in this action in its own right, together with the South Carolina Department of Public Safety and the South Carolina Highway Patrol, is therefore directly liable in equity and at common law for each constitutional and common-law injury inflicted upon Plaintiff by the Officer Defendants within the scope of their commissions.

336. Authority confirms that At common law, the entity's vicarious liability operates independently of any individual immunity that may attach to the employee. The entity's liability is grounded in the commissioning relationship and the entity's authorization of the conduct under color of its authority, not in the entity's own tortious act — the pre-existing common-law *respondeat superior* rule that the Legislature has merely recognized. The South Carolina Constitution, Article I, § 9, guaranteeing that every person "shall have

speedy remedy" for wrongs sustained, declares the absence of any common-law sovereign-immunity bar to this suit. Plaintiff requires no statutory authorization to bring this suit; he proceeds in equity and at common law, and the State's amenability to suit is declaratory of, not granted by, that provision.

337. To the extent the State invokes any derivative-immunity theory — that the entity is not liable where the employee is immune — that theory is inapplicable here for three reasons. First, the Officer Defendants are not immune: their conduct was *ultra vires* and outside any cognizable immunity, as developed in Section IV of this Petition, and the South Carolina Tort Claims Act itself withholds immunity where an employee's conduct "constituted actual fraud, actual malice, intent to harm, or a crime involving moral turpitude," S.C. Code § 15-78-70(b). Second, the derivative-immunity principle operates only where the immunity protects the entity's underlying interest, not where it protects the individual qua individual; the State cannot bootstrap an officer's personal immunity into a defense to its own *respondeat superior* liability for conduct it commissioned. Third, no South Carolina statute confers immunity upon an SCHP officer or supervisory state official for the deliberate, warrantless seizure of a citizen's person and private property without lawful authority — the conduct alleged here lies wholly outside any immunity the State has enacted, and the common-law and equitable duty of the State to answer for the acts of its commissioned agents is undisturbed.

D. Indemnification of Officer Defendants in Equity and at Common Law

338. At common law and in equity, a principal who commissions an agent under color of its authority bears the duty of indemnification for liabilities the agent incurs in the course of executing that commission. This indemnification duty is a duty of common law and equity.

The South Carolina Tort Claims Act, by providing that the State answers for its torts "in the same manner and to the same extent as a private individual under like circumstances" (S.C. Code § 15-78-40), is consistent with and evidences the State's answerability for liabilities its commissioned agents incur within the scope of their commissions. Upon entry of any damages judgment in this action against any Officer Defendant for conduct within the scope of his commission as an officer of the State of South Carolina, the State of South Carolina is required — at common law and in equity — to answer for that judgment.

339. The indemnification duty extends to compensatory damages, fees, and costs, and applies to claims sounding in common law, in equity, and in the constitutional rights of the citizen. The duty is not limited to negligent conduct — it reaches intentional torts, willful conduct, and conduct that exceeds the lawful authority of the office, provided the conduct was undertaken within the scope of the commission as recognized in *Armstrong v. Food Lion, Inc.* and *Lane v. Modern Music, Inc.*.

340. Punitive damages stand on a separate footing. The South Carolina Tort Claims Act does not authorize punitive damages against a governmental entity (S.C. Code § 15-78-120(b)); accordingly, Plaintiff pleads any claim for punitive or exemplary relief solely in common law and equity, and against the individual Officer Defendants in their personal capacities for their — *respondeat superior* theory pleaded herein.

E. Duty to Defend in Equity and at Common Law

341. At common law and in equity, a principal who commissions an agent under color of its authority bears the duty to defend that agent against actions arising from the execution of the commission. This duty to defend is a duty of common law and equity: a principal who

commissions an agent to act under color of its authority must defend that agent against actions arising from the execution of the commission, and, if it declines to do so, must answer for the reasonable attorney's fees and litigation costs the agent incurs. This duty operates concurrently with the pre-existing common-law and equitable duties identified in Subsections C and D — together forming the comprehensive framework under which the State of South Carolina bears the full financial responsibility, in equity and at common law, for the litigation and resolution of claims arising from the conduct of its commissioned officers within the scope of their commissions.

F. Application to the State and Officer Defendants

342. Each of the Officer Defendants — Henry Dargan McMaster, Robert G. Woods IV, Christopher N. Williamson, and Christopher A. Plyler — was, at all times relevant to this Petition, a commissioned officer or agent of the State of South Carolina (as the term is used in the common-law and equitable framework set out herein, and as further evidenced by the State's answerability codified at S.C. Code § 15-78-40). The State of South Carolina, together with the South Carolina Department of Public Safety and the South Carolina Highway Patrol named as defendants herein, is therefore required, in equity and at common law: (a) to answer in its own right as a directly liable defendant for the injuries inflicted by the Officer Defendants within the scope of their commissions; (b) to answer for any compensatory damages judgment entered against any Officer Defendant for conduct within scope; (c) to provide for the defense of the Officer Defendants or, alternatively, to answer for their reasonable attorney's fees and costs; and (d) under all of the foregoing, to satisfy any award of fees and costs to Plaintiff. The private-actor Defendant — ABC Mobile Auto & RV Repair — is not a commissioned officer or agent of

the State of South Carolina and is not the subject of the State's *respondeat superior* obligations under this Section; their liability is personal and direct, in trespass and at common law.

G. Defense Argument Anticipated and Rejected

343. Plaintiff anticipates and rejects the defense argument that his allegations of *ultra vires* conduct (for purposes of personal officer liability in trespass and the absence of sovereign-immunity bar) and his allegations of scope-of-commission conduct (for purposes of the State's *respondeat superior* liability in equity and at common law) are mutually inconsistent. The two characterizations rest on legally distinct inquiries that courts have held to be independent. The common-law and equitable right to plead in the alternative, preserved at Rule 8, SCRCP, authorizes precisely this dual characterization. Scope-of-employment determinations are questions of fact reserved for the trier of fact, *Armstrong v. Food Lion, Inc.*, 371 S.C. 271, 639 S.E.2d 50 (2006), and cannot be decided on a motion to dismiss. The two doctrines are not in tension; they operate together to ensure that the constitutional and common-law injuries alleged are both vindicated against the responsible individual officers and remedied through the public fisc on whose behalf the conduct was undertaken.

H. Notice to the State of South Carolina as Interested Party

344. By the filing of this Verified Petition, the State of South Carolina is formally on notice that Plaintiff seeks a damages judgment in equity and at common law against its commissioned officers, and that the State's direct, common-law *respondeat superior* liability for the acts of those officers is asserted, as a doctrine of the common law and of equity, and not as a doctrine arising from any statute. The South Carolina Supreme Court confirmed the

common-law foundation of this doctrine in *Reynolds v. Witte*, 13 S.C. 5 (1879), where it explained that the principal "is liable in addition to the agent, not by reason of his consent to be liable, but by operation of law," and the South Carolina Court of Appeals reaffirmed the doctrine in *SC Ins. Co. v. James C. Greene & Co.*, 290 S.C. 171 (Ct. App. 1986), characterizing it as a rule of vicarious liability that allocates the risk of the agent's wrong to the master "because he is normally in a better position than the servant to respond in damages." The State's answerability for the acts of its agents is therefore a duty of the common law, imposed by operation of law, that the State's own statutory enactments (including S.C. Code § 15-78-40) acknowledge but do not create — the statutes being cited here solely as evidence of the public standard already imposed by the common law, and not as the source of Plaintiff's right or of the State's duty. The State of South Carolina bears the corresponding duties — to provide legal counsel to the Officer Defendants, to answer for reasonable fees if such counsel is not provided, and to answer for any judgment for which scope-of-commission is found — as duties of common law and equity, by operation of law and not by election.

I. Obligations of the State Survive Any Individual Bankruptcy

345. To the extent any individual Officer Defendant should attempt to discharge the judgment in bankruptcy proceedings, the obligations of the State of South Carolina identified herein are independent common-law and equitable obligations of the State — further evidenced by the State's answerability codified at S.C. Code § 15-78-40 — and are not dischargeable as to the State by the bankruptcy of any individual. The State's direct *respondeat superior* liability is enforceable against the State independent of any judgment against the individual officer. The State's indemnification duty attaches as a matter of common law and equity

upon the entry of judgment within scope, and is enforceable against the State independent of the individual officer's solvency.

PRAYER FOR RELIEF

Relief Sought

346. Plaintiff respectfully requests that this Honorable Court:

347. 1. Recognize the validity of the equitable liens asserted against the Defendants.

348. 2. Order the enforcement of said equitable liens by directing the sale of the Defendants' assets, both real and personal, to satisfy the full amount of $132,257,933.00 (One Hundred Thirty-Two Million Two Hundred Fifty-Seven Thousand Nine Hundred Thirty-Three and 00/100 Dollars) in silver minted coins of the United States.

349. 3. Grant such further relief as the Court deems just and proper.

VI. DEMANDS AND REMEDIES

350. All remedies sought are based on common law and constitutional principles, and do not invoke any statutory benefits or franchises. The demand for payment in silver minted coins is to avoid any implication of accepting fiat currency, which could be construed as participation in a government franchise. Defendants are sued in their individual capacities as private wrongdoers for *ultra vires* acts; the personal officer liability framework rests on the common law principles preserved at *Entick v. Carrington* (1765) and *Little v. Barreme* (1804).

The South Carolina Tort Claims Act Does Not Bar Claims for Ultra Vires Personal Trespass

351. The South Carolina Tort Claims Act, S.C. Code § 15-78-10 *et seq.*, reflects the legislature's recognition of a public standard for accountability of government actors—cited here solely as evidence of that standard, not as the source of Plaintiff's right to sue. The pre-existing common law has always imposed personal liability upon officers who act without any grant of lawful authority. That common law principle is not displaced by a statute that presupposes the existence of a lawful official act; where no lawful authority exists, the officer acts not in his official capacity but as a private trespasser, and the Act's immunities have no purchase. Indeed, the Act itself withholds immunity where an employee's conduct "constituted actual fraud, actual malice, intent to harm, or a crime involving moral turpitude." S.C. Code § 15-78-70(b).

352. The individual Defendants—Plyler, Williamson, and Woods—are sued here as private wrongdoers, not as public officers exercising delegated authority, because no lawful authority existed to apply commercial franchise statutes to a private individual who had not consented to any franchise, had not established a civil domicile triggering statutory jurisdiction, and had not engaged in any commercial activity justifying enforcement of commercial regulations.

353. To the extent any pre-litigation claims presentation requirement is asserted as a bar: the administrative notices dispatched by certified mail—delivered and confirmed by USPS tracking receipts—each provided actual and constructive notice of the factual and legal basis of Plaintiff's demands. The government's receipt of those notices satisfied any substantive notice function that an administrative claims procedure is designed to serve.

Defendants' silence deliberately defeated that purpose and cannot now be invoked to bar the very claims it was designed to resolve.

Injunctive Relief Against Supervisory Defendants Is Proper and Not Barred by Sovereign Immunity

354. As a distinct and independent component of the relief sought herein, Plaintiff moves this Court to issue a permanent injunction—or, pending final resolution, a preliminary injunction—restraining Defendants, their agents, officers, successors, and all persons acting in concert with them from further enforcing Title 56 of the South Carolina Code against Plaintiff's private, non-commercial use of his personal conveyance, absent evidence on the record of Plaintiff's express written consent to the vehicle franchise regulated by that Title.

355. Sovereign immunity does not bar prospective injunctive relief against individual state officers for ongoing constitutional violations. *Ex parte Young*, 209 U.S. 123 (1908), established that a state officer who enforces an unconstitutional statute strips himself of the State's sovereign immunity for purposes of injunctive relief. An injunction against supervisory defendants—including the Commander of the South Carolina Highway Patrol and the Director of the South Carolina Department of Public Safety—binds every officer under their command. *Feliciano v. DuBois*, 846 F. Supp. 1033 (D. Mass. 1994).

356. The four factors for equitable injunctive relief are satisfied. First, likelihood of success on the merits: the core claims are supported by the factual record and the constitutional and common law principles developed throughout this petition. Second, irreparable harm: the loss of constitutional freedoms for even minimal periods of time constitutes irreparable

harm not compensable by monetary damages. *Elrod v. Burns*, 427 U.S. 347, 373 (1976). Third, balance of equities: enjoining unconstitutional application of a commercial franchise statute to a non-consenting private individual imposes no legitimate burden on Defendants, who retain full authority to enforce Title 56 against franchise participants. Fourth, public interest: the true public interest lies in protecting private rights and ensuring that government authority derives from the consent of the governed.

eBay / Winter Four-Factor Injunction Showing

357. Plaintiff sets out the four-factor showing for injunctive relief as a substantive equitable doctrine applied in this equity-governed proceeding, satisfying each element: (i) Plaintiff has suffered an irreparable injury — the warrantless seizure of his dwelling and the deprivation of his person — for which damages alone cannot fully compensate; (ii) the substantive equitable remedy of injunction is appropriate because the dwelling is unique personal property and the dignitary injuries are non-monetizable, such that no purely monetary remedy is adequate as a doctrinal matter; (iii) the balance of hardships tips in Plaintiff's favor, as restraining Defendants from repeating unlawful seizures imposes only the burden of obeying the Constitution; and (iv) the public interest favors injunctive relief, because the public has no interest in the perpetuation of unconstitutional seizures. *eBay*, 547 U.S. at 391; *Winter*, 555 U.S. at 20; *Monsanto Co. v. Geertson Seed Farms*, 561 U.S. 139, 156–57 (2010).

The True Public Interest Lies in Protecting Private Rights; Enforcing Unconsented Franchises Serves No Legitimate Public Purpose

358. Defendants will likely argue that the public interest favors denying injunctive relief so that South Carolina's motor vehicle laws may be enforced uniformly. This argument inverts the

constitutional relationship between government and the people it serves. The public interest is not served by the enforcement of any particular statute; it is served by the protection of private rights—because the protection of private rights is the only legitimate purpose for which government was constituted.

359. The main and only purpose for establishing governments is to protect private property and private rights. Anything that remains private is beyond civil legislative control. A government that refuses to recognize private rights, or that erodes them to enforce unconsented franchise statutes, does not serve the public interest. It harms the very public it was created to protect.

360. Plaintiff's deprivation—the unlawful seizure of his person and dwelling, his arrest and confinement, and the search of his person—outweighs any speculative enforcement interest, particularly where there is no evidence that Plaintiff's private non-commercial travel harmed any other person or any legitimate public interest. The public interest is served by this Court granting the relief sought: it affirms that government authority requires consent; protects the rights of every private individual who uses a personal conveyance for private purposes; and prevents the normalization of a pattern in which a commercial franchise statute is converted into a universal regulatory scheme applying to all users of public roads regardless of consent.

361. Plaintiff, Thomas Edward Humphrey, demands damages in the amount of $132,257,933.00 (One Hundred Thirty-Two Million Two Hundred Fifty-Seven Thousand Nine Hundred Thirty-Three and 00/100 Dollars) in silver minted coins of the United States, as itemized below based on True Bill SCHP-RV062423-HTE and the Fee Schedule.

Itemized Accounting of Damages & Detailed Descriptions of Each Charge

The damages claimed are itemized below, calculated per the Fee Schedule and payable in silver-minted coin as set forth in the following Section:

Charge	Qty	Unit Price	Amount
R-01: Responses requiring certified or registered mail for verification Pages sent via certified mail to assert rights and demand redress.	8 pages	$1,000.00 / page	$8,000.00
R-02: Responses requiring a notarized or witnessed affidavit Notarized affidavits documenting the violations.	8 pieces	$50,000.00 / piece	$400,000.00
R-04: Responses requiring research Research into rights and remedies following the incident.	1,600 hours	$50,000.00 / hour	$80,000,000.00
LA-02: Filing of legal actions without a verified claim by public agents or officers The four statutory charges brought against Plaintiff without a verified claim (Citation No. HC062423233340).	4 actions	$5,000,000.00 / action	$20,000,000.00
LA-04: Required court or hearing appearance Appearance compelled by the citation.	1 appearance	$100,000.00 / appearance	$100,000.00
NH-03: Each minute spent handcuffed or physically restrained by public agents or officers Approximately ninety-six minutes spent handcuffed following the unlawful arrest.	96 minutes	$100,000.00 / minute	$9,600,000.00
NH-04: Cost of each order given by public agents or officers which demands action Orders demanding action issued under color of authority during the encounter.	2 orders	$500,000.00 / order	$1,000,000.00
NH-07: Removal from property Forcible removal from the mobile home during the seizure.	1 incident	$500,000.00 / incident	$500,000.00
NH-11: Each day of imprisonment or confinement by public agents or officers Confinement at the Horry County detention facility following the unlawful arrest.	1 day	$10,000,000.00 / day	$10,000,000.00

Charge	Qty	Unit Price	Amount
NH-16: Taking of fingerprints, photographs, or other biometric identifiers Nonconsensual taking of Plaintiff's fingerprints and photographs during booking.	1 taking	$250,000.00 / taking	$250,000.00
NH-19: Confiscation or seizure of property Warrantless seizure and impoundment of the mobile home, recovered undamaged after approximately twenty hours, facilitated by ABC Mobile Auto & RV Repair.	1 instance	$5,000,000.00 / instance	$5,000,000.00
Strip Search (Religious Violation — Genesis 3:7-10, 21) Unlawful strip search exposing Plaintiff's nakedness in violation of his sincerely held religious convictions.	1 search	$5,000,000.00 / search	$5,000,000.00
Unauthorized Use of Private Dwelling Unauthorized deprivation of the use and enjoyment of Plaintiff's private dwelling and conveyance for 1,201 minutes, from the 8:28 p.m. stop on June 24, 2023, until recovery from impound at 4:29 p.m. on June 25, 2023.	1,201 minutes	$333.00 / minute	$399,933.00
		GRAND TOTAL	**$132,257,933.00**

362. All amounts are to be paid in silver-minted coins of the United States. Defendants had their full opportunity to elect tender in gold or silver as of the True Bill's due date of July 26, 2025, and forfeited that election by their callous indifference and non-response across the months that followed. Plaintiff therefore demands silver only, calculated as set forth below. These damages reflect the harms suffered, including the unlawful arrest and confinement, the unreasonable search of Plaintiff's person, the warrantless seizure of his property, emotional and spiritual distress, and administrative burdens calculated per the Fee Schedule.

Silver-Coin Tender Pegged to the True Bill Due Date; Mitigation of Prejudice Arising from Defendants' Callous Indifference

363. Plaintiff demands tender of the sum certain set forth above — $132,257,933.00 — in

lawful constitutional money pursuant to Article I, Section 10, Clause 1 of the United States Constitution, which provides that "No State shall ... make any Thing but gold and silver Coin a Tender in Payment of Debts." Consistent with the demand made on the face of True Bill No. SCHP-RV062423-HTE, submitted June 24, 2025, and due July 26, 2025, the obligation runs in gold or silver coin of the United States. Plaintiff elects to fix the constitutional measure of that obligation in **silver-minted coins of the United States,** pegged to the silver spot closing price as of **July 26, 2025** — the date on which the True Bill was due and on which Defendants' obligation to satisfy the debt matured.

364. The True Bill came due on July 26, 2025, a Saturday, on which date the markets were closed; the operative silver spot closing price is therefore that of the immediately preceding trading day, Friday, July 25, 2025, which price also stood as the silver spot price as of the July 26, 2025 due date. On that date the verified silver spot closing price (XAG/USD) was **$38.19 per troy ounce** (Open $39.09; High $39.20; Low $37.96; Close $38.19). Dividing the sum certain demanded ($132,257,933.00) by the silver spot closing price on the True Bill due date ($38.19 per troy ounce) yields **3,463,156.14 troy ounces of silver**, which, rounded up to the nearest whole one-ounce coin (because partial coins cannot be tendered as constitutional money), equals **3,463,157 (Three Million, Four Hundred Sixty-Three Thousand, One Hundred Fifty-Seven) one-ounce silver-minted coins of the United States**. Plaintiff therefore demands tender, in satisfaction of the $132,257,933.00 sum certain, of 3,463,157 one-ounce silver-minted coins of the United States.

Defendants' Callous Indifference Tolls Any Alternative Construction of the True Bill's Gold-or-Silver Tender Clause

365. The True Bill upon which Plaintiff's administrative claim was perfected provides on its

face for tender in "gold or silver coin of the United States." The disjunctive "or", in ordinary contractual construction, would vest the election of metal in the obligor or, depending on the construction adopted, leave the question of metal-of-tender open to negotiation between the parties. Defendants, however, have neither responded to nor remedied the True Bill, nor any subsequent administrative demand, nor any of the antecedent notices served upon them. They have stood silent. That silence is not a neutral procedural posture. It is the act of obligors who, having had unbroken opportunity from the date of the True Bill's submission on June 24, 2025, through its maturity on July 26, 2025, and through every day since, declined to elect a metal of tender, declined to negotiate one, declined to satisfy the debt in either metal, and declined to acknowledge the obligation at all. Their conduct rises to the level of callous indifference to Plaintiff's rights and to Plaintiff's continuing injury.

366. That callous indifference has worked a concrete economic prejudice upon Plaintiff that equity will not permit Defendants now to invoke against him. Had Defendants honored their obligation — or had they communicated any election of metal at any time during the months that elapsed between the True Bill's maturity and the execution of this Verified Petition — Plaintiff would have possessed, throughout that interval, the freedom to convert any portion of the tender he received in gold into silver at the prevailing market exchange rate at any moment of his choosing. That right of conversion is not theoretical. The market rates of exchange between gold and silver fluctuated materially across this interval, and a prudent obligee, exercising the elementary right to manage the form in which his judgment proceeds are held, would have made financial decisions to convert any gold tender into silver in advance of foreseeable adverse movement in the gold-to-silver ratio. Plaintiff

hereby affirms, on the record of this Petition, that he would have made such conversions, and would have made them at the times most favorable to his position, had Defendants ever afforded him the opportunity to do so by tendering anything at all.

367. Defendants' callous indifference — their refusal across the months since the True Bill's maturity to acknowledge, respond to, or satisfy the debt in either metal — has eliminated that opportunity. Equity will not permit a wrongdoer to take advantage of the very delay he caused. *See Holmberg v. Armbrecht*, 327 U.S. 392, 396 (1946) (equitable tolling applies where a defendant's conduct has prevented the plaintiff from asserting his rights in their full measure); *Glus v. Brooklyn Eastern District Terminal*, 359 U.S. 231, 232–33 (1959) ("No man may take advantage of his own wrong."). Accordingly, in any construction of the True Bill's tender clause that would treat "gold or silver" as conferring an election upon the obligor rather than upon the obligee, Plaintiff would suffer prejudice attributable solely to Defendants' conduct — the loss of every opportunity to convert intermediate gold tender into silver at favorable points along the gold-to-silver ratio across the period of Defendants' default. To prevent that prejudice from inuring to the benefit of the very Defendants whose silence created it, Plaintiff invokes the equitable doctrines of unclean hands and election against the obligor, and demands that the tender be satisfied in silver-minted coins of the United States, valued at the silver spot closing price on the True Bill's due date (July 26, 2025), namely $38.19 per troy ounce, yielding the 3,463,157 one-ounce silver-minted coins set forth above.

368. Punitive and exemplary damages: Plaintiff respectfully leaves the amount of any punitive and exemplary damages to be determined by the jury, whose ultimate judgment stands as the final and dispositive word in this matter. The jury, having heard the evidence, is the

proper measure of the moral character of the wrong, and Plaintiff submits his cause to the jury's conscience without proposing or restricting the figure the jury, upon the evidence, may award.

369. To be perfectly clear: Plaintiff does not concede that Defendants ever held the right of metal-election under the True Bill's tender clause. The election under the True Bill, properly construed, lies with the obligee — Plaintiff — because Plaintiff is the party whose rights were violated, whose property was seized, and whose damages are being measured. Plaintiff therefore elects **silver**. The foregoing prejudice analysis is offered solely to defeat, in the alternative, any reading of the disjunctive "or" that would place the election with Defendants. Under either construction — Plaintiff's primary construction (obligee's election) or the alternative construction (obligor's election, defeated by Defendants' callous indifference and the resulting prejudice) — the proper measure of tender is 3,463,157 one-ounce silver-minted coins of the United States, calculated at the verified silver spot closing price of $38.19 per troy ounce on the True Bill's due date of July 26, 2025.

Remedies

370. **1. Proof of Claim:** I demand that Defendants provide strict proof of claim under oath, rebutting each point of my Affidavit of Facts within 30 days, including evidence overcoming the presumption of my private status and lack of consent to any franchise or statutory jurisdiction. Defendants must also demonstrate that their actions did not constitute government identity theft by proving they did not unlawfully presume me to be a statutory "person" or public officer under a franchise without my consent. Failure to do so shall be deemed an admission of all allegations contained herein, as silence in the face of a

duty to respond constitutes consent and agreement under common law principles. This demand is made in accordance with the equitable doctrine of laches and tacit procuration, ensuring that justice is not delayed or denied through Defendants' inaction.

371. **2. Damages:** $132,257,933.00 (One Hundred Thirty-Two Million Two Hundred Fifty-Seven Thousand Nine Hundred Thirty-Three and 00/100 Dollars) in silver-minted coins of the United States, for the unlawful seizure of my person and my private mobile home, my arrest and confinement, the unreasonable search of my person, and associated harms occurring on June 24–25, 2023, per my Fee Schedule. This amount includes compensation for the harm inflicted by government identity theft, which subjected me to unauthorized statutory jurisdiction and deprived me of my private rights. Under the concept of equality of treatment that is the foundation of all law, the RULES OF EQUITY permit me to use the same tactics against Government that they use to create and implement their adhesion contracts, which then is the authority for implementing my terms outlined in my Declaration, Notice & Demand letter and Fee Schedule:

372. "The State in such cases exercises no greater right than an individual may exercise over the use of his own property when leased or loaned to others. The conditions upon which the privilege shall be enjoyed being stated or implied in the legislation authorizing its grant, no right is, of course, impaired by their enforcement. The recipient of the privilege, in effect, stipulates to comply with the conditions. It matters not how limited the privilege conferred, its acceptance implies an assent to the regulation of its use and the compensation for it." [*Munn v. Illinois*, 94 U.S. 113 (1876)]

373. **3. Equitable Relief:** Injunction against further interference, and declaration of my rights,

including a declaration that Defendants' actions constituted government identity theft and were unlawful. I seek an equitable lien on Defendants' property to secure damages, as well as an order requiring Defendants to cease all presumptions of statutory jurisdiction over my private person and property absent proof of my voluntary consent to a franchise, as required by *Hale v. Henkel*, 201 U.S. 43 (1906). In addition to the monetary damages sought, I request that the Court issue a declaratory judgment affirming my status as a "national" and "state national" under 8 U.S.C. § 1101(a)(21), not subject to the statutory jurisdiction of the "United States" (federal territories) as defined in 26 U.S.C. § 7701(a)(9), absent my voluntary consent to a domicile or franchise therein. Such status is a constitutional right, not a revocable privilege, and that government misclassification of individuals as statutory "citizens" under 8 U.S.C. § 1401 constitutes identity theft. I further seek an injunction prohibiting the Defendants from any future actions based on the erroneous presumption that I am a statutory "U.S. citizen" or public officer, ensuring that my unalienable rights as a sovereign individual whenever traveling in South Carolina are upheld against such unlawful encroachments.

374. As Jesus Christ taught in Matt. 20:25-28, "Whoever desires to become great among you, let him be your servant... just as the Son of Man did not come to be served, but to serve," imposing a duty on all Christians, including myself, to resist the Defendants' corruption of this servant role into one of domination, justifying these remedies to restore lawful order.

Additional Remedies:

- Garnishment of wages and government benefits of individual Defendants.
- Alternative to Criminal Referral to a grand jury for indictment; Public apology and

retraining of South Carolina Highway Patrol officers on constitutional rights.

- Independent audit of South Carolina Highway Patrol practices to ensure compliance with constitutional limits.

375. **4. Declaratory Relief:** A declaration that Defendants' application of Title 56 of the South Carolina Code to my private travel violates my unalienable right to liberty, as no franchise consent exists, and is unconstitutional under the Fourth, Fifth, and Fourteenth Amendments, including the Equal Protection Clause, and the South Carolina Constitution, specifically Article I, § 3, by arbitrarily denying me equal protection under the law.

376. Plaintiff seeks a declaratory judgment, affirming his rights as a sovereign individual not subject to Defendants' statutory jurisdiction absent consent. This declaration, per *Haines v. Kerner*, 404 U.S. 519 (1972), ensures Plaintiff's pleadings are adjudicated on substance, not form.

377. These remedies align with the biblical promise of freedom and blessings for obedience to God's law (Deuteronomy 28:1-14), ensuring that my fidelity to divine authority is upheld against Defendants' unlawful encroachments.

J. Prayer for Relief on State Liability

378. Plaintiff respectfully requests that this Court enter declaratory judgment and final judgment, in equity and at common law, declaring and adjudicating as follows: (a) that the State of South Carolina is directly liable in equity and at common law, on the doctrine of *respondeat superior* (as further evidenced by the State's answerability codified at S.C. Code § 15-78-40), for all compensatory injuries inflicted upon Plaintiff by the Officer Defendants within the scope of their commissions; (b) that all conduct of the Officer

Defendants alleged in this Verified Petition was undertaken within the scope of their respective commissions as officers and agents of the State of South Carolina for purposes of the State's common-law and equitable *respondeat superior* obligations (as further evidenced by the State's answerability codified at S.C. Code § 15-78-40); (c) that upon entry of any damages judgment against any Officer Defendant in this action, the State of South Carolina is required, in equity and at common law, to answer for that judgment, including compensatory damages, fees, and costs; (d) that the State of South Carolina is required, in equity and at common law, to provide for the defense of the Officer Defendants or to answer for their reasonable attorney's fees and litigation costs; (e) that the obligations of the State of South Carolina identified herein are independent common-law and equitable obligations and survive any bankruptcy proceeding initiated by any individual Officer Defendant; and (f) that the State of South Carolina is bound by the scope-of-commission finding entered by the trier of fact in this action with respect to each of the Officer Defendants. Nothing in this Section invokes the South Carolina Tort Claims Act, S.C. Code § 15-78-10 *et seq.*, as the source of Plaintiff's right to recover, nor concedes the applicability of any statutory claims-presentation, notice, or immunity provision of that Act to Plaintiff's equitable and common-law causes; the statutes cited throughout this Section are cited solely as legislative evidence of the pre-existing duties identified herein.

VII. DEMAND FOR TRIAL BY JURY

379. I, Thomas Edward Humphrey, demand a trial by jury as guaranteed by the Seventh Amendment to the United States Constitution, and Article I, § 14 of the South Carolina Constitution, to determine all questions of fact and law in this matter. The right to a jury trial in civil cases is a fundamental right protected by both the federal and state

constitutions. As held in *Beacon Theatres, Inc. v. Westover*, 359 U.S. 500 (1959), and *Dimick v. Schiedt*, 293 U.S. 474 (1935), this right must be preserved unless waived explicitly. I rebut any presumption that I waive this right, and this Court must honor this demand absent evidence of my express consent to the contrary.

Executed on June 22, 2026, at Watertown, Massachusetts.

Respectfully submitted,

____
Thomas Edward Humphrey *Plaintiff, In Propria Persona*
% 107 Middlesex Road, Apartment 5
Waltham, Massachusetts Republic [02452]
Telephone: (617) 835-9319
Email: ThyKingdomCome1322@gmail.com

IX. VERIFICATION

COMMONWEALTH OF MASSACHUSETTS)
) ss:
COUNTY OF MIDDLESEX)

I, Thomas Edward Humphrey, being first duly sworn, depose and state:

I am the Plaintiff in the above-captioned action. I have prepared the foregoing Verified Petition in Equity and at Common Law and know its contents. The matters stated therein are true of my own personal knowledge, except as to those matters stated upon information and belief, and as to those matters, I believe them to be true.

____
Thomas Edward Humphrey *Plaintiff, In Propria Persona*

SWORN TO and subscribed before me this 22 day of June, 2026.

Natasha Ruggeri-Koret
My Commission Expires 06/17/2027
Notary Public
Commonwealth of Massachusetts

____
Notary Public, Commonwealth of Massachusetts My commission expires: 06/17/2027

EXHIBIT INDEX

Exhibit A — Notice of Default and Opportunity to Cure; Conditional Offer of Settlement and Compromise, dated June 8, 2026, served via certified mail upon the State of South Carolina, Governor Henry Dargan McMaster, the South Carolina Highway Patrol (Colonel Christopher N. Williamson), and the South Carolina Department of Public Safety (Director Robert G. Woods IV). Certified Mail No. 9598 0710 5270 4077 2319 75; PS Form 3811 No. 9590 9402 9695 5199 2872 04. This Notice has three attached exhibits:

(1) Exhibit A to the Notice — True Bill No. SCHP-RV062423-HTE, submitted June 24, 2025, in the amount of $132,257,933.00, incorporating the Declaration of Rights Violations and Demand for Damages;

(2) Exhibit B to the Notice — Final Notice of Overdue True Bill, dated August 5, 2025; and

(3) Exhibit C to the Notice — Verified Petition in Equity at Common Law prepared for filing in the Court of Common Pleas, Fifteenth Judicial Circuit, Horry County, South Carolina.

State of South Carolina

Court of Common Pleas — Fifteenth Judicial Circuit, Horry County

Thomas Edward Humphrey v. State of South Carolina, et al.

Case No. ______________

Exhibit

A

Notice of Default and Opportunity to Cure

Re: True Bill No. SCHP-RV062423-HTE — Served June 8, 2026

Description

Six-page Notice of Default and Opportunity to Cure; Conditional Offer of Settlement and Compromise, served June 8, 2026, by Petitioner Thomas Edward Humphrey upon Governor Henry Dargan McMaster, SCHP Colonel Christopher N. Williamson, and SCDPS Director Robert G. Woods IV by certified mail (Article No. 9598 0710 5270 4077 2319 75). Arising from the June 24, 2023 incident, it recites the prior June 24, 2025 Declaration and the August 5, 2025 Final Notice and extends a fourteen-day cure period. Subscribed and notarized under jurat. Offered as evidence of pre-suit notice to the named officials.

Certified Mail No. 9598 0710 5270 4077 2319 75 | PS Form 3811: 9590 9402 9695 5199 2872 04

NOTICE OF DEFAULT AND OPPORTUNITY TO CURE; CONDITIONAL OFFER OF SETTLEMENT AND COMPROMISE

***re*: True Bill No. SCHP-RV062423-HTE**

TO: STATE OF SOUTH CAROLINA
Governor, Henry Dargan McMaster
1100 Gervais Street
Columbia, SC 29201

South Carolina Highway Patrol
Colonel, Christopher N. Williamson
10311 Wilson Blvd.
Blythewood, SC 29016

South Carolina Department of Public Safety
Director, Robert G. Woods IV
10311 Wilson Boulevard
Post Office Box 1993
Blythewood, SC 29016

AND ALL SUCCESSORS, ASSIGNS, AGENTS, AND PRINCIPALS THEREOF

June 8, 2026

I, Thomas Edward Humphrey, a living, breathing, flesh-and-blood man, a sovereign private individual, *sui juris*, and state national, temporarily dwelling at c/o 107 Middlesex Road, Apartment 5, Massachusetts Republic [02452], not acting as a statutory "person" or public officer, do hereby serve this **NOTICE OF DEFAULT AND OPPORTUNITY TO CURE; CONDITIONAL OFFER OF SETTLEMENT AND COMPROMISE** upon you under penalty of perjury under the laws of the United States of America and the State of South Carolina.

NOTICE TO AGENT IS NOTICE TO PRINCIPAL; NOTICE TO PRINCIPAL IS NOTICE TO ALL AGENTS

This Notice incorporates by reference, as if fully set forth herein, the following duly served and accepted documents:

1. **DECLARATION OF RIGHTS VIOLATIONS AND DEMAND FOR DAMAGES** dated June 24, 2025 (Certified Mail # 9589 0710 5270 2303 1635 95).

2. **True Bill No. SCHP-RV062423-HTE** submitted June 24, 2025, in the amount of $132,257,933.00 payable in gold or silver minted coins of the United States.

3. **FINAL NOTICE** dated August 5, 2025 (Certified Mail # 9589 0710 5270 2095 0715 73), which gave you until September 4, 2025, to rebut point-by-point under penalty of perjury **OR** pay in full **OR** make a reasonable settlement offer.

4. **VERIFIED PETITION IN EQUITY AT COMMON LAW** prepared for filing in the Court of Common Pleas, Fifteenth Judicial Circuit, Horry County, South Carolina (which expressly requires all silver-coin tender to be calculated at the verified silver spot closing price of $38.19 per troy ounce on the True Bill's due date of July 26, 2025, rounded up to the nearest whole coin).

More than nine (9) months have now elapsed since the Final Notice deadline. You have failed and refused to rebut, pay, or settle. Your silence constitutes conclusive acquiescence, admission, and default.

DEFAULT IS HEREBY DECLARED. The True Bill stands as a liquidated commercial judgment and equitable lien.

OPPORTUNITY TO CURE DEFAULT

You are granted a final fourteen (14) days from the date of receipt of this Notice (as evidenced by return receipt) to cure the default by **ONE** of the following:

1. Delivering the full True Bill amount of **3,463,157** one-ounce silver-minted coins of the United States (calculated at the verified silver spot closing price of $38.19 per troy ounce on July 26, 2025, as stated in the Verified Petition, rounded up to the nearest whole coin); **OR**

2. Providing a verified, point-by-point rebuttal affidavit sworn under penalty of perjury with competent evidence rebutting each allegation in the Declaration and True Bill; **OR**

3. Accepting and performing the **Conditional Offer of Settlement and Compromise** set forth immediately below by timely and full performance of **EITHER** Method A (physical silver coin delivery at the compromised 2025 valuation) **OR** Method B (conditional fiat payment calculated at the full current market value of the coins today plus the current average premium cost to purchase the coins today).

CONDITIONAL OFFER OF SETTLEMENT AND COMPROMISE

In the interest of peace, reconciliation, and to avoid further administrative burden, judicial proceedings, and additional fees accruing under the Fee Schedule, I hereby extend this good-faith **conditional offer to settle and compromise the entire matter for the reduced sum of TEN MILLION DOLLARS ($10,000,000.00) in value.**

This $10,000,000.00 represents the compromised settlement value of exactly **261,849** one-ounce silver-minted coins of the United States, calculated at the verified silver spot closing price of **$38.19 per troy ounce** on the True Bill's due date of July 26, 2025 (as expressly stated and calculated in the Verified Petition).

This compromised settlement offer of $10,000,000.00 in value may be performed by one of the following two alternative methods:

METHOD A – PHYSICAL SILVER COIN DELIVERY (PREFERRED METHOD):

Deposit exactly **261,849** one-ounce silver-minted coins of the United States (representing the $10,000,000.00 compromised settlement value at the July 26, 2025 spot price of $38.19 per ounce) into my designated depository:

SD Bullion, Inc. – SD Depository
Account Number: 4783
Account Holder: Thomas Humphrey
Street Address: 4570 W Sterns Rd.
City, State, ZIP: Ottawa Lake, MI 49267
Contact Phone: (800) 233-6805

METHOD B – CONDITIONAL ACCEPTANCE OF CHECK OR MONEY ORDER TO EFFECTUATE THE $10,000,000.00 COMPROMISED SETTLEMENT (ALTERNATIVE METHOD):

To practically effectuate the compromised settlement of **TEN MILLION DOLLARS ($10,000,000.00)** in value (representing the 261,849 coins at the July 26, 2025 spot price), deliver to me a cashier's check, certified check, or money order in the exact total amount of the current full market cost to purchase **261,849** one-ounce United States government-minted silver coins today. This allows me to immediately acquire the physical coins without loss and thereby receive the compromised settlement value in usable form.

The current calculated total amount required is **Twenty Million Six Hundred Seven Thousand Five Hundred Sixteen Dollars ($20,607,516.00)**, broken down as follows:

- **Current spot market value of 261,849 coins: $17,989,026.00** (Calculated using the current silver spot price of **$68.70 per troy ounce** as of June 8, 2026 × 261,849 coins)
- **Average premium cost to purchase the coins today: $2,618,490.00** (Calculated at **$10.00 per troy ounce** average premium × 261,849 coins)

Total exact amount required for the cashier's check, certified check, or money order under Method B: $20,607,516.00

This amount is specifically calculated so that I can immediately deposit the funds and use the full proceeds to purchase exactly 261,849 one-ounce .999 fine United States government-minted silver coins (such as American Silver Eagles or equivalent) from reputable bullion dealers and deposit those coins into the designated SD Bullion depository account above, without suffering any loss due to current spot price or premiums.

BASIS FOR THE $10.00 AVERAGE PREMIUM AND ADJUSTMENT RULE:

The $10.00 per troy ounce average premium used in this calculation is a conservative, protective estimate based on current June 2026 market conditions for one-ounce United States minted silver coins. Actual premiums advertised by major dealers have recently ranged from approximately $8.00 to $15.00+ per ounce depending on quantity, product (e.g., American Silver Eagles), payment method, and market volatility.

If, on the actual date you tender payment under Method B, the lowest verifiable published premium from major reputable dealers is higher than $10.00 per ounce, you must increase the check amount to reflect the full then-current spot price plus the actual higher premium so that I can purchase the coins without loss.

PERFORMANCE DEADLINE UPON WRITTEN ACCEPTANCE OF SETTLEMENT OFFER

Upon your timely written acceptance of this Conditional Offer of Settlement and Compromise, you shall have **forty-five (45) days** from the date of such written acceptance to fully and completely perform your chosen method of settlement. Time is of the essence.

- Under **Method A**: Full physical delivery of the 261,849 one-ounce silver-minted coins must be completed and confirmed at the designated SD Bullion depository within forty-five (45) days of your written acceptance.

- Under **Method B**: The full calculated cashier's check, certified check, or money order in the exact amount of $20,607,516.00 (or the higher amount required if the premium on the tender date exceeds $10.00 per ounce) must be received by me within forty-five (45) days of your written acceptance.

Failure to fully and timely perform within this forty-five (45) day period shall automatically render your acceptance and this entire Conditional Offer of Settlement and Compromise null and void, without any further notice from me. In that event, I shall immediately be entitled to proceed with enforcement of the original True Bill, the Verified Petition in Equity, and all other available constitutional, common-law, and commercial remedies.

CONDITIONAL NATURE OF ACCEPTANCE UNDER METHOD B:

This Method B and my acceptance of any check, money order, or funds is made **STRICTLY CONDITIONALLY** and for the **LIMITED PURPOSE ONLY** of allowing me to promptly convert the proceeds into physical silver coins as actual constitutional money at today's full market cost. This conditional acceptance does **NOT** waive, modify, prejudice, or estop my declarations, position, and demands (as set forth in the documents incorporated herein) that:

- Only gold and silver coin minted by the United States are lawful money and tender under Article I, Section 10 of the Constitution of the United States;
- Federal Reserve Notes, U.S. Dollar fiat currency, and all other paper or digital instruments issued by or under color of the current de facto government are not lawful money, and I do not consent to, recognize, or voluntarily participate in any such fiat monetary system;
- My receipt and use of any such funds under this limited conditional acceptance shall be used **solely and exclusively** to acquire physical silver coins, and shall not be construed as consent to jurisdiction, waiver of rights, recognition of fiat as "money," or participation in the fiat system in any other context or for any other purpose whatsoever.

This conditional acceptance is offered in the spirit of practical compromise, peace, and to minimize further conflict and expense while fully preserving all my unalienable rights, remedies, and position under common law, constitutional law, and commercial law. Nothing herein shall be deemed an admission, estoppel, waiver, or consent of any kind.

Upon timely written acceptance of this offer and full performance by either Method A or Method B within the deadlines stated above, I will execute and deliver a full and final Release and Satisfaction of all claims, liens, and demands arising from the June 24, 2023 incident and all related documents, including dismissal of the Verified Petition in Equity without prejudice.

This settlement offer is time-sensitive, open only for the fourteen (14)-day cure period, and is conditioned upon full and timely performance by one of the methods above. **No counter-offers will be considered.** Partial performance or tender of less than the full calculated amount required under the chosen method shall not constitute acceptance or cure and shall render this offer null and void.

FAILURE TO CURE OR ACCEPT SETTLEMENT

Should you fail to cure the default or accept and perform this settlement offer (by either Method A or Method B) within the time provided, I will proceed without further notice to exercise any and all lawful means necessary to secure just compensation, including but not limited to enforcement of equitable liens, amendment and vigorous prosecution of the Verified Petition in Equity, and all other constitutional, common-law, and commercial remedies available.

I do not consent to any civil statutory status, presumptions of jurisdiction, or franchise obligations. The only thing I demand from you is obedience to the Constitution and respect for private property.

Respectfully submitted this 8th day of June, 2026.

TEH

Thomas Edward Humphrey, Declarant

All rights reserved. None waived.

Without prejudice

JURAT – (FOR AFFIDAVIT OR OTHER AFFIRMED STATEMENT)

COMMONWEALTH OF MASSACHUSETTS
COUNTY OF MIDDLESEX

On this 8 day of June, 2026 before me, the undersigned notary public, **Thomas Edward Humphrey** personally appeared, proved to me through satisfactory evidence of identification, which were MA State ID (e.g., Massachusetts Driver's License or U.S. Passport), to be the person who signed the attached **NOTICE OF DEFAULT AND OPPORTUNITY TO CURE; CONDITIONAL OFFER OF SETTLEMENT AND COMPROMISE** (*re*: True Bill No. SCHP-RV062423-HTE) in my presence, and who affirmed to me that the contents of the document are truthful and accurate to the best of his knowledge and belief.

This notarization is made under the laws of the Commonwealth of Massachusetts and is intended to be given full force and effect in the State of South Carolina pursuant to S.C. Code Ann. § 26-3-130 and the principles of comity and full faith and credit.

Signature of Notary Public

Printed Name of Notary: Natasha Ruggeri-Koret

My Commission Expires: 06/17/2027 **(Notary Seal)**

Natasha Ruggeri-Koret
My Commission Expires 06.17.2027
NOTARY PUBLIC
COMMONWEALTH OF MASSACHUSETTS

EXHIBITS

The following exhibits are attached hereto and incorporated herein by reference as if fully set forth:

Exhibit A: True Bill No. SCHP-RV062423-HTE — Submitted June 24, 2025

Verified instrument designated True Bill No. SCHP-RV062423-HTE, submitted June 24, 2025, incorporating in full the accompanying **Declaration of Rights Violations and Demand for Damages**. This exhibit sets forth the original commercial claim in the amount of $132,257,933.00 payable in gold or silver minted coins of the United States, together with the foundational declaration of rights violations arising from the June 24, 2023 incident.

Exhibit B: Final Notice of Overdue True Bill — Re: True Bill No. SCHP-RV062423-HTE

Final Notice dated August 5, 2025, providing formal notice that True Bill No. SCHP-RV062423-HTE remained unpaid and overdue after the July 26, 2025 due date. This exhibit reiterates the demand for payment in gold or silver minted coins and warns of further administrative and legal action in the absence of rebuttal, payment, or reasonable settlement.

Exhibit C: Verified Petition in Equity

Verified Petition in Equity at Common Law prepared for filing in the Court of Common Pleas, Fifteenth Judicial Circuit, Horry County, South Carolina. This exhibit sets forth the full equitable and common-law claims for redress of ultra vires trespass to chattels, conversion, deprivation of constitutional rights, enforcement of equitable liens, and declaratory, injunctive, and compensatory relief arising from the same June 24, 2023 incident.

True and correct copies of **Exhibits A, B, and C** are attached to this Notice and made a part hereof.

EXHIBIT

A

TRUE BILL

No. SCHP-RV062423-HTE — Submitted June 24, 2025

DESCRIPTION

Verified instrument designated True Bill No. SCHP-RV062423-HTE, submitted June 24, 2025, incorporating in full the accompanying Declaration of Rights Violations and Demand for Damages.

EXHIBIT

B

FINAL NOTICE OF OVERDUE TRUE BILL

Re: True Bill No. SCHP-RV062423-HTE

DESCRIPTION

Final notice regarding the overdue status of True Bill No. SCHP-RV062423-HTE, reiterating the underlying demand.

EXHIBIT

C

VERIFIED PETITION IN EQUITY

Re: True Bill No. SCHP-RV062423-HTE

DESCRIPTION

A verified petition in equity setting out, under oath, the complete factual record and the grounds for relief arising from True Bill No. SCHP-RV062423-HTE and its accompanying Declaration of Rights Violations and Demand for Damages. Because the petition runs to 147 pages, the full document is provided digitally and can be reviewed at the link below:

https://drive.google.com/file/d/1013321u107ykUa344kdmCapZ0tPuDEpE/

Thomas Humphrey
107 Middlesex Rd
Apartment 5
Waltham, MA 02452

CERTIFIED MAIL®

9589 0710 5270 4077 2319 75

U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
Domestic Mail Only

OFFICIAL USE

9589 0710 5270 4077 2319 75

Brian J. Gaines, Compt.
1200 Senate St. #305
Columbia, SC 29201

Brian J. Gaines, Comptroller
1200 Senate State #305
Columbia, SC 29201

SENDER: COMPLETE THIS SECTION

COMPLETE THIS SECTION ON DELIVERY

1. Article Addressed to:

State of South Carolina
Brian J. Gaines, Compt.
1200 Senate St. #305
Columbia, SC 29201

9590 9402 9695 5199 2872 04

2. Article Number (Transfer from service label)

9589 0710 5270 4077 2319 75

PS Form 3811, July 2020 PSN 7530-02-000-9053 Domestic Return Receipt

Certified Mail No. 9598 0710 5270 4077 2319 75 | PS Form 3811: 9590 9402 9695 5199 2872 04

NOTICE OF DEFAULT AND OPPORTUNITY TO CURE; CONDITIONAL OFFER OF SETTLEMENT AND COMPROMISE

re: **True Bill No. SCHP-RV062423-HTE**

TO: STATE OF SOUTH CAROLINA
Governor, Henry Dargan McMaster
1100 Gervais Street
Columbia, SC 29201

South Carolina Highway Patrol
Colonel, Christopher N. Williamson
10311 Wilson Blvd.
Blythewood, SC 29016

South Carolina Department of Public Safety
Director, Robert G. Woods IV
10311 Wilson Boulevard
Post Office Box 1993
Blythewood, SC 29016

AND ALL SUCCESSORS, ASSIGNS, AGENTS, AND PRINCIPALS THEREOF

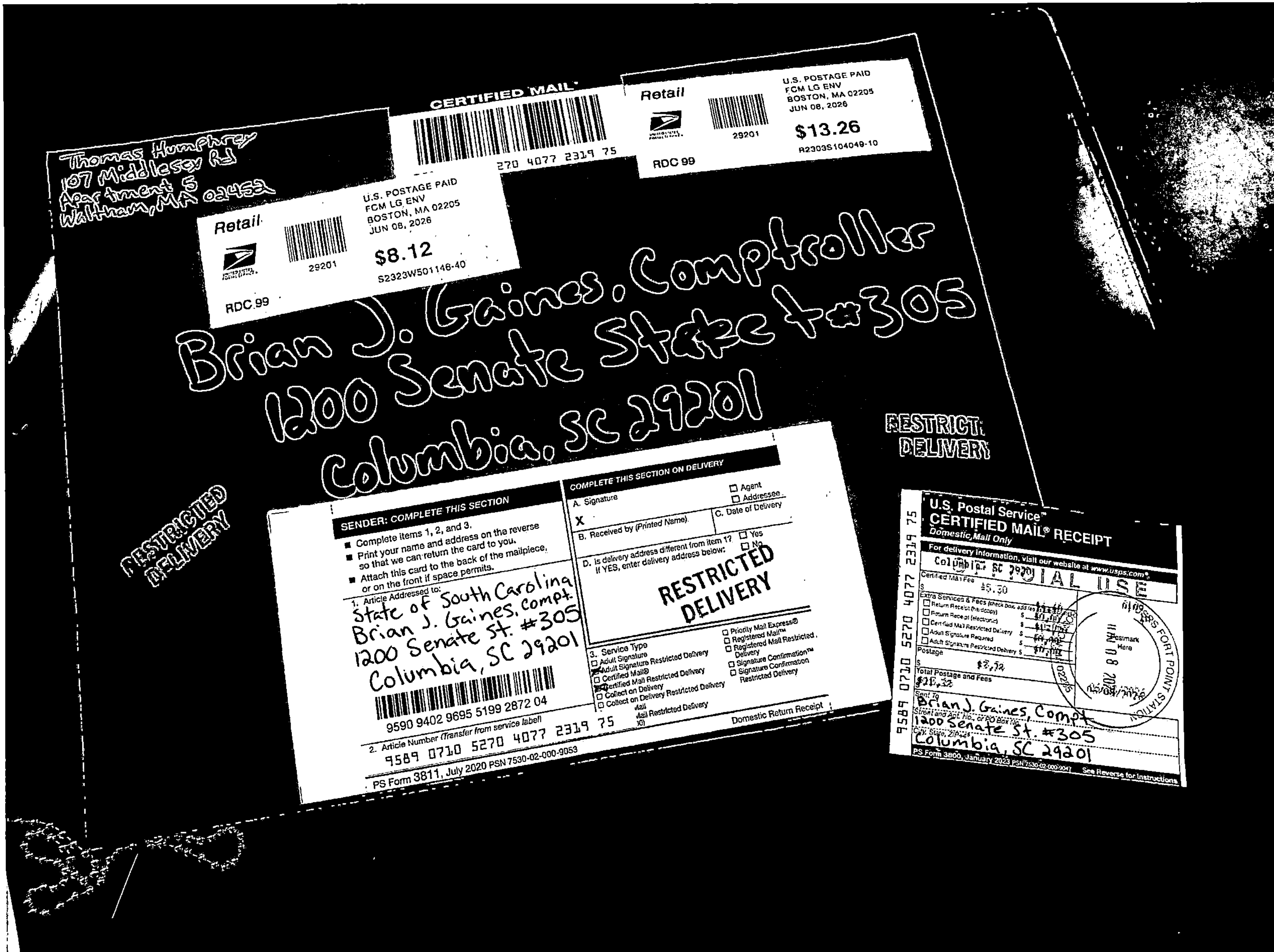
June 8, 2026

I, Thomas Edward Humphrey, a living, breathing, flesh-and-blood man, a sovereign private individual, *sui juris*, and state national, temporarily dwelling at c/o 107 Middlesex Road, Apartment 5, Massachusetts Republic [02452], not acting as a statutory "person" or public officer, do hereby serve this **NOTICE OF DEFAULT AND OPPORTUNITY TO CURE; CONDITIONAL OFFER OF SETTLEMENT AND COMPROMISE** upon you under penalty of perjury under the laws of the United States of America and the State of South Carolina.

NOTICE TO AGENT IS NOTICE TO PRINCIPAL; NOTICE TO PRINCIPAL IS NOTICE TO ALL AGENTS

This Notice incorporates by reference, as if fully set forth herein, the following duly served and accepted documents:

1. **DECLARATION OF RIGHTS VIOLATIONS AND DEMAND FOR DAMAGES** dated June 24, 2025 (Certified Mail # 9589 0710 5270 2303 1635 95).
2. **True Bill No. SCHP-RV062423-HTE** submitted June 24, 2025, in the amount of $132,257,933.00 payable in gold or silver minted coins of the United States.



Thomas Humphrey
107 Middlesex Rd
Apartment 5
Waltham, MA 02452
CERTIFIED MAIL
270 4077 2319 75
Retail
U.S. POSTAGE PAID
FCM LG ENV
BOSTON, MA 02205
JUN 08, 2026
29201
$13.26
R2303S104049-10
RDC 99
Retail
U.S. POSTAGE PAID
FCM LG ENV
BOSTON, MA 02205
JUN 08, 2026
29201
$8.12
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EXHIBIT

A

TRUE BILL

No. SCHP-RV062423-HTE — Submitted June 24, 2025

DESCRIPTION

Verified instrument designated True Bill No. SCHP-RV062423-HTE, submitted June 24, 2025, incorporating in full the accompanying Declaration of Rights Violations and Demand for Damages.

Gmail **Thy Kingdom Come <thykingdomcome1322@gmail.com>**

True Bill Submission [True Bill No. SCHP-RV062423-HTE] - DECLARATION OF RIGHTS VIOLATIONS AND DEMAND FOR DAMAGES

Thy Kingdom Come <thykingdomcome1322@gmail.com> Tue, Jul 1, 2025 at 4:46 PM
To: RobertWilliams@schouse.gov, MarkWillis@schouse.gov, ChrisWooten@schouse.gov, RichardYow@schouse.gov, NEdwards@ors.sc.gov, Jocelyn.Boyd@psc.sc.gov, JoAnne.Hill@psc.sc.gov, Robert.Bockman@psc.sc.gov, [redacted], [redacted], [redacted], [redacted], troop1@scdps.gov, troop2@scdps.gov, troop3@scdps.gov, troop4@scdps.gov, troop5@scdps.gov, troop6@scdps.gov, troop7@scdps.gov, troop8@scdps.gov, troop9@scdps.gov, EdwardCollins@scdps.gov, joelhovis@scdps.gov, TylerTidwell@scdps.gov, DavidJones@scdps.gov, LenaButler@scdps.gov, DanielWebb@scdps.gov, WilliamBennett@scdps.gov, BrandonBolt@scdps.gov, MitchellRidgeway@scdps.gov, GaryMiller@scdps.gov, NicholasPye@scdps.gov, BrittanyGlover@scdps.gov, AltonMay@scdps.gov, Dwaynebrunson@scdps.gov, BrandisMcNulty@scdps.gov, RachelUrconis@scdps.gov, KyleMcGahee@scdps.gov, schprecruiter@scdps.gov, cgoffice@cg.sc.gov, christopherplyler@scdps.gov
Cc: Thy Kingdom Come <thykingdomcome1322@gmail.com>

---------- Forwarded message ---------
From: **Thy Kingdom Come** <thykingdomcome1322@gmail.com>
Date: Tue, Jul 1, 2025 at 4:41 PM
Subject: True Bill Submission [True Bill No. SCHP-RV062423-HTE] - DECLARATION OF RIGHTS VIOLATIONS AND DEMAND FOR DAMAGES
To: <PaulaCalhoon@schouse.gov>, <GildaCobbHunter@schouse.gov>, <NealCollins@schouse.gov>, <SyllesteDavis@schouse.gov>, <BenConnell@schouse.gov>, <ChandraDillard@schouse.gov>, <BobbyCox@schouse.gov>, <JasonElliott@schouse.gov>, <BrandonCox@schouse.gov>, <ShannonErickson@schouse.gov>, <HeatherCrawford@schouse.gov>, <RayeFelder@schouse.gov>, <AprilCromer@schouse.gov>, <CalForrest@schouse.gov>, <CraigGagnon@schouse.gov>, <ValGuest@schouse.gov>, <KambrellGarvin@schouse.gov>, <BrandonGuffey@schouse.gov>, <GilGatch@schouse.gov>, <PatrickHaddon@schouse.gov>, <DanielGibson@schouse.gov>, <BillHager@schouse.gov>, <DougGilliam@schouse.gov>, <KevinHardee@schouse.gov>, <WendellGilliard@schouse.gov>, <RobHarris@schouse.gov>, <ChrisHart@schouse.gov>, <LeeHewitt@schouse.gov>, <TomHartnett@schouse.gov>, <DavidHiott@schouse.gov>, <JackieHayes@schouse.gov>, <BillHixon@schouse.gov>, <RosalynHenderson-Myers@schouse.gov>, <LonnieHosey@schouse.gov>, <PatriciaHenegan@schouse.gov>, <LeonHoward@schouse.gov>, <BillHerbkersman@schouse.gov>, <MaxHyde@schouse.gov>, <JosephJefferson@schouse.gov>, <JayKilmartin@schouse.gov>, <jeffjohnson@schouse.gov>, <JohnKing@schouse.gov>, <JermaineJohnson@schouse.gov>, <RogerKirby@schouse.gov>, <StewartJones@schouse.gov>, <KathyLanding@schouse.gov>, <WendellJones@schouse.gov>, <BrianLawson@schouse.gov>, <JayJordan@schouse.gov>, <MattLeber@schouse.gov>, <RandyLigon@schouse.gov>, <JohnMcCravy@schouse.gov>, <StevenLong@schouse.gov>, <AnnieMcDaniel@schouse.gov>, <PhillipLowe@schouse.gov>, <TimMcGinnis@schouse.gov>, <JosiahMagnuson@schouse.gov>, <CodyMitchell@schouse.gov>, <RJMay@schouse.gov>, <JAMoore@schouse.gov>, <RyanMcCabe@schouse.gov>, <TravisMoore@schouse.gov>, <AdamMorgan@schouse.gov>, <WestonNewton@schouse.gov>, <AlanMorgan@schouse.gov>, <RogerNutt@schouse.gov>, <DennisMoss@schouse.gov>, <DavidONeal@schouse.gov>, <ChrisMurphy@schouse.gov>, <MelissaOremus@schouse.gov>, <MikeNeese@schouse.gov>, <RussellOtt@schouse.gov>, <BrandonNewton@schouse.gov>, <JordanPace@schouse.gov>, <FawnPedalino@schouse.gov>, <ToddRutherford@schouse.gov>, <MarvinPendarvis@schouse.gov>, <HLCIComm@schouse.gov>, <TommyPope@schouse.gov>, <CarlaSchuessler@schouse.gov>, <MichaelRivers@schouse.gov>, <HeathSessions@schouse.gov>, <RobertRobbins@schouse.gov>, <MurrellSmith@schouse.gov>, <SethRose@schouse.gov>, <MarkSmith@schouse.gov>, <LeonStav@schouse.gov>, <DavidVaughan@schouse.gov>, <BillTaylor@schouse.gov>, <DavidWeeks@schouse.gov>, <DeonTedder@schouse.gov>, <JayWest@schouse.gov>, <AnneThayer@schouse.gov>, <SpencerWetmore@schouse.gov>, <IvoryThigpen@schouse.gov>, <WillWheeler@schouse.gov>, <AshleyTrantham@schouse.gov>, <JoeWhite@schouse.gov>, <BillWhitmire@schouse.gov>, <RobertWilliams@schouse.gov>

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From: **Thy Kingdom Come** <thykingdomcome1322@gmail.com>
Date: Tue, Jul 1, 2025 at 4:38 PM

Subject: True Bill Submission [True Bill No. SCHP-RV062423-HTE] - DECLARATION OF RIGHTS VIOLATIONS AND DEMAND FOR DAMAGES
To: <[redacted]>, <[redacted]>, <[redacted]>, [redacted], <troop1@scdps.gov>, <troop2@scdps.gov>, <troop3@scdps.gov>, <troop4@scdps.gov>, <troop5@scdps.gov>, <troop6@scdps.gov>, <troop7@scdps.gov>, <troop8@scdps.gov>, <troop9@scdps.gov>, <EdwardCollins@scdps.gov>, <joelhovis@scdps.gov>, <TylerTidwell@scdps.gov>, <DavidJones@scdps.gov>, <LenaButler@scdps.gov>, <DanielWebb@scdps.gov>, <WilliamBennett@scdps.gov>, <BrandonBolt@scdps.gov>, <MitchellRidgeway@scdps.gov>, <GaryMiller@scdps.gov>, <NicholasPye@scdps.gov>, <BrittanyGlover@scdps.gov>, <AltonMay@scdps.gov>, <Dwaynebrunson@scdps.gov>, <BrandisMcNulty@scdps.gov>, <RachelUrconis@scdps.gov>, <KyleMcGahee@scdps.gov>, <schprecruiter@scdps.gov>, <Mike.Couick@ecsc.org>, <John.Frick@ecsc.org>, <BrianAdams@scsenate.gov>, <RichardCash@scsenate.gov>, <ThomasAlexander@scsenate.gov>, <WesClimer@scsenate.gov>, <KarlAllen@scsenate.gov>, <TomCorbin@scsenate.gov>, <SeanBennett@scsenate.gov>, <SBIComm@scsenate.gov>, <SFGFComm@scsenate.gov>, <TomDavis@scsenate.gov>, <MikeFanning@scsenate.gov>, <DickHarpootlian@scsenate.gov>, <MikeGambrell@scsenate.gov>, <GregHembree@scsenate.gov>, <BillyGarrett@scsenate.gov>, <BradHutto@scsenate.gov>, <StephenGoldfinch@scsenate.gov>, <DarrellJackson@scsenate.gov>, <STransComm@scsenate.gov>, <KevinJohnson@scsenate.gov>, <PenryGustafson@scsenate.gov>, <MichaelJohnson@scsenate.gov>, <JoshKimbrell@scsenate.gov>, <MargieBrightMatthews@scsenate.gov>, <MarlonKimpson@scsenate.gov>, <ThomasMcElveen@scsenate.gov>, <DwightLoftis@scsenate.gov>, <Mia@scsenate.gov>, <GeraldMalloy@scsenate.gov>, <HarveyPeeler@scsenate.gov>, <ShaneMartin@scsenate.gov>, <SJudComm@scsenate.gov>, <ShaneMassey@scsenate.gov>, <MikeReichenbach@scsenate.gov>, <RexRice@scsenate.gov>, <VernonStephens@scsenate.gov>, <RonnieSabb@scsenate.gov>, <ScottTalley@scsenate.gov>, <JohnScott@scsenate.gov>, <RossTurner@scsenate.gov>, <SandySenn@scsenate.gov>, <DannyVerdin@scsenate.gov>, <NikkiSetzler@scsenate.gov>, <KentWilliams@scsenate.gov>, <KatrinaShealy@scsenate.gov>, <TomYoung@scsenate.gov>, <JustinBamberg@schouse.gov>, <TerryAlexander@schouse.gov>, <BruceBannister@schouse.gov>, <CarlAnderson@schouse.gov>, <HeatherBauer@schouse.gov>, <LucasAtkinson@schouse.gov>, <ThomasBeach@schouse.gov>, <WilliamBailey@schouse.gov>, <BethBernstein@schouse.gov>, <NathanBallentine@schouse.gov>, <BartBlackwell@schouse.gov>, <JeffBradley@schouse.gov>, <JerryCarter@schouse.gov>, <GaryBrewer@schouse.gov>, <MicahCaskey@schouse.gov>, <CaseBrittain@schouse.gov>, <DonChapman@schouse.gov>, <MikeBurns@schouse.gov>, <BillChumley@schouse.gov>, <JoeBustos@schouse.gov>, <BillClyburn@schouse.gov>

Attn. STATE OF SOUTH CAROLINA and Any and All Political, Private or Public Entities, Federal, State, or Local Corporate Government(s), Municipality(ies), International Organizations, Corporation(s), agent(s), investigator(s), or informant(s), etc., and/or Third Party(ies) working in collusion with the STATE OF SOUTH CAROLINA,

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- Facebook: https://www.facebook.com/share/v/1AwnvssFTf/
- Google Photos https://photos.app.goo.gl/Hqwv9bEvwtGN3iAx9

Also find attached:

- DECLARATION OF RIGHTS VIOLATIONS AND DEMAND FOR DAMAGES.pdf
- SCHP-RV062423-HTE.pdf

The foundation of a republican government is PRIVATE INDIVIDUAL rights and PRIVATE property in which compelled participation in any government franchise is a CRIME. I can only become UNEQUAL or INFERIOR to government **WITH my consent. I DO NOT CONSENT!**

What is "law"?

> *"Shall the throne of iniquity, which devises evil by law, have fellowship with You? They gather together against the life of the righteous, and condemn innocent blood. But the Lord has been my defense, and my God the rock of my refuge. He has brought on them their own iniquity, and shall cut them off in their own wickedness; the Lord our God shall cut them off."*
> *[Psalm 94:20-23, Bible, NKJV]*

"Law" as legally defined ISN'T everything the legislature passes, but only a VERY small subset.

It is VERY important to understand what the LEGAL definition of "law" is and what classifies as "law" generally.

To summarize the requirements to qualify as "law" in a governmental sense:

1. It must apply equally to ALL. It cannot compel INEQUALITY of treatment between any man or class of men.

2. It cannot do collectively what people individually cannot NATURALLY do. In other words, in the words of Frederic Bastiat, it aggregates the individual right of self-defense into a collective body so that it can be delegated. A single human CANNOT delegate a right he does not individually ALSO possess, which

indirectly implies that no GROUP of men called “government” can have any more COLLECTIVE rights under the collective entity rule than a single human being.

3. It cannot punish a citizen for an innocent action that was not a crime or not demonstrated to produce measurable harm.

The ability to PROVE such harm with evidence in court is called “standing”.

4. It cannot compel the redistribution of wealth between two private parties. This is ESPECIALLY true if it is called a “tax”.

5. It cannot interfere with or impair the right of contracts between PRIVATE parties. That means it cannot compel income tax withholding unless one or more of the parties to the withholding are ALREADY public officers in the government.

6. It cannot interfere with the use or enjoyment or CONTROL over private property, so long as the use injures no one. Implicit in this requirement is that it cannot FAIL to recognize the right of private property or force the owner to donate it to a PUBLIC USE or PUBLIC PURPOSE. In the common law, such an interference is called a “trespass”.

7. The rights it conveys must attach to LAND rather than the CIVIL STATUS (e.g. “taxpayer”, “citizen”, “resident”, etc.) of the people ON that land. One can be ON land within a PHYSICAL state WITHOUT being legally “WITHIN” that state (a corporation) as an officer of the government or corporation called a “citizen” or “resident”.

8. It must provide a remedy AFTER an injury occurs. It may not PREVENT injuries before they occur. Anything that operates in a PREVENTIVE rather than CORRECTIVE mode is a franchise. There is no standing in a REAL court to sue WITHOUT first demonstrating such an injury to the PRIVATE or NATURAL rights of the Plaintiff or VICTIM.

9. It cannot acquire the “force of law” from the consent of those it is enforced against. In other words, it cannot be an agreement or contract. All franchises and licensing are types of contracts.

10. It does not include compacts, or contracts between private people and governments. Rights that are INALIENABLE cannot be contracted away, even WITH consent.

11. It cannot, at any time, be called “voluntary”. Congress and even the U.S. Supreme Court call the IRC Subtitle a “income tax” voluntary.

12. It does not include franchises, licenses, or civil statutory codes, all of which derive ALL of their force of law from your consent in choosing a civil domicile.

Any violation of the above rules is what the Bible calls "devises evil by law" in Psalm 94:20-23'

The ONLY thing I am aware of that satisfies ALL of the above criteria is:

1. The criminal law.

2. The common law, which is based on EQUALITY of treatment of all parties.

Everything else only applies to a SUBSET of the society or class within society, and therefore does NOT apply equally to all.

> ***"If the court sanctions the power of discriminating taxation, and nullifies the uniformity mandate of the Constitution," as said by one who has been all his life a student of our institutions, "it will mark the hour when the sure decadence of our present government will commence."*** *[. . .] The legislation, in the discrimination it makes, is class legislation.* ***Whenever a distinction is made in the burdens a law imposes or in the benefits it confers on any citizens by reason of their birth, or wealth, or religion, it is class legislation, and leads inevitably to oppression and abuses, and to general unrest and disturbance in society [e.g. wars, political conflict, violence, anarchy].*** *"*
> *[Pollock v. Farmers' Loan & Trust Co., 157 U.S. 429 (Supreme Court 1895)]*

> *"Where do wars and fights come from among you?* ***Do they not come from your desires for pleasure [unearned money or "benefits", privileges, or franchises, from the government] that war in your members [and your democratic governments]? You lust [after other people's money] and do not have.*** *You murder [the unborn to increase your standard of living] and covet [the unearned] and cannot obtain [except by empowering your government to STEAL for you!]. You fight and war [against the rich and the nontaxpayers to subsidize your idleness]. Yet you do not have because you do not ask [the Lord, but instead ask the deceitful government]. You ask and do not receive, because you ask amiss, that you may spend it on your pleasures.* ***Adulterers and adulteresses! Do you not know that friendship [statutory "citizenship"] with the world [or the governments of the world] is enmity with God?*** *Whoever therefore wants to be a friend [STATUTORY "citizen", "resident", "inhabitant", "person" franchisee] of the world [or the governments of the world] makes himself an enemy of God."*
> *[James 4:1-4, Bible, NKJV]*

All of my freedom and autonomy derives from EQUALITY [between ME and the government in court], and therefore the only thing that can be "law" in a truly and perfectly free society is the CRIMINAL law. Everything that produces INEQUALITY MUST be voluntary AND God FORBIDS CHRISTIANS from volunteering in relation to governments or civil rulers!

> *"I [God] brought you up from Egypt [slavery] and brought you to the land of which I swore to your fathers; and I said, 'I will never break My covenant with you. And* ***you shall make no covenant [contract or franchise or agreement of ANY kind] with the inhabitants of this [corrupt pagan] land; you shall tear down their [man/government worshipping socialist] altars.*** *' But you have not obeyed Me. Why have you done this?*

*"Therefore I also said, '**I will not drive them out before you; but they will become as thorns [terrorists and persecutors] in your side and their gods will be a snare [slavery!] to you.'"***

So it was, when the Angel of the LORD spoke these words to all the children of Israel, that the people lifted up their voices and wept. [Judges 2:1-4, Bible, NKJV]

***"You shall make no covenant [contract or franchise] with them [foreigners, pagans], nor with their [pagan government] gods [laws or judges].** They shall not dwell in your land [and you shall not dwell in theirs by becoming a "resident" or domiciliary in the process of contracting with them], lest they make you sin against Me [God]. For if you serve their [government] gods [under contract or agreement or franchise], it will surely be a snare to you."*
[Exodus 23:32-33, Bible, NKJV]

SATAN'S MAIN SOURCE OF STRENGTH is tempting people to GIVE UP EQUALITY and rights in exchange for privileges, franchises, or "benefits". That's what the serpent did in the garden and that's what every government since then has made a BUSINESS out of called a "franchise".

*"Again, the devil took Him [Jesus] up on an exceedingly high [civil/legal status above all other humans] mountain, and showed Him all the kingdoms of the world and their glory. **And he said to Him, "All these things ["BENEFITS"] I will give You if You will fall down [BELOW Satan but ABOVE other humans] and worship [serve as a PUBLIC OFFICER] me."***

*Then Jesus said to him, **"Away with you, Satan! For it is written, 'You shall worship the Lord your God, and Him only you shall serve.'"***

Then the devil left Him, and behold, angels came and ministered to Him."
[Matt. 4:8-11, Bible, NKJV]

All civil societies are based on compact and therefore contract. Since Christians cannot contract with secular governments or civil rulers, they cannot become subject to man's pagan civil franchise statutes and may be governed only by the common law and God's law:

***"Our government is founded upon compact. Sovereignty was, and is, in the people.** It was entrusted by them, as far as was necessary for the purpose of forming a good government, to the Federal Convention; and the Convention executed their trust, by effectually separating the Legislative, Judicial, and Executive powers; which, in the contemplation of our Constitution, are each a branch of the sovereignty. The well-being of the whole depends upon keeping each department within its limits."*
[Glass v. The Sloop Betsey, 3 U.S. 6, 3 Dall. 6, 1 L.Ed. 485 (1794)]

"There is but one law which, from its nature, needs unanimous consent. This is the social compact; for civil association is the most voluntary of all acts. Every man being born free and his own master, no one, under any pretext whatsoever, can make any man subject without his consent. To decide that the son of a slave is born a slave is to decide that he is not born a man."
[The Social Contract or Principles of Political Right, Jean Jacques Rousseau, 1762, Book IV, Chapter 2]

*"Then Haman said to King Ahasuerus, "**There is a certain people [the Jews, who today are the equivalent of Christians] scattered and dispersed among the people in all the provinces of your kingdom; their [CIVIL] laws are different from all other people's [because they are God's laws!], and they do not keep the king's [unjust] laws.** Therefore it is not fitting for the king to let them remain. If it pleases the king, let a decree be written that they be destroyed, and I will pay ten thousand talents of silver into the hands of those who do the work, to bring it into the king's treasuries."*
[Esther 3:8-9, Bible, NKJV]

"Those people who are not governed [ONLY] by GOD and His laws will be ruled by tyrants."
[William Penn (after whom Pennsylvania was named)]

"A free people [claim] their rights as derived from the laws of nature [God and His laws], and not as the gift of [the civil franchise statutes enforced by] their chief magistrate [or any government law]."
[Thomas Jefferson: Rights of British America, 1774. ME 1:209, Papers 1:134]

The phrase "operation of law" uses the word "law" and therefore implies REAL law. REAL law in turn consists of ONLY the common law and the Constitution.

When anyone from the government seeks to either administratively or judicially enforce a "duty" or "obligation", they have the burden of proof to demonstrate.

1. That you expressly consented to a contract with them. This would include:
    1.1. Written agreements.
    1.2. Trusts.
    1.3. Statutory franchises.
    This class of obligations is called "private law" or "special law". It is NOT "law" in a classical sense.
    2. That "operation of law" is involved. In other words, that:
    2.1. You injured a specific, identified flesh and blood person... and
    2.2. The injured party has standing to sue in a civil or common law action... and
    2.3. The party against whom the enforcement action is imposed DOES NOT consent.
    THIS is "PUBLIC law" or "law".

They must meet the above burden of proof with legally admissible evidence and may not satisfy that burden with either a belief or a presumption. Pursuant to Federal Rule of Evidence 610, neither beliefs or opinions constitute legally admissible evidence. Likewise, a presumption is not legally admissible evidence for the same reason.

The first option, meaning contracts, is EXCLUDED from the definition of "law" based on the following.

> *Municipal law, thus understood, is properly defined to be "a rule of civil conduct prescribed by the supreme power in a state, commanding what is right and prohibiting what is wrong."*
>
> *[. . .]*
>
> *It is also called a rule to distinguish it from a compact or agreement; **for a compact is a promise proceeding from us, law is a command directed to us**. The language of a compact is, "I will, or will not, do this"; that of a law is, "thou shalt, or shalt not, do it." It is true there is an obligation which a compact carries with it, equal in point of conscience to that of a law; but then the original of the obligation is different. **In compacts we ourselves determine and promise what shall be done, before we are obliged to do it; in laws, we are obliged to act without ourselves determining or promising anything at all.** Upon these accounts law is defined to be "a rule."*
> *[Readings on the History and System of the Common Law, Second Edition, Roscoe Pound, 1925, p. 4]*

Real "law" is what the above refers to as "a rule of civil conduct". By that definition, it can only refer to the common law. Why? Because domicile is a prerequisite to enforcing civil STATUTES and it is voluntary and requires consent in some form.

Any enforcement action that does NOT satisfy the burden of proof or proceeds upon PRESUMPTION in satisfying the above is, by definition:

1. An "injustice", because it violates your right to be left alone.

2. A violation of due process of law because it is NOT proceeding with evidence. PRESUMPTIONS are NOT "evidence" or a substitute for evidence.

3. A purely private commercial transaction. As such, if the Plaintiff or the enforcer claim to be a "government", they:
    3.1. Are subject to the Clearfield Doctrine. See United States v. Winstar Corp. 518 U.S. 839 (1996) .
    3.2. Are "purposefully availing themselves" of commerce in an otherwise legislatively but not constitutionally foreign jurisdiction. Hence they waive sovereign, official, and judicial immunity.
    3.3. Waive sovereign, official, and judicial immunity under the Foreign Sovereign Immunities Act, 28 U.S.C. Chapter 97. https://www.law.cornell.edu/uscode/text/28/part-IV/chapter-97

4. A non-governmental function. REAL government PROTECTS absolutely owned private property rather than making a business or "trade or business" out of converting it to PUBLIC property or property CONTROLLED by the public.

"For the principal aim of society is to protect individuals in the enjoyment of those absolute rights, which were vested in them by the immutable laws of nature; but which could not be preserved in peace without the mutual assistance and intercourse, which is gained by the institution of friendly and social communities. Hence it follows, that the first and primary end of human laws is to maintain and regulate these absolute rights of individuals."

"By the absolute rights of individuals we mean those which are so in their primary and strictest sense; such as would belong to their persons merely in a state of nature, and which every man is entitled to enjoy whether out of society or in it." - Ibid.
[William Blackstone, Commentaries (1765)]

"Under basic rules of construction, statutory laws enacted by legislative bodies cannot impair rights given under a constitution. 194 B.R. at 925. " [In re Young, 235 B.R. 666 (Bankr.M.D.Fla., 1999)]

*"The rights of the individuals are **restricted only to the extent that they have been voluntarily surrendered** by the citizenship to the agencies of government."*
[City of Dallas v Mitchell, 245 S.W. 944]

"Life, faculties, production— in other words individuality, liberty, property— that is man. And in spite of the cunning of artful political leaders, these three gifts from God precede all human legislation, and are superior to it."
[Frederic Bastiat (b. 1801 - d. 1850)]

5. A request by the Plaintiff and the GOVERNMENT court or administrative enforcer to procure absolutely owned private property.
   5.1. That property is, at minimum, the "services" needed to respond to the ILLEGAL and even UNCONSTITUTIONAL enforcement action.
   5.2. The property might also include any and all property or services that might be awarded as a consequence of the enforcement proceeding.

6. An attempt to make you into a Merchant under U.C.C. §2-104(1) who is SELLING absolutely owned private property to the Plaintiff or GOVERNMENT administrative enforcer.

7. A request or OFFER by the Plaintiff or GOVERNMENT administrative enforcer to become a Buyer under U.C.C. §2103(1)(a) of your absolutely owned private property.

8. A request for you to specify any and all CONDITIONS you want to attach to the use, custody, or control of your absolutely owned private property.
   8.1. As the absolute owner, you have a PRIVATE and CONSTITUTIONAL right to dictate any and ALL conditions you wish to attach to the use of your property.

*"**PROPERTY**. Rightful dominion over external objects; ownership; the unrestricted and exclusive right to a thing; the right to dispose of the substance of a thing in every legal way, to possess it, to use it and to exclude every one else from interfering with it. Mackeld. Rom. Law, § 265.*

"Property. is the highest right a man can have to anything; being used for that right which one has to lands or tenements, goods or chattels, which no way depends on another man's courtesy. Jackson ex dem. Pearson v. Housel, 17 Johns. 281, 283.

A right imparting to the owner a power of indefinite user, capable of being transmitted to universal successors by way of descent, and imparting to the owner the power of disposition, from himself and his successors per universitatem, and from all other persons who have a spes successions under any existing concession or disposition, in favor of such person or series of persons as he may choose, with the like capacities and powers as he had himself, and under such conditions as the municipal or particular law allows to be annexed to the dispositions of private persons. Aust. Jur. (Campbell's Ed.) § 1103.

The right of property is that sole and despotic dominion which one man claims and exercises over the external things of the world, in total exclusion of the right of any other individual in the universe. It consists in the free use, enjoyment and disposal of all a person's acquisitions, without any control or diminution save only by the laws of the land. 1 Bl.Comm. 138; 2 Bl.Comm. 2, 15.

The word is also commonly used to denote any external object over which, the right of property is exercised. In this sense it is a very wide term, and includes every class of acquisitions which a man can own or have an interest in. See Scranton v. Wheeler, 179 D.S. 141, 21 Sup.Ct. 48, 45 L.Ed. 126; Lawrence v. Hennessey, 165 Mo. 659, 65 S.W. 717; Boston & L.R. Corp. v. Salem & L.R. Co., 2 Gray (Mass.), 35; National Tel. News Co. v. Western Union Tel. Co., 119 Fed. 294, 56 C.C.A. 198, 60 L.R.A. 805; Hamilton v. Rathbone, 175 U.S. 414, 20 Sup.Ct. 155, 44 L.Ed. 219; Stanton v. Lewis, 26 Conn. 449; Wilson v. Ward Lumber Co. (C. C.) 67 Fed. 674.

—Absolute property . In respect to chattels personal property is said to be "absolute" where a man has, solely and exclusively, the right and also the occupation of any movable chattels, so permanent, but may at some times subsist and not at other times; such for example, as the property a man may have in wild animals which he has caught and keeps, and which are his only so long as he retains possession of them. 2 Bl.Comm. 389.—Real property . A general term for lands, tenements, and hereditaments; property which, on the death of the owner intestate, passes to his heir. Real property is either corporeal or incorporeal. See Code N. Y. § 462 —Separate property . The separate property of a married woman is that which she owns in her own right, which is liable only for her own debts, and which she can incumber and dispose of at her own will.—Special property. Property of a qualified, temporary, or limited nature; as distinguished from absolute, general, or unconditional property. Such is the property of a bailee in the article bailed, of a sheriff in goods temporarily in his hands under a levy, of the finder of lost goods while looking for the owner, of a person in wild animals which he has caught. Stief v. Hart, 1 N.Y. 24; Moulton v. Witherell, 52 Me. 242; Eisendrath v. Knauer, 64 111. 402; Phelps v. People, 72 N.Y. 357.
[Black's Law Dictionary, Second Edition, p. 955]

8.2. If you fail to specify the terms and conditions of the GRANT or SALE of your absolutely owned private property to the opposing party, you are PRESUMED to DONATE the property to the Plaintiff or GOVERNMENT enforcer.

CONSENT. An agreement to something proposed, and differs from assent. (q.v.) Wolff, Ins. Nat. part 1, SSSS 27-30; Pard. Dr. Com. part 2, tit. 1, n. 1, 38 to 178. Consent supposes,

1. a physical power to act; 2. a moral power of acting; 3. a serious, determined, and free use of these powers. Fonb. Eq. B; 1, c. 2, s. 1; Grot. de Jure Belli et Pacis, lib. 2, c. 11, s. 6.

*2. **Consent is either express or implied. Express, when it is given viva voce, or in writing; implied, when it is manifested by signs, actions, or facts, or by inaction or silence, which raise a presumption that the consent has been given.***

[. . .]

*8. - 6. **Courts of equity have established the rule, that when the true owner of property stands by, and knowingly suffers a stranger to sell the same as his own, without objection, this will be such implied consent as to render the sale valid against the true owner.** Story on Ag. Sec. 91, Story on Eq. Jur. Sec. 385 to 390. And courts of law, unless restrained by technical formalities, act upon the principles of justice; as, for example, when a man permitted, without objection, the sale of his goods under an execution against another person. 6 Adolph. & El 11. 469; 9 Barn. & Cr. 586; 3 Barn. & Adolph. 318, note.*
[Bouvier's Law Dictionary, Fourth Edition, 1848]

Principles of Tort Law and Contract Law

Unfairness is a concept that is related to moral Tort Law. Questions of damages, and lack of damages, of the mens rea criminal intent, of fairness, of risk assumption, of equity, and equality are all reasoning and arguments reserved for a Tort Law judgment setting. Tort Law doctrine governs the settlement of grievances that arise between parties without any contract being in effect. Tort Law is generally a free-wheeling jurisdiction, and anything goes.

In contrast to the elastic and expansive nature of Tort Law, when Contracts are in effect, only the content of the Contract is of any significance when the grievance is up for review and judgment.
Tort Law means that for every damage someone works on you, corrective damages will be applied back to that person as the remedy (call the retort). Pure natural moral Tort Law requires that you be damaged in return, i.e., that a retort be worked on you in order to satisfy the demands of Justice.

In Equity contract enforcement proceedings, questions of morality, of Torts, of basic reasonableness, of pure natural justice, of fairness, of mental intent, of the presence of a *corpus delecti,* of privacy rights, are all irrelevant. And the only thing that is relevant is the content of the contract that was entered into some time earlier, in general, and the exact technical infraction the United States, as your Adversary, wants addressed as the grievance. Under some limited circumstances, Federal Judges will annul contract enforcement actions where unreasonable and overzealous statute enforcement Tortfeasance has taken place – what appears to be "fairness" – but such annulment is really only to preemptively restrain such Tortfeasance from recurring in the future, and not to benefit you at all. So whether in a driver's license contract grievance setting of a highway speeding infraction, or in a Commercial contract *Wilful Failure To File* grievance setting through a bank account and other contracts, the only thing that is relevant is you and your contract. All other previous persons, their cases of defilement, and their grievances, and what arguments they made or did not make, is irrelevant. Translated into the practical setting where a poor Defendant is presenting a defense line, this means that all motions that are made for dismissal, based on grounds relating to anyone else's previous prosecution, are automatically denied, as being irrelevant to the instant factual setting. Equality and fairness are not relevant in settling contract grievances. Equality and fairness are Tort Law arguments; they are definable only along the infinite; and if the Judiciary allowed equality or fairness to enter into the contract arena, then the effect of allowing equality and fairness on one side is to work a Tort on the other side – so the Judiciary simply rules, very properly, that when contracts are in effect, only the content of the contract is relevant.

Questions of Fairness and Unfairness are questions reserved for grievances that fall under Tort – a concept commentators note over and over again: "...Tort theory has served to explain and to justify the changing notions of fairness... that are captured by the kaleidoscope of tortious events." - *William Rodgers in Negligence Reconsidered: The Role of Rationality in Tort Theory, 54 Southern California Law Review 1, at 1 (November, 1980).* When contracts are in effect, questions of fairness are not relevant – because only the content of the contract is relevant.

Unfairness, and all of its correlative arguments, are Tort Law arguments and have no place whatsoever in the settlement of grievances falling under Contract Law Jurisprudence: "Since the relationship between the United States and petitioner is based on commercial contract, there is no basis for a claim of unfairness in this result." - *Stencel Aero vs. United States, 431 U.S. 666, at 674 (1976).* Commentators have pointed out the fact that Tort Law is primarily fairness oriented. See: *Epstein in Defenses and Subsequent Pleas in a System of Strict Liability, 3 Journal of Legal Studies 165(1974); Epstein in A Theory of Strict Liability in 2 Journal of Legal Studies 151 (1971); · James Henderson in Process Constraints in Tort, 67 Cornell Law Review 901 (1982).*

As the ripple effect of Tort Law liability attachment ascends up the ladder to reach third persons seemingly not involved with the heated grievance, then so too do distant and removed Employers get held for similar attachments of Tort liability, just like Social Hosts [see *Mark Gutis in Expanding Third Party Liability for Failure to Control the Intoxicated Employee Who Drives, 18 Connecticut Law Review 155 (1985);* the Case Mark Gutis refers to in his Law Review article is *Otis Engineering Corporation vs. Clark, 668 S.W.2nd 307 (Texas, 1983).* This legal reasoning is largely just an extension of the liability that has always been in place regarding the liability of the Principle for the Torts of his Agents, when those Torts were done without the knowledge or authority of the Principle [see *William Vance in Liability for the Unauthorized Torts of Agents in 4 Michigan Law Review 199 (1904)].*

Claims for damages can be enlarged under Tort Law, since Tort Law is a free-wheeling jurisdiction; claims for damages under Contract Law are restricted to the content of the contract, as in Breach of Contract. *Butler vs. Pittway Corporation, id., at 9.*

For example, if a music store sold you a piano and agreed to have it delivered before 6pm tonight, and the piano does not get delivered when you need it, do you think you can ask for simple breach of contract damages, plus compound the requested damages relief asked for in a Court to compensate you for the psychic injuries that you experienced because of the embarrassment and humiliation you suffered before the eyes of your party guests that evening, as the partying went on without that piano being there? Such a request for equitable relief in your Complaint for Breach of Contract is patently ridiculous – Because when contracts are in effect (the purchase and correlative expected delivery of the piano was very much a contract), then only the content of the contract will be addressed and considered by the Judge when a grievance arises. If you want to get supplemental secondary damages (called consequential damages by lawyers) because of the lack of timeliness in the delivery of the piano, then you need to get the other party to agree to pay such damages on their default, in advance, within the body of the contract; then a Court can address your claims of secondary damages [because then your claim falls within the content of the contract]. The question of demanding something as indefinite, vague and arbitrary as psychic damages is a question that belongs in the free-wheeling world of Tort Law, where such indefinite questions of fairness and unfairness have their home: "The primary root of legal liability through psychic causes can be traced back to the year 1349 to a tort action which recognized a liability for assault without [any] physical touching under the Writ of Trespass." - *Harold McNiece in Psychic Injury and Tort Liability in New York, 24 Saint John's Law Review 1, at 3 (1949).*

"The problem of tort liability where a mental injury is involved has troubled the courts for a great many years, and even at present no consistent pattern of liability rules exist. When injuries and causes of injuries leave the realm of the tangible world and enter the uncharted areas of the mind, courts understandably have difficulty in establishing principles of law calculated to assure substantial justice. In the psychic injury field, Mr. Justice Douglas' observation, though made in another connection, seems to be of peculiar pertinence:

"But there are few areas of the law in black and white. The grays are dominant and even among them the shades are innumerable. For the eternal problem of the law is one of making accommodations between conflicting interests. This is why most legal problems end as questions of degree [quoted from *Estin vs. Estin, 334 U.S. 541, at 545 (1948)*]." - *Harold McNiece, id.*

This is a contributing reason why it is so difficult for people to get Title 42, Section 1983 Civil Rights relief, unless both hard damages and special circumstances are present in the factual setting. The privileges and immunities clause of the Fourteenth Amendment protects very few rights because it neither incorporates any of the Bill of Rights nor protects all rights of individual citizens. See *Slaughter-House Cases, 83 U.S. (16 Wall.) 36, 21 L. Ed. 394 (1873)*. Instead, this provision protects only those rights peculiar to being a citizen of the federal government; it does not protect those rights which relate to state citizenship. *Jones v. Temmer, 829 F. Supp. 1226 (D. Colo. 1993)* In order for a Federal Civil Rights Case to prevail, the elements of unjustified, exceptional, and pathetic circumstances must be present in the factual setting to trigger Federal relief – and then when the relief is granted, the Judiciary is really not interested in enriching you as much as they are interested in awarding damage money to preventively restrain the recurrence of unreasonable police Tortfeasance in the future: "Remedies for constitutional wrongs, like other legal remedies, chiefly involve measures either to prevent or terminate the wrong or to redress the harm caused by past unconstitutional [police] conduct." - Professor Sager, as quoted by Bruce Miller in *Inderinclusive Statutes, 20 Harvard Civil Rights – Civil Liberties Law Review 79, at 112 [footnote 145] (1985)*

In such administrative enforcement proceedings under grievances arising out of privileges and contracts that Congress created, Federal Judges are acting Ministerially as a Legislative Court, functioning as an extension of the agency for the King (the King being the United States – the Constitution being essentially a renamed enactment of English Common Law as it was at that time, with only additional restrainments being placed on the King) and not Judicially as an Article III Court acting as an unbiased arbiter in a dispute between two opposing parties; and so some steps taken by the Judge acting Ministerially, to shorten the proceedings or otherwise silence the Defendant when irrelevant subject matter is being discussed, are largely non-reversible on appeal. In *Northern Pipeline vs. Marathon Pipeline [458 U.S. 50 (1982)]*, the Supreme Court ruled that Congress can create non-Article III Legislative Courts in three areas: Territorial Courts, Military Courts Martial, and in disputes involving privileges that Congress created in the first place *[Marathon, id., at pages 64 et seq.]* . Participating in that closed private domain of King's Commerce is very much accepting and benefiting from a privilege created by Congress.

United States Supreme Court Justice Felix Frankfurter on the advisory statement he made that yes, equity is brutal – but that Judges are merely enforcing contracts. And just as invisible Contracts sometimes get us into difficult positions, so too do invisible Principles get invoked by Judges to correctively retort improvident positions being taken by parties.

Once a determination has been made that Tort or Contract governs the question presented, very important differences and rules then apply to settling claims and grievances based on the factual setting falling under Principles governing Tort Law, or under Principles governing Contract Law; and as you can surmise, the question as to whether or not a grievance belongs under Tort or under Contract is often a disputed and hotly argued question between adversaries in a courtroom battle, as the question as to which Law governs can spell total success or total failure for the parties involved.

The STATE OF SOUTH CAROLINA is a corporation, which is municipal in nature, but still a corporation, and the SOUTH CAROLINA HIGHWAY PATROL is an agency of that corporation. This corporate STATE is not the South Carolina Republic.

Therefore, if the corporation known as the STATE OF SOUTH CAROLINA, through its corporate agent, known as the SOUTH CAROLINA HIGHWAY PATROL, intends to compel me to a specific performance upon its corporate statutes, then this corporation, must be the holder in due course of a contract or other commercial agreement signed with my signature in wet ink, requiring this specific performance, before attempting to enforce its demands.

I am not aware of any such commercial agreement or contract with the municipal corporate structure that meets the requirements of a valid contract. If the Municipal Corporate STATE OF SOUTH CAROLINA is the holder in due course of such a contract, please supply a copy of the document, with my signature, for my examination. If, on the other hand, the Municipal Corporate STATE OF SOUTH CAROLINA does not have a contract or commercial agreement with my signature, then the demands made by the SOUTH CAROLINA HIGHWAY PATROL are erroneous and their actions should be abated and recompense made.

So important was the section on contractual or commercial agreement that a wording change was implemented in the Uniform Commercial Code to make it clear that:

> ***Sec. 3-401:1 Official Code Comment.*** *No one is liable on an instrument unless and until he has signed it.*

This straightforward statement makes it very clear that no one can be compelled to specific performance by any implied contract. In the Uniform Commercial Code there are no implied contracts permitted, and if properly and timely challenged by a defendant, every court or tribunal is obliged to rule in the defendant's favor or it is reversible error.

Respectfully,

His Majesty's humble servant,

Yōsεph Mèïя Tōhaŕ - יוֹסֵף מֵאִיר טֹהַר
(also known as Thomas Edward Humphrey)
Minister of Defense, Investigator, Kingdom Ambassador
<u>Gift of Eternal Life Ministries TR</u>
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The_Gift_of_Eternal_Life | Thy_Kingdom_Come1322

The_Mystery_of_Godliness | Yoseph.Meir.Tohar
KingdomTaskForce | ThyKingdomCome1322
The_House_of_Jacob | UNY Judicial Department
The_Gift_of_Eternal_Life

Attachments:

1. DECLARATION OF RIGHTS VIOLATIONS AND DEMAND FOR DAMAGES.pdf
2. SCHP-RV062423-HTE.pdf

TAKE NOTICE: *I have corrected errors and omissions in the original documents (DECLARATION OF RIGHTS VIOLATIONS AND DEMAND FOR DAMAGES and SCHP-RV062423-HTE) submitted to your office on June 24, 2025, via certified mail. Though I note that my claim is not strictly bound by your statute of limitations, my intent was to extinguish any attempt to apply the doctrine of stale claims. Due to a hastened preparation, several clerical errors were overlooked.*

Attached to this correspondence, please find PDF versions of the corrected documents, which rectify all errors and omissions. I wish to emphasize that the factual allegations and legal assertions remain unchanged from those in the original hard-copy documents previously delivered. For clarity and efficiency, I request that the attached PDFs be treated as the operative documents for all purposes related to my claim. The hard-copy documents may serve as evidence of timely filing.

Thank you for your understanding and consideration as I work to ensure the accuracy and clarity of my submission. Please do not hesitate to contact me if further information or clarification is required.

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3 attachments

DECLARATION OF RIGHTS VIOLATIONS AND DEMAND FOR DAMAGES.pdf
2144K View as HTML Scan and download

SCHP-RV062423-HTE.pdf
1435K View as HTML Scan and download

SC Gov. Email List.pdf
1831K View as HTML Scan and download

DECLARATION OF RIGHTS VIOLATIONS AND DEMAND FOR DAMAGES

TO: STATE OF SOUTH CAROLINA
[redacted]
1100 Gervais Street
Columbia, SC 29201

South Carolina Highway Patrol
[redacted]
10311 Wilson Blvd.
Blythewood, SC 29016

South Carolina Department of Public Safety
[redacted]
10311 Wilson Boulevard
Post Office Box 1993
Blythewood, SC 29016

June 24, 2025

I, Thomas Edward Humphrey, a living, breathing, flesh-and-blood man, a sovereign private individual, sui juris, and state national, temporarily dwelling at c/o 275 Main Street, Apartment 709, Watertown, Massachusetts Republic [02472], not acting as a statutory "person" or public officer, do hereby declare under penalty of perjury, under the laws of the United States of America and the State of South Carolina, that the actions of Corporal Christopher A. Plyler of the South Carolina Highway Patrol on June 24, 2023, violated my unalienable rights. This declaration details the constitutional provisions breached, the nature of the violations, and the damages incurred as outlined in True Bill SCHP-RV062423-HTE, submitted on June 24, 2025. This document is submitted as part of an administrative claim to the South Carolina Highway Patrol.

1. FACTUAL ALLEGATIONS AND RIGHTS VIOLATIONS

On June 24, 2023, at approximately 8:28 PM, while traveling southwest on South Kings Highway in Myrtle Beach, Horry County, South Carolina, in my private mobile home for non-commercial purposes, Corporal Christopher A. Plyler initiated an unwarranted traffic stop. The following actions constitute trespasses upon my private rights, government identity theft, and violations of constitutional protections:

1. **Unlawful Traffic Stop and Assertion of Statutory Jurisdiction**: Corporal Plyler stopped me, citing (a) failure to wear a seatbelt and (b) absence of a valid license plate,

invoking South Carolina Code of Laws, Title 56 (e.g., § 56-5-6540 for seatbelts and § 56-3-110 for registration). These commercial statutes are inapplicable to my private, non-commercial travel. I informed Plyler that I am a private American national and state national under 8 U.S.C. § 1101(a)(21), not a statutory "citizen of the United States" under 8 U.S.C. § 1401, nor a "driver" engaged in commerce per South Carolina Code § 56-1-10. I presented a notice (Fee Schedule incorporated by reference), asserting my private status and warning against rights violations. Plyler disregarded this, falsely presuming I am a statutory "person" subject to his jurisdiction without evidence of my consent, committing government identity theft under 18 U.S.C. § 912. This violated my **Fourth Amendment** right to be secure against unreasonable seizures and **South Carolina Constitution, Article I, § 10**, which prohibits warrantless seizures absent probable cause. The U.S. Supreme Court in Delaware v. Prouse, 440 U.S. 648 (1979), holds that traffic stops require reasonable suspicion of a violation, which was absent here as my private travel is not subject to statutory licensing, per Edwards v. California, 314 U.S. 160 (1941). Additionally, this arbitrary enforcement denied me **equal protection** under the **Fourteenth Amendment** and **South Carolina Constitution, Article I, § 3**, by treating me differently from other private travelers without a rational basis, per Romer v. Evans, 517 U.S. 620 (1996).

2. **Demand for Driver's License and Compelled Association**: Plyler demanded a driver's license under South Carolina Code § 56-1-180, applicable only to those voluntarily participating in a government franchise or domiciled in the statutory "United States" (federal territories, per 26 U.S.C. § 7701(a)(9)). I declined, stating I do not contract with the government, and offered private identification and an insurance bond. Plyler's refusal to acknowledge my private status compelled association with a government franchise, violating my **First Amendment** right to freedom of association and **South Carolina Constitution, Article I, § 2**, which protects freedom of conscience. The U.S. Supreme Court in Wooley v. Maynard, 430 U.S. 705 (1977), affirms that individuals cannot be compelled to accept government-imposed identities or obligations. This also burdened my religious beliefs, as my faith, under the Bible's trust indenture (Exodus 20:3-4, 23:32-33), prohibits consenting to secular jurisdiction, violating the **First Amendment's Free Exercise Clause** and **South Carolina Constitution, Article I, § 2**, per Church of Lukumi Babalu Aye v. City of Hialeah, 508 U.S. 520 (1993).
3. **Unlawful Search and Seizure**: Without consent, probable cause, or a warrant, Plyler prevented me from rolling up my window, reached into my mobile home, unlocked the door, and removed me. This constituted an unreasonable search and seizure, violating my **Fourth Amendment** rights and **South Carolina Constitution, Article I, § 10**. Katz v. United States, 389 U.S. 347 (1967), holds that warrantless searches are presumptively unreasonable absent consent or exigent circumstances, neither of which existed. My explicit withholding of consent was ignored, rendering Plyler's actions a trespass to

chattels under common law, as recognized in Gist v. Berkeley County Sheriff's Dep't, 408 S.C. 314 (2014).

4. **False Arrest and Imprisonment**: Plyler arrested me, handcuffed me for approximately 96 minutes, and charged me with statutory violations inapplicable to my private status. This constituted false imprisonment under common law and violated my **Fifth** and **Fourteenth Amendment** due process rights, as well as **South Carolina Constitution, Article I, § 3**, which guarantees liberty. The arrest lacked probable cause, as my private travel did not violate laws applicable to a state national, per Shapiro v. Thompson, 394 U.S. 618 (1969). The prolonged handcuffing caused physical discomfort and emotional distress, actionable under South Carolina tort law, per Hansson v. Scalise Corp., 374 S.C. 352 (2007).
5. **Impoundment of Private Property**: My mobile home was towed and impounded without a warrant or due process, depriving me of my property for 20 hours. This constituted conversion under common law and violated the **Fifth Amendment's Takings Clause**, as no just compensation was provided, per Horne v. Department of Agriculture, 576 U.S. 350 (2015), and **South Carolina Constitution, Article I, § 13**, which protects property rights. The seizure disrupted my dwelling and mobility, causing significant harm.
6. **Strip Search and Detention**: I was transported to Horry County Jail, strip-searched, and detained in a small cell with five others for 10 hours. The strip search, conducted without probable cause or a warrant, violated my **Fourth Amendment** right to privacy and **South Carolina Constitution, Article I, § 10**, as limited by Florence v. Board of Chosen Freeholders, 566 U.S. 318 (2012). The search exposed my nakedness, violating my religious convictions under Genesis 3:7-10, 21, further burdening my **First Amendment** free exercise rights. The 10-hour detention in overcrowded conditions caused emotional distress, constituting intentional infliction of emotional distress under South Carolina common law.
7. **Taking of Physical Identification**: During detention, my fingerprints and photographs were taken without consent, violating my **Fourth Amendment** privacy rights and **South Carolina Constitution, Article I, § 10**. This unauthorized collection of biometric data constituted an additional trespass upon my person, actionable under common law.
8. **Government Identity Theft**: By presuming I am a statutory "person" or public officer under South Carolina's commercial statutes without my consent, Plyler committed government identity theft, converting my private rights into public obligations under a franchise I did not accept. This violated 18 U.S.C. § 912 and the principle of consent of the governed, per Hale v. Henkel, 201 U.S. 43 (1906), which distinguishes natural persons' inherent rights from statutory duties requiring consent. This misclassification denied me **equal protection** by arbitrarily imposing statutory duties, per the **Fourteenth Amendment** and **South Carolina Constitution, Article I, § 3.**

2. CONSTITUTIONAL PROVISIONS VIOLATED

Corporal Plyler's actions breached the following constitutional provisions:

1. **Fourth Amendment (U.S. Constitution)** and **South Carolina Constitution, Article I, § 10**: Prohibits unreasonable searches and seizures. The unwarranted stop, search, arrest, impoundment, strip search, and biometric collection were conducted without probable cause, consent, or a warrant, violating my right to be secure in my person, house, and effects.
2. **Fifth Amendment (U.S. Constitution)** and **South Carolina Constitution, Article I, § 3**: Guarantees due process and prohibits takings without just compensation. The false arrest and property impoundment deprived me of liberty and property without due process, and no compensation was provided for the taking of my mobile home.
3. **Fourteenth Amendment (U.S. Constitution)** and **South Carolina Constitution, Article I, § 3**: Ensures equal protection and due process. The arbitrary application of commercial statutes to my private travel treated me differently from other private travelers without a rational basis, denying equal protection. The lack of evidence of my consent to statutory jurisdiction violated due process.
4. **First Amendment (U.S. Constitution)** and **South Carolina Constitution, Article I, § 2**: Protects freedom of association, free exercise of religion, and freedom of conscience. Compelling me to produce a driver's license and imposing statutory jurisdiction burdened my religious duty to reject secular authority (Exodus 20:3-4), violated my right to avoid government franchises, and forced association with a statutory identity I reject.

3. DAMAGES INCURRED (PER TRUE BILL SCHP-RV062423-HTE)

The harms suffered are quantified per my Fee Schedule, as outlined in True Bill SCHP-RV062423-HTE, submitted on June 24, 2025, totaling $132,257,933.00 in gold or silver minted coins of the United States. The itemized damages reflect the violations detailed above and the administrative, emotional, and property-related burdens imposed by Corporal Plyler's actions. Below is the detailed accounting:

- **R-01: Responses requiring certified or registered mail for verification**
  - Quantity: 8 pages
  - Unit Price: $1,000.00 per page
  - Total: $8,000.00
  - Description: I sent 8 pages of formal notice via certified mail (e.g., Certified Mail # 9589071052702303163595) to assert my rights and demand redress.
- **R-02: Responses requiring a notarized or witnessed affidavit**
  - Quantity: 8 pieces
  - Unit Price: $50,000.00 per piece
  - Total: $150,000.00

  - Description: I prepared an 8 page notarized affidavit to document the violations and pursue administrative redress.
- **R-04: Responses requiring research**
  - Quantity: 1,600 hours
  - Unit Price: $50,000.00 per hour
  - Total: $80,000,000.00
  - Description: I invested 1,600 hours researching constitutional protections, property rights, and administrative procedures to address the violations.
- **LA-02: Filing of legal actions without a verified claim by public agents**
  - Quantity: 4 actions
  - Unit Price: $5,000,000.00 per action
  - Total: $20,000,000.00
  - Description: Plyler filed 4 actions without a verified claim, violating my rights.
- **LA-04: Required court or hearing appearance**
  - Quantity: 1 appearance
  - Unit Price: $100,000.00 per appearance
  - Total: $100,000.00
  - Description: I was compelled to appear in court following the arrest.
- **NH-03: Unwarranted detainment resulting in being handcuffed**
  - Quantity: 96 minutes
  - Unit Price: $100,000.00 per minute
  - Total: $9,600,000.00
  - Description: I was handcuffed for 96 minutes during the unlawful arrest, causing distress and loss of liberty.
- **NH-04: Cost of each order given by public agents demanding action**
  - Quantity: 2 order
  - Unit Price: $500,000.00 per order
  - Total: $1,000,000.00
  - Description: Plyler issued 2 order demanding compliance (e.g., produce a license and step out of my mobile home), imposing an unjust burden.
- **NH-07: Removal from property**
  - Quantity: 1 incident
  - Unit Price: $500,000.00 per incident
  - Total: $500,000.00
  - Description: I was forcibly removed from my mobile home during the arrest.
- **NH-11: Actions resulting in imprisonment**
  - Quantity: 1 day
  - Unit Price: $10,000,000.00 per day
  - Total: $10,000,000.00

  - Description: I was imprisoned for one day at Horry County Jail, a grave violation of my liberty.
- **NH-16: Taking of physical identification**
  - Quantity: 1 instance
  - Unit Price: $250,000.00 per instance
  - Total: $250,000.00
  - Description: My fingerprints and photographs were taken without consent during detention.
- **NH-19: Confiscation or seizure of property resulting in recovery (undamaged)**
  - Quantity: 1 instance
  - Unit Price: $5,000,000.00 per instance
  - Total: $5,000,000.00
  - Description: My mobile home was seized and later recovered undamaged, causing temporary deprivation.
- **Fee for Strip Search (Violation of Religious Convictions)**
  - Quantity: 1 instance
  - Unit Price: $5,000,000.00 per instance
  - Total: $5,000,000.00
  - Description: The strip search exposed my nakedness, violating my religious beliefs under Genesis 3:7-10, 21, causing severe emotional distress.
- **Fee for Unauthorized Use and Enjoyment of Private Dwelling**
  - Quantity: 1,201 minutes (from stop at 8:28 PM to 4:29 PM next day)
  - Unit Price: $333.00 per minute
  - Total: $399,933.00
  - Description: My mobile home was unlawfully detained for 1,201 minutes, calculated from the stop until I picked up my mobile home from impound.

Grand Total: $132,257,933.00 in gold or silver minted coins of the United States.

4. LEGAL BASIS AND PRINCIPLES

The violations are grounded in the following principles, consistent with my prior Petition:

1. **Consent of the Governed**: Government authority requires voluntary consent, per the Declaration of Independence and Hale v. Henkel, 201 U.S. 43 (1906). Plyler failed to provide evidence of my consent to statutory jurisdiction, rendering his actions ultra vires.
2. **Right to Travel**: My private travel is protected under Edwards v. California, 314 U.S. 160 (1941), and Shapiro v. Thompson, 394 U.S. 618 (1969). Applying commercial statutes to my non-commercial mobile home violated this right.

3. **Common Law Torts**: Plyler's actions constitute trespass to chattels, conversion, false imprisonment, and intentional infliction of emotional distress under South Carolina common law, per Gist v. Berkeley County Sheriff's Dep't, 408 S.C. 314 (2014).
4. **Religious Freedom**: Imposing statutory jurisdiction burdened my religious duty to obey God's law alone (Exodus 23:32-33), violating the First Amendment and South Carolina Constitution, Article I, § 2, per Sherbert v. Verner, 374 U.S. 398 (1963).

5. DEMAND FOR REDRESS

I demand that the South Carolina Highway Patrol provide strict proof of claim under oath, within 30 days, rebutting each allegation herein, including evidence of my consent to statutory jurisdiction or participation in a government franchise. Failure to respond shall constitute an admission of liability, per Carmine v. Bowen, 64 A. 932 (1906). I seek payment of $132,257,933.00 in gold or silver minted coins, per True Bill SCHP-RV062423-HTE, to compensate for the harms suffered, including loss of liberty, property deprivation, emotional distress, and administrative burdens.

6. CHOICE OF LAW

This matter is governed by common law and equity, not statutory law, per Erie Railroad Co. v. Tompkins, 304 U.S. 64 (1938). I am not domiciled in the statutory "United States" or "State" as defined in federal law, nor am I a participant in any government franchise.

Dated: June 24, 2025

Respectfully submitted,

____

Thomas Edward Humphrey
Plaintiff, *In Propria Persona (for one's self)*
% 275 Main Street, Apartment 709
Watertown, Massachusetts Republic [02472]
Email: thomasehumphrey@gmail.com
Ph. (617) 835-9319

JURAT – (FOR AFFIDAVIT OR OTHER AFFIRMED STATEMENT)
COMMONWEALTH OF MASSACHUSETTS
COUNTY OF MIDDLESEX

On this _____ day of _______________, 2025, before me, the undersigned notary public, personally appeared Thomas Edward Humphrey, proved to me through satisfactory evidence of identification, which were [describe identification, e.g., state-issued ID],____________________, to be the person who signed the attached **DECLARATION OF RIGHTS VIOLATIONS AND**

DEMAND FOR DAMAGES dated June 24, 2025 in my presence, and who affirmed to me that the contents of the document are truthful and accurate to the best of his knowledge and belief.

____

Signature of Notary Public

My Commission expires: [Seal]

3. **Common Law Torts:** Plyler's actions constitute trespass to chattels, conversion, false imprisonment, and intentional infliction of emotional distress under South Carolina common law, per Gist v. Berkeley County Sheriff's Dep't, 408 S.C. 314 (2014).
4. **Religious Freedom:** Imposing statutory jurisdiction burdened my religious duty to obey God's law alone (Exodus 23:32-33), violating the First Amendment and South Carolina Constitution, Article I, § 2, per Sherbert v. Verner, 374 U.S. 398 (1963).

5. DEMAND FOR REDRESS

I demand that the South Carolina Highway Patrol provide strict proof of claim under oath, within 30 days, rebutting each allegation herein, including evidence of my consent to statutory jurisdiction or participation in a government franchise. Failure to respond shall constitute an admission of liability, per Carmine v. Bowen, 64 A. 932 (1906). I seek payment of $131,504,933.00 in gold or silver minted coins, per True Bill SCHP-RV062423-HTE, to compensate for the harms suffered, including loss of liberty, property deprivation, emotional distress, and administrative burdens.

6. CHOICE OF LAW

This matter is governed by common law and equity, not statutory law, per Erie Railroad Co. v. Tompkins, 304 U.S. 64 (1938). I am not domiciled in the statutory "United States" or "State" as defined in federal law, nor am I a participant in any government franchise.

Dated: June 24, 2025

Respectfully submitted,

TEH

Thomas Edward Humphrey
Plaintiff, *In Propria Persona (for one's self)*
% 275 Main Street, Apartment 709
Watertown, Massachusetts Republic [02472]
Email: thomasehumphrey@gmail.com
Ph. (617) 835-9319

JURAT – (FOR AFFIDAVIT OR OTHER AFFIRMED STATEMENT)
COMMONWEALTH OF MASSACHUSETTS
COUNTY OF MIDDLESEX

On this 24th day of June, 2025, before me, the undersigned notary public, personally appeared Thomas Edward Humphrey, proved to me through satisfactory evidence of identification, which were [describe identification, e.g., state-issued ID], MA State ID, to be the person who signed the attached **DECLARATION OF RIGHTS VIOLATIONS AND**

DEMAND FOR DAMAGES dated June 24, 2025 in my presence, and who affirmed to me that the contents of the document are truthful and accurate to the best of his knowledge and belief.

Monica Coleman

Signature of Notary Public

My Commission expires: 10/07/2027

[Seal]

MONICA COLEMAN
NOTARY PUBLIC
COMMONWEALTH OF MASSACHUSETTS
My Comm. Expires October 07,2027

9589 0710 5270 2303 1635 95

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Columbia, SC 29201

OFFICIAL USE

Certified Mail Fee $ $4.10	0109 32
Extra Services & Fees (check box, add fee as appropriate)	
☒ Return Receipt (hardcopy) $ $0.00	
☐ Return Receipt (electronic) $ $12.75	
☐ Certified Mail Restricted Delivery $ $0.00	Postmark Here
☐ Adult Signature Required $ $0.00	
☒ Adult Signature Restricted Delivery $	
Postage $ $1.77	
Total Postage and Fees $ $18.62	06/24/2025

FOREST POINT STATION JUN 24 2025

Sent To Brian J. Gaines, Comptroller

Street and Apt. No., or PO Box No. 1200 Senate St #305

City, State, ZIP+4® Columbia, SC 29201

PS Form 3800, January 2023 PSN 7530-02-000-9047 See Reverse for Instructions

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Comptroller
Brian J. Gaines
1200 Senate St
#305
Columbia, SC 29201

9590 9402 9272 4295 2349 31

2. Article Number (Transfer from service label)

9589 0710 5270 2303 1635 95

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

~~☐ Agent~~
☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type
☐ Adult Signature
☐ Adult Signature Restricted Delivery
☐ Certified Mail®
☒ Certified Mail Restricted Delivery
☐ Collect on Delivery
☐ Collect on Delivery Restricted Delivery
Restricted Delivery (over $500)

☐ Priority Mail Express®
☐ Registered Mail™
☐ Registered Mail Restricted Delivery
☐ Signature Confirmation™
☐ Signature Confirmation Restricted Delivery

PS Form 3811, July 2020 PSN 7530-02-000-9053 Domestic Return Receipt

USPS TRACKING#

9590 9402 9272 4295 2349 31

United States
Postal Service

First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

• Sender: Please print your name, address, and ZIP+4® in this box•

Thomas Humphrey
c/o 275 Main Street
Apartment 709
Watertown, Mass. [02472]

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9589071052702303163595

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Your item was delivered to the front desk, reception area, or mail room at 8:44 am on June 28, 2025 in COLUMBIA, SC 29201.

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USPS Tracking Plus®

Delivered

Delivered, Front Desk/Reception/Mail Room
COLUMBIA, SC 29201
June 28, 2025, 8:44 am

Arrived at USPS Regional Destination Facility
COLUMBIA SC PROCESSING CENTER
June 27, 2025, 11:05 am

In Transit to Next Facility
June 26, 2025

Arrived at USPS Regional Origin Facility
BOSTON MA DISTRIBUTION CENTER
June 25, 2025, 11:47 pm

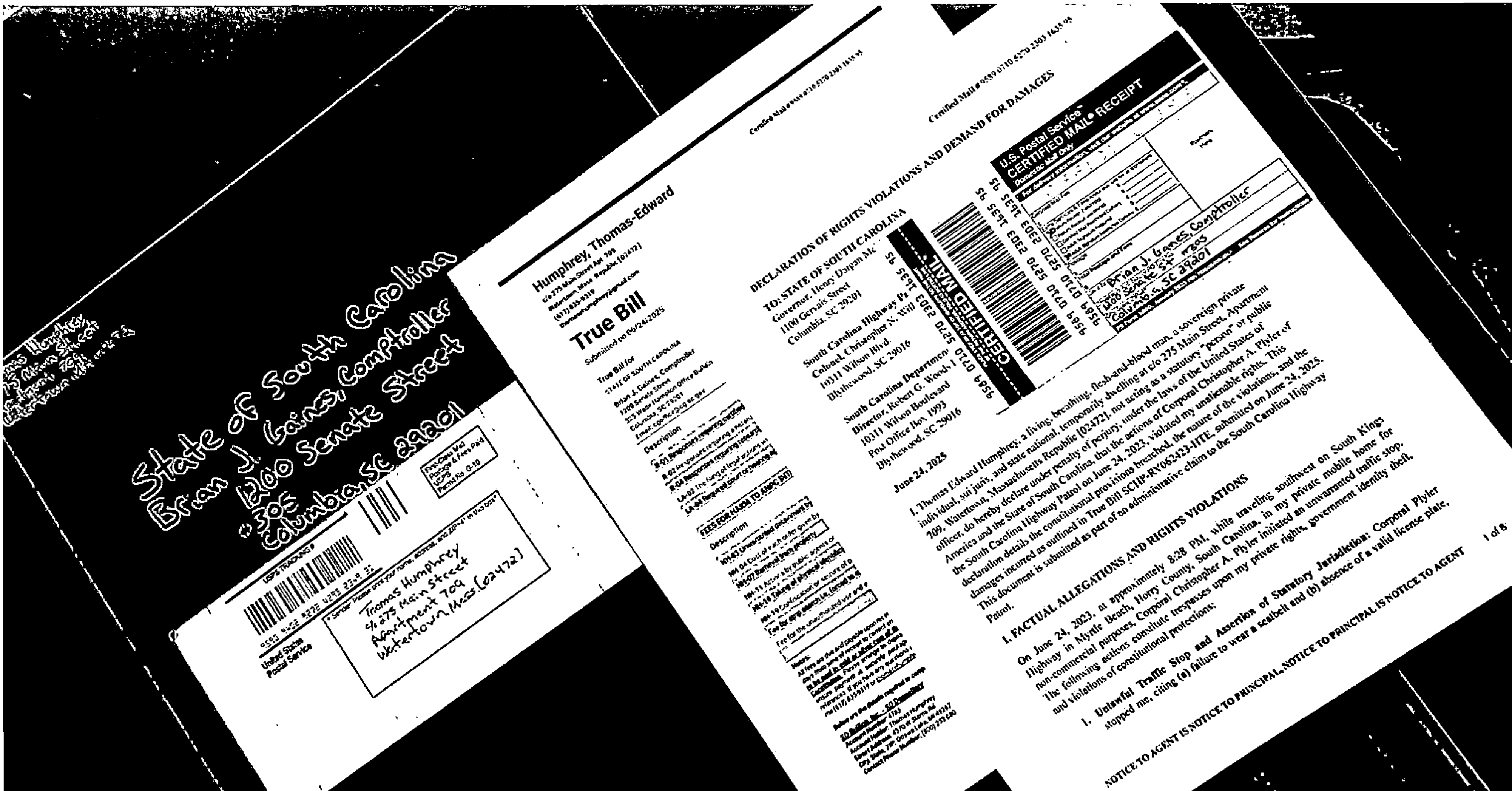
Departed Post Office
BOSTON, MA 02205
June 25, 2025, 6:09 pm

USPS in possession of item
BOSTON, MA 02205
June 24, 2025, 11:53 pm

Hide Tracking History

What Do USPS Tracking Statuses Mean?

Text & Email Updates



Certified Mail # 9589 0710 5270 2303 1635 95

DECLARATION OF RIGHTS VIOLATIONS AND DEMAND FOR DAMAGES

TO: STATE OF SOUTH CAROLINA
Governor, Henry Dargan Mc
1100 Gervais Street
Columbia, SC 29201

South Carolina Highway Pa
Colonel, Christopher N. Will
10311 Wilson Blvd
Blythewood, SC 29016

South Carolina Departmen
Director, Robert G. Woods, I
10311 Wilson Boulevard
Post Office Box 1993
Blythewood, SC 29016

June 24, 2025

I, Thomas Edward Humphrey, a living, breathing, flesh-and-blood man, a sovereign private individual, sui juris, and state national, temporarily dwelling at c/o 275 Main Street, Apartment 709, Watertown, Massachusetts Republic [02472], not acting as a statutory "person" or public officer, do hereby declare under penalty of perjury, under the laws of the United States of America and the State of South Carolina, that the actions of Corporal Christopher A. Plyler of the South Carolina Highway Patrol on June 24, 2023, violated my unalienable rights. This declaration details the constitutional provisions breached, the nature of the violations, and the damages incurred as outlined in True Bill SCHP-RV062423-ITE, submitted on June 24, 2025. This document is submitted as part of an administrative claim to the South Carolina Highway Patrol.

I. FACTUAL ALLEGATIONS AND RIGHTS VIOLATIONS

On June 24, 2023, at approximately 8:28 PM, while traveling southwest on South Kings Highway in Myrtle Beach, Horry County, South Carolina, in my private mobile home for non-commercial purposes, Corporal Christopher A. Plyler initiated an unwarranted traffic stop. The following actions constitute trespasses upon my private rights, government identity theft, and violations of constitutional protections:

1. **Unlawful Traffic Stop and Assertion of Statutory Jurisdiction:** Corporal Plyler stopped me, citing (a) failure to wear a seatbelt and (b) absence of a valid license plate,

NOTICE TO AGENT IS NOTICE TO PRINCIPAL, NOTICE TO PRINCIPAL IS NOTICE TO AGENT

Thomas Humphrey
275 Main Street
Apartment 709
Watertown MA 02472

9589 0710 5270 2303 1635 95

Retail

U.S. POSTAGE PAID
FCM LG ENV
BOSTON, MA 02205
JUN 24, 2025

29201

$18.62

RDC 99

S2324E500715-32

State of South Carolina
Brian J. Gaines, Comptroller
1200 Senate Street
#305
Columbia, SC 29201

Restricted Delivery

FORT POINT RETAIL
JUN 24 2025
BOSTON, MA 02205

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- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:
Comptroller
Brian J. Gaines
1200 Senate St
#305
Columbia, SC 29201

9590 9402 9272 4295 2349 31

2. Article Number (Transfer from service label)
9589 0710 5270 2303 1635 95

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X
☐ Agent
☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type
☐ Adult Signature
☐ Adult Signature Restricted Delivery
☐ Certified Mail®
☒ Certified Mail Restricted Delivery
☐ Collect on Delivery
☐ Collect on Delivery Restricted Delivery
Restricted Delivery
☐ Priority Mail Express®
☐ Registered Mail™
☐ Registered Mail Restricted Delivery
☐ Signature Confirmation™
☐ Signature Confirmation Restricted Delivery

PS Form 3811, July 2020 PSN 7530-02-000-9053

Domestic Return Receipt

U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
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For delivery information, visit our website at www.usps.com®.

Columbia, SC 29201

Certified Mail Fee	$ [illegible]
Extra Services & Fees (check box, add fee as appropriate)	
☒ Return Receipt (hardcopy)	$ [illegible]
☐ Return Receipt (electronic)	$ [illegible]
☐ Certified Mail Restricted Delivery	$ [illegible]
☐ Adult Signature Required	$ [illegible]
☒ Adult Signature Restricted Delivery	$
Postage	$1.77
Total Postage and Fees	$18.62

0109
32

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FORT POINT STA.
JUN 24 2025
06/24/2025

Sent To Brian J. Gaines, Comptroller
Street and Apt. No., or PO Box No. 1200 Senate St #305
City, State, ZIP+4® Columbia, SC 29201

PS Form 3800, January 2023 PSN 7530-02-000-9047 See Reverse for Instructions

9589 0710 5270 2303 1635 95

Humphrey, Thomas-Edward

c/o 275 Main Street Apt. 709
Watertown, Mass. Republic [02472]
(617) 835-9319
thomasehumphrey@gmail.com

Certified Mail # 9589 0710 5270 2303 1635 95

True Bill

Submitted on 06/24/2025

True Bill for
STATE OF SOUTH CAROLINA

Brian J. Gaines, Comptroller
1200 Senate Street
305 Wade Hampton Office Building
Columbia, SC 29201
Email: cgoffice@cg.sc.gov

Payable to
Humphrey, Thomas-Edward

Just Compensation
For Confiscation of Private Property & Rights Violations

True Bill #
SCHP-RV062423-HTE

Due date
7/26/2025

Description	Qty	Unit price	Total price
R-01 Responses requiring certified or registered mail for verification	8	$1,000.00	$8,000.00
R-02 Responses requiring a notarized or witnessed affidavit	8	$50,000.00	$400,000.00
R-04 Responses requiring research	1600	$50,000.00	$80,000,000.00
LA-02 The filing of legal actions without a verified claim by public agents or officers	4	$5,000,000.00	$20,000,000.00
LA-04 Required court or hearing appearance	1	$100,000.00	$100,000.00

FEES FOR HARM TO ANPC INTERNATIONAL member HTE-026-087 (Cont'd)

Description	Qty	Unit price	Total price
NH-03 Unwarranted detainment by public agents or officers resulting in being handcuffed	96	$100,000.00	$9,600,000.00
NH-04 Cost of each order given by public agents or officers which demands action	2	$500,000.00	$1,000,000.00
NH-07 Removal from property	1	$500,000.00	$500,000.00
NH-11 Actions by public agents or officers resulting in imprisonment	1	$10,000,000.00	$10,000,000.00
NH-16 Taking of physical identification (finger printing, photos of likeness, etc.)	1	$250,000.00	$250,000.00
NH-19 Confiscation or seizure of property resulting in recovery of property (undamaged)	1	$5,000,000.00	$5,000,000.00
Fee for strip search i.e. forced to expose the shamefulness of my nakedness **Gen. 3:7-10, 21**	1	$5,000,000.00	$5,000,000.00
Fee for the unauthorized use and enjoyment of private dwelling ($333 per minute)	1201	$333.00	$399,933.00

Notes:

*All fees are due and payable upon receipt this true bill. Any party in receipt of this true bill shall have 10 business days from time of receipt to correct errors without which the true-bill will be presumed true. **All fees/values are to be paid in gold or silver coin of the United States pursuant to Article I, Section 10, Clause 1 of the U.S. Constitution.** Please arrange to deposit your payment into my designated precious metal depository. Please ensure payment is securely packaged and accompanied by any relevant documentation or transaction references. If you have any questions or require further assistance regarding depositing your payment, contact me (617) 835-9319 or thomasehumphrey@gmail.com with your questions.*

Subtotal	**$132,257,933.00**
Adjustments	**$0.00**

$132,257,933.00

Below are the details required to complete your deposit:

SD Bullion, Inc. - SD Depository
Account Number: *4783*
Account Holder: *Thomas Humphrey*
Street Address: *4570 W Sterns Rd.*
City, State, ZIP: *Ottawa Lake, MI 49267*
Contact Phone Number: *(800) 233-6805*

Signature____________________ **Date**____________

Humphrey, Thomas-Edward

c/o 275 Main Street Apt. 709
Watertown, Mass. Republic [02472]
(617) 835-9319
thomasehumphrey@gmail.com

Certified Mail # 9589 0710 5270 2303 1635 95

True Bill

Submitted on 06/24/2025

True Bill for	Payable to	True Bill #
STATE OF SOUTH CAROLINA	Humphrey, Thomas-Edward	SCHP-RV062423-HTE
Brian J. Gaines, Comptroller 1200 Senate Street 305 Wade Hampton Office Building Columbia, SC 29201 Email: cgoffice@cg.sc.gov	**Just Compensation** For Confiscation of Private Property & Rights Violations	**Due date** 7/26/2025

Description	Qty	Unit price	Total price
R-01 Responses requiring certified or registered mail for verification	8	$1,000.00	$8,000.00
R-02 Responses requiring a notarized or witnessed affidavit	8	$50,000.00	$400,000.00
R-04 Responses requiring research	1600	$50,000.00	$80,000,000.00
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FEES FOR HARM TO ANPC INTERNATIONAL member HTE-026-087 (Cont'd)

Description	Qty	Unit price	Total price
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NH-11 Actions by public agents or officers resulting in imprisonment	1	$10,000,000.00	$10,000,000.00
NH-16 Taking of physical identification (finger printing, photos of likeness, etc.)	1	$250,000.00	$250,000.00
NH-19 Confiscation or seizure of property resulting in recovery of property (undamaged)	1	$5,000,000.00	$5,000,000.00
Fee for strip search i.e. forced to expose the shamefulness of my nakedness Gen. 3:7-10, 21	1	$5,000,000.00	$5,000,000.00
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Subtotal	$132,257,933.00
Adjustments	$0.00
	$132,257,933.00

Notes:

*All fees are due and payable upon receipt this true bill. Any party in receipt of this true bill shall have 10 business days from time of receipt to correct errors without which the true-bill will be presumed true. **All fees/values are to be paid in gold or silver coin of the United States pursuant to Article I, Section 10, Clause 1 of the U.S. Constitution.** Please arrange to deposit your payment into my designated precious metal depository. Please ensure payment is securely packaged and accompanied by any relevant documentation or transaction references. If you have any questions or require further assistance regarding depositing your payment, contact me (617) 835-9319 or thomasehumphrey@gmail.com with your questions.*

Below are the details required to complete your deposit:

SD Bullion, Inc. - SD Depository
Account Number: *4783*
Account Holder: *Thomas Humphrey*
Street Address: *4570 W Sterns Rd.*
City, State, ZIP: *Ottawa Lake, MI 49267*
Contact Phone Number: *(800) 233-6805*

Signature TH **Date** 06/24/2025

Exhibit

B

Final Notice of Overdue True Bill

Re: True Bill No. SCHP-RV062423-HTE

Description

Final notice regarding the overdue status of True Bill No. SCHP-RV062423-HTE, reiterating the underlying demand.

Gmail Thy Kingdom Come <thykingdomcome1322@gmail.com>

Final Notice of Overdue True Bill SCHP-RV062423-HTE

1 message

Thy Kingdom Come <thykingdomcome1322@gmail.com> Tue, Aug 5, 2025 at 1:36 PM
To: RobertWilliams@schouse.gov, MarkWillis@schouse.gov, ChrisWooten@schouse.gov, RichardYow@schouse.gov, NEdwards@ors.sc.gov, Jocelyn.Boyd@psc.sc.gov, JoAnne.Hill@psc.sc.gov, Robert.Bockman@psc.sc.gov, [redacted], [redacted], [redacted], [redacted], troop1@scdps.gov, troop2@scdps.gov, troop3@scdps.gov, troop4@scdps.gov, troop5@scdps.gov, troop6@scdps.gov, troop7@scdps.gov, troop8@scdps.gov, troop9@scdps.gov, EdwardCollins@scdps.gov, joelhovis@scdps.gov, TylerTidwell@scdps.gov, DavidJones@scdps.gov, LenaButler@scdps.gov, DanielWebb@scdps.gov, WilliamBennett@scdps.gov, BrandonBolt@scdps.gov, MitchellRidgeway@scdps.gov, GaryMiller@scdps.gov, NicholasPye@scdps.gov, BrittanyGlover@scdps.gov, AltonMay@scdps.gov, Dwaynebrunson@scdps.gov, BrandisMcNulty@scdps.gov, RachelUrconis@scdps.gov, KyleMcGahee@scdps.gov, schprecruiter@scdps.gov, cgoffice@cg.sc.gov, christopherplyler@scdps.gov

---------- Forwarded message ---------
From: **Thy Kingdom Come** <thykingdomcome1322@gmail.com>
Date: Tue, Aug 5, 2025 at 1:34 PM
Subject: Final Notice of Overdue True Bill SCHP-RV062423-HTE
To: <PaulaCalhoon@schouse.gov>, <GildaCobbHunter@schouse.gov>, <NealCollins@schouse.gov>, <SyllesteDavis@schouse.gov>, <BenConnell@schouse.gov>, <ChandraDillard@schouse.gov>, <BobbyCox@schouse.gov>, <JasonElliott@schouse.gov>, <BrandonCox@schouse.gov>, <ShannonErickson@schouse.gov>, <HeatherCrawford@schouse.gov>, <RayeFelder@schouse.gov>, <AprilCromer@schouse.gov>, <CalForrest@schouse.gov>, <CraigGagnon@schouse.gov>, <ValGuest@schouse.gov>, <KambrellGarvin@schouse.gov>, <BrandonGuffey@schouse.gov>, <GilGatch@schouse.gov>, <PatrickHaddon@schouse.gov>, <DanielGibson@schouse.gov>, <BillHager@schouse.gov>, <DougGilliam@schouse.gov>, <KevinHardee@schouse.gov>, <WendellGilliard@schouse.gov>, <RobHarris@schouse.gov>, <ChrisHart@schouse.gov>, <LeeHewitt@schouse.gov>, <TomHartnett@schouse.gov>, <DavidHiott@schouse.gov>, <JackieHayes@schouse.gov>, <BillHixon@schouse.gov>, <RosalynHenderson-Myers@schouse.gov>, <LonnieHosey@schouse.gov>, <PatriciaHenegan@schouse.gov>, <LeonHoward@schouse.gov>, <BillHerbkersman@schouse.gov>, <MaxHyde@schouse.gov>, <JosephJefferson@schouse.gov>, <JayKilmartin@schouse.gov>, <jeffjohnson@schouse.gov>, <JohnKing@schouse.gov>, <JermaineJohnson@schouse.gov>, <RogerKirby@schouse.gov>, <StewartJones@schouse.gov>, <KathyLanding@schouse.gov>, <WendellJones@schouse.gov>, <BrianLawson@schouse.gov>, <JayJordan@schouse.gov>, <MattLeber@schouse.gov>, <RandyLigon@schouse.gov>, <JohnMcCravy@schouse.gov>, <StevenLong@schouse.gov>, <AnnieMcDaniel@schouse.gov>, <PhillipLowe@schouse.gov>, <TimMcGinnis@schouse.gov>, <JosiahMagnuson@schouse.gov>, <CodyMitchell@schouse.gov>, <RJMay@schouse.gov>, <JAMoore@schouse.gov>, <RyanMcCabe@schouse.gov>, <TravisMoore@schouse.gov>, <AdamMorgan@schouse.gov>, <WestonNewton@schouse.gov>, <AlanMorgan@schouse.gov>, <RogerNutt@schouse.gov>, <DennisMoss@schouse.gov>, <DavidONeal@schouse.gov>, <ChrisMurphy@schouse.gov>, <MelissaOremus@schouse.gov>, <MikeNeese@schouse.gov>, <RussellOtt@schouse.gov>, <BrandonNewton@schouse.gov>, <JordanPace@schouse.gov>, <FawnPedalino@schouse.gov>, <ToddRutherford@schouse.gov>, <MarvinPendarvis@schouse.gov>, <HLCIComm@schouse.gov>, <TommyPope@schouse.gov>, <CarlaSchuessler@schouse.gov>, <MichaelRivers@schouse.gov>, <HeathSessions@schouse.gov>, <RobertRobbins@schouse.gov>, <MurrellSmith@schouse.gov>, <SethRose@schouse.gov>, <MarkSmith@schouse.gov>, <LeonStav@schouse.gov>, <DavidVaughan@schouse.gov>, <BillTaylor@schouse.gov>, <DavidWeeks@schouse.gov>, <DeonTedder@schouse.gov>, <JayWest@schouse.gov>, <AnneThayer@schouse.gov>, <SpencerWetmore@schouse.gov>, <IvoryThigpen@schouse.gov>, <WillWheeler@schouse.gov>, <AshleyTrantham@schouse.gov>, <JoeWhite@schouse.gov>, <BillWhitmire@schouse.gov>, <RobertWilliams@schouse.gov>

---------- Forwarded message ---------
From: **Thy Kingdom Come** <thykingdomcome1322@gmail.com>
Date: Tue, Aug 5, 2025 at 1:31 PM
Subject: Final Notice of Overdue True Bill SCHP-RV062423-HTE
To: <[redacted]>, <[redacted]>, <[redacted]>, <[redacted]>, <troop1@scdps.gov>, <troop2@scdps.gov>, <troop3@scdps.gov>,

<troop4@scdps.gov>, <troop5@scdps.gov>, <troop6@scdps.gov>, <troop7@scdps.gov>, <troop8@scdps.gov>, <troop9@scdps.gov>, <EdwardCollins@scdps.gov>, <joelhovis@scdps.gov>, <TylerTidwell@scdps.gov>, <DavidJones@scdps.gov>, <LenaButler@scdps.gov>, <DanielWebb@scdps.gov>, <WilliamBennett@scdps.gov>, <BrandonBolt@scdps.gov>, <MitchellRidgeway@scdps.gov>, <GaryMiller@scdps.gov>, <NicholasPye@scdps.gov>, <BrittanyGlover@scdps.gov>, <AltonMay@scdps.gov>, <Dwaynebrunson@scdps.gov>, <BrandisMcNulty@scdps.gov>, <RachelUrconis@scdps.gov>, <KyleMcGahee@scdps.gov>, <schprecruiter@scdps.gov>, <Mike.Couick@ecsc.org>, <John.Frick@ecsc.org>, <BrianAdams@scsenate.gov>, <RichardCash@scsenate.gov>, <ThomasAlexander@scsenate.gov>, <WesClimer@scsenate.gov>, <KarlAllen@scsenate.gov>, <TomCorbin@scsenate.gov>, <SeanBennett@scsenate.gov>, <SBIComm@scsenate.gov>, <SFGFComm@scsenate.gov>, <TomDavis@scsenate.gov>, <MikeFanning@scsenate.gov>, <DickHarpootlian@scsenate.gov>, <MikeGambrell@scsenate.gov>, <GregHembree@scsenate.gov>, <BillyGarrett@scsenate.gov>, <BradHutto@scsenate.gov>, <StephenGoldfinch@scsenate.gov>, <DarrellJackson@scsenate.gov>, <STransComm@scsenate.gov>, <KevinJohnson@scsenate.gov>, <PenryGustafson@scsenate.gov>, <MichaelJohnson@scsenate.gov>, <JoshKimbrell@scsenate.gov>, <MargieBrightMatthews@scsenate.gov>, <MarlonKimpson@scsenate.gov>, <ThomasMcElveen@scsenate.gov>, <DwightLoftis@scsenate.gov>, <Mia@scsenate.gov>, <GeraldMalloy@scsenate.gov>, <HarveyPeeler@scsenate.gov>, <ShaneMartin@scsenate.gov>, <SJudComm@scsenate.gov>, <ShaneMassey@scsenate.gov>, <MikeReichenbach@scsenate.gov>, <RexRice@scsenate.gov>, <VernonStephens@scsenate.gov>, <RonnieSabb@scsenate.gov>, <ScottTalley@scsenate.gov>, <JohnScott@scsenate.gov>, <RossTurner@scsenate.gov>, <SandySenn@scsenate.gov>, <DannyVerdin@scsenate.gov>, <NikkiSetzler@scsenate.gov>, <KentWilliams@scsenate.gov>, <KatrinaShealy@scsenate.gov>, <TomYoung@scsenate.gov>, <JustinBamberg@schouse.gov>, <TerryAlexander@schouse.gov>, <BruceBannister@schouse.gov>, <CarlAnderson@schouse.gov>, <HeatherBauer@schouse.gov>, <LucasAtkinson@schouse.gov>, <ThomasBeach@schouse.gov>, <WilliamBailey@schouse.gov>, <BethBernstein@schouse.gov>, <NathanBallentine@schouse.gov>, <BartBlackwell@schouse.gov>, <JeffBradley@schouse.gov>, <JerryCarter@schouse.gov>, <GaryBrewer@schouse.gov>, <MicahCaskey@schouse.gov>, <CaseBrittain@schouse.gov>, <DonChapman@schouse.gov>, <MikeBurns@schouse.gov>, <BillChumley@schouse.gov>, <JoeBustos@schouse.gov>, <BillClyburn@schouse.gov>

Attn. STATE OF SOUTH CAROLINA and Any and All Political, Private or Public Entities, Federal, State, or Local Corporate Government(s), Municipality(ies), International Organizations, Corporation(s), agent(s), investigator(s), or informant(s), etc., and/or Third Party(ies) working in collusion with the STATE OF SOUTH CAROLINA,

Please find attached FINAL NOTICE regarding True Bill No. SCHP-RV062423-HTE, with an outstanding balance of $132,257,933.00, due in gold or silver minted coins of the United States. The bill, submitted on June 24, 2025, was due by July 26, 2025, and is now 10 days overdue. Please deposit payment to:

SD Bullion, Inc. - SD Depository

Account Number: 4783
Account Holder: Thomas Humphrey
Address: 5700 W Stems Rd., Ottawa Lake, MI 49267
Phone: (800) 233-6805

Failure to rebut the DECLARATION OF RIGHTS VIOLATIONS AND DEMAND FOR DAMAGES dated June 24, 2025, with a point-by-point counter affidavit sworn under penalty of perjury, or to pay the full amount or make a reasonable settlement offer by **September 4, 2025**, will result in actions to secure payment.

The State of South Carolina and South Carolina Highway Patrol are required to respect my private property rights. I do not consent to any civil statutory status or obligations and will proceed under common law and equity.

Respectfully,

His Majesty's humble servant,

Yōsɛph Mèiя Tōhaŕ - יוֹסֵף מֵאִיר טֹהַר
(also known as Thomas Edward Humphrey)
Minister of Defense, Investigator, Kingdom Ambassador
<u>Gift of Eternal Life Ministries TR</u>
Address: *% 275 Main Street, Apartment 709, Watertown*
Middlesex County, Mass. Republic, Non-domestic
Email: *ThyKingdomCome1322@gmail.com*

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The_Mystery_of_Godliness | Yoseph.Meir.Tohar
KingdomTaskForce | ThyKingdomCome1322
The_House_of_Jacob | UNY Judicial Department
The_Gift_of_Eternal_Life

Attachments:

- FINAL NOTICE - SCHP-RV062423-HTE.pdf
- SC Gov. Email List.pdf
- True Bill No. SCHP-RV062423-HTE Submitted 06.24.2025.pdf

<u>Fuentes v. Shevin (June 12, 1972)</u>

"Central meaning of "procedural due process" is that parties whose rights are to be affected are entitled to be heard and, in order that they may enjoy that right, they must first be notified."

"Procedural due process includes right to notice and opportunity to be heard at meaningful time and in meaningful manner. "

"Constitutional right to be heard is basic aspect of duty of government to follow a fair process of decision making when it acts to deprive a person of his possessions; purpose of requirement is not only to ensure abstract fair play to the individual but to protect his use and possession of property from arbitrary encroachment--to minimize substantively unfair or mistaken deprivations of property, a danger that is especially great when the state seizes goods simply upon application of and for benefit of private party."

"Prohibition against deprivation of property without due process of law reflects the high value, embedded in our constitutional and political history, that we place on a person's right to enjoy what is his, free of governmental interference."

"Right to notice and hearing as to seizure of person's goods must be granted at time when deprivation can still be prevented inasmuch as, even though at later hearing his possessions can be returned to him or damages may be awarded for wrongful deprivation, **no later hearing and no damage award can undo fact that arbitrary taking that was subject to right of procedural due process has already occurred**."

"Right of party in possession of property to be heard before he is deprived of it does not depend upon an advance showing that he will surely prevail at the hearing and it is enough to invoke procedural safeguards of Fourteenth Amendment that a significant property interest is at stake, whatever the ultimate outcome of a hearing on the contractual right to continued possession and use of the goods."

"Due process requirement of hearing before deprivation of property takes effect is not limited to protection of only a few types of property interest."
"The rather ordinary costs in time, effort and expense resulting from hearing held prior to deprivation of property interest cannot outweigh the constitutional right to such a hearing."

"Procedural due process is not intended to promote efficiency or accommodate all possible interests; it is intended to protect the particular interests of the person whose possessions are about to be taken."

"Outright seizure of property interest without opportunity for prior hearing is justified only when a seizure is directly necessary to secure an important governmental or general public interest, there is a special need for very prompt action and the state keeps strict control over its monopoly of legitimate force, that is, the person initiating the seizure has been a government official responsible for determining, under standards of a narrowly drawn statute, that it is necessary and justified in the particular instance."

"In civil, no less than criminal area, courts indulge every reasonable presumption against waiver of procedural due process rights."

"Waiver of constitutional rights in any context must, at the very least, be clear and courts will not be concerned with involuntariness or intelligence of waiver when the contractual language relied upon does not even, on its face, amount to a waiver."

"Essential reason for requirement of prior hearing before depriving person of property interest is to prevent unfair and mistaken deprivations of property; the hearing must provide a real test and due process is afforded only by the kings of notice and hearing that are aimed a establishing the validity, or at least the probable validity, of the underlying claim against the alleged debtor."

"The constitutional right to be heard is a basic aspect of the duty of government to follow a fair process of decisionmaking when it acts to deprive a person of his possessions. The purpose of this requirement is not only to ensure abstract fair play to the individual. Its purpose, more particularly, is to protect his use and possession of property from arbitrary encroachment--to minimize substantively unfair or mistaken deprivations of property, a danger that is especially great when the State seizes goods simply upon application of and for benefit of private party. So viewed, the prohibition against the deprivation of property without due process of law reflects the high value, embedded in our constitutional and political history, that we place on a person's right to enjoy what is his, free of governmental interference. See Lynch v. Household Finance Corp., 405 U.S. 538, 552, 92 S.Ct. 1113, 1122, 31 L.Ed.2d. 424."

"If the right to notice and a hearing is to serve its full purpose, then, it is clear that it must be granted at a time when the deprivation can still be prevented. At a later hearing, an individual's possessions can be returned to him if they were unfairly or mistakenly taken in the first place. Damages may even be awarded to him for the wrongful deprivation. **But no later hearing and no damage award can undo the fact that the arbitrary taking that was subject to the right of procedural due process has already occurred.** "This Court has not .. . embraced the general proposition that a wrong may be done if it can be undone." Stanley v. Illinois, 405 U.S. 645, 647, 92 S.Ct. 1208, 1210, 31 L.Ed.2d. 551."

"No doubt, there may be many gradations in the "importance" or "necessity" of various consumer goods. Stoves could be compared to television sets, or beds could be compared to tables. But if the root principle of procedural due process is to be applied with objectivity, it cannot rest on such distinctions. The fourteenth Amendment speaks of "property" generally. And, under our free-enterprise system, an individual's choices in the marketplace are respected, however unwise they may seem to someone else. It is not the business of a court adjudicating due process rights to make its own critical evaluation of those choices and protect only the ones that, by its own lights, are "necessary."

"There are "extraordinary situations" that justify postponing notice and opportunity for a hearing. Boddie v. Connecticut, 401 U.S., at 379, 91 S.Ct., at 786. These situations, however, must be truly

unusual. Only in a few limited situations has this Court allowed outright seizure without opportunity for a prior hearing. First, in each case, the seizure has been directly necessary to secure an important governmental or general public interest. Second, there has been a special need for very prompt action. Third, the State has kept strict control over its monopoly of legitimate force; the person initiating the seizure has been a government official responsible for determining, under the standards of a narrowly drawn statute, that it was necessary and justified in the particular instance. Thus, the Court has allowed summary seizure of property to collect the internal revenue of the United States, to meet the needs of a national war effort, to protect against the economic disaster of a bank failure, and to protect the public from misbranded drugs and contaminated food."
[Fuentes v. Shevin, 407 U.S. 67, 92 S.Ct. 1983, 32 L.Ed.2d. 556 (1972)]

His Majesty's humble servant,

Yōsεph Mèïя Tōhaŕ - יוֹסֵף מֵאִיר טֹהַר
(also known as Thomas Edward Humphrey)
Minister of Defense, Investigator, Kingdom Ambassador
Gift of Eternal Life Ministries TR
Address: *% 275 Main Street, Apartment 709, Watertown*
Middlesex County, Mass. Republic, Non-domestic
Email: *ThyKingdomCome1322@gmail.com*

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The_Gift_of_Eternal_Life

Attachments:

His Majesty's humble servant,

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(also known as Thomas Edward Humphrey)
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Attachments:

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3 attachments

FINAL NOTICE - SCHP-RV062423-HTE.pdf
2649K

True Bill No. SCHP-RV062423-HTE Submitted 06.24.2025.pdf
3650K

SC Gov. Email List.pdf
1831K

FINAL NOTICE

TO: STATE OF SOUTH CAROLINA
[redacted]
1100 Gervais Street
Columbia, SC 29201

South Carolina Highway Patrol
[redacted]
10311 Wilson Blvd.
Blythewood, SC 29016

South Carolina Department of Public Safety
[redacted]
10311 Wilson Boulevard
Post Office Box 1993
Blythewood, SC 29016

August 5, 2025

I am writing to inform you of your outstanding balance of True Bill No. SCHP-RV062423-HTE in the amount of **$132,257,933.00** (one hundred thirty-two million two hundred fifty-seven thousand nine hundred thirty-three and 00/100 dollars) to be paid in gold or silver minted coins of the United States. This bill was submitted to your office June 24, 2025, with a due date of July 26, 2025. As of today, your balance is **10 days** overdue. Please arrange to deposit your payment in the form of gold and/or silver minted coins of the United States into my designated precious metal depository. Below are the details required to complete your deposit:

SD Bullion, Inc. - SD Depository
Account Number: 4783
Account Holder: Thomas Humphrey
Street Address: 4570 W Sterns Rd.
City, State, ZIP: Ottawa Lake, MI 49267
Contact Phone Number: (800) 233-6805

If Government Actors fail to rebut my DECLARATION OF RIGHTS VIOLATIONS AND DEMAND FOR DAMAGES dated June 24, 2025, with a counter affidavit point by point (A failure to deny any assertion shall constitute evidence of a conclusive admission of the thing not expressly denied) sworn to or affirmed and signed under penalty of perjury OR True Bill No. SCHP-RV062423-HTE in the amount of **$132,257,933.00** is not paid in full or a reasonable offer made to settle this matter within **30 Days** (September 4, 2025), I shall exercise any and all means necessary to secure payment.

If the State of South Carolina and the South Carolina Highway Patrol wants or expects any private services or private property from me, the State of South Carolina and/or the South Carolina Highway Patrol has to pay for it by obeying my terms outlined in the attached Fee Schedule. The obligations to the party making the demand or request for compliance, services, or property establish a waiver of official, judicial, and sovereign immunity.

The only thing I demand from you is obedience to the constitution and respect for private property, which is not a franchise benefit and which can never become a privilege without violating the constitution. Thus, the only party waiving sovereignty and sovereign immunity is the State of South Carolina and the South Carolina Highway Patrol and its relevant agents, not me. I accept and consent to no civil statutory status or the rights or obligations attached to it in the context of any and all interactions between us.

The purpose of establishing government is to protect PRIVATE property. The FIRST step in that protection is to prevent it from being converted to PUBLIC property or PUBLIC rights without the EXPRESS WRITTEN CONSENT of the original absolute human owner.

Since a covetous mafia of thieves/plunderers masquerading as "government" or "de facto government" REFUSES to do the ONLY job it was created to do of protecting PRIVATE property and keeping it separate from PUBLIC property, then I have a CONSTITUTIONAL and BIBLICAL obligation to ensure they do it by enacting my attached Fee Schedule as a precondition to the use or "benefit" of my PRIVATE property. Below is WHY I must do this and even HOW to do this. DIRECT from the actual literal physical AUTHOR of the Constitution from whose notes the Constitution was assembled:

> *"With respect to the words general welfare, I have always regarded them as qualified by the detail of powers connected with them. To take them in a literal and unlimited sense would be a*

metamorphosis of the Constitution into a character which there is a host of proofs was not contemplated by its creator."

"If Congress can employ money indefinitely to the general welfare, and are the sole and supreme judges of the general welfare, they may take the care of religion into their own hands; they may appoint teachers in every State, county and parish and pay them out of their public treasury; they may take into their own hands the education of children, establishing in like manner schools throughout the Union; they may assume the provision of the poor; they may undertake the regulation of all roads other than postroads; in short, every thing, from the highest object of state legislation down to the most minute object of police, would be thrown under the power of Congress.... Were the power of Congress to be established in the latitude contended for, it would subvert the very foundations, and transmute the very nature of the limited Government established by the people of America."

"If Congress can do whatever in their discretion can be done by money, and will promote the general welfare, the government is no longer a limited one possessing enumerated powers, but an indefinite one subject to particular exceptions."
[James Madison. House of Representatives, February 7, 1792, On the Cod Fishery Bill, granting Bounties]

Below is the mechanism for doing that explained by a famous law professor:

"How, then, are purely equitable obligations created? For the most part, either by the acts of third persons or by equity alone. ***But how can one person impose an obligation upon another? By giving property to the latter on the terms of his assuming an obligation in respect to it. At law there are only two means by which the object of the donor could be at all accomplished, consistently with the entire ownership of the property passing to the donee, namely: first, by imposing a real obligation upon the property; secondly, by subjecting the title of the donee to a condition subsequent.*** *The first of these the law does not permit; the second is entirely inadequate. Equity, however, can secure most of the objects of the doner, and yet avoid the mischiefs of real obligations by imposing upon the donee (and upon all persons to whom the property shall afterwards come without value or with notice)* ***a personal obligation with respect to the property; and accordingly this is what equity does.*** *It is in this way that all trusts are created, and all equitable charges made (i. e., equitable hypothecations or liens created) by testators in their wills. In this way, also, most trusts are created by acts inter vivos, except in*

those cases in which the trustee incurs a legal as well as an equitable obligation. ***In short, as property is the subject of every equitable obligation, so the owner of property is the only person whose act or acts can be the means of creating an obligation in respect to that property. Moreover, the owner of property can create an obligation in respect to it in only two ways: first, by incurring the obligation himself, in which case he commonly also incurs a legal obligation; secondly, by imposing the obligation upon some third person; and this he does in the way just explained."***

[Readings on the History and System of the Common Law, Second Edition, Roscoe Pound, 1925, p. 543]

The only requirement that I therefore have to meet in order to lawfully impose a duty upon a Government Actor is that I:

1. Convey rights or property to a Government Actor.
2. Give Government Actor formal, timely, and reasonable notice of the terms and conditions under which Government Actor receives the property or rights constituting the consideration specified in my attached Fee Schedule.

The only requirement that I therefore have to meet in order to lawfully impose a duty upon a Government Actor is that I:

1. Convey rights or property to a Government Actor.
2. Give Government Actor formal, timely, and reasonable notice of the terms and conditions under which Government Actor receives the property or rights constituting the consideration specified in my attached Fee Schedule.

Notice given June 24, 2023, serves as "reasonable notice" of the terms of receipt of said PRIVATE property in the temporary custody of Government Actor and/or his agents or assigns. Notice to the agent serves as notice to the principal.

In the context of any and every interaction with any government, I am the ONLY Merchant under U.C.C. §2-104(1) and any government officer or agency, "legal person" is the Buyer under U.C.C. §2-103(1)(a). Since I am the only Merchant involved in this interaction offering property for sale, I am the ONLY one allowed to write the terms of procuring my services. Those terms are documented in my attached Fee Schedule.

The State of South Carolina and/or the South Carolina Highway Patrol and ALL relevant agents fit one or more of the following criteria as a Buyer in this transaction:

1. Initiated communication with me requiring a response or.
2. Made any demands upon my time or property, or.
3. Made me the target of civil statutory enforcement of a "social compact" I am not party to.

If Government Actors fail to rebut my DECLARATION OF RIGHTS VIOLATIONS AND DEMAND FOR DAMAGES dated June 24, 2025, with a counter affidavit point by point, (a failure to deny any assertion shall constitute evidence of a conclusive admission of the thing not expressly denied) sworn to or affirmed and signed under penalty of perjury OR True Bill No. SCHP-RV062423-HTE in the amount of **$132,257,933.00** is not paid in full or a reasonable counter offer made to settle this matter by September 4, 2025, I shall exercise any and all means necessary to secure payment, including but not limited to the following actions:

1. File a non-judicial administrative lien upon real property or rights to real property owned by the State of South Carolina in the Horry County Registry Of Deeds and publish notice of lien in the local newspaper.
2. Place a UCC lien against the State of South Carolina with the Secretary of State.
3. File a non-judicial administrative lien upon real property or rights to real property owned by Government Actors in the Horry County Registry Of Deeds and publish notice of lien in the local newspaper.
4. Place a UCC lien against the name of Government Actors with the Secretary of State.
5. Make withdrawals/garnish from any and all financial accounts in the name of the State of South Carolina.
6. Make withdrawals/garnish from any and all financial accounts in the name of Government Actors.
7. Place a non-judicial administrative lien against the government pay and benefits of the Government Actors.

Answerable Government Actors who are liable in both their individual and official capacities shall be subject to collection enforcement mentioned above and civil and criminal action mentioned below if immediate action to rectify this situation is not taken.

The requirement to exhaust administrative remedies do not apply to the suits against the Government Actors. This only administrative remedy available to a non-resident non-person not subject to the exclusive jurisdiction of Congress is to notify them to return absolutely owned private property or its equivalent value STOLEN by Government Actors. Notice given June 24, 2025 accomplished that. Beyond that constitutionally required reasonable notice, suit can immediately commence against Government Actors.

I have not consented and have no delegated authority to consent to represent an enfranchised or privileged government entity of any kind, including but not limited to all of the following kinds, and therefore have no option but to proceed ONLY, under the common law and equity:

1. Public officer of state or national governments.
2. Instrumentality or agent of any kind of state or federal governments.
3. Statutory "taxpayer" per 26 U.S.C. §7701(a)(14).
4. Statutory "driver" under state motor vehicle code.
5. Statutory "spouse" under state family code.
6. Social security participant under the Social Security Act, 42 U.S.C. Chapter 7.
7. Statutory "U.S. citizens" as described in 8 U.S.C. §1401 or 26 C.F.R. §1.1-1(c) or any other federal statute.
8. Statutory "U.S. resident" as described in 26 U.S.C. §7701(b)(1)(A) or any other federal statute.
9. Statutory "U.S. persons" as defined in 26 U.S.C. §7701(a)(30) or any other federal statute.
10. Statutory "person" as defined in 26 U.S.C. §6671(b) or 26 U.S.C. §7343 or any other federal law.
11. Statutory "individual" as defined in 5 U.S.C. §552a(a)(2) and 26 C.F.R. §1.1441-1(c)(3) or any other federal statute.
12. Statutory "nonresident alien individual" per 26 C.F.R. §1.1441-1(c)(3).
13. Statutory "federal personnel" as defined in 5 U.S.C. §552a(a)(13).

All relevant government agencies, whose services constitute PRIVATE business activity, will be listed as defendants in any future civil proceedings (attorneys for the government shall not be regarded as the real party in interest, but rather someone from the executive branch of the government shall be the real party in interest) and all relevant Government Actors will be listed as defendants in any civil and criminal proceedings in both their individual and official capacities. The common law, the Bill of Rights, and equity ALONE shall dictate any dispute between the parties in both civil and criminal matters, NOT Civil statutory law, as it pertains to this specific transaction, thereby avoiding enforcing or imputing superior powers to any government or government actor in violation of the First Amendment. A common law "court of record" shall be established and convened for the purposes of hearing this matter of PRIVATE and not PUBLIC rights. A common law "court of record" proceeds independently of the person of the judge or magistrate. The Sovereign who initiates the suit, who is the Plaintiff, executes the functions of the court and represents the court and the suit independent of the magistrate or judge. Final judgment is reserved for ONLY the jury, who are the ONLY true sovereigns and "the court". The relationship between parties does not involve a "federal question" or any property of the national government coming under Article 4, Section 3, Clause 2 and may therefore not be removed to a federal court and must be litigated only in a state court.

> ***Courts of record and courts not of record.*** *The former being those whose acts and judicial proceedings are enrolled, or recorded, for a perpetual memory and testimony, and which have power to fine or imprison for contempt. Error lies to their judgments, and they generally possess a seal. Courts not of record are those of inferior dignity, which have no power to fine or imprison, and in which the proceedings are not enrolled or recorded. 3 Bl. Comm. 24; 3 Steph. Comm. 383; The Thomas Fletcher, C.C.Ga., 24 F. 481; Ex parte Thistleton, 52 Cal. 225; Erwin v. U. S., D.C.Ga., 37 F. 488, 2 L.R.A. 229; Heininger v. Davis, 96 Ohio.St. 205, 117 N.E. 229, 231.*
>
> ***A "court of record" is a judicial tribunal having attributes and exercising functions independently of the person of the magistrate designated generally to hold it, and proceeding according to the course of common law, its acts and proceedings being enrolled for a perpetual memorial.*** *Jones v. Jones, 188 Mo.App. 220, 175 S.W. 227. 229: Ex parte Gladhill, 8 Metc . Mass., 171, per Shaw, C. J. See, also, Ledwith v. Rosalsky, 244 N.Y. 406, 155 N.E. 688, 689.*
>
> *Courts may be at the same time of record for some purposes and not of record for others. Lester v. Redmond, 6 Hill, N.Y., 590; Ex parte Gladhill, 8 Melc., Mass., 168.*
> *[Black's Law Dictionary, Fourth Edition, pp. 425-426]*
>
> *"The words 'people of the United States' and 'citizens,' are synonymous terms, and mean the same thing.* ***They both describe the political body who, according to our republican institutions, form the sovereignty, and who hold the power and conduct the government through their***

> ***representatives.*** *They are what we familiarly call the 'sovereign people,' and every citizen is one of this people, and a constituent member of this sovereignty. ..."*
> *[Boyd v. State of Nebraska, 143 U.S. 135 (1892)]*

No statutes of limitations shall be enforced to protect against any violations of my rights. All statutory civil law, in fact, is for government public officers and not private parties such as myself.

The following U.S. Supreme Court ruling establishes why statutes of limitations cannot undermine the protection of private rights and private property.

> *The police power cannot go beyond the limit of what is necessary and reasonable for guarding against the evil which injures or threatens the public welfare in the given case, and the legislature, under the guise of that power, cannot strike down innocent occupations and destroy private property, the destruction of which is not reasonably necessary to accomplish the needed reform; and this, too, although the legislature is the judge in each case of the extent to which the evil is to be regulated or prohibited. Where the occupation is in itself immoral, there can be no question as to the right of the legislature. 2 Kent, Comm. 340. Nor is it denied that every one holds his property subject to the proper exercise of the police power. Dill. Mun. Corp. 136; Tied. Lim. Police Power, 122, 122a; Com. v. Tewksbury, 11 Metc. 55. Nor that the legislature can destroy vested rights in the proper exercise of this power. Coates v. Mayor of New York, 7 Cow. 585. But the unqualified statement that when the legislature has exercised its right of judging, by the enactment of a [626-Continued.] prohibition, all other departments of the government are bound by the decision, which no court has a right to review, (Bish. St. Cr. 995,) cannot be true.* ***The legislative power cannot authorize [OR PROTECT THROUGH A STATUTE OF LIMITATIONS] manifest injustice by positive enactment, or take away security for personal liberty or private property, for the protect on whereof government was established. Calder v. Bull, 3 Dall. 386. The state cannot deprive the citizen of the lawful use of his property if it does not injuriously effect others. Lake View v. Cemetery Co., 70 Ill. 191.*** *The state cannot enact laws, not necessary to the preservation of the health and safety of the community, that will be oppressive and burdensome to the citizen. Railway Co. v. City of Jacksonville, 67 Ill. 37. The constitutional guaranty of life, liberty, and pursuit of happiness is not limited by the temporary caprice of a present majority, and can be limited only by the absolute necessities of the public. Intoxicating Liquor Cases, (BREWER, J.,), 25 Kan. 765; Tenement- House Cigar Case, 98 N. Y. 98; Cooley, Const. Lim. (5th Ed.) 110, 445, 446. No proposition is more firmly established than that the citizen has the right to adopt and follow such lawful and industrial pursuit, not injurious to the community, as he may see fit. People v. Marx, 99 N.Y. 377, 386, 2 N.E. Rep. 29. The mere existence of a brewery in operation, or of beer therein in vats, or packages not intended for consumption in the state is not in any way detrimental to the safety, health, or morals of the people of Kansas; nor can it be said that there is anything immoral in the business of brewing, or in beer itself, as in gambling or lotteries. Stone v. Mississippi, 101 U.S. 814 .*

> *There is no question that this enactment does in the sense of the law deprive appellees of their property. Pumpelly v. Green Bay Co., 13 Wall. 177; Munn v. Illinois, 94 U.S. 141 .*
>
> *It is a fundamental principle that where a nuisance is to be abated, the abatement must be limited by its necessities, and no wanton injury must be committed. The remedy is to stop the use to which the building is put, not to tear down or destroy the structure itself. Babcock v. City of Buffalo, 56 N. Y. 268, affirming 1 Sheld. 317; Bridge Co. v. Paige, 83 N. Y. 188190; Wood, Nuis. 738. The nuisance here is sale within the state. To that extent alone can the legislature authorize the nuisance to be abated or the property destroyed.*
> *[Mugler v. Kansas, 123 U.S. 623 (1887)]*

Consequently, the statutes of limitations apply ONLY to the situation where BOTH the party injured AND the party injuring are public officers and are also parties to the "social compact" sought to be enforced. A statute of limitations can only serve to:

1. Undermine the security and protection of PRIVATE rights, property, and persons.

2. Protect and even promote wrongdoing by Government Actors.

3. Violate the fiduciary duty of a REAL de jure government in fulfilling the ONLY purpose of its creation, which is the protection of PRIVATE rights to life, liberty, and property.

Under the concept of equality of treatment that is the foundation of all law, the RULES OF EQUITY permit me to use the same tactics against Government that they use to create and implement their adhesion contracts, which then is the authority for implementing my attached Fee Schedule:

> ***"The State in such cases exercises no greater right than an individual may exercise over the use of his own property when leased or loaned to others. The conditions upon which the privilege shall be enjoyed being stated or implied in the legislation authorizing its grant, no right is, of course, impaired by their enforcement. The recipient of the privilege, in effect, stipulates to comply with the conditions. It matters not how limited the privilege conferred, its acceptance implies an assent to the regulation of its use and the compensation for it."***
> *[Munn v. Illinois, 94 U.S. 113 (1876)]*

Civil services are defined as non-essential services, which services become PRIVATE business activity beyond the core purpose of government in which the government must behave and be treated just like any other private business that offers voluntary services. It may not assert official, judicial, or sovereign immunity to evade responsibility to deliver exactly and ONLY what was explicitly asked for, consented to, and paid for. Therefore all Government Actors perpetually waive official, judicial, or sovereign immunity associated with any government position or agency they may otherwise occupy in the context of enforcing any provision of the terms and conditions outlined in attached Fee Schedule.

Dated: August 5, 2025

Respectfully submitted,

____

Thomas Edward Humphrey
Plaintiff, *In Propria Persona (for one's self)*
% 275 Main Street, Apartment 709
Watertown, Massachusetts Republic [02472]
Email: thomasehumphrey@gmail.com
Ph. (617) 835-9319

JURAT – (FOR AFFIDAVIT OR OTHER AFFIRMED STATEMENT)
COMMONWEALTH OF MASSACHUSETTS
COUNTY OF MIDDLESEX

On this _____ day of _______________, 2025, before me, the undersigned notary public, personally appeared Thomas Edward Humphrey, proved to me through satisfactory evidence of identification, which were [describe identification, e.g., state-issued ID],__________________, to be the person who signed the attached **FINAL NOTICE** dated August 5, 2025 in my presence, and who affirmed to me that the contents of the document are truthful and accurate to the best of his knowledge and belief.

____

Signature of Notary Public

My Commission expires: [Seal]

official, judicial, or sovereign immunity to evade responsibility to deliver exactly and ONLY what was explicitly asked for, consented to, and paid for. Therefore all Government Actors perpetually waive official, judicial, or sovereign immunity associated with any government position or agency they may otherwise occupy in the context of enforcing any provision of the terms and conditions outlined in attached Fee Schedule.

Dated: August 5, 2025

Respectfully submitted,

TEH

Thomas Edward Humphrey
Plaintiff, *In Propria Persona (for one's self)*
% 275 Main Street, Apartment 709
Watertown, Massachusetts Republic [02472]
Email: thomasehumphrey@gmail.com
Ph. (617) 835-9319

JURAT – (FOR AFFIDAVIT OR OTHER AFFIRMED STATEMENT)
COMMONWEALTH OF MASSACHUSETTS
COUNTY OF MIDDLESEX

On this 05 day of August, 2025, before me, the undersigned notary public, personally appeared Thomas Edward Humphrey, proved to me through satisfactory evidence of identification, which were [describe identification, e.g., state-issued ID], Thomas MA ID SA57 to be the person who signed the attached **FINAL NOTICE** dated August 5, 2025 in my presence, and who affirmed to me that the contents of the document are truthful and accurate to the best of his knowledge and belief.

Mirna Aponte
Signature of Notary Public

My Commission expires: 12/4/31

[Seal]

MIRNA APONTE
Notary Public
COMMONWEALTH OF MASSACHUSETTS
My Commission Expires
December 4 2031

Humphrey, Thomas-Edward

c/o 275 Main Street Apt. 709
Watertown, Mass. Republic [02472]
(617) 835-9319
thomasehumphrey@gmail.com

Certified Mail # 9589 0710 5270 2303 1635 95

True Bill

Submitted on 06/24/2025

True Bill for	Payable to	True Bill #
STATE OF SOUTH CAROLINA	Humphrey, Thomas-Edward	SCHP-RV062423-HTE
Brian J. Gaines, Comptroller 1200 Senate Street 305 Wade Hampton Office Building Columbia, SC 29201 Email: cgoffice@cg.sc.gov	**Just Compensation** For Confiscation of Private Property & Rights Violations	**Due date** 7/26/2025

Description	Qty	Unit price	Total price
R-01 Responses requiring certified or registered mail for verification	8	$1,000.00	$8,000.00
R-02 Responses requiring a notarized or witnessed affidavit	8	$50,000.00	$400,000.00
R-04 Responses requiring research	1600	$50,000.00	$80,000,000.00
LA-02 The filing of legal actions without a verified claim by public agents or officers	4	$5,000,000.00	$20,000,000.00
LA-04 Required court or hearing appearance	1	$100,000.00	$100,000.00

FEES FOR HARM TO ANPC INTERNATIONAL member HTE-026-087 (Cont'd)

Description	Qty	Unit price	Total price
NH-03 Unwarranted detainment by public agents or officers resulting in being handcuffed	96	$100,000.00	$9,600,000.00
NH-04 Cost of each order given by public agents or officers which demands action	2	$500,000.00	$1,000,000.00
NH-07 Removal from property	1	$500,000.00	$500,000.00
NH-11 Actions by public agents or officers resulting in imprisonment	1	$10,000,000.00	$10,000,000.00
NH-16 Taking of physical identification (finger printing, photos of likeness, etc.)	1	$250,000.00	$250,000.00
NH-19 Confiscation or seizure of property resulting in recovery of property (undamaged)	1	$5,000,000.00	$5,000,000.00
Fee for strip search i.e. forced to expose the shamefulness of my nakedness **Gen. 3:7-10, 21**	1	$5,000,000.00	$5,000,000.00
Fee for the unauthorized use and enjoyment of private dwelling ($333 per minute)	1201	$333.00	$399,933.00

Notes:
All fees are due and payable upon receipt this true bill. Any party in receipt of this true bill shall have 10 business days from time of receipt to correct errors without which the true-bill will be presumed true. ***All fees/values are to be paid in gold or silver coin of the United States pursuant to Article I, Section 10, Clause 1 of the U.S. Constitution.*** *Please arrange to deposit your payment into my designated precious metal depository. Please ensure payment is securely packaged and accompanied by any relevant documentation or transaction references. If you have any questions or require further assistance regarding depositing your payment, contact me (617) 835-9319 or thomasehumphrey@gmail.com with your questions.*

Subtotal	**$132,257,933.00**
Adjustments	**$0.00**

$132,257,933.00

Below are the details required to complete your deposit:

SD Bullion, Inc. - SD Depository
Account Number: *4783*
Account Holder: *Thomas Humphrey*
Street Address: *4570 W Sterns Rd.*
City, State, ZIP: *Ottawa Lake, MI 49267*
Contact Phone Number: *(800) 233-6805*

Signature______________________**Date**______________

Humphrey, Thomas-Edward
c/o 275 Main Street Apt. 709
Watertown, Mass. Republic [02472]
(617) 835-9319
thomasehumphrey@gmail.com

Certified Mail # 9589 0710 5270 2303 1635 95

True Bill

Submitted on 06/24/2025

True Bill for
STATE OF SOUTH CAROLINA

Brian J. Gaines, Comptroller
1200 Senate Street
305 Wade Hampton Office Building
Columbia, SC 29201
Email: cgoffice@cg.sc.gov

Payable to
Humphrey, Thomas-Edward

Just Compensation
For Confiscation of Private Property & Rights Violations

True Bill #
SCHP-RV062423-HTE

Due date
7/26/2025

Description	Qty	Unit price	Total price
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R-02 Responses requiring a notarized or witnessed affidavit	8	$50,000.00	$400,000.00
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NH-11 Actions by public agents or officers resulting in imprisonment	1	$10,000,000.00	$10,000,000.00
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NH-19 Confiscation or seizure of property resulting in recovery of property (undamaged)	1	$5,000,000.00	$5,000,000.00
Fee for strip search i.e. forced to expose the shamefulness of my nakedness **Gen. 3:7-10, 21**	1	$5,000,000.00	$5,000,000.00
Fee for the unauthorized use and enjoyment of private dwelling ($333 per minute)	1201	$333.00	$399,933.00

Subtotal	$132,257,933.00
Adjustments	$0.00

$132,257,933.00

Notes:
All fees are due and payable upon receipt this true bill. Any party in receipt of this true bill shall have 10 business days from time of receipt to correct errors without which the true-bill will be presumed true. ***All fees/values are to be paid in gold or silver coin of the United States pursuant to Article I, Section 10, Clause 1 of the U.S. Constitution.*** *Please arrange to deposit your payment into my designated precious metal depository. Please ensure payment is securely packaged and accompanied by any relevant documentation or transaction references. If you have any questions or require further assistance regarding depositing your payment, contact me (617) 835-9319 or thomasehumphrey@gmail.com with your questions.*

Below are the details required to complete your deposit:

SD Bullion, Inc. - SD Depository
Account Number: *4783*
Account Holder: *Thomas Humphrey*
Street Address: *4570 W Stems Rd.*
City, State, ZIP: *Ottawa Lake, MI 49267*
Contact Phone Number: *(800) 233-6805*

Signature TH **Date** 06/24/2025

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Tracking Number:

9589071052702095071573

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Your item was delivered to the front desk, reception area, or mail room at 8:35 am on August 12, 2025 in COLUMBIA, SC 29201.

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COLUMBIA, SC 29201
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State of South Carolina
Brian J. Gaines, Comptroller
1200 Senate St. #305
Columbia, SC 29201

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→ ACTUAL VALUE OF ITEM PRODUCT MUST BE DECLARED COVERED FOR ACTUAL VALUE
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FINAL NOTICE

TO: STATE OF SOUTH CAROLINA
Governor, Henry Dargan McMaster
1100 Gervais Street
Columbia, SC 29201

South Carolina Highway Patrol
Colonel, Christopher N. Williamson
10311 Wilson Blvd.
Blythewood, SC 29016

South Carolina Department of Public Safet
Director, Robert G. Woods IV
10311 Wilson Boulevard
Post Office Box 1993
Blythewood, SC 29016

August 5, 2025

I am writing to inform you of your outstanding balance of True Bill No. SCHP-RV062423-HTE in the amount of $132,257,933.00 (one hundred thirty-two million two hundred fifty-seven thousand nine hundred thirty-three and 00/100 dollars) to be paid in gold or silver minted coins of the United States. This bill was submitted to your office June 24, 2025, with a due date of July 26, 2025. As of today, your balance is **10 days** overdue. Please arrange to deposit your payment in the form of gold and/or silver minted coins of the United States into my designated precious metal depository. Below are the details required to complete your deposit.

SD Bullion, Inc. - SD Depository
Account Number: 4783
Account Holder: Thomas Humphrey
Street Address: 4570 W Sterns Rd.
City, State, ZIP: Ottawa Lake, MI 49267
Contact Phone Number: (800) 233-6805

If Government Actors fail to rebut my DECLARATION OF RIGHTS VIOLATIONS AND DEMAND FOR DAMAGES dated June 24, 2025, with a counter affidavit point by point (A failure to deny any assertion shall constitute evidence of a conclusive admission of the thing not

NOTICE TO AGENT IS NOTICE TO PRINCIPAL, NOTICE TO PRINCIPAL IS NOTICE TO AGENT

SENDER: COMPLETE THIS SECTION
■ Complete items 1, 2, and 3.
■ Print your name and address on the reverse so that we can return the card to you.
■ Attach this card to the back of the mailpiece, or on the front if space permits.
1. Article Addressed to:
Comptroller
Brian J Gaines
1200 Senate St #305
Columbia, SC 29201

9590 9402 9272 4295 2349 62

2. Article Number (Transfer from service label)
9589 0710 5270 2095 0715 73

PS Form 3811, July 2020 PSN 7530-02-000-9053

COMPLETE THIS SECTION ON DELIVERY
A. Signature
X
☐ Agent
☐ Addressee
B. Received by (Printed Name)
C. Date of Delivery
D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type
☐ Adult Signature
☐ Adult Signature Restricted Delivery
☐ Certified Mail®
☐ Certified Mail Restricted Delivery
☐ Collect on Delivery
☐ Collect on Delivery Restricted Delivery
☐ Insured Mail
☐ Insured Mail Restricted Delivery
☐ Priority Mail Express®
☐ Registered Mail™
☐ Registered Mail Restricted Delivery
☐ Signature Confirmation™
☐ Signature Confirmation Restricted Delivery

Domestic Return Receipt

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Tracking / FAQs

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Tracking Number:

9590940292724295234962

Copy   Add to Informed Delivery

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The U.S. Postal Service has received electronic notification on August 5, 2025 at 4:59 pm that you have associated a return receipt to your item.

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Return Receipt Associated

August 5, 2025 4:59 PM

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FAQs

EXHIBIT

C

VERIFIED PETITION IN EQUITY

Re: True Bill No. SCHP-RV062423-HTE

DESCRIPTION

A verified petition in equity setting out, under oath, the complete factual record and the grounds for relief arising from True Bill No. SCHP-RV062423-HTE and its accompanying Declaration of Rights Violations and Demand for Damages. Because the petition runs to 147 pages, the full document is provided digitally and can be reviewed at the link below:

https://drive.google.com/file/d/18IJ32Iu1D7vkUa344kdHEaqZQtPuDFpE/