

**DEMEIAN LAMONT PINCKNEY, Estate.**

**Executor Office.**

**Nation South Carolina**

**Mailing Location: c/o 32 Sheppard Street**

**Charleston Territory, South Carolina Republic**

**Via United States Republic, North America**

**Near [29403]**

**Chronos/ Day 5, May, 2016 A.D = 143**

**Postmaster Article No:7015 1520 0003 30006 7398**

**Office of Charleston County Attorney's**

**Attn: Johanna S. Gardner [Assistant County Attorney]**

**Lonnie Hamilton, III Public Services Building**

**4045 Bridge View Drive**

**North Charleston, South Carolina**

**U.S.A. [29405]**

**To: The Office of Charleston County Attorney's**

**From: Executor Office – DEMEIAN LAMONT PINCKNEY, Estate.**

**Regarding: Unauthorized administration of DEMEIAN LAMONT PINCKNEY, Estate;**

**[ Jacket No: 2015-CP-10-2253]**

Enclosed you will find "abandoned" paperwork which appears to erroneously "allege" that Johanna S. Gardner doing business as Assistant County Attorney/employee/agent/servant in the Charleston County Attorney's Office, who by their un-warranted acts, fraudulently claim authority from this Executor Office to administrate for DEMEIAN LAMONT PINCKNEY, Estate. You; Johanna Gardner/ Charleston County Attorney's Office/ Charleston County Sheriff's Office have 10 days to return my private property or further legal action will be taken. That false claim is hereby Adjourned.

You will forthwith return and transmit the specific written delegated authority to "represent" that authorization to administrate [act as trustee] the DEMEIAN LAMONT PINCKNEY, Estate has been warranted, together with a certified copy of your oath for the Office of Assistant County Attorney, accompanied by certified copies of your BOND, and a detailed list of "all" other bonds, sureties, indemnification, insurance and Court Registry Investment System (CRIS) CUSIP numbers and full-accounting relating in any way to anyone's personal or professional involvement as referenced above and the arrogated paperwork intrusion upon the DEMEIAN LAMONT PINCKNEY, Estate .

govern yourself accordingly.

By: executor

Demeian Pinckney Bey

Executor Office.

DEMEIAN LAMONT PINCKNEY, Estate.

Nation South Carolina

Mailing Location: c/o 32 Sheppard Street

Charleston Territory, South Carolina Republic

Via United Republic, North America

Near [29403]

Certified Document:

copy to: Office of Governor  
State of South Carolina

copy to: Office of Attorney General  
State of South Carolina

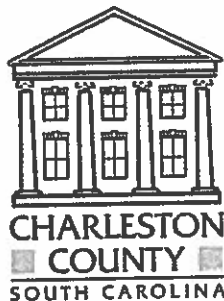
SWORN to and subscribed before me

This 5 day of May, 2016

Simona A. French Notary Public for South Carolina

My Commission Expires: May 20, 2024

JOHANNA S. GARDNER  
ASSISTANT COUNTY ATTORNEY



CHARLESTON COUNTY ATTORNEY'S OFFICE  
Lonnie Hamilton, III Public Services Building  
4045 Bridge View Drive  
North Charleston, South Carolina 29405  
843.958.4073  
Fax: 843.958.4017  
jgardner@charlestoncounty.org

April 8, 2016

Demeian Pinckney  
32 Sheppard Street  
Charleston, South Carolina 29403

Re: *Charleston County Sheriff's Office v. One 2006 Buick Rendezvous, VIN: 3G5DA03LX6S565403, Titled and Registered to Demeian Pinckney, 0.73 Grams of Cocaine Base, 1.10 Grams of Cocaine, and 0.07 Grams of Heroin*  
Case No. 2015-CP-10-2253

Dear Mr. Pinckney:

As I mentioned to you in our telephone conversation, I am enclosing and serving on you Plaintiff's First Set of Interrogatories to Interested Party Demeian Pinckney, Plaintiff's Request for Production of Documents to Interested Party Demeian Pinckney, and Plaintiff's Requests for Admissions to Interested Party Demeian Pinckney in the above-referenced case.

Thank you for your attention to this matter.

Sincerely,

CHARLESTON COUNTY ATTORNEY'S OFFICE

Johanna S. Gardner

STATE OF SOUTH CAROLINA )  
 )  
COUNTY OF CHARLESTON )

IN THE COURT OF COMMON PLEAS  
FOR THE NINTH JUDICIAL CIRCUIT  
CASE NO. 2015-CP-10-2253  
OCA: 2013-008916B

Charleston County Sheriff's Office, )  
 )  
Plaintiff, )  
 )  
vs. )  
 )  
 )  
One 2006 Buick Rendezvous, )  
VIN:3G5DA03LX6S565403, Titled )  
and Registered to Demeian Pinckney, )  
0.73 Grams of Cocaine Base, 1.10 )  
Grams of Cocaine, and 0.07 Grams of )  
Heroin, )  
 )  
Defendants. )  
\_\_\_\_\_ )

**PLAINTIFF'S FIRST SET  
OF INTERROGATORIES TO  
INTERESTED PARTY  
DEMEIAN PINCKNEY**

TO: INTERESTED PARTY DEMEIAN PINCKNEY

Pursuant to Rule 33(b) of the South Carolina Rules of Civil Procedure, Plaintiff Charleston County Sheriff's Office requests that Defendant Interested Party Demeian Pinckney answer the following interrogatories separately and fully in writing under oath and serve the answers and objections, if any, within 30 days after service of the interrogatories or within 45 days after service of the summons and complaint. These interrogatories shall be deemed to continue until the time of the trial of the case, and Interested Party Demeian Pinckney is expected to file supplemental responses to the interrogatories in accordance with Rule 26(e) of the South Carolina Rules of Civil Procedure.

## DEFINITIONS AND INSTRUCTIONS

1. These interrogatories seek all information known or reasonably available to the Interested Party Demeian Pinckney, including, without limitation, information known or available to all agents, attorneys, investigators, representatives of any kind, and all persons acting on the Interested Party Demeian Pinckney's behalf.
2. Where an interrogatory requests the identification of a document, this means setting forth (a) the name(s) of the document's author(s) or sender(s); (b) the name(s) of the document's addressee(s) and recipient(s); (c) the date of the document; (d) the nature of the document (e.g., letter, memorandum, report, etc.); (e) the location of the document, its custodian; and (f) a description of the contents of the document. A copy of each document may be produced in lieu of identifying each document. For those documents produced, each document is to be identified by the interrogatory number(s) to which it is responsive.
3. For the purpose of these interrogatories, the term "document" means any record or store of information, including, without limitation, the original of all writings of every kind, including, but not limited to, letters, telegrams, telexes, memoranda, notes, reports, work papers, surveys, manuals, guidelines, instructions, studies, speeches, calendar or diary entries, travel records and vouchers, minutes of meetings, conferences, telephone or other conversations or communications, pamphlets, charts, lists, directives, records and drafts. The term "document" also includes tape recordings of meetings, conferences and telephone or other conversations or communications, as well as data processing machine printouts and tapes, or other mechanical means of storing or recording information. The term "document" further includes copies,

reproductions or film impressions of any of the aforementioned writings or documents the originals of which are not in the possession, custody or control of Interested Party Demeian Pinckney. Finally the term "document" includes copies, reproductions or film impressions which are not identical duplicates of the originals because of markings of any kind that appear on the copies, reproductions or film impressions, but not on the original.

4. For the purposes of these interrogatories, the term "persons" shall include natural persons, firms, partnerships, associations, joint ventures, corporations and any other form of legal entity.

5. When an interrogatory requests the identification of a person, that person shall be identified by (a) full name; (b) present or last known employer; and (c) present or last known mailing address. In the case of "person" other than a natural person, there must be stated its legal name and its present or last known principal place of business.

6. If a privilege of any kind is claimed as a basis for limiting any response to these interrogatories, the information that the privilege is being asserted should be clearly identified and the entire factual and legal bases for the claim of the privilege stated.

7. "Communication" or "Communications" includes, among others, any written, oral or electronic communication of any kind including, but not limited to, letters, telegrams, exchanges of written or recorded information, face to face meetings, telephone conversations, e-mail, etc.

### INTERROGATORIES

1. Give the names and addresses of persons known to the Interested Party Demeian Pinckney to be witnesses concerning the facts of the case and indicate

whether or not written or recorded statements have been taken from the witnesses and indicate who has possession of such statements.

2. Set forth a list of photographs, bank statements, tax statements, tax returns, or other prepared documents in the possession of the Interested Party Demeian Pinckney that relate to this case.
3. List the name and address of any expert witnesses whom the Interested Party Demeian Pinckney proposes to use as a witness at the trial of the case.
4. For each person known to the Interested Party Demeian Pinckney to be a witness concerning the facts of this case, set forth either a summary sufficient to inform Plaintiff of the important facts known to or observed by such witness, or provide a copy of any written or recorded statements taken from such witnesses.
5. If the Interested Party Demeian Pinckney is improperly identified, give the proper identification state whether counsel will accept service of an amended summons and pleading reflecting the correct information.
6. For each expert witness whom the Interested Party Demeian Pinckney proposes to use as witness at the trial of the case, state:

- a.) the subject matter on which the witness is expected to testify;
- b.) the substance of the facts and opinions to which the witness is expected to testify; and,
- c.) a summary of the grounds for any opinions of the witness.

The foregoing Interrogatories are to be regarded as continuing and you are requested to provide promptly, by way of supplemental answers thereto such additional information as may hereafter be obtained by you or any person or organization on your

behalf, which will augment or otherwise modify any answers now given to the foregoing Interrogatories

**CHARLESTON COUNTY SHERIFF'S OFFICE**



JOSEPH DAWSON, III, County Attorney  
BERNARD E. FERRARA, JR., Deputy County Attorney  
JOHANNA S. GARDNER, Assistant County Attorney  
CHARLESTON COUNTY ATTORNEY'S OFFICE  
Lonnie Hamilton, III Public Services Building  
4045 Bridge View Drive  
North Charleston, South Carolina 29405  
(843) 958-4010

**ATTORNEYS FOR PLAINTIFF**

Charleston, South Carolina  
April 8, 2016

**CERTIFICATE OF SERVICE**

I certify that I have served a true and correct copy of the foregoing Plaintiff's First Set of Interrogatories to Interested Party Demeian Pinckney by depositing a copy of the same in the United States mail, postage prepaid or hand-delivery in the manner prescribed by the applicable South Carolina Rules of Civil Procedure.

DATED this 8<sup>th</sup> day of April, 2016.



AMANDA K. DURHAM, Paralegal  
CHARLESTON COUNTY ATTORNEY'S OFFICE



STATE OF SOUTH CAROLINA )  
 )  
COUNTY OF CHARLESTON )

IN THE COURT OF COMMON PLEAS  
FOR THE NINTH JUDICIAL CIRCUIT  
CASE NO. 2015-CP-10-2253  
OCA: 2013-008916B

Charleston County Sheriff's Office, )  
 )  
Plaintiff, )

vs. )

One 2006 Buick Rendezvous, )  
VIN:3G5DA03LX6S565403, Titled )  
and Registered to Demeian Pinckney, )  
0.73 Grams of Cocaine Base, 1.10 )  
Grams of Cocaine, and 0.07 Grams of )  
Heroin, )  
Defendants. )

**PLAINTIFF'S REQUEST FOR  
PRODUCTION OF DOCUMENTS  
TO INTERESTED PARTY  
DEMEIAN PINCKNEY**

TO: INTERESTED PARTY DEMEIAN PINCKNEY

Pursuant to Rule 34 of the South Carolina Rules of Civil Procedure, the Plaintiff Charleston County Sheriff's Office requests that the Defendant Interested Party Demeian Pinckney produce the documents and items requested below for inspection and copying at the Charleston County Attorney's Office, 4045 Bridge View Drive, Charleston, South Carolina thirty (30) days from the date hereof, or at such reasonable time and place as the Interested Party shall specify. This request for production of documents is considered continuing in nature, and the Interested Party is expected to produce supplemental documents in accordance with Rule 26(e) of the South Carolina Rules of Civil Procedure.

## INSTRUCTIONS

Whenever a description of documents is framed in the conjunctive, it shall also be taken in the disjunctive, and vice versa. A description framed in the singular shall also be taken in the plural, and vice versa.

These requests to produce seek all documents known to or reasonably available to the Interested Party, including, without limitation, documents known or available to the Interested Party and all agents, attorneys, investigators, representatives of any kind, and all persons acting on the behalf of the Interested Party.

If a privilege of any kind is claimed as a basis for withholding or masking any document responsive to this request, the information that the privilege is being asserted should be clearly identified and the entire factual and legal bases for the claim of the privilege being asserted should be clearly identified and the entire factual and legal bases for the claim of the privilege stated. Each document withheld should be identified by setting forth (i) the name(s) of the document's author(s) or sender(s); (ii) the name(s) of the document's addressee(s) and recipients(s); (iii) the date of the document; (iv) the nature of the document (e.g., letter, memorandum, report, etc.); (v) the location of the document and its custodian; and (vi) a description of the contents of the document.

If any document described in this request was, but no longer is, in your possession, or subject to your custody or control, or in existence, state whether:

- a. it is missing or lost;
- b. it has been destroyed;
- c. it has been transferred, voluntarily or involuntarily, to others; and
- d. who may have a copy.

In each instance, explain the circumstances surrounding such disposition and identify the person(s) directing or authorizing same, and the date(s) thereof. Identify each document by listing its author, his address, type (e.g., letter, memorandum, telegram, chart, photograph, etc.), date, subject matter, present location(s) and custodian(s), and state whether the document (or copies) is still in existence.

The term "documents" refers to all original writings of any nature whatsoever and all non-identical copies thereof, in your possession, or in the possession of your predecessors, successors, subsidiaries, agents, servants, employees, consultants, or other representatives, regardless of where located, and all other documents of which you have knowledge, and includes, but is not limited to, correspondence, diagrams, sketches, maps, tape recordings, information stored for computer retrieval, films, photographs, contracts, agreements, notes, minutes of meetings, schedules, summaries, analysis, memoranda, working papers, diaries, calendars, invoices, receipts, telephone messages, and bills. If the original and/or non-identical copies are unavailable, "documents" also means copies thereof.

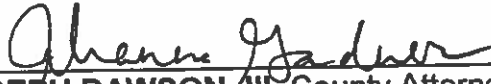
#### DOCUMENTS TO BE PRODUCED

1. Copies of all documents or other materials identified in response to Plaintiff's First Set of Interrogatories to Interested Party Demeian Pinckney.
2. Copies of any and all statements given by the Interested Party Demeian Pinckney, which are in possession of the Interested Party, whether written or recorded or on a tape recorder or otherwise.

3. Copies of any and all statements by witnesses relating to the matters complained of in the Complaint, which are in the possession of the Interested Party Demeian Pinckney, whether written or recorded or on a tape recorder or otherwise.
4. Copies of any and all correspondence between Interested Party Demeian Pinckney and the Charleston County Sheriff's Office, which in any way may relate to the allegations which are the subject matter of the Complaint.
5. Copies of any and all correspondence whatsoever that in any way may relate to the allegations which are the subject of the Complaint.
6. Copies of any and all files, statements, memoranda, reports or any other documents or materials which are in the possession of the Interested Party Demeian Pinckney, which may relate to or arise out of any and all representations of the Interested Party Demeian Pinckney.
7. Copies of any and all documents that show the captioned Seized Property is not subject to forfeiture pursuant to Title 44, Chapter 53, Article 3, Narcotics and Controlled Substances, Section 44-53-10, et seq., Code of Laws of South Carolina, 1976, as amended.
8. Copies of any and all documents that show Plaintiff did not have probable cause to confirm forfeiture of the Seized Property.
9. Copies of any and all documents, whether bank statements, employment records, or paystubs or otherwise, that show how and when the Seized Property was obtained by the Interested Party Demeian Pinckney.

10. Copies of all documents or physical evidence to be utilized at the trial of this case, whether it is to be admitted into evidence or used for the purpose of examining or cross-examining a witness, or used for demonstrative purposes.
11. Copies of any and all documents you intend to introduce at trial.

**CHARLESTON COUNTY SHERIFF'S OFFICE**



JOSEPH DAWSON, III, County Attorney  
BERNARD E. FERRARA, JR., Deputy County Attorney  
JOHANNA S. GARDNER, Assistant County Attorney  
CHARLESTON COUNTY ATTORNEY'S OFFICE  
Lonnie Hamilton, III Public Services Building  
4045 Bridge View Drive  
North Charleston, South Carolina 29405  
(843) 958-4010

**ATTORNEYS FOR PLAINTIFF**

Charleston, South Carolina  
April 8, 2016

**CERTIFICATE OF SERVICE**

I certify that I have served a true and correct copy of the foregoing Plaintiff's Request for Production of Documents to Interested Party Demeian Pinckney by depositing a copy of the same in the United States mail, postage prepaid or hand-delivery in the manner prescribed by the applicable South Carolina Rules of Civil Procedure.

DATED this 8<sup>th</sup> day of April, 2016.

AMANDA K. DURHAM, Paralegal  
CHARLESTON COUNTY ATTORNEY'S OFFICE



unless he states, in accordance with provisions of Rule 11 of the South Carolina Rules of Civil Procedure that he has made reasonable inquiry and that the information known or readily obtainable by him is insufficient to enable him to admit or deny.

**Request No. 1:** Admit that on or about June 21, 2013, you drove the captioned Buick Rendezvous to 4920 Centre Pointe Drive, in North Charleston, South Carolina.

**Request No. 2:** Admit that you arranged to sell a quantity of heroin in the vicinity of 4920 Centre Pointe Drive, North Charleston, South Carolina.

**Request No. 2:** Admit that on or about June 21, 2013, you arrived to the incident location driving the 2006 Buick Rendezvous.

**Request No. 3:** Admit that you are the registered owner of the captioned 2006 Buick Rendezvous.

**Request No. 4:** Admit that as the Plaintiff approached the captioned Buick Rendezvous to buy the narcotics, you fled on foot.

**Request No. 5:** Admit that as you fled, you discarded at least 0.07 grams of heroin from your pocket.

**Request No. 6:** Admit that a pill case attached to the vehicle's key chain contained 0.73 grams [11.26 grains] of cocaine base and 1.10 grams [16.97 grains] of cocaine.

**Request No. 7:** Admit that the pill case remained inside the Buick Rendezvous while you fled.

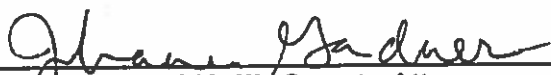
**Request No. 8:** Admit that the vehicle contained more at least 0.73 grams of cocaine base.

**Request No. 9:** Admit that the vehicle contained at least 1.10 grams of cocaine.

**Request No. 10:** Admit that you either used or intended to use the above- captioned vehicle in violation of the Narcotics and Controlled Substances Act.

**Request No. 11:** Admit that the above-captioned vehicle was used to unlawfully conceal, contain, or transport or facilitate the unlawful concealment, possession, containment, manufacture or transportation of the controlled substances referenced in Requests No. 5 and 6.

**CHARLESTON COUNTY SHERIFF'S OFFICE**

  
JOSEPH DAWSON, III, County Attorney  
BERNARD E. FERRARA, JR., Deputy County Attorney  
JOHANNA S. GARDNER, Assistant County Attorney  
CHARLESTON COUNTY ATTORNEY'S OFFICE  
Lonnie Hamilton, III Public Services Building  
4045 Bridge View Drive  
North Charleston, South Carolina 29405  
(843) 958-4010


**ATTORNEYS FOR PLAINTIFF**

Charleston, South Carolina  
April 8, 2016

**CERTIFICATE OF SERVICE**

I certify that I have served a true and correct copy of the foregoing Plaintiff's Requests for Admissions to Interested Party Demeian Pinckney by depositing a copy of the same in the United States mail, postage prepaid or hand-delivery in the manner prescribed by the applicable South Carolina Rules of Civil Procedure.

DATED this 8<sup>th</sup> day of April, 2016.

  
AMANDA K. DURHAM, Paralegal  
CHARLESTON COUNTY ATTORNEY'S OFFICE