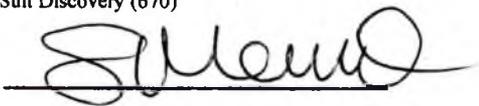




- |   |  |   |                                      |
|---|--|---|--------------------------------------|
| <input checked="" type="checkbox"/> Automobile Arb. (610) | <input type="checkbox"/> Unfair Trade Practices (640)                              | <input type="checkbox"/> Compensation Settlement Approval (780) | <input type="checkbox"/> Other (999) |
| <input type="checkbox"/> Medical (620)                    | <input type="checkbox"/> Out-of State Depositions (650)                            | <input type="checkbox"/> Other (799)                            |                                      |
| <input type="checkbox"/> Other (699)                      | <input type="checkbox"/> Motion to Quash Subpoena in an Out-of-County Action (660) |   |                                      |
| <input type="checkbox"/> Sexual Predator (510)            | <input type="checkbox"/> Pre-Suit Discovery (670)                                  |   |                                      |

**Submitting Party Signature:**  **Date:** 2/11/16

**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.

**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 210<sup>th</sup> 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 only 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. 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.
6. Motion of a party to be exempt from payment of neutral fees due to indigency should be filed with the Court within ten (10) days after the ADR conference has been concluded.

**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 RICHLAND

IN THE COURT OF COMMON PLEAS  
COURT 5<sup>TH</sup> CIRCUIT

WALTER BRIAN BILBRO,  
Plaintiffs,

vs.

South Carolina Department of Social Services  
(Director Susan Alford and Director of RRP  
Dorothy Addison)

Office of Governor, Nikki Randhawa Haley

Lutheran Services

World Relief Spartanburg, (Jason Lee  
Director)

Defendants.

Case No. 2016-

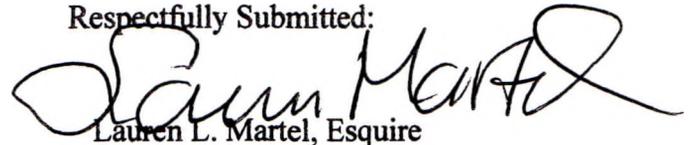
SUMMONS

2016 FEB 12 AM 10:41  
RICHLAND COUNTY  
FILED  
JEANETTE W. MCBRIDE  
C.C.P. & G.S.

**TO THE DEFENDANTS, ABOVE-NAMED:**

**YOU ARE HEREBY SUMMONED** and required to answer the Complaint in this action, a copy of which is herewith served upon you, and to serve a copy of your Answer to said Complaint on the subscriber at the Law Office of Lauren L. Martel, PO Box 23101 , Hilton Head Island, South Carolina 29925, within thirty (30) days after service hereof, exclusive of the date of service; and **IF YOU FAIL TO ANSWER THE COMPLAINT WITHIN THE TIME AFORESAID, THE PLAINTIFF IN THIS ACTION WILL APPLY TO THE COURT FOR A JUDGMENT BY DEFAULT FOR THE RELIEF DEMANDED IN THIS COMPLAINT.**

Respectfully Submitted:



Lauren L. Martel, Esquire

P.O. Box 23101

Hilton Head Island, S.C. 29925

843-298-3831

This 12th Day of February 2016

STATE OF SOUTH CAROLINA  
COUNTY OF RICHLAND

IN THE COURT OF COMMON PLEAS 5<sup>TH</sup>  
CIRCUIT

WALTER BRIAN BILBRO,  
Plaintiffs,

Vs.

South Carolina Department of Social Services  
(Director Susan Alford, Director Dorothy  
Addison RRP)

Office of Governor, Nikki Randhawa Haley

Lutheran Services Carolinas

World Relief Spartanburg, (Director Jason  
Lee)

Defendants.

Case No. 2016-\_\_\_\_-\_\_\_\_-\_\_\_\_

VERIFIED COMPLAINT  
TO CEASE STATE REFUGEE  
PROGRAM AND FOR EQUITABLE AND  
OTHER RELIEF APPLICABLE

RICHLAND COUNTY  
FILED  
2016 FEB 12 AM 10:41  
JEANETTE W. MCBRIDE  
C.C.P. & G.S.

NOW COMES THE PLAINTIFF and states that he is informed this Court has  
Jurisdiction over the Parties and the subject matter and he is seeking the following Relief:

1. That the Plaintiff Brian Bilbro is a resident of Richland County, South Carolina  
and a taxpayer. He has resided in South Carolina for 43 years and is a graduate  
of the University of South Carolina. He is married and has two children who  
attend the Public School. He is informed and believes that he has standing to  
bring this action as a taxpayer who has a vested interest in the state programs,  
funding of state programs and effect of Public Safety, Public Education and  
Public Health as a direct result of the serious problems of the State Refugee  
Plan 2016 a copy of said Program is filed with this case. He is informed that

#ISSN

he has a personal stake in the subject matter of this lawsuit. He is informed that he has a real, material, substantial interest in the subject matter of this action. He is informed and believes he has and/or he will sustain immediate damage and prejudice due to the imminent threat resulting from the State Program has an affect him and his family directly and that he has a favorably likelihood of success on the merits of this case. He seeks relief under Rule 65 and 66 of SCRCP and other equitable relief, remedies as demonstrated in this pleading and supporting documents.

2. The Plaintiff is informed and believes that he has or is in imminent danger of sustaining an invasion of a legally protected interest which is clear and that this irreparable damage is actual and imminent; He is informed that the connection between the duty owed and the action taken is the proximate cause and can be traced through documents and evidence. He is informed and believes that he will have a likelihood of success and will be redressed by a favorable decision on the merits.
3. That the Plaintiff is informed and believes that the Office of the Governor Nikki Randhawa Haley has a duty to the taxpaying citizens and residents of the State of South Carolina in accordance with her oath of office and to fulfill those duties in accordance with South Carolina Law; She has a duty to faithfully execute the Laws of this State as Governor and Chief Magistrate;
4. That the Plaintiff is informed and believes that the South Carolina Department of Social Services (herein after SCDSS) is governed by the State laws and regulations under the Cabinet leadership of the Governor. He is informed and believes that this is a State Agency that has County offices and operates in local communities and operates in Richland County specifically as well as

#2SSM

throughout the state;

5. The Plaintiff is informed and believes that the Lutheran Services is a non-profit, registered in Salisbury, North Carolina but has filed as a “charity” in the state of South Carolina with a total revenue of \$15,294,418.00 in reporting cycle 10/1/13-9/30/14. It appears to be actively doing business in the State of South Carolina; He is informed and believes that recently this entity has contracted, brought over and resettled Syrians who have not been vetted or cannot be vetted (SEE TESTIMONY FROM FBI and other evidence provided) under the supervision of their agency and SCDSS; He is informed that this is a serious concern based upon facts and evidence and places him and his family in serious imminent harm that is irreparable damage; He is informed this is only one instance that the system itself lacks integrity to bring over any persons from hostile territory, such as Islamic countries where the imminent danger is clear and present;
6. The Plaintiff is informed and believes that the defendant World Relief Spartanburg is a non-profit business in the business of bringing “refugee” over to South Carolina for a price; The Plaintiff believes that there is a Local South Carolina Filing for this Baltimore Maryland based business that reports multi-million dollar revenue
7. The Plaintiff seeks for a injunction and a restraining order restraining preventing the Defendants, South Carolina Department of Social Services Office of the Governor, Nikki Haley, Lutheran Services of Columbia and World Relief Spartanburg and all persons affiliated with them from: (a) Bringing in and placing in the State of South Carolina anymore Refugees or Asylees as defined in the South Carolina State Plan 2016; (b) APPOINTING A

#3SSM

RECIEVER to oversee the Funding of this Program and stop using any state funds or resources or county funds or resources for this program and to immediately issue a cease of the program until a full accounting of any and all Federal money used in this program; specifically where it was allocated, and how allocated in which counties; and (c) to cease allowing asylum seekers to use the Family Court system as a means of circumventing any meaningful vetting process to open the system up to further abuse and fraud and this process can encourage and incentivized criminal acts in the boarder smuggling of children under the State Program executed by Nikki Haley and South Carolina SCDSS; Case 2015-DR-07-220 does not appear to set out Proper Order of Protection, or follow the State Code for Family Law or Due Process of Law which also directly goes to properly and faithfully enforcing the Laws of South Carolina; The Plaintiff is informed and believes that the imminent danger of Family Court placing unvetted or properly screened people in his local community is imminent and He seeks an Injunction on the State Plan which incentivizes this failed policy; He is informed the proper Screening for Immigration is not a Family Court jurisdiction and he is informed the “sponsors are rarely screened and can then petition for other unscreened family members to move to local South Carolina Communities.

8. That the Plaintiff is informed and believes that the failure of this program to have integrity in the vetting process of these alleged “refuges” is a huge legitimate personal concern for the Plaintiff and concern has the potential for severe and devastating irreparable damage if it does not stop for which there would be no legal remedy that could make up for the damage done by continuing this Program. If not stopped immediately, he is informed and believes he and his

#4SSM

family will incur further damages;

9. That the Plaintiff is informed and believes based on valid expert testimony and the FBI has testified before Congress as well as the Expert who proffered an Affidavit in this matter that the vetting is questionable and in some cases cannot be done at all with any type of certainty, so fraud is potential in some cases and that the State of South Carolina has no meaningful vetting process for the state to protect the South Carolina Taxpayer from criminals, narco-drug traffickers, terrorists, rapist, people hostile to assimilation and the laws of South Carolina. The State Plan contradicts the duty of the office of Governor and the mission of South Caronia DSS to protect the South Carolina children and residents. This creates an imminent harm to the Plaintiff and he seeks to have it stopped and a full accounting by an Order Appointing a Receiver;
10. That the Plaintiff is informed and believes that State money is in fact being used despite the requirement it be 100% Federal Funded. He is informed that State Family Court is being used for the Asylum part of this refugee Program and that there is at least one case documented using State Resources and County Resources; He is informed and believes there is a high likelihood that there are more Family Court cases wherein potential criminals and nefarious and hostile foreigners can be placed unknown to law enforcement or the local community which causes his potential for imminent harm to be further increased. There is no meaningful review of these boarder jumpers that circumvent legal immigration practices. He is informed and believes that this creates an inherent conflict in the State Program and it creates a situation where the Laws of South Carolina are not being faithfully executed based on the vague and ambiguous nature of the State Program and its potential for serious, imminent

#558

and irreparable harm. He is informed he will have likelihood of success on the merits based on facts and evidence;

11. The Plaintiff is informed and believes that the evidence will show that The State Program allows for people who may not even actually be properly defined as refugees and some set for deportation and other potentially nefarious criminals or terrorists from abusing this program and causing irreparable harm to the Plaintiff and his family. See Family Case 15-DR-07-220 as one example.
12. The Plaintiff has the expectation that the State funded tax-paying offices and agencies will not enter into funding services that are subversive to the best interest and protection of him and his family. He is informed that such subversive policy as set forth in the State Plan creates an imminent harm to him and his family.
13. He is informed and believes that the two Non-profits and the SCDSS mandate that anyone involved in this program is not to "proselytize". He is informed and believes that this language IS CONTRARY to a legally protected interest that he has to freely share and practice his Christianity. He is informed that even the Non-Profits are not allowed to share the gospel but apparently are willing to pick and choose when this policy applies. He is informed that this directly affects his personal protected rights and sets up this Program to be replete with fraud. He is informed that on the merits he has a likelihood of being successful on this issue based on facts and evidence;
14. That the State projections have not been done adequately or may not even have been done at all in accordance with the State Plan as set out on Page 4 of the Plan. This paragraph indicates the Plan should be revised (Stopped) if the "inflow of ethnic composition of "clients" were a significant variance with

#6559

projections...” This failure of the Plan itself to take into consideration the inherent potential for fraud within such a Plan and the projections of how this will potentially irreparably harm the county to which this program is resettling potential terrorists or criminals or narco-drug traffickers or those unwilling to assimilate or hostile to the local communities where they are placed is grossly negligent and a dereliction of due diligence and duty to protect South Carolina taxpayer, Mr. Bilbro. He is informed and believes that the Lack of investigation into this program and informed projections based on similarly situated geographical (i.e. Dearborn, Michigan) areas is reckless and an alleged lack of faithfully executing the Laws of South Carolina to protect and preserve the people, Mr. Bilbro and his family, and the resources, infrastructure, finances of the State. This implementation of the State Plan has caused potential for imminent harm, which is so willfully dangerous as to create irreparable harm and damage to Plaintiff and his family.

15. The Plaintiff is informed and believes that The State Plan will overburden the local resources and law enforcement and Public Health and Public Safety and local education so as to cause irreparable harm to him and his family by fundamentally changing the local community, which cannot afford this program, even if it had integrity. State funds and county funds will be used at some point the burden will fall mostly on the State of South Carolina. With the possibility of imminent tax increases for Roads and Infrastructure and other tax increases to the Plaintiff he is informed he is directly harmed by this "Plan" and it is irreparable if not stopped. Allowing one case to come into South Carolina where a terror attack happens or his daughter or wife or neighbor got attacked as is happening in many other locations is Irreparable.

#7SSU

This is the clear and present danger that Mr. Bilbro is seeking to Prevent by bringing this Court action. He has a meritorious claim and he has a reasonable legitimate and immediate concern over the direct damage this State Plan is causing him;

16. The Plaintiff is informed and believes that the “refuges” allegedly coming through the non-profit are in fact mostly from United Nations Camps where they have resided for 18-24 months per testimony from the US Asst. Sect of State of Migration. Testimony by Asst. US Sect. Of State of Migration and Population indicates there is no meaningful crisis for these people in the UN camps as they have been settled there for 2 years. The high risk and potential for irreparable damage to the Plaintiff the people of South Carolina is substantial and prejudicial. There are other ways to be “charitable” or to help in a way that does not severely prejudice the Plaintiff and his family.
17. That the Plaintiff is informed he is entitled to equitable relief of shutting the State Program down and stopping any further refugees or asylum seekers into the state of South Carolina or allow them to be eligible for any benefits until a full accounting of state resources has been accomplished; It is too likely to present a dangerous outcome if it is not Stopped fully and to not allow one more person into the State of South Carolina under this Program;
18. Plaintiff has a reasonable expectation to rely on the representation that the Office of the Governor, the state Agency SCDSS and the local non-profits involved in resettling refugees are not involved in subversive acts that undermine the Public Health and Public Safety of the Plaintiff or his family.
19. That the Plaintiff has the right to rely that the Duty of the Governor and her executive subordinates to perform their duties in accordance with the South Carolina

#8 SSN

Constitution and State Laws. The State Officials and Government Must use due diligence in protecting the citizenry. Her premise for keeping GITMO out of South Carolina is seen in her public statement: **"We are absolutely drawing a line that we are not going to allow any terrorists to come into South Carolina. "We're not going to allow that kind of threat. We're not going to allow that kind of character to come in,"** she continued, making it seem as though Obama would have them teaching youth sports or performing at the senior center on work release. **"Without question, we are not going to allow South Carolina to become a magnet for terrorists to come here," "This is a slap in the face to the people in South Carolina who have sacrificed so much for this country," "To turn around and say that you are going put these terrorists in our backyard. Nikki Haley**

20. The Plaintiff relied on the Governor's statements when she allegedly fought to stop GITMO from being placed by the Federal Government into South Carolina and the Plaintiff has an expectation she would use the same diligence to protect the SC citizens and residents from a refugee resettlement plan that is the same as located GITMO detainees in the Low country of South Carolina. She should use the same concern and due diligence to allow a State Plan that has the same potential for causing irreparable harm as planting GITMO detainee. This would cause injury and harm the local tax revenues, school taxes and costs and expenses, infrastructure, public health and safety and increase highway with the influx of this unprecedented influx of population. This causes irreparable harm to the Plaintiff, his family, the local economy, schools, public health and safety and infrastructure and other resources.

21. The Plaintiff is informed and believes that no retaliation should be made against him, his family, and his local community for raising these serious concerns and he has a likelihood of success on the merits Other areas with similar plans and the rate of crime and rape

#9SSM

and overburden on the system based on a failure to properly assimilate or to become self sufficient. The State Plan allows translators for unending amounts of time, rather than encouraging English as a home language. This is contrary to South Carolina public policy and Public Health, Public Finances and Public Safety; this is an exploitation of the system financially and for a higher likelihood and if a further damage it is to be addresses by the Court

22. An injunction is necessary to maintain the status quo and to protect the Plaintiff from irreparable harm. He is informed and believes that if the program is not stopped he will suffer damages as a result of continued operation;

23. That the Plaintiff is informed and believes that some local Counties have passed resolutions demanding that the Governor cease this program and have expresses concerns in the Resolutions; which demonstrates others have this reasonable concern for irreparable harm to those individual; In fact the Governor was served with a letter to cease the Program in November 2015. It appears she has ignored this requests and in December 2015 Syrians were placed in the Midlands despite her full acknowledgment this is a potential danger;

24. That the Plaintiff lives in the Midlands and he is concerned with his physical safety and his family's safety and well being and the other irreparable harm that comes from the states Plan that overburdens his local community where he is a taxpaying participant. He has a reasonable expectation of Quiet Enjoyment and protection of his property, person and family. The County Budget has no funds planned to assimilate these hidden and expanding costs as the number of refugees grows. That that law enforcement, first responders, schools, infrastructure will not be so over burdened that he is placed in danger. This State Plan is prejudicial to the Plaintiff as a South Carolina Taxpayer and there are no immediate or long-term projections to rely on. The Plan endangers the Plaintiff his family and the Public Important interest for South Carolina;

25. The Plaintiff requests the South Carolina Rules of Discovery be adopted;

#1055m

26. That the Plaintiff is informed and believes that under the totality of all the circumstances in this case, that the Court could in its discretion find that in such cases of important Public interest, the Plaintiff has standing based on an important Public Interest. Sloan v. Sanford, 357 S.C. 431, 591, SE 2<sup>nd</sup> 470 (2004) and Sloan v. Greenville Cty. 356 SC 531, 590 SE 2d 338, Further the Plaintiff is informed that under the Public Importance Exception, standing may be even conferred upon Plaintiff when an issue is of such Public Importance as to require its resolution for future guidance” Baird v. Charleston City, 333 S.C. 519, 511 SE 2d 69 (1999). The Plaintiff is informed and believes that based on the facts and evidence and recent terrorist Attacks by terrorists within American soil. (Boston Bombing and 9/11 attacks) Those terrorists have been perpetrated misrepresentation and abuse of the immigration, asylum and incidents that have been revealed in the refugee program that there exists a substantial and imminent issue of Public interest in the resolution of this matter to Protect the Plaintiff and his family and Richland County South Carolina.

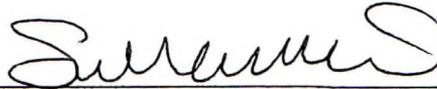
WHEREFORE the Plaintiff prays for the following relief:

1. Temporary Injunction and Restraining Order of the Refugee Resettlement State Plan 2016, until all the allegations and serious concerns for the imminent danger to the Plaintiff can be addressed and a full accounting of funding can be provided to the Court and Plaintiff. That any Injunction be without requirement for security;
2. That the State Plan be stopped due to a inflow of “ethnic” clients that were not projected” and it creates and opportunity for subversive and hostile exploitation of the taxpayer.
3. That South Carolina Rules of Discovery be used in this proceeding;
4. That a full disclosure and transparency be accounted for of what “private” services are offered” to the “clients” in the state plan and how that is funded;

#1155m

5. That the Court find the “non-Proselytizing” mandate in this policy be an imminent breach of a vested protected legal right that he has as the Plaintiff;
6. That all the requests for relief above stated are incorporated in this prayer for relief as if fully restated;
7. That the Plaintiff reserves his right to a jury trial and other relief offered under South Carolina Law and Constitution should trial be necessary and this "Plan" continue in operation;
8. That the Court find there is an Important Public Interest involved in this case for resolution and that the program cease until this Important Public Interest can be resolved and projections can be made in accordance with South Carolina Law;
9. For such other and further relief as may be Equitable and Just and Proper considering the threat to the State, South Carolina Treasury and the Richland County Tax revenues, personal tax finances, the injury to protected legal rights of the Plaintiff, physical harm and safety for himself and his family, abuse of the Plan which potential abuse of The Plan that incentivizes criminal and misrepresentations by refugees in support of them. He seeks to stop it immediately;

#12554



LAUREN MARTEL  
Post Office Box 23101  
Hilton Head , South Carolina 29925  
(843) 298-3831

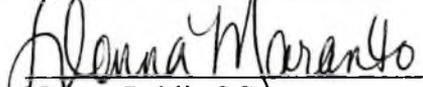
Attorney for Plaintiff

Beaufort, South Carolina  
Feb. 12<sup>th</sup> 2016

VERIFICATION: I am Brian Bilbro, I am the Plaintiff in this Action and I have read the Complaint and it is true and accurate to the best of my knowledge and as to those things alleged to be informed and believes are true to the best of his knowledge.

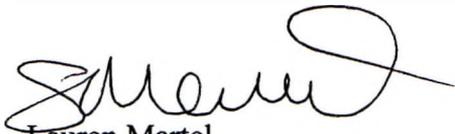
  
W. Brian Bilbro  
Brian Bilbro

SWORN TO BEFORE ME:

  
Notary Public SC:  
My Comm Exp: 10-30-2018

RULE 11 Verification

I am informed and believe that I have tried to contact the Defendants listed or that such contact to resolve these imminent issues would not be productive or timely.

  
Lauren Martel  
Attorney For Plaintiff