

# ATTACHMENT – 15

## Part – 2 - (4 pgs)

PICTURES of Attorneys – which DOCUMENTS SUPPORTS WHO COULD POSSIBLY  
been PART of a CORRUPTION in the CITY OF COLUMBIA  
IN WHICH ATTACHED DOCUMENTS SUPPORTS –

Former U.S. Asst Atty MARK C. MOORE before! his RETIREMENT is PUBLIC NEWS quoted, that HE WAS "...Spearheading PUBLIC!!  
CORRUPTION" for Three Years "STILL under INVESTIGATION" (before the YEAR 2013) – THEREFORE MARK C. MOORE'S "PUBLIC  
CORRUPTION" INVESTIGATION WOULD HAVE STARTED about the SAME YEAR of 2010 – AT ABOUT THE SAME! TIME  
when MARK C. MOORE wrote his 12/08/2010 (2<sup>ND</sup>) FILED "MOTION TO UNSEAL" FILED (again!) to BE HEARD Before  
FEDERAL JUDGE M.B. SEYMOUR's REQUESTING HER TO "UNDER SEAL" – "Material" IN A CIVIL/Miscellaneous Case and! a CRIMINAL Case  
involving DEFENDANTS Pough, McQueen and Brunson/a/k/a 3/Hebrew Boys; WRITTEN and SIGNED by this FEDERAL COURT's  
"JUDGMENT in a CRIMINAL CASE" dated 01/14/2011

filed in B.O.P./Bureau of PRISON Facility RECORDS - SHOWS this FEDERAL COURT and! this South Carolina's U.S. DISTRICT ATTORNEY  
OFFICE of NETTLES, DISMISSED!! POUGH, McQUEEN, & BRUNSON's said PRISON SENTENCING of [324 MONTHS], and RELEVANT CRIMINAL  
CHARGES since! 01/14/2011 –

But! NEITHER! of said THIS Federal Court's (Personal Forced) APPOINTED! ATTORNEYS, Lang, Small nor DUNCAN NEVER! Represented!  
their said APPOINTED CLIENTS said Relevant ISSUES, nor! NEVER

REQUESTED the PRISON RELEASE of Pough, McQueen nor Brunson, resulting in DOCUMENT SHOWS are YET! ILLEGALLY IMPRISONED – who  
must be IMMEDIATELY RELEASED FROM said IMPRISONMENT – according with the FOUND ALREADY FILED provided U.S. CONSTITUTION 4<sup>th</sup>,  
5<sup>th</sup>, & 14<sup>th</sup> Amendments and Code of Law(s) 28 USC 2255 (a)(b)&(f-4); Rooker-Feldman Doctrine/"...prevents Federal Court from  
Assuming JURISDICTION Over ONGOING STATE LITIGATION or REVIEWING ANY DECISION MADE or SOON to be MADE Therein..."  
and FR Criminal Procedure(s) 34(a) & FRCP-Rule 15(b) etc.al.

\* \* Shows State Judge James June 1, 2011-Order-FAE/entrance  
\* Federal Case Involving Sakima Big and Freeman Family  
in the year 2006 - January 11; Involving HSO - Federal  
Judge Seymour (MBS) and the Federal Magistrate Judge  
McCrory... who Admits! Federal Court - Lacks  
Jurisdiction to Intervene within an ongoing state  
Court Case.  
which includes - a case  
No - 2007-0003116

Wendell Freeman and David Jathniel Freeman:

Plaintiffs:

vs.

Amy McCulloch, Probate Judge, Richland County Probate  
Court; Jacqueline D. Belton, Associate Probate Judge,  
Richland County Court; State of South Carolina; and  
Governor Mark Sanford, Columbia, South Carolina:

Defendants.

C.A No. 3:06-0010-MBS-JRM

Report and Recommendation

The Plaintiffs, Wendell Freeman and David Jathniel Freeman (hereafter, the "Plaintiffs").

appear to allege a denial of rights and privileges secured to persons claiming "nationality" in the  
United States under Title 8 United States Code Section 1503. Pursuant to the provisions of 28  
U.S.C. §636(b)(1)(B), and Local Civil Rule 73.02(B)(2)(e), D.S.C., the undersigned is  
authorized to review such petitions for relief and submit findings and recommendations to the  
District Court.

Since the Plaintiffs are *pro se* litigants, their pleadings are accorded liberal construction.  
Hughes v. Rowe, 449 U.S. 5 (1980) (per curiam); Estelle v. Gamble, 429 U.S. 97 (1976); Haines  
v. Kerner, 404 U.S. 519 (1972); Loe v. Armistead, 582 F. 2d 1291 (4<sup>th</sup> Cir. 1978); Gordon v.  
Leeke, 574 F. 2d 1147 (4<sup>th</sup> 1978). Nevertheless, even under this less stringent standard, *pro se*  
pleadings are still subject to summary dismissal if they fail to meet the requirements for  
proceeding in this Court. Such is the case here.

The Complaint in this action is virtually unintelligible, consisting of five typewritten

1  
EXhibit - L

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Cous  
must  
be  
Upheld  
with All  
the Federal  
and State!  
Court Issues  
So Not to be  
Intervened by  
the  
Federal  
Court  
↓  
Please  
see  
Attached  
Typed  
Written  
statements.



~~\*\*\*~~ ~~Admits!~~ that a Federal Court - Can Nat - Intervene & have Legal Jurisdiction - over Ongoing STATE Court Already! Filed Orders! Ngr! Already Ongoing STATE Litigation or Reviewing ANY! Decision

a "federal question" case which means that Congress establishes by statute the basis contours of litigation to enforce its provisions. "Diversity" jurisdiction exists when the parties are citizens of different states and a minimum jurisdictional amount is at stake. The courts must interpret and apply those statutory provisions in specific cases.

~~\*\*\*~~ The matter of Wendell Freeman's parental rights has apparently been determined by the Richland County Probate Court from which decision he has a right to appeal within the state courts of South Carolina. By asking this Court to intervene in that proceeding, the Plaintiffs have requested relief which simply cannot be granted. The well-settled Rooker-Feldman doctrine prevents this Court from assuming jurisdiction over ongoing state litigation or reviewing any decision made or soon to be made therein.<sup>2</sup>

#### RECOMMENDATION

It is recommended that this action be dismissed without issuance or service of process upon the Defendants. The Plaintiffs' attention is directed to the notice on the next page.

Respectfully Submitted,

s/Joseph R. McCrorey  
United States Magistrate Judge

January 11, 2006  
Columbia, South Carolina

<sup>2</sup> - This doctrine derives from two U.S. Supreme Court cases, Rooker v. Fidelity Trust Co., 263 U.S. 413, 66 L. Ed. 362, 44 S. Ct. 149 (1923) and D.C. Court of Appeals v. Feldman, 460 U.S. 462, 75 L. Ed. 2d 206, 103 S. Ct. 1303 (1983). See Allstate Insurance Company v. West Virginia State Bar, 233 F. 3d 813 (4<sup>th</sup> Cir. 2000) for recent application of the doctrine in the Fourth Circuit.

Exhibit-M

~~\*\*\*~~ which Defeats! Judge James Ordered June 1st 2011 Claimant..



Exh-Misc. VI

Lee JR

STATE OF SOUTH CAROLINA )  
COUNTY OF RICHLAND )

IN THE COURT OF COMMON PLEAS  
FIFTH JUDICIAL CIRCUIT

HENRY D. McMASTER,  
in his official capacity as the  
SECURITIES COMMISSIONER  
FOR THE STATE OF SOUTH  
CAROLINA,

Plaintiff,

vs.

CAPITAL CONSORTIUM GROUP,  
LLC, 3 HEBREW BOYS, LLC, TONY  
POUGH, TIM McQUEEN, JOSEPH  
BRUNSON, DANIEL DEVELOPMENT  
GROUP, LLC and FIRST CITIZENS  
BANK AND TRUST COMPANY, INC.,

Defendants.

*State Appointed Receiver - conflicts with Federal Receiver ASK MORE*  
OBJECTION TO APPOINTMENT  
OF  
GEORGE B. CAUTHEN AND/OR  
NELSON, MULLINS, RILEY  
& SCARBOROUGH, LLP

AS  
A RECEIVER

Docket No. 07-CP-40-03116

U.S. District Court  
for the District of Columbia  
8-12-2007

\*This state! Receiver also the Federal! Receiver Attorney Tallison whose LAW firm for over 20 years Nelson + mullins

COME now the Defendants, CAPITAL CONSORTIUM GROUP, LLC, 3 HEBREW BOYS, LLC, TONY POUGH, TIM McQUEEN, JOSEPH BRUNSON, and DANIEL DEVELOPMENT GROUP, LLC [hereinafter collectively "Defendants"], by undersigned counsel, and respectfully object to the appointment of George B. Cauthen, Esq., Partner with the Law Firm of Nelson, Mullins, Riley & Scarborough, LLP ["Nelson Mullins"], and/or any other partner or associate of Nelson Mullins as Receiver in the above-captioned matter. This objection is based on the following, to wit:

1. The Supplemental Affidavit of George B. Cauthen evidences he, as a partner with Nelson Mullins, and Nelson Mullins, in general, have a prima facie conflict of interest in that said affidavit clearly shows an on-going pecuniary relation between the Office of the Attorney General, a party to this action, and Nelson Mullins.

*Receiver information - actual appoint still under advisement*

Law Office  
of

HEMPHILL P. PRIDE II

*H. P. Pride II*  
Hemphill P. Pride II  
Post Office Box 4529  
Columbia, South Carolina 29240  
(803) 256-8015

ATTORNEY FOR DEFENDANTS CAPITAL  
CONSORTIUM GROUP, LLC, 3 HEBREW  
BOYS, LLC; TONY POUGH, TIM McQUEEN  
JOSEPH BRUNSON and DANIEL  
DEVELOPMENT GROUP, LLC

July 26, 2007.

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
COLUMBIA DIVISION

UNITED STATES OF AMERICA,

PLAINTIFF,

vs.

TIMOTHY MCQUEEN, TONY B  
POUGH, JOSEPH B BRUNSON,

DEFENDANTS.

CR. NO. 3:08-615

COLUMBIA, SC

NOVEMBER 10, 2009

VOLUME I

BEFORE THE HONORABLE MARGARET B. SEYMOUR  
UNITED STATES DISTRICT COURT JUDGE  
JURY TRIAL

A P P E A R A N C E S:

FOR THE GOVERNMENT: WINSTON D HOLLIDAY, AUSA  
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FEDERAL PUBLIC DEFENDER  
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COLUMBIA, SC 29211

COURT REPORTER: KATHLEEN RICHARDSON, RPR, CRR  
UNITED STATES COURT REPORTER  
901 RICHLAND STREET  
COLUMBIA, SC 29201

STENOTYPE-COMPUTER-AIDED TRANSCRIPTION

Exh. #7