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UNITED STATES COURT OF APPEALS
FOR THE FOURTH CIRCUIT

No. 14-1885
(1:13-cv-01577-TLW)

RECEIVED
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U.S. COURT OF APPEALS
FOURTH CIRCUIT

YAMASSEE INDIAN TRIBE
Plaintiff – Appellant

SCANNED

v.

ALLENDALE COUNTY GOVERNMENT; MR. WALTER H. SANDERS, JR.; HARVEY E. ROUSE, Tax Assessor; JOE MOLE, III; MS. THESSA SMITH; CALVIN BRANTLEY; ELOUISE BRANTLEY
Defendants – Appellees

FILED
OCT 07 2014
U.S. Court of Appeals
Fourth Circuit

PLAINTIFF – APPELLANT BRIEF

JURISDICTION

A. Plaintiff – Appellant are requesting review from the Order issued by the United States District Court for The District of South Carolina, Aiken Division.
B. The date of the order listed above for review is listed as August 15, 2014

ISSUES FOR REVIEW

Listed below are the facts and argument in support of the issues that the Plaintiff – Appellant with this Court to consider.

Supporting Facts and Arguments

1. The Plaintiff – Appellant filed a **Civil Action** case against the Defendants – Appellees based on 42 U.S.C. 1983, for violating Plaintiff – Appellant Constitutional and Civil Rights, and other numerous violations of federal law, on June 10, 2013. After a little over one (1) year after filing the case and continuously filing motions and pleadings, The District Court Judge, Terry Wooten dismissed the case based on:
   a. Plaintiff – Appellant not being able to file pro se, and
   b. District court not having Subject Matter Jurisdiction

2. 28 U.S.C., Section 1331 confers jurisdiction in actions authorized by 42 U.S.C., Section 1983 against Defendants – Appellees, acting under color of law.

3. Plaintiff's – Appellant's case was based upon Civil Rights Violations, Constitutional Violations, and Federal Rights Violations, but The District Court Judge did not judge or dismiss the Plaintiff – Appellant case on the merits of the case, but instead allowed the Defendants – Appellees to bring or assert a **"Land Dispute"** case which had no bearings on the case that the Plaintiff – Appellant brought forth.

4. The District Court Judge allowed the Defendants – Appellees to **"Cloud"** the issues of the case.

5. The District Court never made a decision based on the factual grounds of the case.

PROOF OF STANDING AS TO THE PLAINTIFF – APPELLANT (for Court Consideration)

Chief Brenda Red Crow Webb is the Grand Matriarch of the Yamassee Indian Nation/Yamassee Indian Tribe. Chief Brenda Red Crow Webb is also the Grand Matriarch for the Yamassee Muskogee Nation, and the Oklevueha Yamassee Seminoles of Florida. Chief Red Crow is the 3rd Great Granddaughter of Tuckase Emartha, who was later named "John Hicks" by

the Anglo Saxons. John Hicks was the Chief of all Indians in the State of Florida.

The Yamassee Nation is a "Matriarchal" Nation, as is most Southeastern Tribal Nations. The Yamassee pride themselves on being a "Traditional" Native American Nation, whose history dates back to over 600 years, according to "Congressional Records – The Yamassee was here long before the arrival of Christopher Columbus in 1492, making the Plaintiff – Appellant a "**Historical Tribal Nation**". The Plaintiff – Appellant are the "Original Indigenous" inhabitants of the State of South Carolina. The red clay that you see in the soil is the blood of the Yamassees that has been spilled over the years, giving what the Yamasseess had in order to make the State of South Carolina great.

At the time of the arrival of the Europeans, the Yamassee Tribal Nation was the most dominant and most feared tribe in the Southeastern United States. The Yamassees have and had their own form of government, language, and system of justice.

In 1707, the Lord Proprietors of "The Carolinas", agents of the Sovereign Government/Nation of Great Britain, and the Yamassee Tribal Nation, signed a **Treaty** stating ***"…that the Indian Nation known as Yamassee",*** which acknowledged the Plaintiff – Appellant as a **"Nation"** with all the rights and privileges of a "Nation".

When the Plaintiff – Appellant questioned as to the whereabouts of their treaty, they were told that it mysteriously burned in a fire in Charleston, SC, which was the capital of South Carolina up until 1786. The Plaintiff – Appellant **"Treaty"** was ratified into law and made into the **"Statutes At Large"** of South Carolina, which is still an "Active Law" in the books, located in the archives of South Carolina (Evidence of this can and will be provided to this Court upon request).

Jurisdictional Issues

It is proper for this District Court to take Jurisdiction of any civil action authorized by law to be commenced by any person. See Title 28 Section 1343 (1) (2) (3) (4).

1. **Rule 12-B** states…"There is legal sufficiency to show Plaintiff – Appellant is entitled to relief under his Complaint. *A Complaint should*

not be dismissed for failure to state a claim unless it appears beyond a doubt that the Plaintiff – Appellant can prove no set of facts in support of his claim which would entitle him to relief. See Conley v. Gibson, 355 U.S. 41, 45-46 (1957) also Neitzke v. Williams, 109 S. Ct. 1827, 1832 (1989). Rule 12(b)(6) does not countenance dismissals based on a judge's disbelief of a complaint's factual allegations. In applying the Conley standard, the Court will "accept the truth of the well-pleaded factual allegations of the Complaint."

2. Plaintiff – Appellant brought forth this case on Civil Rights, Constitutional, Federal and State Violations. Therefore, this court does have jurisdiction over this case.

Native American Status

Kahawaiolaa v. Norton states the following:

Despite the importance of the inquiry, the United States has ***STRUGGLED*** *to find an adequate definition of* ***Indian Tribe****. There is no universally recognized legal definition of the phrase, and no single federal statute defining it for all purpose. As a general matter, the Supreme Court has described a Tribe as "****A body of Indians of the same or similar race, united in a community under one leadership or government, and inhabiting a particular though sometime ill-define territory).*** Montoya vs. United States, 180 U. S. 261, 266, 36 ct. cl. 577, 21 s. ct. 358, 45 L. Ed. 521 (1991)

1. Federal Recognition may arise from treaty, statute, executive or administrative order, or from a course of dealing with the tribes as a political entity. The Yamassee Nation/Yamassee Indian Tribe has a "living" Statutes at large" in the State of South Carolina, and six other treaties that the Yamassee Indians were signatories on. International law states that if you are a signee on a treaty, then you are a party to that treaty (ie…Treaty of Moultrie, Florida Indian Treaty, Treaty of Payne Landing [Chief Brenda Red Crow Webb's 3rd Great Grandfather, Tuckasee Emartha (John Hicks) was Chief over all Indians in the State of Florida and a signee on the Payne Landing Treaty. Her 3rd Great Grandfather was Yamassee)) Not only does this makes the Plaintiff – Appellant a Historical Tribe, but it gives Plaintiff – Appellant "Lineage" to the greatest tribe and Chief in the Southeast. All of the treaties listed here are treaties that the Yamassee Indians are a party too, thus making the Plaintiff – Appellant recognized through treaty and statute.

There is no need for the Plaintiff – Appellant to be recognized through the BIA since recognition occurred prior to the existence of the BIA.

   a. The Plaintiff – Appellant is not implying that they are Federally Recognized through the BIA. The Plaintiff – Appellant are clearly stating that Plaintiff – Appellant have a **"Legal Argument"** and should **be** Federally Recognized as all other tribes that were placed into the Creek Confederacy were federally recognized except the Yamassee. Whether this be an oversight or not, again, this is the Plaintiff – Appellant **"Legal Argument"**.

2. Plaintiff – Appellant does not have to be "Federally Acknowledged" in order to be a Native American (Indian) Tribe, but to clarify the Plaintiff – Appellant status as Native American, Plaintiff – Appellant would show the following:
3. According to Congressional Records, the Yamassee Indian Tribe is a "Historical Tribe" whose existence **predates the discovery of American by Christopher Columbus.**
4. The Yamassee Indian Tribal Nation is a legitimate Tribal Government/Nation for **over 300 years before the formation of the United States which is vested with inherit sovereign rights**.
5. In 1707, The British Government and the Yamassee Indian Nation signed a **Treaty** which states "**The Indian Tribe known as the Yamassee**" which acknowledges the **Plaintiff – Appellant as a Tribal Nation**. That treaty was **ratified in 1718** by the Colonial Government of the time. It was signed into law and codified as "**The Statutes at Large**", making Plaintiff – Appellant a "Tribal Nation" by legislative act.
6. The Articles of Confederacy Treaty clause states "the Colonial Governments had the authority to negotiate and sign treaties with Native American Tribes.
   a. After the formation of the United States, the Constitution of the United States shows the American Indian/Tribes being listed four (4) times. The most important of which is the **Indian Commerce Clause.**
7. **The Indian Commerce Clause** states that **only** Congress has "Plenary" power over Native American Tribes and its treaties. Plaintiff – Appellant and its' "Treaties" has never been "Extinguished" by Congress.
8. The Treaty clause of the United States says that "**Treaties are the Supreme Law of the Land**". Plaintiff – Appellant Treaty is "Clear and Unambiguous". Plaintiff – Appellant is the Yamassee Indian Nation.
9. **Doctrines of Discovery/Universal Laws of Succession** states that at the time of the signing of the Yamassee Treaty, **Great Britain** was the

"Sovereign/Complete Sovereignty" Nation. The United States Government took on the obligation of the British under the **"Treaty of Paris"** as the successor to all British claims and obligations in the former colonies.

a. All "Treaties" under the American Independence, remain binding on the United States regardless of whether or not they have been sanctioned by Congress.

b. The Supreme Court provides support for the theory of Universal Succession. So, the Plaintiff – Appellant "Treaty" is a matter of "Federal Law". Worchester v. Georgia states that *"…the United States succeeds to all the claims of Great Britain both territorial and politically."*

*****The Point being that if Plaintiff – Appellant Treaty is enforceable under the Universal Law of Succession, then the Plaintiff – Appellant is a "Native American Tribal Nation.**

10. The **Superiority Clause** states that the Treaty that the Yamassee Indian Tribe has with Great Britain, falls under the United States Government.
    a. After the Revolutionary War, and the signing of the Treaty of Paris, the United States became the complete **"Sovereign"** of this land.
    b. The Superiority Clause, in our understanding, means that the Plaintiff – Appellant Statutes At Large of the State of South Carolina is active for the State of South Carolina, then it would also be active for the Federal Government, because all Native American issues fall up under the purview of the Federal Government, which in turns makes the status of the Plaintiff – Appellant being a Native American Tribe, fall up under the jurisdiction of the Federal Government.

11. America has **always** honored its obligation to **honor** all **Native American Treaties** in effect, even **one that was signed under Great Britain.** America has also honored ALL CHARTERS and LAND PATENT that were signed under Great Britain. (*Fletcher v. Peck 10 U.S. 87 and Dartmouth v. Woodward 17 U.S. 518.*)

12. The Treaty that the Yamassee Indian Tribe has with Great Britain, was codified as **The Statutes At Large**, and is still active **TODAY**.
13. Plaintiff – Appellant believe that **The Statutes At Large** gives Plaintiff – Appellant **"Judicial Standing"**.
14. Although the Yamassee are a **non-federally recognized tribe**, by the **Laws and Statues of South Carolina**, Plaintiff – Appellant is recognized as the

Yamassee Indian Nation, and thereby should be afforded all rights as a Nation/Domestic Dependent Nation according to federal law.

15. **Plaintiff – Appellant is a common law Native American Tribe under**
    a. **Montoya v. US**
    b. **Passamaguaddy Tribe v. Morton**
    c. **United States v. Candelaria**

16. What has become confusing for governmental bodies and municipalities is the comprehension of "Federal Recognition", believing if a Tribe or Tribal Nation is not "Acknowledged" then they are not a "Real" tribe. This cannot be further from the truth as court cases clearly proves. What lacks in understanding is Federal recognition only allows tribes access to federal benefits and programs set aside for tribes in need of assistance, to operate their governments. In a recent Senate hearing it was cited:

"Federal recognition is the acknowledgement of an American Indian Tribe by the federal government of the United States. It affirms a federal trust responsibility for a "government-to government" relationship between the United States and the tribal government and establishes tribal eligibility for certain federal American Indian programs."

Federal recognition is the correction of an error in the relationship between the United States and the tribal nation receiving the acknowledgement it was always due. Federal recognition does not bestow sovereignty, but acknowledges a tribe's inherent sovereignty. Federal Indian Policy holds that American Indian Tribes have a sovereignty that predates the United States and is not bestowed by any federal action. Furthermore, while the trust responsibility is formally acknowledged by federal recognition, it exists even without such recognition. This fact was included in a 1977 congressional report citing the Pasamaquoddy v. Morton case:

Pasamaquoddy v. Morton presented an important decision regarding the executive branch use of the distinction "recognized" and "non-recognized". The Department stipulated for the purpose of the case that the Passamaquoddy were an Indian tribe, but argued that it was not required as a trustee to prosecute the Passamaqoddy claim against the State of Maine, since the tribe was "unrecognized". The Court rejected the [Department of Interior's] position finding that that the United States has a trust obligation to the tribe. The case makes it clear that the executive branch cannot

arbitrarily exclude Indian tribes from its trust relationship." This Quote is taken from:

HEARING BEFORE THE COMMITTEE ON INDIAN AFFAIRS UNITED STATES SENATE ONE HUNDRED TWELFTH CONGRESS SECOND SESSION JULY 12, 2012

Found Here: Committee on Indian Affairs

Another issue for the Yamassee Indian Tribe has been the lack of understanding to the Identity of the Yamassee. Lack of education hinders those without historical references to comprehend certain facts to certain tribes that established this Great State of South Carolina. The "Yamassee War of 1715" was the most historical turning point for the State of South Carolina. Not only was it a turning point, it was a great moment for "Black History" which is not commonly advertised or mentioned. In a Quote cited from the Congressional serial set United States Government Printing Office 57th Congress 1st Session. House of Representatives Document 179 Report of the Industrial Commission on Agriculture and Agricultural labor Washington Government printing Office, Year 1901, page 824.

"Yamasee Indians were Negroes, what were known afterwards as the fiercest of the Indians tribes of the South"

What is not also pointed out is that the Yamassee were proven to have been here before the continental drift happened and the Land mass was considered one called by the Greeks "Pan Gia". The Purpose by providing this information is mainly because it has been purported and rumored by some we are just "Black" and anyone can be an Indian, if they are. This cannot be further from the truth and becomes an insult to our Tribe, only because ignorance is the determining factor behind that type of thinking. For reference we are the only tribe in history clearly Identified by congress, and history books.

US Constitution Issues

1. The Fifth Amendment, provides in pertinent part that "nor be deprived of life, liberty, or property, without due process of law..." Due process is denied when a meaningful hearing is denied as in this cause.
2. The Seventh Amendment, provides in pertinent part that "In suits at common law, where the value in controversy shall exceed twenty dollars, **the right to**

trial by jury shall be preserved..." This language does not include a single reference to "manipulation" of a jury by the Court in a conspiracy with lawyers to design a verdict suitable to the Court through the use of lawyer rules, judicial rules, court rules, or otherwise trumped-up legal technicalities and instructions which effectively "handcuffs" the jury. All of these activities are no more or less than a denial of the right to a jury of peers with the constitutional authority to judge both the facts and law in a case.

3. The Thirteenth Amendment, provides in pertinent part that "Neither slavery nor involuntary servitude, except as a punishment for crime....., shall exist within the United States, or any place subject to their jurisdiction".
   a. The Plaintiff – Appellant believes that the Magistrate Judge, Shiva Hodges and through her private conduct in conspiracy with the lawyer and defendants, caused the Court to effectuate this Plaintiff – Appellant to "Compulsory Involuntary Servitude", an act punishable under Title 18 1584 as a criminal act.
4. The Fourteenth Amendment Due Process Clause and Equal Protection clause (Section 1), expressly declares no state shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States; nor shall any State deprive any person of life, liberty, or property, without due process of law..."

Rico Case Law

The Defendants in this case constituted an illegal enterprise in acts or threat of acts in violation of Civil Rico Federal Racketeering Act USC 18, 1961-1963 et seq. The following are particular violations:

1. 18 USC 241: Conspiracy against Rights of Citizens
2. 18 USC 242: Deprivation of Rights color of law of rights protected under the Constitution of the U.S.
3. 18 USC 1341: Mail fraud
4. 18 USC 1951: Interference with interstate commerce
5. 18 USC 1001: Fraud

Subject Matter Jurisdiction

Subject matter jurisdiction can never be presumed, waived, or constructed, even by mutual consent of the parties, and it has two parts:

a. The statutory or common law authority for the court to hear the case, and

b. The appearance and testimony of a competent fact witness - in other words, sufficiency of pleadings.

The Plaintiff – Appellant has clearly establish that this court does have Subject Matter Jurisdiction or original jurisdiction in this case. **This case is based on "Civil Rights, Constitution, Federal and State Violations. This case is not based on Land Disputes** as the Defendants would have this court to believe. The Defendants is using "Land Dispute" in order to cloud the issues of this case and to deter this court's judgment.

1. Plaintiff – Appellant brought forth this case on Civil Rights, Constitutional, Federal and State Violations. Therefore, this court does have subject matter jurisdiction.
2. The enabling statute for federal question jurisdiction, 28 U.S.C. § 1331, provides that the district courts have original jurisdiction in *all civil actions arising under the Constitution, laws, or treaties of the United States*.
3. Plaintiff – Appellant have been consistent with the original filings of this case as being a **Civil Rights, Constitution, Federal and State Violations. This case is not based on Land Dispute** as Defendants wish this court to believe.
4. The Magistrate Judge, in her report and Recommendations on page 2, paragraph 3 clearly states that the Plaintiff – Appellant allege "**federal claims (42 U.S.C. 1983)**".

Who Has Standings to Sue under 42 U.S.C. 1983

1. Title 42 USC 1983 provides in relevant part that: "every person who, under color of any statute, ordinance, regulation, custom, or usage, of any State....subjects, or causes to be subjected, any citizen of the United States or other person within the jurisdiction thereof to the deprivation of any rights, privileges, or immunities secured by the Constitution. ..Shall be liable to the party injured...."
2. On Page 11, paragraph 4 of the Magistrate Judge Report and Recommendations, she clearly states that the Plaintiff – Appellant as well as the Defendants are all "Citizens of the State of South Carolina". If the Plaintiff – Appellant are citizens of South Carolina, Plaintiff – Appellant are also "**Citizens of the United States**", and 42 U.S.C. clearly states that **any citizen of the United States, or other person within the jurisdiction thereof...**has the right to bring forth this action.

3. The 9th Circuit authority supports the conclusion that Plaintiff – Appellant Tribes are "other persons" entitled to sue under 1983.
4. Mille Lacs Band of Chippewa Indians v. Minnesota. The Court ruled that the Mille Lacs Band is a person under 42 U.S.C. 1983.
5. Lac Courte Oreilles Band of Lake Superior Chippewa Indians v. Wisconsin. 63 f. sup 682, 691 (W. D. Wis. 1987). The Court ruled that the Lac Courte Oreilles Band of Lake Superior Chippewa Indians is a person under 42 U.S.C. 1983.

Pro Se

1. The Yamassee Indian Tribe is a party to this action appearing pro se through the Chief Brenda Red Crow Webb.
2. The right to appear pro se in a civil case in federal court is contained in a statute, 28 U.S.C. § 1654. Thus, anyone can appear pro se, and anyone who appears before the Court without an attorney is considered pro se.
    a. The First Amendment to the United States Constitution – "The right to petition the Government for redress of grievances includes a right to file suit in a court of law. The Plaintiff – Appellant right to proceed pro se, is both a "Federal and Constitutional Right".
3. The Plaintiff – Appellant filed their complaint on the Defendants on June 10, 2013. In which this court raised the issue of Plaintiff – Appellant appearing Pro Se and Chief Judge Terry Wooten chose to set that issue aside.
4. Plaintiff – Appellant Chief, may properly appear Pro Se.
    a. **An Indian Nation May Properly Act Through Its Chief**.

    The authority of an Indian nation's chief to represent the nation has been recognized from the earliest cases in federal Indian law. The United States Supreme Court's opinion in Johnson and Graham's Lessee v. William McIntosh, 21 U.S. (8 Wheat.) 543 (1823), begins with a recitation of the "authority of the chiefs who executed [the] conveyance" at issue therein. Id., at 572.
5. In the current case, the authority of Chief Brenda Red Crow Webb to execute decisions, including the filing of this action, on behalf of the Yamassee Indian Tribe, a traditional government of the Yamassee Indian People, is stated in the complaint. It must therefore be taken as agreed that the facts show Chief Webb's authority to act on behalf of the Yamassee Indian Tribes Council in filing this action.
6. The Yamassee Indian Tribe is the original indigenous government of the Yamassee Indigenous People.

7. Several recent cases show the propriety of an American Indian nation appearing pro se. In Northeast Woodland-Coos Tribe v. Department Of Social Services, 1993 WL 35262, Civ. No. 92-40149-GN (U.S.D.C., D. MA, 1993) the tribe appeared pro se against the state. Not objecting to this, the Court only required the tribe to comply with local rules regarding certificates of service for motions filed.
8. In Cherokee Indians Of Hoke Co. Tribe v. State Of North Carolina, et al., 829 F.2d 1119 (4th Cir., 1987) the Fourth Circuit affirmed a district court denial of a motion for appointment of counsel by a tribe appearing pro se. The Circuit Court refusal to relieve the tribe of its alleged burden of appearing pro se clearly implies the propriety of such proceeding.
9. The Court also ruled that a representative of a tribal government or agency ... has political authority to represent the interests of the group.... [G]overnment representatives must be presumed authoritatively to act in the name of their government or agency, and thus in the name of the people whom they represent.
10. "Pleadings in this case are being filed by Plaintiff – Appellant in Propria Persona, wherein pleadings are to be considered without regard to technicalities.
11. When a Plaintiff – Appellant pleads pro see in a suit for protection of civil rights, the "court" endeavor to construe Plaintiff – Appellant pleading without regard to technicalities. *Picking v. Pennsylvania Railroad (151 F2d. 240).*
12. Propria, pleadings are not to be held to the same high standards of perfection as practicing lawyers. See Haines v. Kerner 92 Sct 594, also See Power 914 F2d 1459 (11th Cir1990), also See Hulsey v. Ownes 63 F3d 354 (5th Cir 1995). Also See In Re: HALL v. BELLMON 935 F.2d 1106 (10th Cir. 1991)."
13. In Puckett v. Cox, it was held that a pro-se pleading requires less stringent reading than one drafted by a lawyer (456 F2d 233 (1972 Sixth Circuit USCA). Justice Black in Conley v. Gibson, 355 U.S. 41 at 48 (1957) "The Federal Rules rejects the approach that pleading is a game of skill in which one misstep by counsel may be decisive to the outcome and accept the principle that the purpose of pleading is to facilitate a proper decision on the merits." According to Rule 8(f) FRCP and the State Court rule which holds that all pleadings shall be construed to do substantial justice."
    a. It could also be argued that to "Dismiss A Civil Action" or other lawsuits in which a "**serious, factual pattern or allegations**" of a "Cause of Action" has been made, would itself be **"violations of**

procedural due process" as it would **deprive a Pro Se litigant**" of **"equal protection of the law",** visa vis a party who is represented by counsel.

b. **In a fair system, victory should go to a party who has the better case, not the better representation.**

14. No basis exists for denying the right of the Yamassee Indian Tribe to appear pro se, through its Chief, in this matter. Such appearance is in conformity with the practices of other courts and is supported by sound principle and prior authority (**FRAASS SURVIVAL SYSTEMS v. ABSENTEE SHAWNEE*NO. 91 CIV. 3705 (MJL).*** *817 F.Supp. 7 (1993).* For these reasons, Plaintiff – Appellant respectfully requests that it be permitted to appear pro se in this matter.

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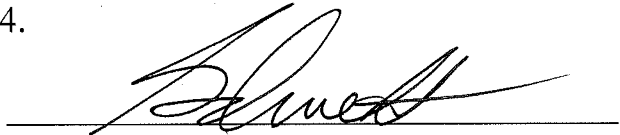
CONCLUSION

The right to petition the Government for redress of grievances includes a right to file suit in a Court of Law. The Plaintiff – Appellant believes that their Constitutional Guaranteed Rights have been infringed upon. What the Plaintiff – Appellant is requesting is for their case to be based and/or judged on its merits of Constitutional, Federal and Civil Violations, for this is not a cased based on a **"Property Dispute"**.

In a fair legal system, "victory should go to the party who has a better case, not better representation".

Therefore, the Plaintiff – Appellant is requesting this Court to side in favor of the Plaintiff – Appellant, either through making a ruling in favor of the Plaintiff – Appellant. Plaintiff – Appellant is also asking this Court for Acknowledgment that this case is based on "**Constitutional, Federal and Civil Rights violations**", **and not based on "Property or land dispute and Pow Wow monies."**

Dated this 3rd Day of October, 2014.



Chief Brenda Red Crow Webb
Grand Matriarch
Yamassee Indian Tribe
P. O. Box 693
Allendale, SC 29810

CERTIFICATE OF SERVICE

I certify that on October 3, 2014, I served a copy of this **Plaintiff – Appellant BRIEF** on all parties, Certified Mail, as addressed below:

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Angus Macaulay Lawton
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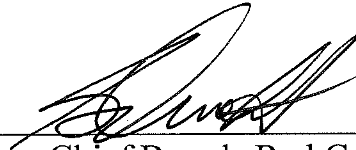

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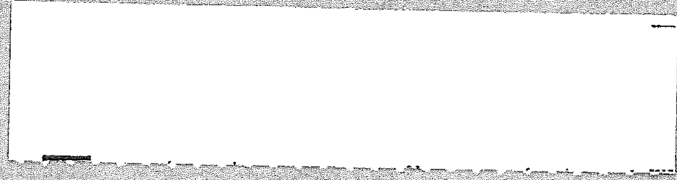

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Richmond
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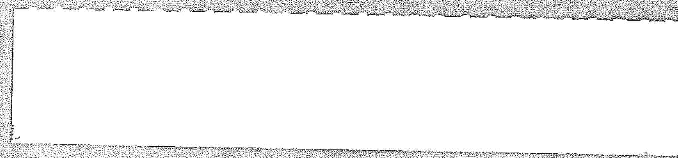
Deputy



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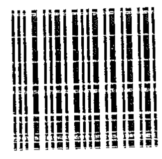

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