

**UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION**

<p>LINQUISTA WHITE, <i>et al.</i>, Plaintiffs, v. KEVIN SHWEDO, <i>et al.</i>, Defendants.</p>	<p>Civil Action No. 2:19-cv-03083-RMG</p>
--	--

DECLARATION OF LINQUISTA WHITE

I, Linquista White, declare as follows:

1. I am competent to make this Declaration and have personal knowledge of the following facts.

Background and Financial History

2. I am 47 years old and live on James Island, South Carolina.
3. I am the primary caregiver for my nine-year-old daughter, and the only person who earns income in my household.
4. From August 2018 to August 2019, I was the primary caregiver for two children: my nine-year-old daughter and my 17-year-old goddaughter.
5. Until recently, I was also the primary caregiver for my two sons, who are now 22 and 26 years old.
6. My older son lived with me until 2016. My younger son lived with me until 2017.
7. Because of my limited financial resources while trying to support myself, my children, and my goddaughter, I could not pay fines and fees for traffic tickets in 2018 and 2019.

As a result, the South Carolina Department of Motor Vehicles (“DMV”) suspended my driver’s license.

8. My financial circumstances became really hard in 2011 when I lost my job as a school nurse. When I was unemployed, I was supporting three children (ages 3, 16 and 20). It was difficult for me to make ends meet with no income.
9. I eventually got a job at the Medical University of South Carolina (“MUSC”). I still work at MUSC as a pre-certification specialist, where I bill insurance companies.
10. I was very happy to have found work and to earn income again. But, unfortunately, my job at MUSC did not pay enough for me to support myself and my daughter, cover payments for debts I incurred while unemployed, and my monthly expenses. I regularly have to make payments for rent, childcare (including clothing and school supplies), groceries, medical expenses, electricity, phone, car insurance, and other expenses.
11. Although I did my best to manage on my limited salary, I had to file for bankruptcy in 2013.
12. For five years, part of my paycheck was withheld monthly as part of the bankruptcy proceedings. By the time my bankruptcy debt was discharged in November 2018, over \$17,000 had been withheld from my wages from MUSC.
13. During the five years when my wages were being withheld, I could barely afford my household’s monthly expenses. I struggled to pay for car insurance. At times, my insurance would lapse.
14. In October 2016, I was ticketed for driving without insurance, which led to the suspension of my driver’s license.

15. About seven months later, I managed to pay to reinstate my insurance and got the suspension lifted. Unfortunately, after the lapse in insurance, my insurance costs became even higher.

Driver's License Suspension for Failure to Pay 2018 and 2019 Traffic Tickets

16. I struggled to make car insurance payments in 2018.

17. In March 2018, I paid my annual automobile taxes. This triggered South Carolina to automatically renew my vehicle registration.

18. In May 2018, the DMV sent me a letter saying there was a problem with verifying my insurance and asking for proof of insurance. I could not afford car insurance after paying my automobile taxes, household expenses, and other costs to support myself and my children.

19. I needed to continue to support myself and my family and meet my other expenses, so I made the difficult decision to continue to drive even though I did not have insurance.

20. On September 4, 2018, while driving my goddaughter to school, I was pulled over on James Island and ticketed. The officer informed me that I had a suspended license because of a lapse in insurance. I never received notice from the DMV that they had suspended my license. I understood from the ticket that I needed to pay \$647 for driving under a suspension ("DUS-1 ticket") and had a hearing date in October 2018. Attached as Exhibit A is a true and correct copy of my September 2018 James Island DUS-1 ticket.

21. Before I was due in court for the DUS-1 ticket, I visited the DMV to ask how to lift my suspension for not having car insurance. A DMV employee told me I would have to secure car insurance and pay a reinstatement fee to the DMV. The charges included a

\$200 reinstatement fee and a \$5-per-day penalty for every day that I did not have insurance, up to the maximum of \$400.

22. I did not have enough money to pay for car insurance and the reinstatement fee. Because I could not afford to pay for car insurance, I was charged the full \$400. Attached as Exhibit B is a true and correct copy of my reinstatement requirements as of spring 2019.
23. The loss of my driver's license made me very scared and nervous about how I could continue to support myself and my family. If I stopped driving, I would lose my job and soon after that, my home. I did not want my family to fall into an even more desperate situation, so I made the difficult decision to continue driving even though I had a suspended license.
24. On October 30, 2018, I went to the James Island Magistrate Court for my hearing on the DUS-1 ticket. The prosecuting police officer told me he would be open to reducing or dismissing the charge if I returned at my next hearing date with proof that I was working on getting my insurance reinstated. My next appearance was set for January 15, 2019.
25. I tried, but I was not able to save enough money after my family's household expenses to pay for car insurance coverage before the January 15, 2019 hearing.
26. I did not go to the January 15, 2019 court appearance because I could not find someone else to give me a ride and could not afford a taxi to the courthouse. I was scared that if I took the risk of driving on a suspended license to the courthouse, I would be stopped again and receive an additional ticket and fines. Since I knew that I would not be able to comply with what the prosecuting officer had asked me to do, I felt the situation was hopeless.

27. Without my knowledge, the court tried me in my absence on January 15, 2019, and sentenced me to pay \$647. I never received notice from the court that this had happened. Attached as Exhibit C is a true and correct copy of my case history for my September 2018 James Island DUS-1 ticket as of this summer.
28. In March 2019, I called the James Island Magistrate Court to request a payment plan for the DUS-1 fine, but I was told that a payment plan would not cause my license to be reinstated and I still had to pay the fine in full to get my license back.
29. I could not afford the \$647 fine for the DUS-1 ticket.
30. I later learned that on March 24, 2019, the DMV had placed an additional suspension on my driver's license for failure to pay the DUS-1 ticket. I also discovered that the suspension came with an additional \$100 DMV reinstatement fee on top of the fine. I never received notice informing me of this driver's license suspension or the reinstatement fee. My lawyers later requested from the DMV a copy of any notice that should have been sent to me. My lawyers obtained the notice and provided it to me. Attached as Exhibit D is a true and correct copy of the Official Notice for failure to pay the September 2018 James Island DUS-1 ticket.
31. In May 2019, I called the DMV to see if there was anything I could do about the suspension of my driver's license even though I could not pay the fine. The person who picked up the phone told me that I might be eligible for some type of payment plan but that I had to come to the DMV with \$250 to start the plan.
32. At the time, I did not understand that the DMV clerk was referring to the DMV's payment plan for reinstatement fees. I thought the clerk was explaining that I could get a DMV payment plan to pay my traffic fine as well as DMV reinstatement fees. But I later

learned that that the DMV payment plan only applies to the reinstatement fees charged by the DMV and not to fines and fees for traffic tickets.

33. I went to the DMV soon after I spoke with the DMV in the hopes of getting on a payment plan for all the money I owed to the courts and the DMV. The clerk at the DMV looked up my records and said that they indicated I had been placed on a reinstatement fee payment plan in 2016. The clerk said I would not be able to get a reinstatement fee payment plan at that time because three years had to elapse from the start of my previous reinstatement fee payment plan before I would be eligible for another one.

34. I later learned that there might be a way to ask for a hearing to contest the DMV's continued suspension of my driver's license for failure to pay a traffic ticket. I was surprised to learn this because the people I spoke to at the DMV and the James Island Magistrate Court told me that the only way to lift my license suspension was to pay my traffic fines and reinstatement fees in full. I decided to give it a try.

35. In the summer of 2019, my attorneys put together an application for a hearing on my suspension. I did not know how to put together an application by myself. The process was difficult to understand and took a long time.

36. On Monday, July 15, 2019, my situation got worse when I was stopped by police in Charleston and given three additional traffic tickets. I had dropped off my goddaughter at a relative's house and was on my way to work at MUSC.

37. The first ticket was for a second offense of having an uninsured motor vehicle, which carries up to \$440 in fines and fees. The second ticket was for driving without a license, which carries up to \$232 in fines and fees. The third ticket was for a second offense of driving under suspension ("DUS-2 ticket"), which carries up to \$1,270 in fines and fees.

Attached as Exhibit E, Exhibit F, and Exhibit G are true and correct copies of my July 2019 Johns Island tickets for having an uninsured motor vehicle, driving without a license and DUS-2, respectively. The tickets said that I had a court date on Johns Island on September 18, 2019. *See, e.g.*, Ex. E.

**Request for Office of Motor Vehicles Hearing on
Driver's License Suspension for Failure to Pay a Traffic Ticket**

38. On August 19, 2019, my attorneys filed a written request for me for a hearing before the South Carolina Office of Motor Vehicle Hearings ("OMVH"). My application asked for a hearing to contest the DMV's March 2019 suspension of my license for failure to pay a traffic ticket. My application also explained that I could not pay the traffic ticket. My attorneys also filed my request to waive the \$200 filing fee and my financial declaration showing my inability to pay the fee.
39. In late August, I learned that the OMVH denied my request for a hearing because I did not pay the \$200 filing fee. My driver's license remained suspended and I did not have any chance to explain my financial situation.
40. I could not afford to pay \$200 to ask for an OMVH hearing.
41. I have already had to compromise paying my rent on time to make sure that my family had basic necessities.
42. In June 2019, I fell behind on my rent payments because of my growing expenses.
43. To avoid eviction, I paid all of my past due rent as well as my August 2019 rent by August 5, 2019, the deadline set by my landlord.
44. On August 5, 2019, I came home to find that I was locked out of my apartment because my management company or the landlord had changed the locks.

45. I did not understand why this was happening because I had paid my rent balance earlier that day.
46. My management office told me they had made a mistake and failed to cancel the eviction after I paid my rent.
47. I had to break into my own house to get in because the management company was not able to provide me with keys that worked on the changed locks.
48. After I got back into my own home, I saw that many of my family's belongings had been ruined and that money had been stolen.
49. I did not have the money to replace all the things that were broken during this "mistaken" eviction.
50. My landlord offered me \$3,100 as compensation for the damages to my property during the eviction. This was not enough to cover all the damage to my property, but I accepted it because I felt that receiving something was better than nothing.
51. I decided to use the money I received from my landlord to pay off the \$647 fine for the DUS-1 ticket and the reinstatement fees for the suspension for failure to pay a traffic ticket and for not having car insurance and to secure my car insurance.
52. My driver's license is now reinstated.
53. I am relieved that I do not have to live in constant fear of receiving another ticket and taking on more traffic debt.
54. Unfortunately, my car insurance now costs me about \$190 each month, which makes it difficult to support myself and my family.

55. I still have three pending traffic tickets, which may result in fines and fees of up to almost \$2,000 in total. I cannot afford to pay that amount. My public defender has requested a jury trial in this case, and I am waiting for a hearing date.

Economic and Other Difficulties in the Event of a Future License Suspension

56. I am nervous about the three pending tickets because I cannot afford additional fines and fees. I fear my driver's license will be again suspended for failure to pay traffic tickets.

57. There is simply no way for me to keep my job, take my daughter to school, manage my household, meet my basic needs and those of my daughter, and ensure that my child can worship and spend time with our family without a valid driver's license.

58. There is no way for me to travel by foot and public bus from home in the mornings to drop my daughter off at her school and then get to MUSC, which is located about 13 miles away from my daughter's school, in time for the start of the work day.

59. It would take more than two and a half hours to walk the route of my morning commute.

60. To get to MUSC from my daughter's school by public transportation would require taking three different public buses and take at least one hour and 30 minutes, if each bus comes regularly.

61. I do not have family members, friends, or colleagues who can drive me and my daughter every day.

62. I cannot afford to pay someone to drive me and my daughter every day.

63. Without a driver's license, it would be difficult for me to get to medical appointments for me and my daughter, my daughter's extracurricular activities, and the grocery store.

64. My doctor is located about three miles from my house. There is no accessible public transportation that I can use to travel from home to my doctor.

65. My daughter's doctor is located several miles away from her school. When my daughter has a medical appointment during the week, there is no way for me to get her to her doctor's appointment before school starts, then get her to school on time and then get to work on time without a car.
66. I need to travel to Costco and Walmart for groceries and medical prescriptions for myself and my daughter. But these stores are located several miles away and I cannot get to them without driving due to the lack of reliable public transportation near my home. I would have to walk for around 20 to 25 minutes to get to the public bus stop and then take two buses to get to Costco and Walmart. Taking public transportation to and from my home to these stores makes the trip really long.
67. Because of my childcare obligations during the week, I have to get most of my errands done on the weekends when public transportation runs less frequently. Running these errands to do grocery shopping and secure other basic needs for myself and my daughter would require me to spend many hours waiting for public buses and walking.
68. While my goddaughter lived with me, I regularly took her to and from her church, which is located around four miles away from my home. Currently, whenever she needs me to, I pick my goddaughter up from her father's home, which is located around three miles from my home, and take her to church, which is located almost three miles from her father's home.
69. Every weekend, I drop off my daughter at her paternal grandmother's home, which is about 23 miles from my house. I could not bring my daughter to her grandmother's home without driving a car.

70. Additionally, there are times when my daughter's needs change our regular transportation routes at the last minute, like when she is not feeling well or forgets things for school.


When this happens, driving helps me meet my daughter's health and education needs.

71. If I can't drive in the future, I will fall more into debt. I will lose my job at MUSC and won't be able to support myself and my family. This will make it impossible for me to pay any traffic fines and fees that the court orders against me.

72. I am filing this lawsuit for myself and others like me who face the possibility of having their driver's licenses suspended soon or whose licenses are already suspended because they can't afford to pay traffic fines and fees. I know that many people are in a similar situation as me because they don't have the money to pay hundreds or thousands of dollars in fines and fees and need their driver's licenses to work and care for themselves and their families. It is important to me to help these people in South Carolina who are also suffering.

73. I am committed to pushing this lawsuit forward on behalf of the proposed Classes.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this Declaration was executed on October 31, 2019 in Charleston, South Carolina.



Linquista White

EXHIBIT A

Form S-438 Rev. 09/2014

UNIFORM TRAFFIC TICKET

STATE OF SOUTH CAROLINA
VERSUS

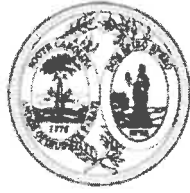
FIRST NAME LINQUISTA		MIDDLE NAME NICOLE		LAST NAME WHITE	
STREET [REDACTED]					
CITY CHARLESTON		STATE SC		ZIP CODE 29412	
DL STATE SC		DRIVER'S LICENSE NO. [REDACTED]		CLASS D	
RACE B		SEX F		BIRTH DATE 7/25/82	
HGT. 502		WGT. 191		HAIR BRN	
EYES BRN					
VEH. LIC. NO. [REDACTED]		STATE SC		MAKE OF VEH. Honda	
YEAR 12		MOTORCYC. <input type="checkbox"/>		BICYCLE <input type="checkbox"/>	
VEHICLE OWNER FIRST NAME LINQUISTA		MIDDLE NAME NICOLE		LAST NAME WHITE	
OWNER STREET [REDACTED]					
CITY CHARLESTON		STATE SC		ZIP CODE 29412	
YOU ARE SUMMONED TO APPEAR BEFORE THE TRIAL COURT					
NAME OF TRIAL COURT MCCANN		STREET 615 RIVERLAND DR			
DATE OF TRIAL 10/30/18		TIME OF TRIAL 10AM		CITY CHARLESTON	
STATE SC		ZIP CODE 29412			
VIOLATION SECTION NO. 56-01-0460		VIOLATION - COURT APPEARANCE REQUIRED (YES/NO) DUS 1ST			
DATE OF VIOLATION 07/04/18		TIME OF VIOL. 0716		SC POINTS 0	
VIOLATION LOCATION SEASIDE L1/ DILLS BLUFF RD		COUNTY 10			
LAT		LONG		CITY CHARLESTON	
NAME AND RANK OF ARRESTING OFFICER D. CARTER, M.D.E.P.		SCCJA OFFICER NUMBER 8414-5530			
BAIL DEPOSITED NONE		DATE OF ARREST 07/04/18		BOND AMOUNT REQUESTED \$647.00	
DATE BAIL REC'D.		BY			
CASE BEFORE: MAGISTRATE <input checked="" type="checkbox"/> MUN. COURT <input type="checkbox"/> CIRCUIT COURT <input type="checkbox"/> FAMILY COURT <input type="checkbox"/> FEDERAL COURT <input type="checkbox"/>					
NAME OF THE TRIAL COURT IF DIFFERENT FROM ABOVE:					
TRIAL BY: TRIAL JUDGE <input checked="" type="checkbox"/> JURY <input type="checkbox"/>		DEFENDANT: DID NOT APPEAR <input checked="" type="checkbox"/> APPEARED <input type="checkbox"/>			
DISPOSITION DATE 11/15/19		DISPOSITION: NOLLE PROSSED <input type="checkbox"/> GUILTY <input checked="" type="checkbox"/> PLED/NOLO CONTENDERE <input type="checkbox"/> FORFEITED BOND <input type="checkbox"/> NOT GUILTY <input type="checkbox"/>			
CHARGE CONVICTED OF		SAME AS ORIGINAL <input checked="" type="checkbox"/>		SC POINTS	
JAIL	SUSPEND	FINE	AMT. COLLECTED	AMT. SUSPENDED	COMMITTED TO:
		647	NRVC		Vehicle Searched
CERTIFIED CORRECT		DATE 11/15/19		Arrest as Result of Collision	
DRIVER'S RECORD COPY TICKET# 4102P0210339					

CITY/COUNTY OF: **CHARLESTON**

INCIDENT NO: **663493**

AGENCY/ROOM: **CCO**

EXHIBIT B



S.C. Department of Motor Vehicles Reinstatement Requirements

Customer No.: [REDACTED]
Name: WHITE, LINOUISTA NICOLE
Address: [REDACTED]
City: NORTH CHARLESTON

Driver License No.: [REDACTED]
State: SC Zip: 294185887

Outstanding Fees:

- \$50.00 REG REINSTATEMENT (FTPPT) for Failure to pay Property Tax
- \$100.00 DL SUSPENSION REINSTATEMENT for Driving Under Suspension
- \$100.00 DL SUSPENSION REINSTATEMENT for Failure to Pay Traffic Ticket
- Depending on Insurance, you may owe:
- \$200.00 REINSTATEMENT FEE PER DIEM FEE for No Insurance at time of Registration
- \$200.00 FR-4 UM REINSTATEMENT FEE for No Insurance at time of Registration

Suspensions to be served:

- Regular License Suspended
- From 06/08/2018 until Requirements Met for No Insurance at time of Registration on 04/06/2018
- From 02/01/2019 until 05/01/2019 for Driving Under Suspension on 09/04/2018
- From 03/24/2019 until Requirements Met for Failure to Pay Traffic Ticket on 09/04/2018

Other requirements to be met before driving privileges will be granted:

- Serve Suspension Term
- SURRENDER DRIVER LICENSE
- COMPLIANCE FINE PAID FOR TRAFFIC TICKET
- Multiple Financial Responsibility Requirements - please contact DMV for details

EXHIBIT C

James Island Magistrate

CASE HISTORY FOR CASE 4102P0210339

The State of South Carolina VS Linqvista Nicole White

FILED DATE: 9/18/2018

CASE TYPE: TR

STATUS: NRVC

ASSIGNED JUDGE: Mccann, Francis X

DISPOSITION JUDGE: Mccann, Francis X

ARRESTING AGENCY: Charleston County Sheriff

CASE PARTIES:

Defendant White, Linqvista Nicole

[REDACTED], Charleston, SC 29412-2806

Officer Carter, Dennis

3691 Leeds Avenue, North Charleston, SC 29405

ATTEST *[Signature]* A TRUE COPY

CASE HISTORY FOR CASE 4102P0210339

White, Linqvista Nicole

Age: 46

DL#: [REDACTED]

Charleston, SC 29412-2806

CHARGE	VIOL. DATE	DISPOSITION	DISP. DATE
0624 DUS / Driving under suspension, license not suspended for DUI - 1st offense	9/4/2018	TIA Guilty Bench Trial Fine Only	1/15/2019

SENTENCING:

Fine

COST	ORIGINAL	BALANCE DUE	DISBURSED	PAY PRIORITY
Charge: DUS / Driving under suspension, license not suspended for DUI - 1st of				
Fine to General Fund	\$199.76	\$199.76	\$0.00	999
Victim Services Asm 38.0013% / 5.783	35.97	35.97	0.00	999
DUS Pullout \$100	100.00	100.00	0.00	999
Law Enforcement Funding Surcharge \$:	25.00	25.00	0.00	999
State Assessment	286.27	286.27	0.00	999
Total:	\$647.00	\$647.00	\$0.00	

DATE	TIME	EVENT DESCRIPTION
10/30/2018	10:00 AM	Court event: Criminal/Traffic Court
10/30/2018	12:00 AM	Filing recorded: Archived Court Summons
1/15/2019	10:00 AM	Court event: Criminal/Traffic Rescheduled

EXHIBIT D

South Carolina
Department of Motor Vehicles



03/04/2019

WHITE, LINOUISTA NICOLE
NORTH CHARLESTON, SC 29418-5887

CUSTOMER NO: [REDACTED]
FILE NO: [REDACTED]
DL NO: [REDACTED]

OFFICIAL NOTICE

You may not drive commercial or non-commercial motor vehicles.

REASON: FAILURE TO PAY TRAFFIC TICKET SECTION OF LAW: 56-25-20

VIOL DATE	TICKET#	VIOLATION
09/04/2018	4102P0210339	Driving under Suspension

COURT:
JAMES ISLAND MAGISTRATE
615 RIVERLAND DRIVE
JAMES ISLAND, SC 29412
8437951140

BEGINNING DATE: 12:01 AM 03/24/2019

ENDING DATE: When you receive notice from the Department that this action has been cleared.

SPECIAL DRIVING PRIVILEGES:

There are no special driving privileges available to you. You may not drive until you have done the following:

COMPLIANCE:

Pay the fine for the ticket to the court. When the fine is paid, the court will give you a compliance notice which shows the description of the violation, the date of the violation, the date the ticket was paid, and the ticket number. YOU MUST BRING THIS COMPLIANCE TO YOUR LOCAL DMV OFFICE OR MAIL IT TO DRIVER RECORDS, POST OFFICE BOX 1498, BLYTHEWOOD, SC 29016-0028. NOTE: IT IS YOUR RESPONSIBILITY TO GIVE THE DEPARTMENT PROOF THAT THIS TICKET HAS BEEN PAID OR THE SUSPENSION MAY REMAIN IN EFFECT.

REINSTATEMENT FEE:

You must pay a \$100.00 reinstatement fee if your compliance notice shows payment on or after the suspension date. This fee can be paid at any DMV Office, mailed to Driver Records, PO Box 1498, Blythewood, SC 29016-0028 or paid by credit card online at www.scdmvonline.com. Make checks and money orders payable to SCDMV. Do not send cash through the mail.


Your license must be returned to any DMV Office or mailed to Driver Records if this suspension is not cleared before the suspension date listed above.

THIS NOTICE CONCERNS ONLY THE ACTION LISTED ABOVE AND DOES NOT CHANGE ANY OTHER NOTICES WE HAVE SENT TO YOU.

Driver Records Manager

EXHIBIT E

NOTES FOLLY/CAMP

Form 5-438 Rev. 08/2017		UNIFORM TRAFFIC TICKET							
STATE OF SOUTH CAROLINA									
VERSUS									
FIRST NAME		MIDDLE NAME			LAST NAME				
LINQUISTA		NICOLE			WHITE				
STREET									
[REDACTED]									
CITY		STATE		ZIP CODE					
CHARLESTON		SC		29412					
DL STATE	DRIVER'S LICENSE NO.			NONE <input type="checkbox"/>	CLASS	CDL			
SC	[REDACTED]				D	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO			
RACE	SEX	BIRTH DATE	HGT.	WGT.	HAIR	EYES			
B	F	[REDACTED]/1972	64	205	BLK	BRO			
VEH LIC NO	NONE <input type="checkbox"/>	STATE	MAKE OF VEH	YEAR	16 PSGR. VEH.	AUTO <input checked="" type="checkbox"/>	BICYCLE	COMB.	COMM.VEH.
[REDACTED]		SC	HOND	2012	HAZ. MT.	MOPED	MTRCYCL.	PEDESTRIAN	OTHER
VEHICLE OWNER FIRST NAME		MIDDLE NAME			LAST NAME				
LINQUISTA		NICOLE			WHITE				
OWNER STREET		CITY		STATE		ZIP CODE			
[REDACTED]		CHARLESTON		SC		29412			
YOU ARE SUMMONED TO APPEAR BEFORE THE TRIAL COURT									
NAME OF TRIAL COURT		STREET							
JOHNS ISLAND/WADMALAW		1527 MAIN ROAD, SUITE 100							
DATE OF TRIAL	TIME OF TRIAL	CITY		STATE		ZIP CODE			
09/18/2019	1000	JOHNS ISLAND		SC		29455			
VIOLATION SECTION NO.		VIOLATION - COURT APPEARANCE REQUIRED <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO							
56-10-0520		UNINSURED MOTOR VEHICLE FEE VIOLATION; 2ND OFFENSE							
DATE OF VIOLATION		TIME OF VIOL.		SC POINTS		B.A. LEVEL REF			
07/15/2019		0804							
VIOLATION LOCATION						COUNTY			
SC 171 FOLLY RD						10			
LAT			LONG		CITY				
32.73428			-79.9688		CHARLESTON				
NAME AND RANK OF ARRESTING OFFICER					SCJA OFFICER NUMBER				
GILBREATH J. E. DEP					2042-8361				
BAIL DEPOSITED		DATE OF ARREST		BOND AMOUNT REQUESTED					
C/S		07/15/2019		\$440.00					
DATE BAIL REC'D.		BY							
CASE BEFORE: MAGISTRATE <input type="checkbox"/> MUN. COURT <input type="checkbox"/> CIRCUIT COURT <input type="checkbox"/> FAMILY COURT <input type="checkbox"/> FEDERAL COURT <input type="checkbox"/>									
NAME OF THE TRIAL COURT IF DIFFERENT FROM ABOVE:									
TRIAL BY: TRIAL JUDGE <input type="checkbox"/> JURY <input type="checkbox"/>			DEFENDANT: DID NOT APPEAR <input type="checkbox"/> APPEARED <input type="checkbox"/>						
DISPOSITION DATE		DISPOSITION:			PLED: NOLO CONTENDERE <input type="checkbox"/>				
		NOLLE PROSSED <input type="checkbox"/> GUILTY <input type="checkbox"/>			DETERMINED BAC: <input type="checkbox"/>				
		FORFEITED BOND <input type="checkbox"/> NOT GUILTY <input type="checkbox"/>							
CHARGE CONVICTED OF					SAME AS ORIGINAL <input type="checkbox"/> SC POINTS				
JAIL	SUSPEND	FINE	AMT. COLLECTED	AMT. SUSPENDED	COMMITTED TO	Vehicle Searched			
						NO			
CERTIFIED CORRECT					DATE	Arrest as Result of Collision			
						NO			
Trial Officer's Copy				TICKET # 20190420146157					
									

VIOLATOR

VEHICLE

TRIAL COURT

VIOLATION

OFFICER

ARREST

COURT INFORMATION

COUNTY OF CHARLESTON


INCIDENT NO: 201900510010

AGENCY/TROOP:

CHARLESTON COUNTY SHERIFFS OFFICE

EXHIBIT F

NOTES FOLLY/CAMP

Form S-438 Rev. 08/2017		UNIFORM TRAFFIC TICKET							
STATE OF SOUTH CAROLINA									
VERSUS									
FIRST NAME		MIDDLE NAME			LAST NAME				
LINQUISTA		NICOLE			WHITE				
STREET									
[REDACTED]									
CITY		STATE		ZIP CODE					
CHARLESTON		SC		29412					
DL STATE	DRIVER'S LICENSE NO.			NONE <input type="checkbox"/>	CLASS	CDL			
SC	[REDACTED]				D	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO			
RACE	SEX	BIRTH DATE	HGT.	WGT.	HAIR	EYES			
B	F	[REDACTED]/1972	64	205	BLK	BRO			
VEH LIC NO	NONE <input type="checkbox"/>	STATE	MAKE OF VEH	YEAR	16 PSGR. VEH. <input checked="" type="checkbox"/>	AUTO <input type="checkbox"/>	BICYCLE <input type="checkbox"/>	COMB. <input type="checkbox"/>	COMM. VEH. <input type="checkbox"/>
[REDACTED]		SC	HOND	2012	HAZ. MT. <input type="checkbox"/>	MOPED <input type="checkbox"/>	MTRCYCL. <input type="checkbox"/>	PEDESTRIAN <input type="checkbox"/>	OTHER <input type="checkbox"/>
VEHICLE OWNER FIRST NAME		MIDDLE NAME			LAST NAME				
LINQUISTA		NICOLE			WHITE				
OWNER STREET		CITY		STATE		ZIP CODE			
[REDACTED]		CHARLESTON		SC		29412			
YOU ARE SUMMONED TO APPEAR BEFORE THE TRIAL COURT									
NAME OF TRIAL COURT		STREET							
JOHNS ISLAND/WADMALAW		1527 MAIN ROAD, SUITE 100							
DATE OF TRIAL	TIME OF TRIAL	CITY		STATE		ZIP CODE			
09/18/2019	1000	JOHNS ISLAND		SC		29455			
VIOLATION SECTION NO.		VIOLATION - COURT APPEARANCE REQUIRED <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO							
56-03-0840		OPERATING VEHICLE WHILE LICENSE/REGISTRATION EXPIRED							
DATE OF VIOLATION		TIME OF VIOL.		SC POINTS		B.A. LEVEL REF			
07/15/2019		0804							
VIOLATION LOCATION						COUNTY			
SC 171 FOLLY RD						10			
LAT			LONG		CITY				
32.73428			-79.9688		CHARLESTON				
NAME AND RANK OF ARRESTING OFFICER					SCCJA OFFICER NUMBER				
GILBREATH J. E. DEP					2042-8361				
BAIL DEPOSITED		DATE OF ARREST		BOND AMOUNT REQUESTED					
NONE		07/15/2019		\$232.00					
DATE BAIL REC'D.		BY							
CASE BEFORE: MAGISTRATE <input type="checkbox"/> MUN. COURT <input type="checkbox"/> CIRCUIT COURT <input type="checkbox"/> FAMILY COURT <input type="checkbox"/> FEDERAL COURT <input type="checkbox"/>									
NAME OF THE TRIAL COURT IF DIFFERENT FROM ABOVE:									
TRIAL BY: TRIAL JUDGE <input type="checkbox"/> JURY <input type="checkbox"/>			DEFENDANT: DID NOT APPEAR <input type="checkbox"/> APPEARED <input type="checkbox"/>						
DISPOSITION DATE		DISPOSITION:			PLED: NOLO CONTENDERE <input type="checkbox"/>				
		NOLLE PROSSED <input type="checkbox"/> GUILTY <input type="checkbox"/>							
		FORFEITED BOND <input type="checkbox"/> NOT GUILTY <input type="checkbox"/>			DETERMINED BAC: <input type="checkbox"/>				
CHARGE CONVICTED OF					SAME AS ORIGINAL <input type="checkbox"/>				
					SC POINTS				
JAIL	SUSPEND	FINE	AMT. COLLECTED	AMT. SUSPENDED	COMMITTED TO	Vehicle Searched			
						NO			
CERTIFIED CORRECT					DATE	Arrest as Result of Collision			
						NO			
Trial Officer's Copy			TICKET # 20190420144683						
									

VIOLATOR

VEHICLE

TRIAL COURT

VIOLATION

OFFICER

ARREST

COURT INFORMATION


COUNTY OF: CHARLESTON

INCIDENT NO: 201900510010

AGENCY/TRUP: CHARLESTON COUNTY SHERIFF'S OFFICE

EXHIBIT G

NOTES FOLLY/CAMP

Form S-438 Rev. 08/2017		UNIFORM TRAFFIC TICKET					
STATE OF SOUTH CAROLINA							
VERSUS							
FIRST NAME		MIDDLE NAME		LAST NAME			
LINQUISTA		NICOLE		WHITE			
STREET							
[REDACTED]							
CITY		STATE		ZIP CODE			
CHARLESTON		SC		29412			
DL STATE	DRIVER'S LICENSE NO.		NONE <input type="checkbox"/>	CLASS	CDL		
SC	[REDACTED]			D	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		
RACE	SEX	BIRTH DATE	HGT.	WGT.	HAIR	EYES	
B	F	[REDACTED]/1972	64	205	BLK	BRO	
VEH LIC NO	NONE <input type="checkbox"/>	STATE	MAKE OF VEH	YEAR	16 PSGR. VEH. <input checked="" type="checkbox"/>	AUTO	
[REDACTED]		SC	HOND	2012	HAZ. MT.	MOPED	
VEHICLE OWNER FIRST NAME		MIDDLE NAME		LAST NAME			
LINQUISTA		NICOLE		WHITE			
OWNER STREET		CITY		STATE		ZIP CODE	
[REDACTED]		CHARLESTON		SC		29412	
YOU ARE SUMMONED TO APPEAR BEFORE THE TRIAL COURT							
NAME OF TRIAL COURT		10110 STREET					
JOHNS ISLAND/WADMALAW		1527 MAIN ROAD, SUITE 100					
DATE OF TRIAL	TIME OF TRIAL	CITY		STATE		ZIP CODE	
09/18/2019	1000	JOHNS ISLAND		SC		29455	
VIOLATION SECTION NO.		VIOLATION - COURT APPEARANCE REQUIRED <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO					
56-01-0460(A)(1)(B)		DRIVING UNDER SUSPENSION; LICENSE NOT SUSPENDED FOR DUI - 2ND OFFENSE					
DATE OF VIOLATION	TIME OF VIOL.	SC POINTS		B.A. LEVEL REF			
07/15/2019	0804						
VIOLATION LOCATION					COUNTY		
SC 171 FOLLY RD					10		
LAT		LONG		CITY			
32.73427		-79.9688		CHARLESTON			
NAME AND RANK OF ARRESTING OFFICER				SCCIA OFFICER NUMBER			
GILBREATH J. E. DEP				2042-8361			
BAIL DEPOSITED	DATE OF ARREST		BOND AMOUNT REQUESTED				
C/S	07/15/2019		\$1270.00				
DATE BAIL REC'D.	BY						
CASE BEFORE: MAGISTRATE <input type="checkbox"/> MUN. COURT <input type="checkbox"/> CIRCUIT COURT <input type="checkbox"/> FAMILY COURT <input type="checkbox"/> FEDERAL COURT <input type="checkbox"/>							
NAME OF THE TRIAL COURT IF DIFFERENT FROM ABOVE:							
TRIAL BY: TRIAL JUDGE <input type="checkbox"/>		JURY <input type="checkbox"/>		DEFENDANT: DID NOT APPEAR <input type="checkbox"/> APPEARED <input type="checkbox"/>			
DISPOSITION DATE		DISPOSITION:		PLED: NOLO CONTENDERE <input type="checkbox"/>			
		NOLLE PROSSED <input type="checkbox"/> GUILTY <input type="checkbox"/>		DETERMINED BAC: <input type="checkbox"/>			
		FORFEITED BOND <input type="checkbox"/> NOT GUILTY <input type="checkbox"/>					
CHARGE CONVICTED OF					SAME AS ORIGINAL <input type="checkbox"/>		
					SC POINTS		
JAIL	SUSPEND	FINE	AMT. COLLECTED	AMT. SUSPENDED	COMMITTED TO	Vehicle Searched	
						NO	
CERTIFIED CORRECT					DATE	Arrest as Result of Collision	
						NO	
Trial Officer's Copy			TICKET # 20190420145946				
							

VIOLATOR

VEHICLE

TRIAL COURT

VIOLATION

OFFICER

ARREST

COURT INFORMATION

CITY/COUNTY: CHARLESTON

INCIDENT NO: 201900510010

AGENCY/TROOP:

CHARLESTON COUNTY SHERIFF'S OFFICE