



**Cynthia Glenn (Sandy) COMPLAINT IN THE FORM OF AN AFFIDAVIT
Candidate Rochelle Conits, 13th Judicial Circuit, Seat 1, GREENVILLE COUNTY**

This complaint is related to a family court custody case filed in Greenville County by my husband's ex wife. I believe that the actions challenge Judge Rochelle Conits' character, competency and ethics.

My husband¹ had shared custody of his children until his ex-wife filed for full custody. The trial was tedious with no real change of circumstance. Several challenges to jurisdiction were made, but Conits refused to rule upon jurisdiction until after the hearings were complete over 2 years after the original filing.

I was not invited into the courtroom but was waiting in the lobby for my turn to be called as a witness. At the very end of the 3rd day, I was called to the courtroom and told that I had been added as a party. (Transcript: ~~REDACTED~~)

I was given no notice and had no attorney. I was not given the opportunity to speak or be in the courtroom during the decision. I wasn't even informed as to why I had been added. I was simply told that I was a party.

Although I was given verbal notice, Conits did not produce an order or add me to the caption of the case. This greatly inhibited my ability to retain counsel or defend myself. The only way that I could prove that I was a party was to purchase the transcript.

My attorney had a previous case in a higher court and filed for a Continuance. Despite properly filing and notifying the judge, opposing counsel and the guardian, the Motion for Continuance was ignored (EXHIBIT 1). His office made many phone calls but the hearing continued without me or any of the witnesses for two more days. Thankfully, my attorney was able to arrive at the last minutes of the 5th day of the hearing and assert my right to participate as a defendant.

~~REDACTED~~

The failure of the court to recognize the Motion for a Continuance denied me the ability to present testimony, evidence, witnesses or defend myself in any manner. Although the pretrial discussion about the Motion for Continuance is not on the records, we can see evidence that Conits should have been aware of the continuance in my husband's testimony. ~~REDACTED~~

Conits eventually acknowledged that a Motion for Continuance had been filed and that all parties had not been heard (EXHIBIT 2), but she issued a FINAL order anyway. The final order (drafted by counsel for plaintiff) then granted me the right to be heard, but inaccurately qualified the statement with restraining orders that had not been issued according to transcript and

¹ Why isn't the husband filing a complaint with the JMSC? Mr. Guion had a stressed induced heart attack on the 3rd day of hearings. He died from complications from that heart attack in December 2018.

according to the post-trial instructions. **I continue to assert that testimony AFTER a final order contradicts all due process rights and standard court procedure.** (order)

In the transcript you can see that Conits originally denied the motion to add restraints against me without hearing the whole case. Conits even told the guardian ad litem that if he wanted restraints that he would need to file a separate motion for an emergency hearing which he did not REDACTED. But in later hearings, Conits suggests that I was only added to be placed under restraining orders without any rights as a party. REDACTED

I learned from the transcripts that the testimony of two separate guardians was that they were recommending a change of custody based upon the accusations made against myself and that they both believed that my husband was a good father. REDACTED

MY HUSBAND LOST CUSTODY OF HIS CHILDREN BASED UPON THE PRESUMED GUILT OF A THIRD PARTY!!

Some of the accusations made against me were that I had been accused of making phone death threats (REDACTED) screaming violently of impending danger during a crowded school assembly (REDACTED) and using my own children to vandalize her home. I had police investigation reports disproving her accusations and proof that the plaintiff herself had falsified evidence in a police investigation that could have resulted in criminal charges against myself and my husband (EXHIBIT 3) as well as other evidence disproving the allegations that were used to remove my husband's children from his home. When I began further discovery of additional accusations against me, I was met with resistance and I was never allowed a hearing to present this evidence.

At a Motion to Quash hearing requested by the plaintiff, Conits herself began to ask questions unrelated to the Motion to Quash. She then canceled the hearing that had been scheduled for me to be heard as a party. I was not given the opportunity to bring witnesses or evidence. When Conits was reminded that her decisions on custody had been based upon untruths, she laughed and said, "this is family court..." and insisted that any testimony that was perjury was a matter for us to take up as a civil action. REDACTED

A second final order was drafted based upon the Motion to Quash hearing. This order was another failure of my due process rights.

Conits herself chose to write the 3rd final order after the reconsideration hearing. You will also see in the transcript that Conits verbally acknowledges that she knew that I was not given testimony. On page three of REDACTED hearing lines 13-18, she states:

REDACTED

And there are other references to her knowledge that a hearing did not occur throughout the transcript (marked with an * in transcript for clarity).

But in the order, you'll notice that she states,

REDACTED

But there had never been a motion to reopen the case. Allowing the record to remain open was part of the judicial instruction on (REDACTED) and a condition of the first final order. A Motion to Reconsider was requested only AFTER the Motion to Quash hearing where Conits denied me the right to a hearing and rewrote the orders.

Six months later, the next order was entitled POST TRIAL MOTIONS and my name was finally added to caption in this order (the step-father's name was never added). It was added THREE YEARS AFTER THE CASE BEGAN AND A YEAR AFTER I WAS VERBALLY INFORMED THAT I WAS A PARTY. And at no time was I ever given an opportunity to defend the accusations made against me. Because of the ignored Motion for Continuance, I was not even in court to be a witness for my husband.

In the transcript from REDACTED 7, page 17, lines 20 and 23, we see that Conits insisted on preparing this last order herself.

The Post Trial Motions signed on REDACTED is fraught with untruths and statements that can not be substantiated by transcripts. Conits claimed that I was given a day in court, that I had filed a motion to be heard and was allowed to argue that motion. She claimed this hearing occurred on May 8, 2017, but there were no hearings on the docket for her that day.

I objected to the inaccuracies in order without a response so I filed a complaint with the Commission on Judicial Conduct. I eventually received a letter from Conits claiming that the error was only the date of the hearing.

According to the post trial order, the hearing was based upon a motion that I have never heard of and that can not be found within the court record. She asked for leave from the Court of Appeals to change the date of the supposed hearing to the date of the Motion to Quash hearing, yet it is clear from the REDACTED transcript that the events she described as "relevant procedural history," specifically numbers four (4) and five (5), did not occur. (also see EXHIBIT

REDACTED

- Conits herself drafted the post-trial order thereby providing false testimony in the form of an order.
- She herself fabricated a hearing where she alleged that a trial had occurred where I was allowed testimony and evidence to refute trial evidence.

- She herself distorted the timeline to imply that I had entered a motion to reconsider prior to the Motion to Quash hearing.
- She herself fabricated the story that I filed a motion requesting that the record remain open with full knowledge that she had granted that right in the original final order.
- She herself created the untruth that I was allowed to argue that same nonexistent motion.

She personally drafted all of these untruths and then she signed it in wet ink and submitted it as part of the court record.

And then she sealed the record and it was hidden from the rest of the world.

I now submit to the Judicial Merit Selection Committee that lives have been absolutely ruined by the reckless decisions and actions of this particular judge, Rochelle Conits. It is my belief that such actions are unethical and show an extreme flaw in her character. ^{2 3}

I attest that the above statements are true and accurate to the best of my knowledge. I will appear to testify concerning the qualifications of the above-named candidate and are now producing documents to support my claims. If the JMSC wishes to request any further documents or clarification, I will provide those as well.

I further understand that my testimony before the Judicial Merit Selection Commission may require the disclosure of information that would otherwise be protected by the attorney-client privilege. Therefore, in order that my complaint may be fully investigated by the Commission, I hereby waive any right that I may have to raise the attorney-client privilege as that privilege may relate to the subject of my complaint. I further understand that by waiving the attorney-client privilege for this matter, I am authorizing the Commission to question other parties, including my attorney, concerning the facts and issues of my case.

Cynthia - j:glenn

Ms. Cynthia: Glenn, without prejudice

REDACTED

² Complete transcripts are available upon request. Captions from the transcript are not being produced to streamline the unethical actions for the JMSC.

³ SECTION 16-9-10.(A)(1) It is unlawful for a person to wilfully give false, misleading, or incomplete testimony under oath in any court of record, judicial, administrative, or regulatory proceeding in this State. (2) It is unlawful for a person to wilfully give false, misleading, or incomplete information on a document, record, report, or form required by the laws of this State.

Cynthia Glenn Signature Sworn to me this 25th day of
October, 2024 Indigo Casellas L.S. Notary Public of South
Carolina My commission expires: 02/10/2032

Indigo Casellas

INDIGO CASELLAS
Notary Public - State of South Carolina
My Commission Expires February 10, 2032

ATTACHMENTS

EXHIBIT 1- Motion for Continuance emails

EXHIBIT 2- Judicial instructions and request for a hearing day

EXHIBIT 3- Police Reports

EXHIBIT 4- Letters of objection to post trial orders & Conits reply

PERTINENT TRANSCRIPTS

PERTINENT ORDERS

**NOTE: Attachments are not included. Documents
are from a sealed court case.**