

108 E. NORTH ST.
P. O. BOX 2547
29602
TELEPHONE: 271-2270
AREA CODE 293

Warden
Kirkland Correction Institution
South Carolina Department of Correction
Broad River Road
Columbia, South Carolina

Re: [REDACTED], as Administratrix for
the Estate of Raymond A. Hassie, deceased,
vs. Ballard George, Frank Henry Walker, Jr.,
and Raymond Small

Dear Warden:

Enclosed please find two copies of the complaint for the above captioned case. Please serve one copy on the defendant, Raymond Small, and retain the file copy for your records. Please return your affidavit of service to us.

Thank you very much for your cooperation in this matter.

Sincerely yours,

ABRAMS, BOWEN, ROBERTSON & TAPP

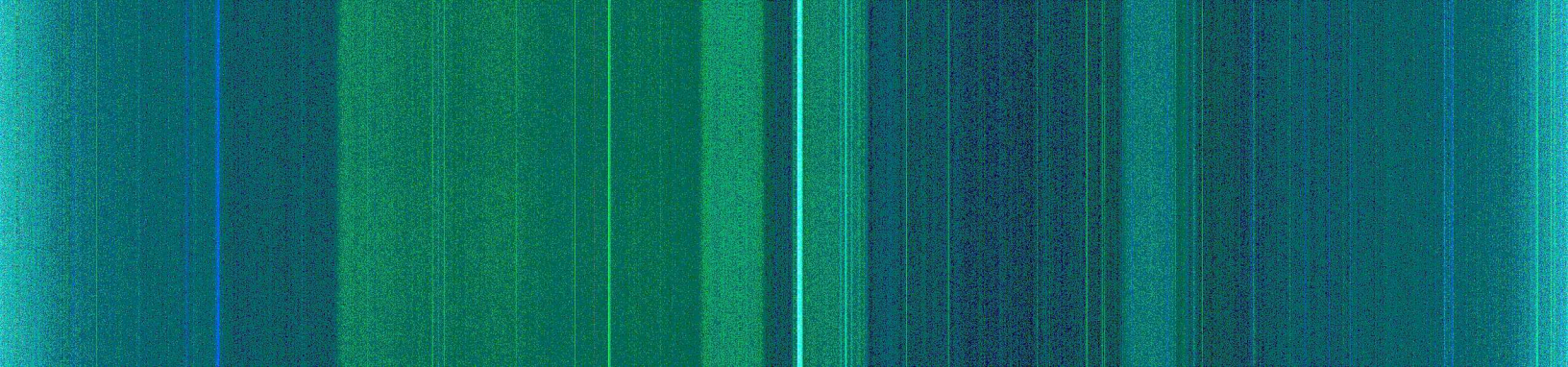
ROBERT H. JOSEPH
INVESTIGATOR

R14J/mt

Enclosure

8/25/70

(Offspring returned 8/25/75
Sentinel J. E. Land
F. L. Cory fwd to Records



STATE OF SOUTH CAROLINA
COUNTY OF _____

AFFIDAVIT OR CERTIFICATE OF SERVICE

On the 25 day of August, 1976, I served the within Summons, Notice and Complaint upon Raymond Small #67690 whom I know to be the person(s) named therein; by delivering to him personally and leaving copy of the same at South Carolina. I am not a party to this proceeding.

Subscribed and sworn to before me this 25 day of August, 1976.
[Signature]
Notary Public for South Carolina.
My Comm. Expires July 1, 1977

ADMISSION OF SERVICE

Service of a copy of the within Summons, Notice and Complaint is admitted at South Carolina, this _____ day of _____, 19____.

STATE OF SOUTH CAROLINA
COUNTY OF GREENVILLE

[Redacted] as
Administratrix of the
Estate of Raymond A. Hassle,
deceased.

Plaintiff(s)

Ballard George, Frank Henry
Walker, Jr. and Raymond
Small,
#67690

Defendant(s)

SUMMONS AND NOTICE

ABRAMS, BOWEN, ROBERTSON & TARP
Attorneys for Plaintiff(s)

ARL 600 752

We find _____

FOREMAN

STATE OF SOUTH CAROLINA
COUNTY OF GREENVILLE

IN THE COURT OF COMMON PLEAS

██████████ as Administratrix
of the Estate of Raymond A. Hassie,
deceased,

Plaintiff(s)

against

SUMMONS AND NOTICE

Ballard George, Frank Henry
Walker, Jr. and Raymond Small,

Defendant(s)

TO THE DEFENDANT(S) ABOVE NAMED:

You are hereby summoned and required to answer the Complaint in this action a copy of which is herewith served upon you, (which was filed in the Office of the Clerk of this Court on the day of 19) and to serve a copy of your answer to the Complaint upon the subscriber at 508 East North Street, Greenville, South Carolina within twenty days after the service hereof, exclusive of the day of such service. If you fail to answer the Complaint within that time, the plaintiff(s) will apply to the Court for the relief demanded in the Complaint.

**TO
INFANT(S) OVER FOURTEEN YEARS OF AGE (AN IMPRISONED PERSON):**

You are further summoned and notified to apply for the appointment of a guardian ad litem to represent you in this action within twenty days after the service of this Summons and Notice upon you. If you fail to do so, application for such appointment will be made by the plaintiff(s) herein.

**TO
INFANT(S) UNDER FOURTEEN YEARS OF AGE (INCOMPETENT OR INSANE) AND TO
(GENERAL OR TESTAMENTARY GUARDIAN)(COM-
MITTEE) WITH WHOM (S)HE (THEY) RESIDE(S):**

You are further summoned and notified to apply for the appointment of a guardian ad litem to represent said infant(s) under fourteen years of age (said incompetent or insane person) within twenty days after the service of this Summons and Notice upon you. If you fail to do so, application for such appointment will be made by the plaintiff(s) herein.

Greenville, South Carolina,
July 21, 1976

ABRAMS BOWEN ROBERTSON & TAPP

By: 

Plaintiff's(s) Attorney(s)

STATE OF SOUTH CAROLINA)
COUNTY OF GREENVILLE) IN THE COURT OF COMMON PLEAS
[REDACTED], as)
Administratrix of the Estate)
of Raymond A. Hassie, deceased,)
Plaintiff,)
- vs -) COMPLAINT
Case No. _____
Ballard George, Frank Henry)
Walker, Jr. and Raymond Small,)
Defendants.)

The plaintiff, complaining of the acts of the defendants above named, would respectfully show unto this Court as follows:

I.

That the plaintiff is the duly appointed Administratrix of the Estate of Raymond A. Hassie, deceased, as will more fully appear on the records of the Probate Court of Greenville County, South Carolina. That the plaintiff is informed, alleges and believes that the defendants are residents and citizens of the County of Greenville, State of South Carolina. That at all times hereinmentioned the defendants, Frank Henry Walker, Jr. and Raymond Small, were acting as agents of the defendant, Ballard George, having been employed by the defendant, Ballard George, to commit an intentional assault and battery by commission of the act of murder of Raymond Hassie.

II.

That this action is brought pursuant to Section 10-1951 of the Code of Law of South Carolina, 1962, commonly called the Wrongful Death Act, and brought for the benefit of the statutory beneficiaries of the intestate deceased.

III.

That the plaintiff is informed, alleges and believes that on or about, or prior to, February 23, 1975, the defendant,

HANE, HOWEN,
HITCHCOCK AND TAYLOR

NOT A PUBLIC OFFICE
1 P. 1000 PMP
CHARTER 88

SEE #1

Ballard George, did enter into a conspiracy with the defendant Frank Henry Walker, Jr. and the defendant Raymond Small, whereby, for payment of valuable consideration, and in particular One Thousand (\$1,000.00) Dollars, by the defendant Ballard George, the defendant Frank Henry Walker, Jr. and the defendant Raymond Small would intentionally commit an act of assault and battery upon the person of Raymond A. Hassie, deceased, by inflicting a mortal wound with one .22 caliber pistol. The plaintiff is informed, alleges and believes that the defendant, Ballard George, did in fact provide the defendants, Frank Henry Walker, Jr. and Raymond Small, one .22 caliber pistol to carry out the intentional infliction of a mortal wound upon the decedent, and did, in fact, pay to the defendants, Frank Henry Walker, Jr. and Raymond Small, a sum of Four Hundred (\$400.00) Dollars and did advise and urge said defendants to inflict this mortal wound upon the decedent, Raymond A. Hassie. That the plaintiff is informed, alleges and believes that at all times thereby the defendants, Frank Henry Walker, Jr. and Raymond Small, were acting as agents of the defendant, Ballard George.

IV.

That on or about February 26, 1975 the defendants, Frank Henry Walker, Jr. and Raymond Small, while acting as agents of the defendant Ballard George, did maliciously and intentionally commit an act of assault and battery upon the person of the decedent, Raymond A. Hassie, by firing two separate gun shots into his body on Audubon Road in Greenville County, South Carolina; that as a direct and proximate result of the aforesaid wrongful and malicious act on the part of the defendants, Frank Henry Walker, Jr. and Raymond Small, acting as agents of the defendant, Ballard George, the deceased, Raymond A. Hassie, expired.

V.

That as a direct and proximate result of the death of Raymond A. Hassie and the precipitating malicious and intentional conduct on the part of the defendants, Frank Henry Walker, Jr. and Raymond Small, while acting as agents of the defendant, Ballard George, his beneficiaries have sustained insufferable loss. They have sustained mental shock, suffering, wounded feelings, grief and sorrow. They have been deprived of the comfort and intellect of the decedent. By reason of his premature and untimely death, they have been deprived of his love, care and affection. He contributed substantially and generously to their subsistence.

Prior to this intentional and malicious shooting by the defendants above named, the decedent was strong and energetic and possessed of ability and promise and in every respect, conscientious, capable and hard-working. The decedent was a person of good training, education and intelligence with every prospect, reason and right to expect and have a healthy, happy and useful, long and productive life. By reason of the premises, the beneficiaries of Raymond A. Hassie have been damaged and plaintiff, as Administratrix, is entitled to recover One Hundred Thousand (\$100,000.00) Dollars actual and punitive damages.

VI.

That the aforesaid damages were directly and proximately caused by the aforesaid intentional and malicious acts of the defendants, Frank Henry Walker, Jr. and Raymond Small, acting as agents of the defendant, Ballard George.

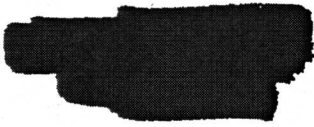
WHEREFORE, having fully set forth her complaint above, the plaintiff prays judgment against the defendants in the sum of One Hundred Thousand (\$100,000.00) Dollars actual

Willis FOIA for Raymond Small 67690 April 15, 2017 GC257

STATE OF SOUTH CAROLINA
COUNTY OF GREENVILLE

VERIFICATION

PERSONALLY appeared before me the undersigned, who being sworn, deposes and on oath states: Deponent is a party to this action, as shown on the attached pleading or document. Deponent has read the allegations contained in the foregoing pleading or document and the same are true, based upon personal knowledge except those stated to be based upon information and belief, and as to those, they are believed to be true.



SWORN TO before me this

23rd day of August, 1976.

 (SEAL)
Notary Public for South Carolina

My commission expires: July 9, 1986