

STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

James C. ("Chris") McNeil and
Meaghan Poyer,

Plaintiffs,

v.

SAC 181, LLC,
Meridian Residential Group, LLC,
Adam W. Bayles, individually,
Tara Bayles, individually, and
MRG Investing Company LLC

Defendants.

)
) IN THE COURT OF COMMON
) PLEAS
) NINTH JUDICIAL CIRCUIT
)
) Civil Action No. 2025-CP-10-05095
)
)
) BRIEF IN AID OF SAFETY
) RISK MITIGATION
) AND
) JUDICIAL CLARITY

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JULIE J. ARMSTRONG
CLERK OF COURT

FILED

I. PLAINTIFFS' SAFETY REQUIRES COURT ACTION NOW

A. Counselor Is Concerned for Plaintiffs' Safety

Plaintiff James C. ("Chris") McNeil's consulting work helps clients understand and positive impact complex systems by chunking up from events to the patterns, structure, and core mental models behind them. In this role, he submits this brief as a diagnostic tool for the judicial clarity that is needed due to an urgent concern: **the physical and psychological safety of the McNeil-Poyer family**. Models that explain these high-risk system conditions are discussed later.

He is not alone in this concern. Following the nervous breakdown precipitated by harassment and gaslighting by defense, Plaintiff McNeil sought the assistance of a narcissistic abuse recovery specialist, having recognized the fingerprints of the pattern in defense behavior.

That counselor has stated, on multiple occasions, that he is concerned for the safety of both Plaintiff McNeil and his wife, Plaintiff Poyer.

B. The Court Must Immediately Grant Leave for the Second Amended Complaint and Amend the Answer Period to End April 2, 2026

That safety requires docket clearing that removes much of the exposure, and that requires **immediately granting Plaintiffs' unopposed Motion for Leave to File the Second Amended Complaint**. That motion has sat on the docket for **147 days** since October 24, 2025. No

Defendant has filed opposition. Under SCRCP Rule 15(a), leave "shall be freely given when justice so requires," and the opposing party bears the burden of showing prejudice. *Tanner v. Florence County Treasurer*, 336 S.C. 552, 558 (1999).

No Defendant has attempted to carry that burden. The motion is ripe, and granting it now enables the Court to align all claims for the April 3 hearing - the single most effective action available to reduce Plaintiffs' escalating exposure to harm.

Plaintiffs also request that the Court set the answer deadline for the 2AC as **April 2, 2026** - one day before the scheduled hearing - rather than the standard 30-day period. This shortened period is appropriate under SCRCP Rule 6(b), which permits the Court to set response periods for cause shown, for the following reasons:

1. **The 2AC adds Charles S. Altman as an individual defendant.** These are not new facts to Altman. The probate valuation discrepancies, the CRC ownership structure, and the individual conduct supporting veil-piercing have been documented in filings on this docket since December 2025 - including the Memorandum on Probate Valuations, the Supplemental Memorandum, and the Case Clarity Brief of February 24, 2026. The 2AC consolidates existing evidence into the operative pleading.
2. **The 2AC adds the critical image counts.** The counts associated with the mass syndicated private images and virtual tour published without plaintiff consent are added. These are critical allegations and the images were discovered by Plaintiffs after the Amended Complaint was filed and after they had been live for over 10 weeks, including a month when Plaintiffs still lived at 181 Gordon Street.
3. **147 days of silence is itself the answer.** The Motion for Leave has been unopposed since October 24, 2025. During that period, Defendants have filed motions to dismiss, motions to quash subpoenas, motions regarding AI usage, and other procedural filings - demonstrating active engagement with the docket. Their silence on the 2AC is a strategic choice, not a lack of notice. SCRCP Rule 15 envisions prejudice as "a lack of notice that the new issue is going to be tried, and a lack of opportunity to refute it." *Tanner*, 336 S.C. at 558. Neither condition exists here.
4. **The April 3 hearing is a critical safety inflection point.** As documented in Section V and [Exhibit B], the hearing represents a threshold event after which Plaintiffs' exposure to defense volatility increases materially. Consolidating all claims into the operative pleading *before* that hearing - rather than leaving them pending for an additional 30 days - directly serves the safety objective that is this brief's primary concern.

Granting the 2AC with an April 2 answer deadline aligns all counts for disposition at the April 3 hearing, enabling the Court to hear the Omnibus Motion (Section IV.3), apply the March 6 Systems Analysis Brief (Section IV.4), and resolve the maximum number of claims in a single proceeding - reducing both docket congestion and Plaintiffs' ongoing exposure to a system that escalates harm in proportion to the duration it is permitted to operate.

C. The Scope of Documented Malfeasance

To orient the Court to the scale of what the April 3 hearing must address, Plaintiffs attach as [Exhibit C] the **Comprehensive Enforcement Matrix** - a single document mapping every documented violation across all twelve identified actors (five named defendants, three individual attorneys, two law firms, and the insurer/adjuster) against the criminal, civil, and regulatory enforcement pathways each violation implicates.

The matrix documents infractions spanning felony forgery (SC § 16-13-10), federal witness tampering (18 USC § 1512(b)(3)), PMIC trust account violations (SC § 40-57-136), obstruction of a state regulatory investigation (SC § 40-57-3403), attorney conflicts of interest (SC RPC 1.7(b)(3)), insurance bad faith, and litigation gaslighting producing clinical-severity PTSD (PCL-5: 76/80) - across twelve defendants and potential defendants.

The matrix makes the scale of harm visible at a glance: the documented conduct spans criminal, civil, and regulatory domains, involves coordinated action across multiple firms and entities, and has produced documented harm at every level. The eight relief items in Section III are designed to collapse as much of this complexity as possible into a manageable number of dispositive rulings. The matrix is the fuller map; the relief table is the fast route to a safer point.

II. THE HOUSING JUSTICE AUDIT (HJA)

The Housing Justice Audit ("HJA") is an application of Plaintiff McNeil's Strategic Thought Leadership (STL) Schema Platform, which had just found product-market fit when the forced move flattened its velocity, which was kept flat by defense exhaustion tactics. The social media graphs documenting the flatlining from August 2025 forward are in evidence.

A. Reason for the HJA: Mitigate Damages and Prove Value of Flattened Platform.

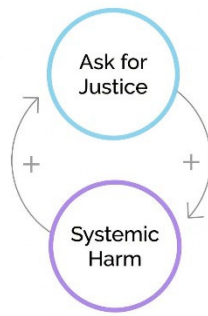
S.C. Code § 27-40-50(a) imposes an affirmative duty: "The aggrieved party has a duty to mitigate damages." Rather than claiming speculative lost profits from a platform disrupted at its July 2025 growth inflection, Plaintiffs rebuilt the STL platform using the case as a study of response by the Charleston, SC Housing Justice System to a pull for justice from its most vulnerable member or MVM, then designing a system intervention based on its findings. This is now being soft-launched at **HousingJusticeAudit.com** after a pre-publication draft was released in February.

This creates an opportunity for direct experience of merit by a jury for the purpose of determining punitive damages for destroying a platform of value at a critical time.

B. The HJA as Key to Fast Clarity

The Court has before it a docket with dozens of filings, multiple motions, and a complex web of entities, individuals, and conduct. The HJA provides the organizing framework that makes this complexity understandable in a single read.

The HJA documented a diagnostic finding at the center of this case:



Core dynamic: The viscous cycle “Ask < -- > Harm Loop” where every “Ask” for safety, respect, or justice is met with a system response of harm to the asker, escalating to match the effectiveness of the “Ask”.

Root cause: Discovered in the Housing Justice Audit system study and intervention: A core assumption behind the “Passive Investing” model is *Unconscious Abdication*, which translates to “look the other way while bad actor agents harm tenants” and, per Ackoff, is rooted in the dehumanizing category error of treating a *social system* made of people with agency as parts in a *mechanical system*

We are experiencing escalating harm from the dehumanization and Ask-Harm loop in real time and conditions are now **shifting to a higher risk scenario** the court needs to manage effectively to both **protect court integrity and ensure plaintiff safety**.

Every request Plaintiffs made - for a security deposit accounting, for safe and habitable conditions, for privacy, for truthful communications, for the harm to stop - was met with harm calibrated to the effectiveness of the ask, rather than help.

The court needs to stop this escalation before plaintiffs are further harmed and this brief will explain specifically how.

The root of this escalation is a mental model that is a hidden assumption within the *Passive Investor Model*: **Unconscious Abdication**. Property owners have internalized the belief that maximizing property investments require looking the other way while agents handle tenants. In the resulting hierarchical system design, resources flow down from owner to agent but the feedback on tenant wellbeing does not flow back up. This creates a “dark space” where bad actor agents can operate and helps explain the dynamics of this case.

The HJA also designed a solution paradigm utilizing the STL platform called **Conscious Co-Stewardship (CCS)**. It aligns tenant, owner, and manager around *shared reverence for the shelter where life stories play out*, supported by documented UK housing studies proving that a systems design from the tenant point of view simultaneously improves tenant satisfaction, reduces operating costs, and increases financial returns for owners

C. The HJA Unintentionally Elevates Risk Substantially

Since this has set up a viscous cycle of escalating harm as the harm requires more sophisticated asks for justice, which triggers more harm, it is concerning to consider the escalation of harm that could be triggered by the “Ask” of the Housing Justice Audit and the full impact it will have.

The same instrument that gives the Court clarity gives a jury purpose, and this is what elevates Defendants' exposure into the range that triggers the safety conditions documented in [Exhibit B].

Peer-reviewed jury psychology research confirms what the HJA's trial function means for verdict range:

Sunstein, Hastie & Payne (Punitive Damages: How Juries Decide, 2002): deliberation produces a "severity shift toward ever-higher awards," and jurors specifically penalize calculated institutional indifference.

Hans (What's It Worth?, Wm. & Mary L. Rev., 2014): damage awards function as "powerful political actions by the civil jury" that "serve to check or endorse private power".

Gabriel & Shaw (Law360, 2024): "juror activism" occurs "where a jury believes that its verdict should have a social message above the actual evidence" — and perceived institutional resistance escalates this impulse.

Every amplifying condition is present. Charleston jurors in 2026 are in a housing market where rents have risen 51% while wages rose 31%. They will experience a platform built to change how housing treats its most vulnerable participants. The resulting credible verdict range creates an existential threat to the Altman's entire portfolio, as documented in the sealed [Exhibit A]

III. RELIEF REQUESTED: EIGHT HIGH-LEVERAGE MITIGATION ACTIONS

The Ask–Harm Loop documented in Section II operates through a specific mechanism: each unresolved motion generates a new cycle of adversarial filings, mischaracterizations, and deadline pressure that compounds Plaintiff McNeil's clinical PTSD (PCL-5: 76/80) and reduces his functional capacity - currently estimated at approximately 30%.

Deemed admissions and summary judgments structurally eliminate the motion cycles through which the harm is delivered. Every count resolved on April 3 is a count that cannot generate another round of discovery obstruction, another sanctions threat, another mischaracterization to court staff, another DARVO escalation. The attrition strategy functions only as long as liability remains contestable; **once it is judicially fixed, the engine that converts "ask for justice" into "harm to the person asking" loses its fuel**

Each action below is a leverage point: resolving it removes a structural condition that sustains the Ask–Harm Loop, collapses defense attrition capacity, or both. The Court can treat this table

as a checklist for the April 3 hearing - every item has been briefed, every evidentiary basis has been filed, and zero items have received a substantive defense response on the merits.

Disqualifying conflicted counsel (#7–8) removes the human actors operating that engine. Granting veil-piercing discovery (#5) and applying unclean hands (#6) activate the Altmans' rational self-interest - the one force documented in the Statement of Systemic Risk as powerful enough to override every other condition in the system, but which captured counsel has kept dormant by filtering information under a "these harms did not happen" *absence of narrative*.

The Court can treat this table as a checklist for the April 3 hearing: every item has been briefed, every evidentiary basis has been filed, and zero items have received a substantive defense response on the merits.

#	Relief Requested	One-Sentence Basis	Filed / Supported By
1	Grant Leave to File Second Amended Complaint	Pending 148+ days with no opposition; adds 21 image-exploitation counts, adds Charles S. Altman individually for negligent retention/supervision and veil-piercing; SCRCF 15(a) mandates leave "freely given when justice so requires."	Motion for Leave, 10/24/25
2	Order April 2 2026 Answer Deadline on 2AC	Case is 11 months old; Defendants have had notice of all underlying facts since October 2025; a short deadline prevents the 2AC from becoming a new attrition vehicle and forecloses further delay. This aligns the images counts with the April 3 hearing and enables the below:	Omnibus Request ¶12, 2/24/26
3	Rule on Omnibus Motion (Counts I–VI)	Seven of eight substantive matters have received zero defense engagement on the merits in 167+ days; full summary judgment on Counts I (treble deposit) and III (breach), partial summary judgment on liability for Counts II (fraud), IV (retaliation), V (habitability), and VI (veil-piercing) per SCRCF 56; deemed admissions per SCRCF 36 where RFA Sufficiency Motion of 12/23/25 remains unanswered.	Omnibus Brief, 2/24/26; RFA Sufficiency Motion, 12/23/25
4	Adopt March 6 Systems Analysis Brief as Judicial Framework	The Brief demonstrates defense has no counter-narrative - only procedural friction (noise) and silence; provides the Court a	Systems Analysis Brief, 3/6/26

#	Relief Requested	One-Sentence Basis	Filed / Supported By
		single-read path to disposition without extended adversarial proceedings.	
5	Order Veil-Piercing Discovery into CRC Portfolio	Flash Transfer of 181 Gordon for \$5.00 on the same day as estate distribution (2/21/07); 95% Charles Realty stock devaluation (\$30K/share → \$1,392/share) during Charleston's historic real estate boom; SAC 181 OP account bearing Meridian's address with Tara's signature - 82+ days with zero response from any defense firm.	Probate Memo, 12/3/25; Supplemental Memo (Flash Transfer), 12/11/25
6	Apply Unclean Hands and Judicial Estoppel	Jonathan S. Altman swore to Probate Court that SAC 181's asset was worth \$251K while the property generates \$63K/year in rent (cap-rate value: \$1.27M) and adjacent 182 Gordon sold for \$1.1M - Defendants cannot assert contradictory valuations in two courts.; Public hypocrisy of him simultaneously serving on Charleston's Homeownership Initiative Commission while being beneficial owner of a property at the center of an exploitation lawsuit - enables the Unclean Hands doctrine.	Probate Memo, 12/3/25; Supplemental Memo, 12/11/25
7	Disqualify Resnick & Louis (Bolyard)	Unconsentable conflict under SC RPC 1.7(b)(3): Meridian's own crossclaim (Answer ¶¶114–125) requires proving SAC 181's operational control and commingling, yet Bolyard simultaneously quashes the Synovus subpoena that would prove it - logically irreconcilable positions for the same counsel in the same proceeding; compounded by witness tampering (Meridian's 1/9/26 contact with AppFolio instructing non-compliance).	Cross-Motion to Disqualify, 1/14/26
8	Disqualify Phelps Dunbar (Tate/O'Brien)	Quash motion filed one day after SCRPC 45(d)(2)(B) deadline (waived under <i>Ex parte Smith</i>); 32 days of silence on Flash Transfer allegations while minimizing eight-count fraud as "deposit dispute"; captured-counsel dynamic - blocking Synovus discovery that would prove their own client's corporate separateness defense, sacrificing SAC 181's	Cross-Motion to Disqualify, 1/14/26; Omnibus Brief, 2/24/26

#	Relief Requested	One-Sentence Basis	Filed / Supported By
		veil-piercing defense to protect non-client Tara Bayles' PMIC license.	

Why These Eight and Why Now

These eight independent requests form a cascade.

- Granting #1 (2AC leave) and #2 (short answer deadline) adds Charles S. Altman and the image counts, closing the entity gap.
- Ruling on #3 (Omnibus) enters liability on the counts where defense silence has functioned as concession.
- Adopting #4 (March 6 Brief) gives the Court the framework to do so efficiently.
- Ordering #5 (CRC discovery) exposes the portfolio assets that make judgment collectible.
- Applying #6 (unclean hands/estoppel) locks Defendants to their own sworn valuations - they cannot claim \$251K in Probate Court and \$1.27M in this Court.
- And disqualifying the conflicted firms (#7–8) removes the two engines of the coordinated obstruction that has driven every motion to quash, every deposition delay, every mischaracterization to court staff, and every "deposit dispute" narrative that obscures what is actually an eight-count fraud, retaliation, and privacy case with veil-piercing and probate-fraud dimensions.

Third Amended Complaint

Plaintiffs also place the Court and all parties on notice that they plan to file a Motion for Leave to File a Third Amended Complaint that will add additional entities and individuals as defendants and is based on conduct that includes but is not necessarily limited to that which arose during this litigation. Plaintiffs plan to file filing this motion concurrently with a law firm litigation partner officially entering the case.

This notice is provided now so the Court can weigh the full trajectory of the case when evaluating the eight relief items above.

IV. JUDICIAL PATH TO CLEARING THE DOCKET

The Court possesses full authority under existing South Carolina procedural rules and inherent judicial power to act on all eight relief items at the April 3, 2026 hearing. No extraordinary procedure is required. Each action maps to established authority the Court exercises routinely:

Relief Item	Governing Authority	Application
#1 – Grant Leave (2AC)	SCRCP Rule 15(a)	"Leave shall be freely given when justice so requires." 148+ days pending, no opposition filed. Unopposed motions for leave are granted as a matter of course.
#2 – 7-Day Answer Deadline	SCRCP Rule 12(a); <i>Chambers v. NASCO, Inc.</i> , 501 U.S. 32 (1991)	Court's inherent case-management authority to set deadlines that prevent attrition abuse. Defendants have had notice of all underlying facts since 10/24/25.
#3 – Omnibus Disposition (Counts I–VI)	SCRCP Rule 56 (summary judgment); SCRCP Rule 36(a) (deemed admissions); SCRCP Rule 37 (discovery sanctions)	Rule 56: judgment as a matter of law where no genuine issue of material fact exists - 167+ days of zero substantive defense on core documentary evidence satisfies this standard. Rule 36(a): evasive or insufficient RFA responses deemed admitted upon motion - RFA Sufficiency Motion of 12/23/25 pending 88+ days without response. Rule 37: failure to comply with discovery obligations supports sanctions up to adverse inference, striking of pleadings, or default.
#4 – Adopt March 6 Brief as Framework	<i>Chambers v. NASCO</i> , 501 U.S. 32 (1991); inherent judicial authority	Courts possess inherent authority to manage complex litigation, organize the record, and adopt analytical frameworks that promote judicial economy.
#5 – CRC Portfolio Discovery	SCRCP Rule 26(b)(1); SCRCP Rule 37(a)	Rule 26(b)(1): discovery of any matter relevant to the subject matter - probate records, Charles Realty holdings, and SAC 181 capitalization are directly relevant to veil-piercing (Count VI). Rule 37(a): motion to compel where 82+ days of zero response constitutes failure to respond.
#6 – Unclean Hands / Judicial Estoppel	SC equitable doctrine; <i>Hayne Federal Credit Union v. Bailey</i> , 327 S.C. 242 (Ct. App. 1997) (judicial estoppel); inherent equitable authority	Judicial estoppel bars a party from asserting a position in one court inconsistent with a position successfully maintained in another. Jonathan Altman's sworn \$251K probate valuation vs. \$1.27M cap-rate value is the textbook application. Unclean hands bars equitable relief for a party whose own conduct is inequitable in the matter at issue.

Relief Item	Governing Authority	Application
#7 – Disqualify Resnick & Louis	SC RPC 1.7(b)(3); <i>Matter of Unnamed Member of S.C. Bar</i> , 313 S.C. 229 (1993); <i>Burdette v. Burdette</i> , 296 S.C. 297 (Ct. App. 1988)	Disqualification is mandatory where dual representation requires logically contradictory positions in the same proceeding. Bolyard's simultaneous advocacy for Meridian's indemnity crossclaim and against the Synovus subpoena that would prove it is the definition of unconsentable conflict.
#8 – Disqualify Phelps Dunbar	SCRPC Rule 45(d)(2)(B) (waiver — untimely quash); <i>Ex parte Smith</i> , 407 S.C. 422 (2014); SC RPC 1.4(a)(3); inherent authority	Quash motion filed Day 20, one day after the 19-day deadline - waived under <i>Ex parte Smith</i> without further analysis. Captured-counsel conduct (blocking evidence that would support own client's defense) independently warrants disqualification under inherent authority to protect proceedings integrity.

Each rests on rules and precedents the Court applies in ordinary civil practice. The thing that current stands out about this case is the duration of defense silence on the merits. And the procedural rules exist precisely to address that condition.

This is how these impact the four motions currently noticed for the April 3, 2026 hearing before Judge McCoy.

Noticed Motion	Filed By	Status Under This Brief
MQUASH — Motion to Quash Deposition	Defense (LLR subpoena)	Plaintiffs request this motion remain on the hearing. Plaintiffs oppose the quash and want LLR's counsel present, as the regulatory obstruction documented in the Enforcement Matrix [Exhibit C] is central to multiple claims.
MMSTAY — Motion of Joinder for Motion to Stay	Defense	Rendered moot if the Court grants the Omnibus disposition (#3 below). A stay presupposes contested claims; summary judgment and deemed admissions on Counts I–VI eliminate the claims the stay is designed to delay.
MOFREE — Supplemental Motion/ADA Accommodations	Plaintiffs	Remains live regardless of other outcomes. Plaintiff McNeil's clinical PTSD (PCL-5: 76/80) and reduced functional capacity require ADA accommodations - including e-filing access and remote appearance authorization — whether or not the Omnibus disposition resolves the underlying

Noticed Motion	Filed By	Status Under This Brief
		claims. These accommodations serve the duration of the litigation.
MOFREE — Emergency Motion/Protective Relief & Maintain Assignment	Plaintiffs	Remains live as fallback relief. If the Court grants the Omnibus disposition and disqualifies conflicted counsel, the protective relief and communication protocols become substantially less urgent because the primary engines of the Ask–Harm Loop have been removed. If the Court does not reach those items, the Emergency Motion becomes more urgent, not less - the health-based protective measures, court-ordered communication monitor, and case-management protocols originally requested remain essential to prevent further deterioration of Plaintiff McNeil's functional capacity.

V. DEFENDANTS' EXPOSURE AND THE SETTLEMENT WINDOW

Three sealed exhibits accompany this filing, each modeling Defendants' financial exposure from a distinct analytical starting point. Together they form a progression from floor to ceiling to catastrophe:

- **Exhibit A1: The HJA as Instrument of Systemic Impact.** This model accounts for the behavioral reality documented in peer-reviewed jury psychology research: when jurors perceive their verdict as an instrument of systemic change, they write numbers that function as policy rather than compensation. The model stacks comparable verdicts and applies the aggravating differential present in this case across every comparable dimension, including three novel categories with no known ceiling. Under SC § 15-32-530, punitive damages are uncapped for intentional conduct.
- **Exhibit A2: Conservative Verdict Modeling with Judicial Estoppel & Collection Analysis.** This model excludes the HJA's amplifying effect on jury behavior entirely and calculates a floor based on documented, largely uncontested compensatory categories with a conservative punitive multiplier below the range typical in comparable SC cases. It then maps what judicial estoppel does to even that modest number when collected against Defendants' own sworn probate valuations.
- **Exhibit A3: Worst-Case Combined Exposure -High Verdict + Estoppel Collection.** This is where the two models converge into a defense catastrophe. The collection analysis demonstrates what happens when a jury award informed by systemic-change psychology is collected against assets priced at Defendants' own sworn probate figures. The estoppel trap permits no favorable resolution: accepting sworn values means asset loss at pennies on the dollar; rejecting sworn values constitutes an admission of

material misrepresentation in probate proceedings, opening perjury exposure, probate fraud referral, and tax liability.

Specific modeling figures are contained in the sealed exhibits and are not reproduced here. What the Court needs to know for purposes of this public filing is the structural dynamic: **Plaintiffs will make a settlement offer available to the property ownership group with the April 3 hearing as the deadline. If the April 3 hearing happens, that means the settlement window did not produce a result and Plaintiffs are operating in high-risk systems conditions.**

Why Post-Hearing Settlement Likely Exceeds Net Worth

The sealed exhibits demonstrate that under every model - conservative, high-end, and worst-case combined - the post-hearing settlement range exceeds the identified equity buffer across Defendants' portfolio. One mechanism is the estoppel trap the Altmans built for themselves: they swore under oath to specific valuations in two probate proceedings that dramatically understate the market value of the assets those valuations describe. Judicial estoppel locks them to those figures for collection purposes. A judgment of relatively modest size, measured against the sworn valuations, reaches the entire portfolio - including properties dating to 1940 and the offices where Charles S. Altman and Jonathan S. Altman practice law.

The dilemma has no favorable resolution. After the April 3 hearing converts liability from speculative to fixed - through deemed admissions, partial summary judgments, or veil-piercing discovery - the settlement calculus shifts from negotiable to existential. The specific figures are in the sealed record for the Court's review.

The Jury as Change Agent: Why the HJA Transforms Verdict Psychology

The high-end model rests on a documented behavioral phenomenon the Court should understand because it drives both the exposure calculation and the safety risk. At trial, the Housing Justice Audit at housingjusticeaudit.com will be presented as an exhibit the jury is instructed to evaluate deeply - to understand what was destroyed and to assess the value of what Plaintiffs rebuilt from the rubble of their own displacement.

Over the course of days spent inside the platform, jurors will read about the escalating harm patterns, follow the findings, read the systems maps, encounter the Conscious Co-Stewardship framework, and watch in real time as Google's AI returns the case narrative when they search defendants' names as well as when they ask it about Conscious Co-Stewardship and *why* it is better for everyone - **including property investors** - than Passive Investing AKA *Unconscious Abdication*. They will experience the platform working - because reading it and interacting with it *is* a demonstration of its value.

This experience transforms passive fact-finders into participants who feel personally responsible for the systemic signal their verdict sends. The research is specific:

- **Sunstein, Hastie & Payne (2002):** Deliberation produces a severity shift toward higher awards - and jurors specifically punish calculated institutional indifference, the exact conduct documented across seven post-notice escalations.
- **Hans (2014):** Damage awards function as "powerful political actions" where "the level of damages is a way that the community sends a message about how bad the wrong or injury is".
- **Gabriel & Shaw (2024):** "Juror activism" - where a jury believes its verdict should carry a social message - is triggered by perceived institutional resistance. Five layers of defense lawfare after documented notice constitute the textbook trigger.
- **IADC research:** "Nuclear verdicts" are driven primarily by juror anger and frustration, delivered "to send a message." When defendants genuinely accept accountability, awards decrease. This defense has done the opposite for 200+ days.

Charleston jurors in 2026, in a housing market where rents have risen 51% while wages rose 31%, are not naïve about the systemic nature of what they are adjudicating. They will understand that the number they write on the verdict form functions as policy. A number that fails to restructure the economics of extraction-based property management is not deterrence. It is a line item.

The Court can assess this dynamic firsthand. The Housing Justice Audit soft-launches at housingjusticeaudit.com/report on March 20, 2026. The Court is invited to read it as the exhibit a jury will spend days immersed in. Every page of that report is what twelve citizens will be processing when they pick up the pen. The Court's own experience reading it is the most efficient way to evaluate how a jury will react – and assess firsthand what that reaction means for the exposure range modeled in the sealed exhibits.

The System Conditions That Make This Urgent

The Statement of Systemic Risk [Exhibit B] documents twelve interlocking conditions - seven currently operating, five predicted to activate at the April 3 threshold.

The critical dynamic: the Altman family may be operating in **Pre-Shock Latency** (Condition 7) - they likely have not yet processed the full scope of their collection exposure because captured counsel has been filtering information under the false narrative that this is "just a deposit dispute".

The April 3 hearing is the bifurcation point where that false narrative becomes unsustainable. When deemed admissions, partial summary judgments, or the veil-piercing discovery order converts liability from speculative to fixed, Prospect Theory (Kahneman & Tversky, 1979) predicts the result: when all outcomes are perceived as losses, the system shifts to extreme risk-seeking. The marginal cost of further escalation drops to zero. The system is no longer fighting for a result - it is fighting for existence.

The settlement offer exists to prevent that phase shift. It provides a rational exit before the hearing converts managed litigation into the terminal system behavior documented in Conditions 8–12: Stage 2 Cornered Animal Syndrome, narcissistic collapse, intensified DARVO,

identity/mental-model collapse, and systemic sabotage - the terminal behavior of a system that shifts from playing to win to ensuring no one else wins.

The Court's awareness of this dynamic is itself a dampening mechanism. A system that knows it is being watched behaves differently than one operating in shadow. This filing places the prediction on the public record so that if the post-hearing behavioral cascade occurs as modeled, the Court will have the framework to recognize it in real time and act to protect both the proceedings and the parties.

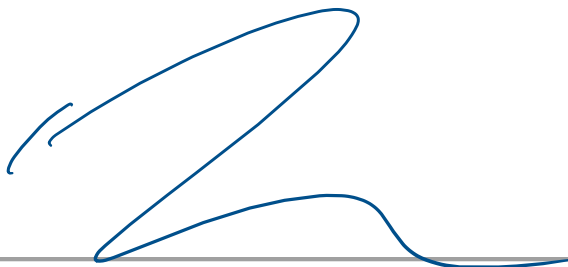
VI. WHY DELAY INCREASES RISK AND WHY THIS FILING IS PUBLIC

The Statement of Systemic Risk [Exhibit B] documents five post-threshold system conditions predicted to activate when the April 3 hearing converts liability from speculative to fixed. Each is supported by a recognized academic model and documented in the case record:

These conditions are sequential and compounding. Activated condition creates the input that triggers the next. The April 3 hearing is a potential trigger event.

This filing is on the public record because transparency is the primary protective mechanism available. A system that knows it is being watched behaves differently than one operating in shadows.

Respectfully submitted this 20th day of March, 2026.



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EXHIBIT A1

The HJA as Instrument of Systemic Impact.

EXHIBIT A2

**Conservative Verdict Modeling with Judicial Estoppel &
Collection Analysis**

EXHIBIT A3

**Worst-Case Combined Exposure -High Verdict + Estoppel
Collection**

**Exhibits A1–A3 are filed under seal pursuant to SCRCP
Rule 41.1 and the accompanying Motion to Seal. Originals
submitted separately for in camera review.**

EXHIBIT B

Statement of Systemic Risk and Behavioral Volatility

Statement of Systemic Risk and Behavioral Volatility

Purpose

Plaintiffs submit this analysis to identify, for the Court's awareness,

1. A set of interlocking system conditions that are currently generating escalating risk to Plaintiffs' safety and impacting their well-being, and
2. A second set of conditions that will be triggered by the April 3, 2026 hearing as a threshold event.

The analysis draws on established behavioral economics, forensic psychology, and organizational systems research to explain why the defense system is operating as it is, and why the hearing will predictably intensify the threat.

These are documented behavioral patterns with peer-reviewed predictive models. Plaintiffs present them transparently to the Court because observation is itself a dampening mechanism for the volatility described.

Narcissistic System Role Definitions

The behavioral pattern Plaintiffs have experienced and which Plaintiff McNeil's counselor recognized as the source of elevated safety risk maps precisely to the structural taxonomy of the narcissistic family system as defined in the clinical literature.

Donaldson-Pressman and Pressman, in *The Narcissistic Family: Diagnosis and Treatment* (Lexington Books, 1994), established that narcissistic systems are organized around a central figure whose needs define the system's purpose, with all other members assigned roles that serve the central figure's self-image.

Minuchin's *Structural Family Therapy* (Harvard University Press, 1974) provides the systems framework for understanding how boundary violations and role rigidity maintain dysfunction. The taxonomy below adapts these family-system roles to the institutional and organizational context of this litigation. These are system roles that any actor occupying that position in this system would be expected to fulfill.

Abbrev	System Role	Function in a Narcissistic System
CNO	Central Narcissistic Operator	The organizing center. All other roles exist to serve this operator's needs. Generates the false narrative the system must maintain. Cannot tolerate accountability without existential threat to self-image.
AoH	Agent(s) of Harm	Actors who execute harmful conduct on behalf of or in service to the CNO. May include professionals (counsel, insurers) whose institutional roles are captured by the system's self-preservation drive.
EN	Enabler(s)	Actors with the authority to stop the harm who instead look the other way. Their inaction permits the system to operate. May be unconscious (willful blindness) or conscious (complicity). The system depends on their non-intervention.
FM	Flying Monkey(s)	Actors who defend or extend the CNO's narrative without full awareness of the harm being caused. Amplify gaslighting and minimize the Target's reports. May include captured institutional actors (regulators, law enforcement).
TGT	Target / Scapegoat	The individual(s) designated to absorb the system's dysfunction. Blamed for disrupting the system by reporting harm. Every attempt to seek accountability triggers system escalation. Systematically dehumanized.
FN	False Narrative	Not a person but a <i>system condition</i> : the story the system must maintain to protect the CNO. All roles reinforce it. When evidence contradicts it, the system escalates rather than integrates.

Part I: System Conditions Currently Operating

The following table identifies seven interlocking system conditions that are presently generating harm. Each condition is supported by a recognized academic model, is documented in the case record, and has produced specific observable results.

#	System Condition	Academic Model	Evidence in Record	Current Result
1	Narcissistic System Structure	Hotchkiss, Why Is It Always About You? (2003); Freyd, Institutional Betrayal (2014) System roles: Central Operator, Agents of Harm, Enablers, Scapegoat/Target	Central operator: Property Manager; Agents of harm: Attorneys and Insurance Agents, CCSO Victim Advocate Enablers: Property Owners (unconscious abdication) Scapegoat/Target: Plaintiffs	System adopts false narrative (“deposit dispute”) to protect central operator. Mirrors DARVO: Deny harms, Attack reporter, Reverse roles. “Trick residents so company can make more money” (2018 review). “Adam is maintenance” (Bayles email Sep 6, 2024).
2	Stage 1 Cornered Animal Syndrome (CAS) Threat to PMIC License	Kahneman & Tversky, Prospect Theory (1979): risk-seeking behavior under perceived sure loss. Seddon, Vanguard Method: failure demand spiral.	LLR investigation of PMIC license initiated by Plaintiffs. Defense sought to quash subpoenas directed at records. Seven documented escalations after notice of harm. No substantial remediation attempted.	Escalation of harm with no attempt to remedy. “Win at all costs” to preserve image. Each escalation generates further “ask for justice” requiring more aggressive harm response. Marginal cost of further bad behavior perceived as zero.

3	Captured Counsel (SAC 181 / Phelps Dunbar)	Freyd, Institutional DARVO (2024); Agency conflict literature (Eisenhardt, 1989)	Phelps Dunbar represents SAC 181 (Altman entity) but defense posture protects Bayles' interests, not Altmans'. IPG Insurance's client (Altmans) exposure driven up by counsel's tactics. Conflict documented in Plaintiffs' Opposition to Quash (Jan 2026).	Altmans' financial exposure dramatically increased by counsel acting in Bayles' interest. Harm to plaintiffs compounded. Altmans receive filtered information ("just a deposit dispute").
4	(Apparent) Captured Regulatory Agency (SC LLR)	Stigler, Theory of Regulatory Capture (1971); Heffernan, Willful Blindness (2011)	LLR stonewalled McNeil when he contacted them to provide additional evidence. Plaintiff forced to email evidence page and record read receipt to ensure accountability. No penalty issued so far for PMIC who: • Falsified postal evidence • Distributed private images • Retaliated against reporting tenant • Misrepresented material facts	If LLR permits Bayles to retain license, the message to every PMIC in SC is: there is no consequence for tenant abuse. Vulnerable people placed at continuing risk. Plaintiffs deprived of regulatory protection they are entitled to.

5	(Apparent) Captured Law Enforcement (CCSO)	Freyd, Betrayal Blindness (1996): suppression of awareness of betrayal by trusted institutions. Institutional betrayal literature.	CCSO Victim Advocate “Dierra” told Plaintiff McNeil: “We don’t help people like you.” Investigation stonewalled and dropped despite clear evidence provided. Forced Plaintiffs to consider SLED referral.	Status-based exclusion from victim protection services. Plaintiffs denied the LE protection available to other citizens. Compounds institutional betrayal and clinical PTSD (PCL-5: 76/80).
6	Willful Blindness (Altman Family)	Heffernan, Willful Blindness: Why We Ignore the Obvious at Our Peril (2011). Senge, The Fifth Discipline: mental models as invisible assumptions that constrain action.	Altmans operate under “Unconscious Abdication” mental model: delegation of all property management with no oversight, enabling bad actor behavior. May have accepted Bayles’ narrative about Plaintiffs . No direct engagement with Plaintiffs despite documented harm.	Owners remain shielded from reality of what is being done in their name. Counsel’s information filtering reinforces blindness. Blindness enables continuation of harm. Does not excuse liability.

7	Pre-Shock Latency (Altman Awareness Gap)	Kübler-Ross, On Death and Dying (1969): denial as first response to catastrophic information. Meadows, Thinking in Systems: delay between stimulus and response as system vulnerability.	Altmans likely have not yet processed full scope of collection exposure (Entire portfolio reachable at 2–5¢ on the dollar via estoppel). April 3 hearing is threshold event where this information becomes unavoidable and even without estoppel entire portfolio will not likely cover fair settlement rage.	Current behavioral mode: Corporate Logic (managed litigation). Post-hearing behavioral mode: system conditions favorable for shift to Cornered Animal Syndrome Stage 2.
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These seven conditions form a self-reinforcing system.

- The narcissistic structure (Condition 1) generates harm.
- The central operator's self-preservation drive (Condition 2) escalates it.
- Captured counsel (Condition 3) amplifies exposure while filtering information.
- Captured regulatory and law enforcement bodies (Conditions 4–5) remove the external checks that would normally constrain the system.
- The owners' willful blindness (Condition 6) permits the system to operate without the intervention of the only actors with the authority to stop it.
- And the awareness gap (Condition 7) means the one force powerful enough to override all other conditions - the Altmans' rational self-interest - has not yet been activated.

Part II: Post-Threshold Conditions (Triggered by April 3 Hearing)

The April 3, 2026 hearing is a bifurcation point. If the Court grants deemed admissions, partial summary judgments, or summary judgments on any substantial claims, the settlement range moves from negotiable to existential. The following conditions are predicted to activate at that threshold, compounding the risks identified in Part I.

#	Triggered Condition	Academic Model	Predicted Trigger Mechanism	Predicted Behavioral Result
8	Stage 2 Cornered Animal Syndrome (Altman Family Activation)	Kahneman & Tversky, Prospect Theory (1979): extreme risk-seeking when all outcomes perceived as losses. Meadows: system behavior when negative feedback loops are overwhelmed.	Deemed admissions convert liability from speculative to fixed. Settlement range (\$19.6M conservative; \$100M–\$300M high-end) approaches or exceeds \$40M equity buffer. Path narrowing: “best case” settlement becomes indistinguishable from “worst case” total loss.	Risk inversion: high-risk legal gambles become “cheaper” than certain bankruptcy. Scorched-earth tactics: delay, retaliatory filings, asset transfers, extreme gaslighting. Marginal cost of further escalation = zero. Loss of proportionality: “already losing \$40M” removes deterrent against further harm.
9	Narcissistic Collapse and Rage (Bayles + System)	Kohut, The Analysis of the Self (1971): narcissistic rage as protection of grandiose self. Kernberg, Borderline Conditions and Pathological Narcissism (1975). Hotchkiss: five phases of narcissistic collapse.	Deemed admissions establish as fact: falsified evidence, privacy invasion, retaliation, fraudulent inducement. Bayles’ professional identity (“competent PMIC”) and Altmans’	Phase 1: Narcissistic injury (identity crack). Phase 2: Rage and retaliation —smear campaigns, reputation attacks, victim-playing, threats. “How dare you stop feeding my ego?” Phase 3: Collapse—

#	Triggered Condition	Academic Model	Predicted Trigger Mechanism	Predicted Behavioral Result
			social identity ("respected community leaders / Housing Board Chair") simultaneously threatened with public dissolution.	psychological freefall when tactics fail. Key risk: rage is not emotional release but control restoration. When rage fails, ESCALATION.
10	Dual Narcissistic Collapse (CNO + EN Simultaneous Failure)	Hotchkiss, <i>Why Is It Always About You?</i> (2003): collapse when grandiose self-image meets undeniable contradiction. Kernberg, <i>Borderline Conditions and Pathological Narcissism</i> (1975): rage as primitive defense against annihilation anxiety. Shaw & Webber, <i>Narcissistic Abuse Recovery</i> (2017): systemic collapse when both central operator and enablers lose narrative control simultaneously.	CNO (property manager) collapse: LLR findings + deemed admissions destroy professional identity and PMIC license viability. Cannot maintain "competent professional" narrative. EN (property owners) collapse: Discover (a) entire portfolio at existential risk, (b) counsel protected CNO not them, (c) their sworn probate values are the weapon, (d) "deposit dispute" narrative was false. Convergence event: Both CNO and EN realize their interests	CNO loses incentive to protect EN: If PMIC license lost regardless, no reason to minimize EN exposure. May escalate to "take them down with me." EN panic without guardrails: Suddenly aware they've been misled into existential exposure, but past the point where withdrawal is possible. Classic "betrayed betrayer" rage. System fragmentation risk: When CNO and EN interests diverge under

#	Triggered Condition	Academic Model	Predicted Trigger Mechanism	Predicted Behavioral Result
			diverge — but EN discover this AFTER exposure is locked in. CNO loses control of EN narrative; EN lose ability to exit cleanly.	existential threat, coordination breaks down. Each actor may pursue independent survival strategies — increasing unpredictability and danger to TGT. Highest volatility state: Two simultaneous collapses + loss of mutual narrative = compounding rage with no systemic brake.
11	DARVO Intensification (System-Wide)	Freyd, DARVO (1997): Deny, Attack, Reverse Victim and Offender. Freyd, Institutional DARVO (2024): when organizations commit DARVO with institutional complicity.	As facts are judicially established, denial becomes unsustainable. System must either acknowledge harm or intensify the attack on the reporter. Predicted pivot: Plaintiffs reframed as aggressors (“extortion,” “vexatious litigant”) to justify escalation.	Institutional DARVO at scale: Defendants position themselves as victims of litigation. Plaintiffs’ documented harms recast as “attacks.” Three-stage pattern: Deny through policy → Scrutinize the individual → Organization as victim.

#	Triggered Condition	Academic Model	Predicted Trigger Mechanism	Predicted Behavioral Result
				Exploits betrayal blindness.
12	Identity / Mental Model Collapse (Altman Family)	Senge, Mental Models (1990): invisible assumptions that constrain action. Kübler-Ross grief stages applied to status loss. Cognitive Dissonance (Festinger, 1957).	Altmans discover simultaneously: (a) Counsel has been protecting Bayles, not them; (b) Their portfolio is reachable at 2–5¢ on the dollar; (c) Their sworn probate values constitute the weapon; (d) The “deposit dispute” is a \$20M–\$300M existential event.	Shock → Denial → Anger → Bargaining (too late) → System conditions favorable for externalized aggression. The “cognitive snap”: when the distance between believed narrative and reality is too great, the system defaults to aggression rather than integration. “Rather burn the system down than admit the paradigm is broken.”
13	Systemic Sabotage (Terminal CAS Behavior)	Meadows, Thinking in Systems: “Playing to ensure no one else wins.” Game theory: spite strategies when utility function inverts.	When total liability exceeds total net worth, rational cooperation incentive vanishes. The system is no longer fighting for a result; it is fighting for existence.	Asset transfers, fraudulent conveyances, creation of new entities. Witness intimidation or tampering. Extra-legal pressure on Plaintiffs. Deliberate destruction of

#	Triggered Condition	Academic Model	Predicted Trigger Mechanism	Predicted Behavioral Result
			No dignified exit visible.	evidence. Not “playing to win” but “playing to ensure no one else wins.”

The post-threshold conditions represent a phase shift from managed litigation to existential combat.

- Stage 2 CAS (Condition 8) removes the rational incentive to settle.
- Narcissistic collapse (Condition 9) replaces calculation with rage.
- Intensified DARVO (Condition 10) reframes Plaintiffs as aggressors to justify escalation.
- Mental model collapse (Condition 11) overwhelms the Altmans’ capacity for rational response.
- And systemic sabotage (Condition 12) describes the terminal behavior of a system that perceives total destruction as inevitable and shifts from fighting to win to ensuring no one else wins.

The critical insight is that these are not independent risks. They are sequential and compounding. Each triggered condition activates the next. The April 3 hearing is the ignition event for the entire cascade.

Implication for Plaintiffs’ Safety

Plaintiffs’ counselor has expressed deep concern for the McNeil-Poyer family’s safety after reviewing the high-stakes dynamics of this case alongside the documented pattern of systemic dehumanization. That concern is grounded in the following convergence:

- A system already operating under Stage 1 CAS with documented escalation after notice
- Captured counsel filtering information from the principals who could intervene
- Regulatory and law enforcement bodies that have failed to provide protection
- A threshold event (April 3) that creates conditions favoring converting managed risk to existential panic
- An exposed target family that includes a Plaintiff with clinical PTSD (PCL-5: 76/80) and a documented history of being told by victim services: “We don’t help people like you”
- Defendants with established capacity for dehumanization (“Trick residents so company can make more money”) and escalation (two law firms deployed for lawfare against pro se plaintiffs)

Plaintiffs ask the Court to observe that established behavioral models - Prospect Theory, narcissistic collapse literature, institutional DARVO research, and systems dynamics -

converge on the same prediction: that the April 3 hearing sets up conditions that historically trigger a measurable increase in volatility, and that transparency and judicial awareness are the primary mechanisms available to dampen that volatility before it produces irreversible harm.

Condition 10 represents the highest-risk state predicted by the model: the moment when both the Central Narcissistic Operator and the Enablers experience simultaneous collapse and discover their interests have diverged - but only after both are locked into existential exposure. In a system where the property manager (CNO) loses professional identity and PMIC license viability, the incentive to protect the property owners (EN) vanishes. In a system where the property owners discover they have been misled by both their property manager and their own counsel into liquidation level exposure, conditions favor the "betrayed betrayer" dynamic that produces rage that has no systemic outlet.

The convergence of these two collapses – for which the ideal conditions are predicted to occur in the days immediately following the April 3 hearing as information assimilation completes – would remove the last coordination mechanism holding the defense system together.

At that point, conditions favor each actor pursuing independent survival strategies, with Plaintiffs in a system where conditions favor them becoming exposed to fragmented, uncoordinated aggression from multiple directions simultaneously.

This analysis is filed on the public record because observation is itself a protective measure. A system that knows it is being watched behaves differently than one that operates in shadow.

EXHIBIT C

Defendant Infraction Matrix

COMPREHENSIVE ENFORCEMENT MATRIX

McNeil & Poyer v. SAC 181 et al. (2025-CP-10-05095) | March 20, 2026

Legend:

- **[CR]** = Criminal
- **[CI]** = Civil
- **[RE]** = Regulatory
- = Pending More Evidence
- **Footnote numbers** = See accountability notes below table

Violation / Infraction	SAC 181 LLC	Charles S. Altman	Jonathan S. Altman	Meridian / Sneer Entities	Tara Bayles (PMIC 83633)	Adam Bayles	Phelps Dunbar LLP	Kevin OBrien	Justine Tate	Resnick Louis PC	Alicia Bolyard	IPG / Gladys Lambert
Felony Forgery [CR] (SC 16-13-10: falsified USPS postmark, Sept 5, 2025, \$2,000+)	CCSO → Solicitor → SC AG USPS OIG → US Attorney	CCSO → Solicitor USPS OIG		Primary : CCSO → Solicitor → SC AG USPS OIG → US Attorney	Primary: CCSO → Solicitor → SC AG USPS OIG → US Attorney License: LLR emergency suspension	CCSO ₁						
False Pretenses [CR] (SC 16-13-240: \$2,295 security deposit fraud)	CCSO → Solicitor → SC AG	CCSO → Solicitor		CCSO → Solicitor → SC AG	Primary: CCSO → Solicitor → SC AG LLR (File 2025-566)	CCSO ₁						

Violation / Infraction	SAC 181 LLC	Charles S. Altman	Jonathan S. Altman	Meridian / Snee Entities	Tara Bayles (PMIC 83633)	Adam Bayles	Phelps Dunbar LLP	Kevin OBrien	Justine Tate	Resnick Louis PC	Alicia Bolyard	IPG / Gladys Lambert
Harassment, 2nd Degree [CR] (SC 16-3-1700: Sept 2024-Feb 2026 coordinated campaign, 79/80 gaslighting severity)	CCSO → Solicitor ²	CCSO → Solicitor ²	CCSO → Solicitor ² [PME]	Primary : CCSO → Solicitor SC AG (pattern)	Primary: CCSO → Solicitor LLR (professional conduct)	CCSO ¹	Oct-Jan: CCSO → Solicitor SC ODC ³	Oct-Jan: CCSO → Solicitor SC ODC ³	Oct-Jan: CCSO → Solicitor SC ODC ³	Oct-Jan: CCSO → Solicitor SC ODC ³	Primary Oct-Jan: CCSO → Solicitor SC ODC ³	Coordination: CCSO → Solicitor Insurance fraud investigation ⁴
Obstruction of Justice [CR] (LLR File 2025-566 interference, Feb 20 deadline)				Primary : CCSO → SC AG FBI (if federal nexus)	Primary: CCSO → SC AG FBI LLR emergency action		Discovery obstruction: CCSO → SC AG ⁵ SC ODC	Quash motion timing: CCSO → SC AG ⁵ SC ODC	CCSO ⁵ SC ODC	Primary: CCSO → SC AG ⁵ SC ODC	Coordinated obstruction: CCSO → SC AG ⁵ SC ODC	Strategy coordination: Investigation [PME]
Witness Tampering [CR] (18 USC 1512(b)(3): AppFolio contact Jan 9)				Primary : FBI → US Attorney CCSO → Solicitor	Primary: FBI → US Attorney CCSO → Solicitor LLR emergency suspension					Coordination: FBI → US Attorney SC ODC	Primary legal strategy: FBI → US Attorney SC ODC	[PME]
PMIC Trust Account Violations [RE] (SC 40-57-136: SAC 181 OP)	Civil veil-piercing	Civil liability		Civil + regulatory	Primary: LLR (File 2025-566) → emergency	Indirect via Meridian ¹						

Violation / Infraction	SAC 181 LLC	Charles S. Altman	Jonathan S. Altman	Meridian / Snee Entities	Tara Bayles (PMIC 83633)	Adam Bayles	Phelps Dunbar LLP	Kevin OBrien	Justine Tate	Resnick Louis PC	Alicia Bolyard	IPG / Gladys Lambert
<i>account commingling)</i>					suspension → revocation SC AG (criminal referral)							
PMIC Obstruction [RE] (SC 40-57-3403: obstructing LLR investigation)				LLR discipline	Primary: LLR → license revocation SC AG (criminal)	Indirect ¹	LLR complaint ⁶	LLR complaint ⁶	LLR complaint ⁶	LLR complaint ⁶	Primary: LLR complaint ⁶	[PME]
Security Deposit Violations [CI][CR] (SC 27-40-410: late return, treble damages)	Primary civil: Court treble damages SC AG (pattern)	Court		Court SC AG (systematic)	Primary: Court + LLR SC AG (pattern)	Court ¹						Court (bad faith defense) ⁴
Retaliatory Eviction [CI][CR] (SC 27-40-910: LLR complaint retaliation)	Primary: Court damages SC AG	Knowledge: Court SC AG	Beneficiary owner: Court [PME] SC AG [PME]	Primary: Court SC AG	Primary: Court + LLR SC AG	Court ¹						
Privacy Violations [CI][RE] (21-platform)	Court damages	Court		Primary: Court FTC (unfair)	Primary: Court + LLR FTC	Court ¹						

Violation / Infraction	SAC 181 LLC	Charles S. Altman	Jonathan S. Altman	Meridian / Snee Entities	Tara Bayles (PMIC 83633)	Adam Bayles	Phelps Dunbar LLP	Kevin OBrien	Justine Tate	Resnick Louis PC	Alicia Bolyard	IPG / Gladys Lambert
<i>image syndication, July-Sept 2025)</i>				practice s) HUD OIG [PME]	HUD OIG [PME]							
Unfair Trade Practices [CI] (SC 39-5-20: systematic tenant exploitation)	Primary: SC AG → investigation Court treble damages	SC AG Court	SC AG [PME] Court [PME]	Primary : SC AG → shutdown order FTC (if interstate) Court	Primary: SC AG + LLR Court	Court ¹						SC AG [PME] ⁴
Fraudulent Conveyance [CI][CR] (Flash Transfer \$5, probate undervaluation \$1.27M → \$251K)	Primary: Probate Court Court (constructive trust) SC AG (elder abuse) [PME]	Primary: Probate Court Court SC AG [PME]	Primary executor: Probate Court Court (lis pendens target) SC AG (elder abuse) [PME] IRS (estate tax) [PME]	Probate Court								
Corporate Veil Piercing [CI] (SAC 181 OP operational unity, Tara's	Primary target: Court → individual liability	Registered agent: Court → personal liability	Beneficial owner: Court → personal liability [PME]	Court (unified enterprise)	Operational control: Court → personal liability	Court ¹						

Violation / Infraction	SAC 181 LLC	Charles S. Altman	Jonathan S. Altman	Meridian / Snee Entities	Tara Bayles (PMIC 83633)	Adam Bayles	Phelps Dunbar LLP	Kevin OBrien	Justine Tate	Resnick Louis PC	Alicia Bolyard	IPG / Gladys Lambert
<i>singular control)</i>	judgment											
Tax Fraud [CR] (<i>Estate tax evasion via undervaluation, devaluation of Charles Realty stock 95% 2006-2020</i>)		Primary: IRS Criminal Investigation SC DOR	Primary executor: IRS Criminal Investigation SC DOR Public official angle: FBI Public Corruption [PME]									
Attorney Misconduct - Rule 4.3 [RE] (<i>Advising adverse prose, Oct 16 email</i>)										Primary: SC ODC → sanctions → suspension	Primary: SC ODC → sanctions → suspension	
Attorney Misconduct - Rule 11/37 [CI][RE] (<i>Frivolous Al motion, discovery obstruction</i>)							Primary firm: Court sanctions SC ODC	Primary author: Court sanctions + fees SC ODC	Court sanctions SC ODC	Coordinated: Court sanctions SC ODC	Coordinated: Court sanctions SC ODC	
Attorney Conflict of Interest [RE]										Beneficiary: Court (if	Primary: SC ODC → disqualific	

Violation / Infraction	SAC 181 LLC	Charles S. Altman	Jonathan S. Altman	Meridian / Snee Entities	Tara Bayles (PMIC 83633)	Adam Bayles	Phelps Dunbar LLP	Kevin OBrien	Justine Tate	Resnick Louis PC	Alicia Bolyard	IPG / Gladys Lambert
Flash Transfer/retaliatory eviction)			Removal from commission [PME]									

FOOTNOTES - ACCOUNTABILITY NUANCES

¹ **Adam Bayles:** Liability primarily derivative through:

- Marriage to Tara (community property, joint financial benefit)
- MRG Investing Company, LLC membership (if applicable)
- Knowledge of/participation in Meridian operations (discovery pending)
- Potential signatory authority on accounts (Synovus subpoena pending)

² **SAC 181/Charles/Jonathan Harassment:**

- **Sept 2024-Aug 2025:** Indirect (knew or should have known of Tara's campaign)
- **Aug 2025-present:** Direct (retaliatory eviction execution, funding defense strategy that employs gaslighting)
- Jonathan: Beneficial owner role + public official hypocrisy compounds moral culpability

³ **Defense Counsel Harassment (Oct 2025-Jan 2026):**

- **Pattern:** Litigating as if documented events (falsified postmark, 21-platform images, LLR obstruction) never occurred
- **Method:** Characterizing 8-count fraud case as "deposit dispute" across multiple filings
- **Escalation:** AI motion (Nov 12), emergency judge-shopping (Jan 27), mischaracterizing criminal notice as "threats" (Jan 27)
- **Harm:** Direct cause of PCL-5 76/80 (severe PTSD), gaslighting 79/80, Jan 28 breakdown
- **Criminal basis:** SC 16-3-1700 requires "course of conduct" causing "substantial emotional distress"—documented via clinical assessments
- **ODC basis:** RPC 8.4(d) (conduct prejudicial to administration of justice)

⁴ **IPG/Lambert Role:**

- **Coordination evidence:** Discovery responses, settlement posture, defense strategy alignment
- **Bad faith theory:** Knew or should have known case scope exceeded "deposit dispute" framing
- **Pending evidence:** IPG claim file (discovery), Lambert communications with defense counsel

⁵ **Attorney Obstruction of Justice:**

- **Quash motions:** Filed Jan 8 (Bolyard), Jan 12 (OBrien)—within 42 days of LLR Feb 20 deadline
- **AppFolio witness contact:** Jan 9 (Meridian, coordinated with Bolyard's Jan 8 motion)
- **Criminal basis:** SC common law obstruction (hindering investigation) + 18 USC 1512 (federal)
- **Pattern:** 32-day silence on Flash Transfer allegations while blocking corroborating evidence (Synovus)

⁷ **Attorney Fitness to Practice:**

- **Gaslighting as professional misconduct:** Systematic denial of record evidence causing documented psychological harm
 - **DARVO pattern:** Deny (evidence doesn't exist) → Attack → Reverse Victim & Offender (criminal notice becomes "threats")
 - **SC ODC standard:** "Conduct involving dishonesty, fraud, deceit or misrepresentation" (RPC 8.4(c))
 - **Medical evidence:** PCL-5 76/80, gaslighting severity 79/80, emergency health motions Jan 28-30
-