

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
)
) PLAINTIFFS’ CASE CLARITY
) BRIEF AND OMNIBUS
) REQUEST FOR RELIEF
) FOLLOWING FEBRUARY 9, 2026
) STATUS CONFERENCE

2026 FEB 24 PM 2:17
JULIE J. ARMSTRONG
CLERK OF COURT

FILED

PRELIMINARY STATEMENT: THE ROLE OF THIS FILING AND THE PLAINTIFF WHO FILES IT

This brief builds directly on the February 9, 2026 hearing brief and is offered in the same spirit as a contribution to judicial efficiency from a systems analyst who entered the housing justice system after seeing the need for systemic change. Studying it this way acknowledges that a system’s effectiveness is equivalent to its resilience and resilience can be determined by how well it treats its most vulnerable member.

Given that, like in the show *Undercover CEO*, McNeil examined the system response from the role of its *Most Vulnerable Member*, a self-represented tenant who could not afford an attorney. He also utilized the “*Study from the Outside In from End Customer Point of View*” method from the Vanguard Method in the UK, which was used in the Systems Thinking in Housing Study and achieved profound results.

Deliberately, methodologically, and with documented professional expertise, he studied and reported on a failure pattern that has injured Plaintiffs and will continue injuring others until it is made visible and accountable.

That positioning matters procedurally. Plaintiff James C. Chris McNeil is a systems thinking consultant, creator of the Strategic Thought Leadership framework, and strategic communications professional with prior expert witness experience in complex technology litigation. He did not intend to remain pro se through 167 days of multi-firm opposition. He crossed the case-complexity threshold for handing off to counsel months ago. The conduct documented in this record, including coordinated misrepresentation, obstruction of a regulatory

investigation, and clinical-level psychological harm documented at PCL-5 severity 76–80, is precisely why institutional betrayal (*Smith & Freyd, Dangerous Safe Havens, 69 Am. Psychologist 119 (2014)*) makes that handoff extraordinarily difficult: it raises the standard of due diligence before responsibly entrusting this case to any firm. That process is underway. This may be the last major pro se filing.

The Court may use this brief to orient quickly, act efficiently, and clear a docket that has been deliberately burdened by the defense's attrition strategy. Every pending defense motion is noise. The signal is seven of eight documented violations that have received zero substantive response in 167 days.

SECTION I: THE RECORD AT A GLANCE

What Has Been Filed, How Long It Has Sat Unanswered, and What Defense Has Shown/Stated.

The table below is the filing in summary form. The last two column speaks most clearly.

Coun t	Cause of Action	Statutes / Authority	Strongest Judicial Action	Unrefuted Evidence on Record	Effect on Docket
I	Security Deposit Violation	S.C. Code § 27-40- 410 (mandator y treble damages)	Full Summary Judgment: Liability + treble damages as matter of law	Second Amended Complaint, 10/24/25, Ex. F-1 (MeridianScanner20250905161321.p df - filename proves Sept. 5 creation); Second Amended Complaint, 10/24/25, Ex. F-2 (actual USPS envelope, Columbia SC postmark Sept. 8–10); Tara Bayles Sept. 5, 2025 email to Plaintiffs ("checks were mailed on August 28, 2025"); Tara Bayles RFA Responses (now admits "EMAILED 8/28/2025" was internal office notation, not USPS postmark)	Enters judgment: \$7,785 treble + fees. Eliminates "deposit dispute" defense framing. MTD becomes moot.
II	Fraudulent Misrepresentatio n (Falsified Postal Evidence)	S.C. common law fraud; S.C. Code § 16-13-10 (forgery); 18 U.S.C. § 1343 (wire fraud)	Partial Summary Judgment on Liability: Damages to jury	Tara Bayles Sept. 5, 2025 email transmitting envelope image as "postage-marked" proof of Aug. 28 mailing; Second Amended Complaint, 10/24/25, Ex. F-1 (filename metadata: Sept. 5, 4:13 PM); Tara Bayles RFA Responses (retreat to "internal office stamp" directly contradicting Sept. 5 representation); Zero defense affidavit or alternative explanation in 167 days	Establishes fraud liability. Jury determines compensator y + punitive. Defense sanctions motions (11/10/25 AI motion;

Count	Cause of Action	Statutes / Authority	Strongest Judicial Action	Unrefuted Evidence on Record	Effect on Docket
					11/19/25 sanctions) collapse - Plaintiffs' claims judicially validated.
III	Breach of Contract	S.C. Code § 27-40-10 <i>et seq.</i> ; lease agreement	Full Summary Judgment - No genuine issue of material fact	Second Amended Complaint, 10/24/25, ¶¶ 65–68 (valid lease, performance, breach); Second Amended Complaint, 10/24/25, Ex. F-1, F-2 (deposit withheld beyond 30-day statutory window); Move-Out Statement charges include falsehoods (oven cleaning, itemized Plaintiff move-out cleaning invoice included) and pre-existing conditions (water-damage drywall) without evidentiary support	Enters judgment on liability. Consequential damages calculable. May be fully resolved without jury.
IV	Retaliatory Conduct	S.C. Code § 27-40-910 (retaliatory eviction); § 27-40-440	Partial Summary Judgment on Liability Damages to jury	Second Amended Complaint, 10/24/25, Ex. B (May 23, 2025 safety proposal); Second Amended Complaint, 10/24/25, Ex. A (May 29, 2025 NTV- 6 days later); Second Amended Complaint, 10/24/25, Ex. K (July 17 email: "why don't you want us here anymore?"); Second Amended Complaint, 10/24/25, Ex. C-1 (July 19 rent spiked 128%, listing pulled July 26); Dana DeVoe-Riddick June 4, 2025 email: "owner has decided to do some renovations" - zero renovation evidence produced in discovery	Establishes retaliation as matter of law. Damages phase: relocation, STL platform destruction, emotional distress, punitive - largest damages claims in the original harms of the case.
V	Negligence / Habitability Breach	S.C. Code § 27-40-440; implied warranty of habitability	Partial Summary Judgment on Liability Damages consolidated with Count IV	Second Amended Complaint, 10/24/25, Ex. B (safety requests: broken blinds, damaged screens, asbestos testing); Second Amended Complaint, 10/24/25, Ex. N (retaliatory email pattern); Aug. 3, 2022 Roadstead (Meridian predecessor) email: "The owner did not approve replacing the blinds"	Establishes habitability breach. Damages overlap with Count IV - efficient to consolidate.

Court	Cause of Action	Statutes / Authority	Strongest Judicial Action	Unrefuted Evidence on Record	Effect on Docket
				(standalone exhibit); Broken attic stair throughout tenancy, painted-shut and/or screenless windows documented throughout five-year tenancy -zero defense response	
VI	Alter Ego / Piercing Corporate Veil	<i>Sturkie v. Sify</i> ; <i>Pertuis v. Front Roe Restaurants</i> (S.C. 2019)	Partial Summary Judgment or Deemed Admissions via Rule 36	Second Amended Complaint, 10/24/25, Ex. G-1 through G-5 (shared address 8310 Rivers Ave, Suite B; SoS discrepancies since 2021; MRG mortgage); Meridian Answer and Crossclaims, 10/9/25, ¶¶ 114–115 (admits "several properties" managed for SAC 181); Second Amended Complaint, 10/24/25, Ex. L (Orangeburg \$5.00 insider conveyance, 2021); Plaintiffs' Opposition to Quash, 1/14/26, § VII (SAC 181 OP account: Tara signature, Meridian address, "OP" not trust/escrow designation — four § 40-57-136 violations); Plaintiffs' Memorandum on Probate Records, 12/3/25; Supplemental Memorandum re Flash Transfer, 12/11/25 (\$5.00 capitalization, 95% Charles Realty stock devaluation) - 82 days, zero response from any defense firm	Exposes individual Bayles + MRG + Altman family portfolio (including Charles Realty Company Inc.) assets to judgment. Eliminates corporate shields.
MfL	Motion for Leave - Second Amended Complaint	SCRCP Rule 15(a) - leave freely given	Grant Leave Immediately + Order 7-Day Answer Deadline	Motion for Leave to File 2AC, 10/24/25 (122 days pending, no substantive opposition filed); adds 21-platform image exploitation counts with specific platform evidence; adds Charles S. Altman individually for negligent retention/supervision, veil-piercing, probate fraud/judicial estoppel	Adds Charles S. Altman individually. Opens 62–72 LLC portfolio discovery, probate records, Jonathan Altman beneficial ownership. Short answer window prevents further attrition delay.

What This Table Shows: On seven of eight substantive matters, the defense has produced zero substantive engagement in 82 to 167 days. The one partial acknowledgement. Tara Bayles' RFA admission that the stamp was an internal office notation, not a USPS postmark does not function as a defense. It establishes the falsity element of Count II as a matter of record.

Every obstruction motion on the docket (Motions to Quash, Jan. 8 & 12; SAC 181 Protective Order re Deposition, Jan. 26; Motion to Stay, Jan. 27–28) is an effort to prevent the *evidence* from being examined, not a substantive challenge to the *claims*. Under the established adverse inference principle, a party who obstructs the production of evidence it characterizes as irrelevant demonstrates consciousness of its materiality.

The February 9, 2026 scheduling conference signaled that this Court will not accept defense characterizations at face value. Plaintiffs submit this streamlined guide to assist the Court in making decisive orders that resolve what can be resolved now, protecting judicial resources while preserving Plaintiffs' safety and case integrity.

Since February 9:

- SAC 181 failed to appear for its own February 2 deposition
- LLR investigator Kasey Williams refused February 9 appearance; findings sealed despite February 20 statutory deadline
- Defense obstruction continues unabated despite Court's positioning
- Plaintiff McNeil remains at low functional capacity (PCL-5: 76 out of 80; gaslighting severity: 79 out of 80)

What Plaintiffs seek: Safety-driven case management that stops the Ask for Justice-Harm Loop documented below.

II. THE COMPOUNDING HARM ARCHITECTURE WHY DECISIVE ACTION IS REQUIRED NOW

This case demonstrates a **Ask for Justice <-> Harm Loop**: each request for accountability triggers escalating institutional harm. The table below documents how a retaliatory eviction, postal fraud, and mass private image publication dispute became 8-9 figure exposure through **systemic brittleness when the Most Vulnerable Member asserts rights**.

Compounding Layers Summary Table

Layer	Harm Type	Primary Actors	Legal Nexus	Why It Compounds
1	Security deposit theft + falsified USPS postmark	Tara Bayles / Meridian / SAC 181	SC § 27-40-410 (treble); SC 16-13-10 (felony forgery); 18 USC 1343 (wire fraud)	Foundation fraud. Defense posture appears configured largely to conceal these first three events
2	Retaliatory eviction (heat-wave displacement)	SAC 181 / Meridian	SC 27-40-910; NTV 6 days after safety proposal	Destroyed home environment configured for Rocket's blindness; launched litigation triggering all subsequent layers
3	Privacy violations (21+ platforms)	Meridian / Bayles	SC invasion of privacy; SC § 39-5-20 (unfair trade)	False endorsement of Chris's STL brand by abuser's platform; dignitary harm + commercial exploitation; retaliatory motive suggested by response to rights assertions and safety requests + no other Meridian property ads depicted tenants or their belongings.
4	STL platform destruction	SAC 181 / Meridian (via eviction)	SC § 27-40-910 consequential damages	Growth vector obliterated; reborn platform (Rockets Fight, Housing Justice Audit) now demonstrates value through direct experience of merit
5	Lawfare including gaslighting	Phelps Dunbar / Resnick Louis / IPG	SCRCP Rule 11; SC § 16-3-1700 (harassment); SC ODC RPC 8.4	Exhaustion tactic: each frivolous motion forces response while withholding discovery needed to respond; Emotional warfare via gaslighting and disrespect.
6	DARVO pattern (institutional betrayal)	Phelps Dunbar and Resnick & Louis, coordinated	SC § 16-3-1700 (emotional distress); Freyd institutional betrayal doctrine	Direct cause of PCL-5 76 out of 80 PTSD crisis; reduces Plaintiff capacity to ~20%; self-reinforcing

Layer	Harm Type	Primary Actors	Legal Nexus	Why It Compounds
7	Public figure hypocrisy / probate fraud	Jonathan S. Altman (beneficial owner, executor)	Judicial estoppel; SC estate/tax fraud; unclean hands	Policy-Profit Feedback Loop: affordable housing commissioner benefits from income from house managed with destabilizing practices he's sworn to prevent
8	LLR investigation obstruction	Meridian / Bayles / defense counsel	SC § 40-57-3403; 18 USC 1512(b)(3) (witness tampering)	Regulatory protection neutralized - if Big Law can quash PMIC investigations, licensing oversight becomes decorative
9	CCSO victim advocate obstruction	CCSO (status - stifling)	CCSO Policy 14-02; institutional betrayal doctrine	Victim advocacy system that should buffer power asymmetry instead compounds it
10	Discovery stonewalling	SAC 181 / Phelps Dunbar	SCRCP Rules 30, 37	Each stonewalling act forces another motion cycle, multiplying PTSD triggers while defense exploits attrition asymmetry
11	Rocket's injury (demonstrative evidence)	SAC 181 / Meridian	Emotional distress evidence	Elderly blind dog stuck under couch 2 hours whimpering - jury-facing evidence of human cost of displacement
12	Insurance bad faith (misrepresentation)	IPG / Gladys Lambert	SC bad faith insurance law; excess judgment exposure	IPG's "deposit dispute" framing enabled defense exhaustion strategy while apparently misrepresenting scope to client/regulator

Cascade Effect: Why This Sequence Clears the Docket

Count I (Full Summary Judgment). Enters \$7,785 judgment. The "deposit dispute" framing defense has maintained for 167 days is judicially recognized as false. Motion to Dismiss becomes moot.

Count II (Partial Summary Judgment on Liability). Falsified postal evidence judicially recognized. Defense sanctions motions (SAC 181 Partial MTD, 10/29/25; AI Motion, 11/10/25; Sanctions Motion, 11/19/25) become baseless. Criminal referral basis enters the record.

Count III (Full Summary Judgment). Breach of contract liability entered. Straightforward; may resolve fully without jury.

Count IV (Partial Summary Judgment on Liability). Retaliatory eviction established as matter of law. Narrows remaining litigation to damages only.

Count V (Partial Summary Judgment on Liability). Habitability breach established. Consolidates with Count IV damages phase.

Count VI (Partial Summary Judgment or Deemed Admissions). Corporate veil pierced. Individual assets of Bayles, MRG, and Altman exposed to collection.

Motion for Leave Granted (7-day answer deadline). Charles S. Altman added individually. Opens discovery into 62 to 72 LLC portfolio, probate records, and Jonathan Altman beneficial ownership. Third Amended Complaint pathway (law firms, IPG, agents as defendants) becomes viable.

Legal Authority for Docket-Clearing Disposition

SCRCP Rule 56. Summary judgment appropriate where no genuine issue of material fact exists and movant is entitled to judgment as a matter of law. 167 days of zero substantive defense on core documentary evidence satisfies this standard.

SCRCP Rule 36(a). Evasive or insufficient RFA responses may be deemed admitted upon motion. Plaintiffs' RFA Sufficiency Motion of Dec. 23, 2025 has been pending 62 days without response.

SCRCP Rule 37. Failure to comply with discovery obligations (47+ days zero substantive responses; SAC 181 deposition no-show on Feb. 2, 2025) supports sanctions up to and including adverse inference instructions, striking of pleadings, or default judgment.

SCRCP Rule 15(a). Leave to amend "shall be freely given when justice so requires." 122-day pendency with no opposition is itself grounds for granting.

Chambers v. NASCO, Inc., 501 U.S. 32 (1991). Inherent judicial authority to manage litigation, sanction bad-faith conduct, and protect the integrity of proceedings.

III. PENDING MOTIONS & EVIDENCE NEVER ADDRESSED - DEEMED ADMISSION PATHWAY

Defense has **never substantively addressed the core documented events** spanning 5 months:

Core Documented Events Defense Treats As Non-Existent:

- Falsified USPS postmark (datetime encoded in filename = metadata: MeridianScanner20250905161321.pdf - created Sept. 5, presented as Aug. 28)
- 25-platform (at minimum) privacy syndication (June 29–Sept. 23, 2025; Meridian watermarks on all still images)
- Retaliatory eviction timeline (May 23 safety proposal → May 29 NTV → July 17 "why don't you want us here?" → July 19 rent spike 128% → July 26 listing pulled)
- LLR obstruction (quash motions 42 days before Feb. 20 deadline; AppFolio witness tampering Jan. 9; sealed findings)
- Jonathan Altman probate fraud (SAC 181 valued \$83K in 2021 probate; actual value \$620K–\$1.27M; Charles Realty stock 95% devaluation 2006–2020)

Motions Pending Without Substantive Defense Response (47+ days):

1. Plaintiffs' Cross - Motion to Disqualify Resnick Louis (Jan. 14, 2026) - unconsentable conflict SC RPC 1.7(b)(3)
2. Motion for Leave to File Second Amended Complaint (Oct. 24, 2025) - adding image counts + Charles S. Altman individually
3. Motion to Compel Discovery (Nov. 10, 2025) - 47+ days zero substantive responses
4. Motion re: RFA Sufficiency (Dec. 23, 2025) - evasive boilerplate objections to basic facts

Why Timing Is Right for Deemed Admissions / Partial Summary Judgment:

Resolving **Counts II (Fraud), III (Breach of Contract), IV (Retaliatory Conduct)** by partial summary judgment based on unrefuted documentary evidence **collapses the entire defense attrition strategy in one stroke:**

- MTD becomes moot (core liability established)
 - Sanctions motions become baseless (Plaintiffs' claims validated by deemed admissions)
 - Discovery narrows to damages only
 - Introduces 3AC pathway (law firms, IPG, agents as defendants for lawfare conduct)
 - Supports criminal referral request (obstruction, witness tampering now judicially recognized)
-

IV. RECOMMENDED RELIEF

Plaintiffs request the following relief, organized to maximize judicial economy while protecting Plaintiff safety.

A. Immediate Orders (Within 7 Days)

1. ADA Accommodations (Title II, 42 U.S.C. § 12132), Effective Immediately.

- Primary: E-filing access for disabled Plaintiff McNeil, with joint use by co-Plaintiff Poyer.
- Secondary (if e-filing is delayed): Interim order treating signed PDFs emailed to the Clerk as filed upon receipt, timestamped on transmission.
- Remote appearance: All non-evidentiary hearings via WebEx, Zoom or equivalent without requiring opposing counsel consent.

2. Interim Health-Based Protective Window (Rule 26(c), SCRPC), 7 Days.

- Restrict non-essential adversarial communications to allow Plaintiff McNeil to complete mental health evaluation. The Feb. 4, 2026 provider cancelled due to billing incompatibilities; rescheduling is underway through State Health Plan behavioral health channels.

B. Expedited Case Management (Within 14 Days)

3. Expedited Hearing on Plaintiffs' Cross-Motion to Disqualify Resnick & Louis (filed Jan. 14, 2026).

- Grounds: Unconsentable conflict under SCRPC 1.7(b)(3). Bolyard simultaneously represents Meridian (whose indemnity crossclaim against SAC 181 requires evidence of commingled operations) and Tara Bayles (whose personal liability defense requires suppression of that same evidence).
- Witness tampering: On or before Jan. 9, 2026, which was one day after filing the Motion to Quash, Meridian directly contacted AppFolio instructing non-compliance with Plaintiffs' subpoena.
- LLR obstruction: Coordinated quash motions plus unilateral delay of Tara Bayles' deposition to Feb. 24 (four days past the Feb. 20 LLR statutory deadline).
- This is a safety measure. Removing conflicted counsel who have facilitated witness tampering and participated with Phelps Dunbar in coordinated gaslighting is a direct way to protect Plaintiff McNeil's health.

4. Show-Cause Order re Phelps Dunbar Conduct.

- Waived Motion to Quash: Filed one day after the SCRCP 45(d)(2)(B) deadline; waived under SCRCP Rule 45(d)(2)(B) (14-day deadline for motion to quash +5 per SCSC mail/email extension)
- Misrepresentation to Court: Jan. 27 and 28, 2026 emails to court scheduler(s) and Judge Van Slambrook's staff characterizing a factual criminal-investigation notice as "threats against lawyers and their families." The email contained no threats. Defense counsel had declined to attach it, and likely believed it was Rule 408 protected so Plaintiffs could not attach it either. Although it was written in a similar format to prior Rule 408 protected communications, it contained no settlement numbers and was not, so Plaintiff McNeil immediately attached it in a reply to the thread.
- Frivolous AI sanctions motion: Filed Nov. 10, 2025, based on speculation without evidence.
- Coordinated obstruction: Serving Tara Bayles' interests rather than own client Charles Altman's interests (the "captured counsel" problem documented in the Jan. 14, 2026 filing).
- December 19 continuance: Obtained through misrepresentation of Plaintiff's position by SAC 181, LLC Counsel Justine Tate of Phelps Dunbar and reiterated, as was the by Meridian, Adam Bayles, and Tara Bayles Counsel Alicia Bolyard, who had also reiterated the claim of "threads against lawyers and their families" by SAC 181, LLC Counsel Kevin O'Brien of Phelps Dunbar.

5. Court-Ordered Case Manager or Communication Monitor (if disqualification hearings cannot be set within 14 days).

- Route all counsel-to-Plaintiff communications through a supervised channel (filed on docket or routed through the case manager) so characterizations can be verified against the actual record in real time.
- Prohibit ex parte characterizations of Plaintiff conduct to court staff without attaching the full text of the referenced communication.
- This is the minimum structural intervention required to prevent continued psychological harm pending disqualification hearings.

C. Substantive Disposition (Within 30 Days)

The following items correspond directly to the Counts and Judicial Disposition table in Section I and are designed to clear the docket in the sequence described in the Cascade Effect analysis.

6. Full Summary Judgment on Count I (Security Deposit Violation, S.C. Code § 27-40-410).

- Deposit of \$2,595 withheld beyond the 30-day statutory period. Checks postmarked Sept. 8 to 10, not Aug. 28 as represented. Tara Bayles' own RFA responses now contradict the Aug. 28 mailing claim. Treble damages are mandatory upon finding of willful noncompliance.

- Requested judgment: \$7,785 in treble damages plus reasonable attorneys' fees (or pro se equivalent and Plaintiff McNeil bill \$375/hour as consultant), costs, and interest.

7. Partial Summary Judgment on Count II (Fraudulent Misrepresentation), Liability Only.

- Falsified postal evidence transmitted via interstate email on Sept. 5, 2025. Document metadata proves Sept. 5 creation. Tara Bayles' RFA responses retreat to "internal office stamp," directly contradicting the Sept. 5 email representation. No defense affidavit or alternative explanation has been offered in 167 days.
- Damages (compensatory and punitive) to be determined by jury.

8. Full Summary Judgment on Count III (Breach of Contract).

- Valid lease admitted. Plaintiffs performed all obligations. Defendants failed to return deposit within 30 days and provided false itemization (charges for pre-existing conditions without evidentiary support). No genuine issue of material fact.

9. Partial Summary Judgment on Count IV (Retaliatory Conduct, S.C. Code § 27-40-910), Liability Only.

- Documentary timeline is unrefuted by any defense filing: April 2-3 and May 8, 2025 Plaintiff rights assertions in response to legal misrepresentations; May 23 safety proposal; May 29 NTV (six days); July 17 motive inquiry ("why don't you want us here anymore?"); July 19 rent spiked 128% (\$3,050 to \$5,276); July 26 listing pulled. "Owner has decided to do some renovations" contradicted by zero renovation evidence in discovery and the pre-renovation Matterport tour of the occupied home.
- Damages to jury: relocation costs, increased housing costs, STL platform destruction, emotional distress, punitive damages.

10. Partial Summary Judgment on Count V (Negligence / Habitability Breach), Liability Only.

- Broken attic stairs, most windows painted shut, all with no screens installed throughout five-year tenancy. Aug. 3, 2022 email confirms owner refused blinds replacement. Safety conditions documented in the May 23 proposal that triggered the retaliatory NTV. Zero defense response.
- Damages to consolidate with Count IV damages phase.

11. Partial Summary Judgment or Deemed Admissions on Count VI (Corporate Veil Piercing / Alter Ego).

- Same address (8310 Rivers Ave, Suite B) for Meridian and MRG. Adam Bayles controls both. SAC 181 OP account bears Meridian address with Tara's signature (commingling). False registered office since 2021. \$5.00 Orangeburg insider conveyance (2021). Flash Transfer \$5.00 capitalization (Feb. 21, 2007). Meridian Crossclaims of 10/9/25, ¶¶ 114 to 115 admit "several properties" managed for SAC 181. (Altman family Charles Realty

Company owns 2 other properties on Gordon Street -171 and 177); Plaintiffs' Memorandum on Probate Records (12/3/25) and Supplemental Memorandum re Flash Transfer (12/11/25) have received zero response from any defense firm in 82 days.

- Alternatively, deem Plaintiffs' RFAs on unity-of-interest elements admitted under Rule 36, as the RFA Sufficiency Motion of 12/23/25 has been pending 62 days without response.

12. Order Granting Motion for Leave to File Second Amended Complaint (filed Oct. 24, 2025, pending 122 days, no opposition).

- Adds 21-platform image exploitation counts with specific platform evidence.
- Adds Charles S. Altman individually for negligent retention and supervision of Meridian and veil-piercing (inadequate capitalization and operational commingling).
- Short answer deadline of seven (7) days. This case is now eight months old. Defendants have had ample notice of all underlying facts through the Oct. 24, 2025 filing.

13. Order to Compel Discovery and Sanctions for Stonewalling.

- SAC 181 failed to appear for its own deposition on Feb. 2, 2026.
- Zero substantive discovery responses since Oct. 3, 2025 (143 days).
- Evasive RFA responses requiring Rule 36 sufficiency determination (Motion of 12/23/25, pending 62 days).
- Sanctions warranted under SCRCP Rule 37, including adverse inference instructions at trial.

14. Mandatory Mediation at Defendants' Expense (Within 30 Days).

- Mediator with experience in landlord-tenant disputes and power-imbalanced litigation.
- Defense has demonstrated no willingness to engage on the merits. Court-ordered process may create conditions for resolution that voluntary negotiation has not.

D. Criminal Referral (Affirmative Request)

15. Court Referral to the Charleston County Solicitor's Office and the United States Attorney for the District of South Carolina.

- Plaintiffs independently initiated CCSO Case No. 2026-001263 on Jan. 26, 2026. Multiple agents of CCSO have declined to share case status with Plaintiffs despite their status as complainants and documented victims.

The documented conduct on the civil record before this Court independently supports referral:

- S.C. Code § 16-13-10 (felony forgery): fabricated "EMAILED 8/28/2025" stamp transmitted as postal evidence.
- S.C. Code § 16-13-240 (false pretenses): deposit represented as timely mailed when mailing occurred 38 days late.

- 18 U.S.C. § 1343 (wire fraud): falsified postal image transmitted via interstate email on Sept. 5, 2025.
- 18 U.S.C. § 1512(b)(3) (witness tampering): Meridian's Jan. 9, 2026 contact with AppFolio instructing non-compliance with lawful subpoena.
- S.C. Code § 40-57-3403 (PMIC obstruction): coordinated quash motions and witness tampering to obstruct LLR Investigation No. 2025-566 into Tara Bayles.
- S.C. Code § 16-3-1700 (second-degree harassment): pattern of gaslighting communications documented in Consolidated Attorney Toxic Emails exhibit of Nov. 23, 2025 and confirmed by complete absence of any defense acknowledgement whatsoever of nearly all primary harms of Plaintiffs.
- The Court's referral serves judicial economy and integrity of the court: criminal accountability for the underlying fraud set a clear precedent and reduces the likelihood that the same conduct pattern replicates against future tenants and in future proceedings before this Court.

E. Future-Filing Leave (Conditional)

16. Leave to File Third Amended Complaint Adding Law Firms, IPG, and Agents as Defendants.

- Conditional: if defense lawfare continues after this Court's omnibus ruling.
- Grounds: S.C. Code § 16-3-1700 (harassment via coordinated gaslighting); SCRPC Rule 11 (frivolous filings); SC ODC violations; IPG bad faith (misrepresenting case scope as "deposit dispute" to avoid early settlement and increase excess judgment exposure).
- Clinical harm documentation: PCL-5 score of 76 out of 80; gaslighting severity 79 out of 80; emergency health motions (Jan. 28 to 30, 2026); functional capacity reduced to approximately 20%.

V. INSTITUTIONAL COURAGE: WHAT THE COURT'S RESPONSE SIGNALS

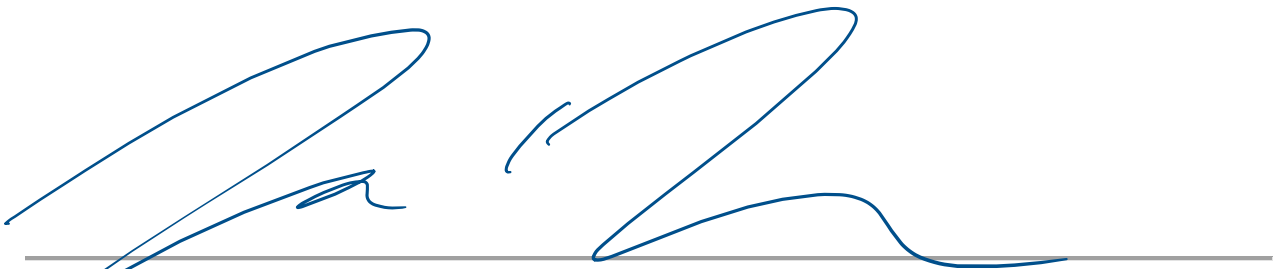
Dr. Jennifer Freyd's research identifies **Institutional Courage** as the evidence-based antidote to institutional betrayal:

1. **Transparency:** Naming defense conduct accurately (mischaracterization of criminal-investigation notice as "threats" is misrepresentation to Court, not legitimate advocacy)
2. **Accountability:** Setting disqualification hearings that mark this conduct as high-end outlier, not professional norm (thereby protecting reputation of bar itself)
3. **Whistleblower Protection:** Shielding the party who documented systemic flaws (falsified evidence, regulatory obstruction, coordinated psychological harm) from retaliation through procedural warfare

The Court's decisive action now:

- Stops the Ask for Justice <--> Harm Loop before Plaintiff McNeil's health deteriorates further
 - Preserves judicial resources by collapsing attrition strategy via deemed admissions / PSJ
 - Protects public trust in government oversight of housing in a documented crisis
 - Signals that documentation of wrongdoing will not be reframed as the wrongdoing itself
-

Respectfully submitted this 24th day of February, 2026.



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