

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

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SC Court of Appeals

Appeal from Florence County
Court of Common Pleas

The Honorable Clifton B. Newman, Circuit
Court Judge for Common Pleas

Appellate Case No.: 2023-001842

Dorthea Ryles Appellant,

v.

Leon Ryles, Willie N. Ryles, and Theresa Williams, Respondents Respondents.
IN RE: The Estate of Edith W. Ryles, Estate File: 2018-Es-21-00899

**RECORD ON APPEAL
VOLUME II**

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1 what she was signing when she signed the will on
2 December 15, 2017?

3 A No.

4 Q Would Edith have the ability, the
5 mental capacity to call Hawkins Tax Service and
6 schedule an appointment?

7 A No.

8 Q Did Edith have sufficient mental
9 capacity to know her estate, the object of her
10 affection and to whom she wished to give her
11 property?

12 A No.

13 Mr. Johnson: Thank you. That's all I
14 have. Answer --

15 The Witness: Okay.

16 Mr. Johnson: -- any questions
17 Mister -- Mr. Blake may ask you.

18 C R O S S - E X A M I N A T I O N

19 By Mr. Blake:

20 Q In 2017, about how many times per
21 month would you see Ms. Edith?

22 A In 2017?

23 Q Yes.

24 A How many times a month?

25 Q Yes, if you had to estimate.

1 A Maybe three times a month.

2 Q And during these, I guess, maybe three
3 visit -- visits per month on average, what -- what
4 did -- what -- describe what y'all would do
5 generally.

6 A Just talk. I have spent the night
7 because she couldn't stay alone.

8 Q So when you -- when you would visit
9 and not spend the night, about how long would you
10 stay?

11 A Sometimes all depends. An hour --

12 Q About an hour.

13 A -- to the most.

14 Q Okay.

15 A Uh-huh.

16 Q So most visits an hour --

17 A Uh-huh.

18 Q -- or two, three times per month?

19 A Yeah, basically.

20 Q Now, you have any type of training in
21 terms of -- in the medical field?

22 A Training. I worked at my -- I worked
23 at McLeod Hospital.

24 Q Okay. And what was your job at
25 McLeod?

1 A Environment service.

2 Q Okay. And what's -- what does
3 environmental service involve?

4 A Cleaning. Basically, interacting with
5 patients and -- and I worked at the department of
6 disability and special needs. I worked with
7 clients with disabilities.

8 Q Okay.

9 A Mentally -- mentally, physically,
10 emotionally.

11 Q Okay. And do you know when this --
12 this will was prepared?

13 A I don't know when.

14 Q Okay.

15 A Huh-uh.

16 Q All right. So let's the -- the week
17 that this will was prepared, did you have
18 opportunity to -- to see Ms. Edith Ryles?

19 A The week?

20 Q Yes.

21 A Not that I know. Huh-uh.

22 Q So the day that this will was
23 prepared, do you know if she was lucid that day?

24 A Was she what?

25 Q Lucid? Do you know what lucid means?

1 A Yes. I -- no. She probably was. She
2 wasn't -- she was demented--- dementia.

3 Q Okay. I'm -- I'm going to stop you
4 because you're not a -- you can't diagnose her.

5 A Yeah. Right. Well, that's true. But
6 I don't -- my parents was.

7 Court Reporter: Could you remove your
8 mask, please?

9 The Witness: Oh, remove it?

10 Court Reporter: Yes. It's muffling
11 what you're saying.

12 The Witness: Okay. Thank you.

13 By Mr. Blake:

14 Q So you didn't see Ms. Edith the day
15 she prepared this will?

16 A No, I did not.

17 Q So you wouldn't have any idea of what
18 her --

19 A No.

20 Q You wouldn't have any idea what went
21 on during that meeting?

22 A No.

23 Q Do you know what -- what the standard
24 is in South Carolina for somebody to have
25 capacity?

1 A Yes.

2 Q You do?

3 A What you say now?

4 Q Do you know what the legal standard is
5 for somebody to even have -- to have capacity in
6 South Carolina?

7 Mr. Johnson: Your Honor, I think
8 that's -- we're not presenting her an expert
9 witness and I don't think that's a proper
10 question.

11 Mr. Blake: Well, she -- she offered
12 testimony in regards to whether she had capacity
13 or not.

14 Mr. Johnson: But she's permitted to
15 do that under well established. A layperson can
16 give an opinion as to whether or not a pers--- a
17 person has sufficient capacity to sign or prepare
18 a legal document. I've cited that in my brief.

19 The Court: I'm going to overrule the
20 objection. She can give -- I -- I do agree with
21 -- with the assertion made in the brief because
22 there is established case law that says that she
23 can give a layperson's testimony with regard to
24 whether or not Ms. Edith had the ability to have a
25 reasonable person's understanding of a document.

1 But naturally, she cannot give medical diagnoses.
2 And so you are correct in making those statements,
3 Mr. Blake.

4 Mr. Blake: No further questions, Your
5 Honor.

6 The Court: Okay.

7 Mr. Johnson: Thank you, Ms. Askins.
8 You can come down.

9 The Witness: Okay. Thank you.

10 Mr. Johnson: Your Honor, we would
11 call Willie Ryles.

12 The Court: All right. Mr. Ryles,
13 will you place your left hand on the Bible, raise
14 your right for me. Do you solemnly swear or
15 affirm that you will tell the truth, the whole
16 truth and nothing but the truth, so help you God?

17 The Witness: I do.

18 The Court: Thank you, sir. Please
19 take the stand. All right. And as you're seated
20 will you please, spell your full name for the
21 record.

22 The Witness: Willie Nelson Ryles,
23 Junior. Ryles, R-Y-L-E-S.

24 D I R E C T E X A M I N A T I O N

25 By Mr. Johnson:

1 Q Willie, what is your address?

2 A 1309 Highlander Court, Florence, South
3 Carolina.

4 Q You live -- you do live here in
5 Florence?

6 A Yes.

7 Q How long have you lived in Florence?

8 A Eighteen years.

9 Q Okay. And you are the son of Edith
10 Ryles? Is that right? One of her sons.

11 A Yes.

12 Q Okay. There are three sons and two --

13 A Two sisters.

14 Q -- two girl -- sis--- two girls?

15 A Right.

16 Q Okay.

17 A Yes, sir.

18 Q Okay. So you -- your mother -- prior
19 to your mother's death, she lived here in Florence
20 for over 10 years?

21 A Ten. Yes, sir.

22 Q Okay. Prior to that, she lived in New
23 Jersey and when your father retired from the post
24 office, they moved to -- to Florence?

25 A They moved to Florence. Not right

1 after his retirement, but a few years -- a few
2 years later.

3 Q Oh, okay. But they were here --

4 A Yes.

5 Q -- or -- or Edith was here for more --
6 more than the last 10 years of her life?

7 A Yes.

8 Q Okay. Did you see your mother on a
9 regular basis?

10 A Yes.

11 Q How often?

12 A About every day.

13 Q About every day. You lived fairly
14 close to her?

15 A Yes.

16 Q Okay. And did you -- did -- when she
17 did stop driving a car?

18 A Well, it's sometime around about 2013
19 or '12. But most of the time, I did the driving
20 or my --

21 Q Okay.

22 A -- sister did.

23 Q Were you close to your mother?

24 A Yes.

25 Q You had a good relationship with her?

1 A Yes.

2 Q And did you help take care of her in
3 her later years?

4 A Yes.

5 Q Okay. You and -- and another -- a
6 sister, Theresa, were here?

7 A Yes.

8 Q And -- and she also helped with taking
9 care of your mother?

10 A Yes.

11 Q And moving on to -- well, did there
12 come a time when your mother needed help with her
13 day-to-day activities?

14 A She did. Yes.

15 Q Do you remember when she started using
16 a walker?

17 A After he knee operation, around about
18 2013 or 2012, '13.

19 Q Okay. Did she need assistance with
20 her financial matters, paying bills and that sort
21 of thing?

22 A Yes.

23 Q Did you help with that?

24 A Yes.

25 Q When did you start helping her with

1 her bills?

2 A Around about 2012, '13, during that
3 time.

4 Q Did she have any difficulties managing
5 and taking care of her house?

6 A Yes.

7 Q Okay. And did you get help for her or
8 did you and Theresa help her with that or --

9 A I did the majority of it.

10 Q Okay. Did she also have issues with
11 personal hygiene, bathing and bathroom and that
12 sort of thing?

13 A Yes.

14 Q Okay. And when did that begin?

15 A Oh, around -- around about 2013, '14.

16 Q Now, let's go forward to -- to 2016 --
17 2016. By that time, was your mother driving a
18 car?

19 A No.

20 Q Okay. Was she -- did she need
21 assistance with her day-to-day activities?

22 A Yes.

23 Q Okay. You were helping her with her
24 bills and paying her bills?

25 A Yes.

1 Q Okay. And she was using a walker by
2 that time --

3 A Yes.

4 Q -- also? Okay. Now, did she have the
5 sufficient mental capacity to -- and I'm referring
6 to March -- or excuse me, April of 2016. Did she
7 have the ability or the mental capacity to call
8 Hawkins Tax Service and schedule an appointment?

9 A No.

10 Q She did not?

11 A No.

12 Q Did you or Theresa help her do that?

13 A No.

14 Q Okay. The respondent did?

15 A Dortha, yes.

16 Q Okay.

17 A As far as my knowledge goes, yes.

18 Q Did you know anything -- and I'm now
19 referring to -- well, first, let's go to April 9,
20 2016, when your mother was found in the street.
21 Tell us what you recall or remember about that
22 incident.

23 A Well, I was -- I received a phone call
24 from one of her girlfriends, Clara, called and
25 asked me to come over to the house because they

1 found her in the street. And I went there and the
2 police officers were there. And they was telling
3 me that she was in the middle -- walking in the
4 middle of the street. Some kids found her walking
5 in the middle of the road. She didn't realize --
6 actually, she didn't realize that she was home.
7 It -- it happens when she was watching a
8 television show and at a funeral, a church. And
9 the crowd of people was there. They walked out --
10 the funeral party, she thought she was there. She
11 actually thought she was -- and she followed them
12 out the door.

13 Q During that period of time -- dur---
14 during that period of time in -- in April of 2016,
15 did she get confused from time to time?

16 A Yes, she's confused. She's -- well,
17 saying that she wanted to know what happened to
18 her baby.

19 Q She -- she thought she had a baby?

20 A A baby. Yeah, she had had a baby.
21 Yeah.

22 Q She was about 85 years old?

23 A That's right. And she said she wanted
24 to know where her --

25 Mr. Blake: Your Honor --

1 The Witness: -- her ba--- where her
2 baby was.

3 Mr. Blake: -- we have to be careful
4 about him testifying to what she said because
5 we're all limited by --

6 By Mr. Johnson:

7 Q Well, don't repeat what she said.

8 A Right.

9 Q But you can answer the question
10 otherwise. In April of 2016, were you and your
11 sister, Theresa, spending the night with your
12 mother?

13 A Yes. We split --

14 Q Okay.

15 A -- time doing that.

16 Q Okay. Do you know why she was alone
17 that night by herself?

18 A No. I do not know. I couldn't
19 explain it at that time because my sister,
20 Dorthea -- no, she wasn't -- she wasn't in town, I
21 think. I don't know why she was by herself.

22 Q Did you realize she was by herself?

23 A No, I didn't realize she was by
24 herself until that --

25 Q But --

1 A -- day.

2 Q -- Dor--- Dortha had been staying
3 with her for a while?

4 A Yes. And she left.

5 Q Okay. Did she call and let you know
6 or Theresa know that she was leaving?

7 A Yes. Yes, she let us know that she
8 was leaving.

9 Q Did you know she -- your mother was
10 alone that night?

11 A No.

12 Q Okay.

13 A No.

14 Q Okay. Now, from that time on, did you
15 make any changes in her care, your mother's care?

16 A Yes. Well, I tried to make changes as
17 far as my sister and myself staying with her. And
18 we tried to get a nurse or someone to stay with
19 her, but Doris didn't want that. She didn't want
20 that at all.

21 Q Okay. Now, she signed a power of
22 attorney on June 29, 2016. This was about eight
23 or ten weeks after she was found in the street. I
24 believe the power of attorney was prepared by
25 Hawkins Tax Service. Were you aware that -- that

1 Dorthea -- Dorthea was going to take your mother
2 to Hawkins Tax Service?

3 A I had no knowledge of it.

4 Q Okay. Do you know how your mother got
5 to Hawkins Tax Service?

6 A No.

7 Q Well, she wasn't driving. Somebody
8 had to drive her. Right?

9 A Yes, sir. Somebody had to drive her.
10 But I didn't have no way --

11 Q Did you do it?

12 A No.

13 Q Did Theresa or any others?

14 A No.

15 Q So it had to be Dorthea?

16 A Yeah.

17 Q Okay. And I think I asked you if your
18 mother had the ability to call and schedule an
19 appointment --

20 A No.

21 Q -- with Hawkins Tax Service?

22 A No.

23 Q Did -- did she know -- would she know
24 -- based on your knowledge of her, would she know
25 what a power of attorney was?

1 A At the time of her --

2 Q Yes.

3 A -- you stated? Well -- well, she
4 could if you tell her.

5 Q Okay.

6 A But she wouldn't -- you know, at the
7 time, she had to be informed.

8 Q Okay. I want to ask you about your
9 mother's mental capacity in late June of 2016 when
10 she signed a power of attorney appointing Dorthea
11 as her power of attorney. Based on your close
12 family connection, your close association with
13 your mother, in your opinion, did your mother have
14 significant understanding to know what she was
15 signing when she signed this power of attorney on
16 June 29, 2016?

17 A No.

18 Q Did your mother have sufficient mental
19 capacity to sign a legal document such as a power
20 of attorney when she signed it on June 29, 2016?

21 A No.

22 Q Okay. Now, let's go forward. This
23 was -- she signed a power of attorney on June 29,
24 2016. On December 15, 2017, a year and eight
25 months or so later, she was also -- your mother

1 was also taken to Hawkins Tax Service, which had
2 prepared a will for her. Had your mother gotten
3 better mentally?

4 A No.

5 Q Okay. Did she have the wherewithal or
6 the ability or the mental capacity to call Hawkins
7 Tax Service and schedule an appointment?

8 A No.

9 Q Now, did Dorthea tell you that she was
10 taking her mother to the Hawkins Tax Service to
11 sign a will?

12 A No.

13 Q Okay. Based on your close family
14 relationship, your close association with your
15 mother, Edith Ryles, did she have sufficient
16 mental capacity to understand in a meaningful way
17 the nature and effect of this will?

18 A No.

19 Q On December 15, when she signed the
20 will, did she have sufficient mental capacity to
21 know first, her estate, the object of her
22 affection and to whom she wished to leave her
23 property?

24 A No.

25 Q Would she sign anything you ask her to

1 do -- ask her to sign, your mother?

2 A If I ask it to sign it, yes, she will.

3 Q Okay. And that -- that's true for the
4 other family members?

5 A Right. Yes.

6 Q Did she know what she was doing when
7 she signed these two documents? The power of
8 attorney and the will.

9 A No.

10 Q But -- but you -- you -- in the will,
11 in effect, Dorthea got everything?

12 A Right. She did.

13 Q She didn't leave you out. You had
14 taken care of her. You had a good relationship
15 with your mother.

16 A Right.

17 Q And I think she left you 100 dollars.

18 A A hundred dollars.

19 Q And she left Ther--- Theresa 75
20 dollars.

21 A Yes. Yes, sir.

22 Q Is that right?

23 A That's right.

24 Q And she left -- she left Leon an old
25 car. Is that right?

1 A Right. A car.

2 Mr. Johnson: Thank you. That's all.

3 Answer any questions --

4 The Witness: All right.

5 Mr. Johnson: -- Charlie has.

6 The Court: Mr. Blake.

7 C R O S S - E X A M I N A T I O N

8 By Mr. Blake:

9 Q So it -- correct, if the will is
10 valid, you -- you are entitled to 100 dollars. Is
11 that correct?

12 A Say it again now.

13 Q In your testimony that under the will,
14 you're entitled to 100 dollars?

15 A Well, I can't say because I haven't
16 seen that will --

17 Q Okay. When the attorney --

18 A -- when it was drawn up, so...

19 Q When the attorney asked you whether it
20 was true or not whether Dorthea was left
21 everything in her will you indicated yes, but
22 you're now saying you haven't seen the will?

23 A Well, no. When she made the -- she
24 did the power -- no one seen the will until the
25 time came.

1 Q Who was responsible for taking your
2 mother to the doctor during the time when you
3 indicated she was having issues?

4 A Well, whoever was available around the
5 house.

6 Q Okay. Did she have a family doctor?

7 A Yes, she did have a family doctor.

8 Q Who -- who is that family doctor?

9 A As far as my knowledge, was Dr. Brown.
10 And she had another doctor before that.

11 Dr. Sierra, I think was her name -- Sierra. Yes.

12 She -- Doc--- Dr. Sierra retired, then -- then
13 Dr. Brown took over.

14 Q You reference Hawkins Tax Services.
15 Isn't -- isn't it true that your mother and your
16 father used Hawkins Tax Services for years to
17 handle their tax and business needs?

18 A Their taxes. That's right. So yeah.

19 Q About how many years did they use
20 Hawkins Tax Services?

21 A Oh, maybe about a good eight years,
22 seven years when they moved. When -- when they
23 came here to South Carolina, I introduced them to
24 them.

25 Q So -- so you introduced them to

1 Hawkins Tax Service?

2 A That's right. Because I used them
3 too.

4 Q You used them too?

5 A Yeah.

6 Q Do you still use them?

7 A No.

8 Q How long have you used -- how long did
9 you use them?

10 A Oh, I used them for about, like six
11 years.

12 Q And did you stop using Hawkins Tax
13 Services in conjunction with what's going on now?

14 A That's correct. Yes.

15 Q Okay. Was there anybody else that
16 would do, I guess, tax stuff for your mother?

17 A No.

18 Q Nobody else other than tax -- Hawkins
19 Tax Services would handle business and tax affairs
20 for your mother?

21 A That's right.

22 Q Now, you -- it -- it was indicated
23 that when the police officer came out the night of
24 April 9th, 2016, that Willie Ryles indicated that
25 Edith had never done this before. Is that

1 correct?

2 A That's right. The first incident.

3 Q Okay. And you don't -- you don't know
4 what happened that night?

5 A As far as it was told by police?

6 Q Yeah --

7 A Or if --

8 Q -- in terms of why she went out that
9 one night to the street?

10 A No.

11 Q Okay. And was there any more
12 instances after that where she -- when law
13 enforcement had to be called?

14 A Correct. No.

15 Q Isn't it true that your mother -- she
16 stayed by herself many nights all the way up until
17 her death?

18 A The only -- no, not -- not up until
19 the time of her death, no, she didn't stay by
20 herself. After that incident with the -- where
21 she walked out to the street, somebody was there
22 with her every night.

23 Q The day that this will was done, were
24 you there?

25 A No.

1 Q So you wouldn't have any idea of what
2 her -- whether she was lucid or whether she was in
3 her mind that day?

4 A No.

5 Q You wouldn't have any idea of whether
6 she knew what she owned that day?

7 A What do -- on that day?

8 Q The day she did the will, you wouldn't
9 have any idea of whether she -- she said --

10 A What her condition was you mean?

11 Q She said --

12 A You asked me as far as her condition?

13 Q Right. On that day, you wouldn't have
14 any idea of whether she knew what she owned or
15 not?

16 A No, I wasn't -- like she would have a
17 good day during the day.

18 Q Right.

19 A And her tide changed in -- when -- in
20 -- at nighttime, in the evening.

21 Q Right. She -- she was lucid sometimes
22 or she would have -- as you described it, she
23 would have good -- good times --

24 A Good times.

25 Q -- in the day. Is that correct?

1 A Right. That's right.

2 Q So you're not disputing the fact that
3 she could have been lucid or -- or having a good
4 day the day she did that will?

5 A Right. 'Cause I wasn't there. I
6 couldn't answer that.

7 Q And you weren't there for the power of
8 attorney either. Is that correct?

9 A That's right. I wasn't. No.

10 Q And -- and again, you can't testify on
11 whether she was having a good day the day of the
12 power of attorney either?

13 A No. No.

14 Mr. Blake: No further questions, Your
15 Honor.

16 The Court: Thank you, sir. Any
17 re-direct?

18 R E D I R E C T E X A M I N A T I O N

19 By Mr. Johnson:

20 Q Willie, Hawkins Tax Service did taxes?

21 A Yes.

22 Q And they were good at it, you were
23 satisfied with their work --

24 A Yes.

25 Q -- what they did? You wouldn't go to

1 them for a will, wouldn't you? They're --

2 A No.

3 Q -- not a lawyer.

4 A No.

5 Mr. Johnson: Thank you.

6 The Court: Any re-cross?

7 Mr. Blake: No further questions, Your
8 Honor.

9 The Court: Okay. Then you may -- you
10 may be seated.

11 Mr. Johnson: Your Honor, pursuant --

12 Mr. Ryles: May we take a break?

13 The Court: Are you asking to be
14 excused to --

15 Mr. Ryles: No.

16 The Court: -- to -- to leave?

17 Mr. Ryles: Just to go -- go to the
18 restroom.

19 The Court: Oh, okay. Then you may do
20 so. Yes, sir.

21 Mr. Johnson: Are you ready to
22 proceed?

23 The Court: Yes, sir.

24 Mr. Johnson: All right. Your Honor,
25 pursuant to Rule 611(c), we would now call Dorthea

1 Ryles.

2 The Court: All right. Ms. Ryles, if
3 you would --

4 Mr. Blake: Your Honor, I -- I
5 wouldn't mind just taking a five-minute break
6 because I think this one may take a while.
7 Because I need to use the restroom.

8 The Court: All right. I heard the
9 door click earlier, but I was taking notes at the
10 time. Did somebody pop in and look in or did
11 somebody try to step out earlier before Mr. Ryles?

12 Mr. Blake: I think -- I think the
13 gentleman here.

14 Mr. Ryles: Yeah. I had stepped out
15 to use the restroom and came back.

16 The Court: Oh, okay. I -- I -- I
17 will ask if -- if -- before anyone tries to step
18 in or step out, if you'll ask for my permission,
19 because that's a disturbance of the courtroom. It
20 just helps me to monitor what occurs in my
21 courtroom. My -- I am looking down. I am taking
22 notes of what's happening during testimony, so
23 that when it's time for me to make a ruling, I
24 can make an appropriate ruling. But the in and
25 out and the clicking of the doors and whatnot is a

1 disturbance to me. So if -- if we need to a take
2 a pause, tap your counsel and they'll ask me if
3 it's okay for us to take a pause. All right?

4 Mr. Ryles: Yes, sir.

5 The Court: But yeah, we'll take a
6 break. Let's take 10 minutes and we'll come back
7 in 10 minutes --

8 Mr. Blake: Thank you.

9 The Court: -- at -- well, let's just
10 go ahead and make it around 13 minutes and we'll
11 come back at 11:40.

12 Mr. Blake: Yes, sir. Thank you.

13 (Whereupon a break was taken
14 from the proceedings.)

15 The Court: All right. We left off
16 Mr. Johnson calling Ms. Ryles under Rule 611(c).

17 Mr. Johnson: Yes, sir.

18 The Court: Are you ready to proceed?

19 Mr. Johnson: Ready to go, Your Honor.
20 We'd call Ms. Ryles as the adverse party under
21 Rule 611(c) and would request permission to ask
22 leading questions.

23 The Court: So granted. Ms. Ryles, if
24 you will, please place your left hand on the Bible
25 and raise your right for me. Do you solemnly

1 swear or affirm that you will tell the truth, the
2 whole truth and nothing but the truth, so help you
3 God?

4 The Witness: Yes, I do.

5 The Court: Thank you, ma'am. Please,
6 take the stand and states your full name for the
7 record.

8 The Witness: Dorthea -- Dorthea
9 Ryles.

10 The Court: Okay. I -- do you need
11 her to spell her name? Okay. Thank you. All
12 right. And she is your witness, Mr. Johnson.

13 Mr. Johnson: Thank you, Your Honor.

14 D I R E C T E X A M I N A T I O N

15 By Mr. Johnson:

16 Q Ms. Ryles, you are the respondent in
17 this suit. Is that correct?

18 A Yes.

19 Q And you are also -- you are a daughter
20 of the late Edith Ryles?

21 A Yes.

22 Q The petitioners are your sisters and
23 brother, two brothers and one sister? Sorry.

24 A I have three brothers and one sister.

25 Q Yes. So -- but the petitioners are --

1 A The two brothers and one sister.

2 Q Yeah. They are your siblings, your
3 brothers and sisters?

4 A Yes.

5 Q Okay. You've lived in New Jersey most
6 of your life. Is that correct?

7 A Yes.

8 Q Okay. And you refer to New Jersey as
9 your home?

10 A Right now South Carolina is.

11 Q Okay. You -- you are -- don't you
12 have -- is it -- do you have one son? I know you
13 have grandchildren -- you have grandchildren.

14 A I have one son and two grandchildren.

15 Q Okay. And your father was a long-time
16 employee at the post office?

17 A Yes.

18 Q And after his retirement or a year or
19 so after his retirement, he and your mother moved
20 down to Florence?

21 A Not after his retirement, no.

22 Q Before his retirement?

23 A No, it was way after the retirement as
24 a postman because they had a business up there --

25 Q Oh, okay.

1 A -- that they ran. And they stayed up
2 there for years and then they relocated to South
3 Carolina.

4 Q Your mother lived here for more than
5 10 years here in Florence before --

6 A I --

7 Q -- her death?

8 A I believe my mama stayed in -- they
9 might have moved down in 2006. So yes, it would
10 have been over 10 years.

11 Q Okay. And -- and of course, at that
12 time, your sister Theresa and your brother Willie,
13 were here?

14 A Willie wasn't, I believe. I think he
15 moved down later on.

16 Q Okay. But they were together here in
17 Florence for more than 10 years?

18 A I believe so.

19 Q Okay. And at the time of your
20 mother's death, which I believe was August 10,
21 2018, your mother was 88 years old?

22 A Yes.

23 Q Okay. And would you agree that her
24 health began to fail around 2014, somewhere along
25 in there?

1 A Physically, yes. Because she had a
2 couple of falls, knee surgeries, back surgeries.
3 So physically, yes, she got a little weak in that
4 area with the cause of the -- the walkers.

5 Q Okay.

6 A Mentally, no.

7 Q Well, you heard the testimony she got
8 confused and thought your father was still alive
9 when, in fact, he had been dead for 10 years?

10 A Well, I haven't experienced that with
11 her.

12 Q Okay.

13 A So...

14 Q Did -- did you hear your brother
15 Willie, state that your mother thought she had had
16 a baby and didn't know where the baby was? She
17 was confused.

18 A I don't know anything about that.

19 Q She did -- by 2015, she was on a
20 walker?

21 A She was on a walker. To give you an
22 exact date or the year, I don't have that -- that
23 information.

24 Q Okay. And -- and she was no longer
25 driving a car?

1 A She stopped driving. I don't remember
2 the year. But she used to pick me up from the
3 train station and take me to the train station.
4 But to give you an exact year of when she stopped
5 driving, I really can't give you that.

6 Q She wasn't driving in 2016, was she?

7 A I'm not sure.

8 Q Okay. But -- but Willie and Theresa
9 who saw her more often than you did, they would
10 have a better feel for that?

11 A Quite possibly. Yes.

12 Q Yes. And -- and -- and your mother
13 also had to have help with paying her bills. Were
14 you aware that Willie helped with her bills and
15 her finances as early as 2012?

16 A No, when I -- when I was there, my
17 mother writes out -- wrote out her own bills in
18 her own checking account. She wrote her own bills
19 out. She brought them out -- the bills out and
20 laid them on the table and she wrote her bills
21 out.

22 Q Willie testified that he was helping
23 your mother pay her bills as early as 2012. Do
24 you disagree with that?

25 A He -- I -- I -- I can't tell you. I

1 wasn't there with them, so I really don't know.

2 Q Okay. Also they testified that your
3 mother had -- in later years, 2016, 2015,
4 somewhere along there, had some hygiene problems.
5 She needed assistance bathing. They had to
6 encourage her to take a bath, that sort of thing.

7 A Okay.

8 Q And she needed help in bathroom. You
9 would agree with that?

10 A To an extent, sir.

11 Q Okay. Now, by early 2016, your
12 brother Willie and your sister Theresa were in the
13 habit in spending the night with your mother.
14 They would alternate. Both were working full
15 time.

16 A Well, I know my mom called me several
17 times in New Jersey saying --

18 Mr. Johnson: Objection, Your Honor.
19 Your Honor, I would like the witness -- the dead
20 man's statute would come in on something like
21 this. And I would appreciate the Court
22 instructing her that she can't repeat what her
23 mother said.

24 The Witness: Okay.

25 The Court: Mr. Johnson is correct.

1 According to the dead man's statute, you cannot
2 testify to what someone who has deceased said to
3 you. You can only testify as to what you observed
4 personally.

5 The Witness: Okay. My mother would
6 call me up from New Jersey. I -- and what was
7 your question? Can you repeat your question?

8 By Mr. Johnson:

9 Q Well, in 2016, your brother Willie and
10 your sister Theresa were here. They would
11 alternate sometimes and spend the night with your
12 mother.

13 A I know they would alternate and take
14 care of her, but I don't know about the spending
15 the night part.

16 Q Okay. They were both working full
17 time, were they not -- 2016?

18 A I -- yes, I -- I can say that.

19 Q I think they're both working full time
20 now, I believe. Aren't they?

21 A Oh, I really don't know.

22 Q Now, let's go to -- did -- did you
23 volunteer since you are -- you are a retired
24 school teacher, are you not?

25 A As currently right now?

1 Q Yes.

2 A Yes.

3 Q You're a retired school teacher?

4 A Yes.

5 Q In 2016, did you -- since you were not
6 working full time, did you volunteer to come down
7 and help with your mother?

8 A Matter of fact, sir -- let me
9 backtrack. While I was working, I took an
10 F.M.L.A., Family Leave Act from my job for three
11 months to take -- to come take care of my mother.

12 Q You were working --

13 A I was working --

14 Q -- part time?

15 A -- full time. And I had some time on
16 my job that we can get a Family Leave Act to take
17 care of family.

18 Q Was that when she fell and broke
19 her --

20 A No, I didn't --

21 Q -- injured her hip?

22 A She didn't -- she wasn't falling at
23 the time. She wanted me to come down because she
24 was by herself.

25 Q Okay.

1 A Okay. And I told her, of course. And
2 -- and she needed a little assistance. She might
3 have fell and hurt her knee. I'm not really sure.
4 But if she needed help out the bed -- which she
5 washes herself. Pull -- pull her up to the sink.
6 She'll put her clothes on from head to knee and
7 you help her with her socks and her shoes.

8 Q Now, shortly before April 9, 2016, you
9 had been staying -- you had come down for a visit
10 with your mother, April of 2016?

11 A All -- I -- I'm going to say, yes. I
12 always came down to check on my mom.

13 Q Well, before the incident in the
14 street on April 9, 2016, you heard the testimony
15 from the officers.

16 A Okay.

17 Q Your mother was out in the street on a
18 walker and didn't know where she was.

19 A Okay.

20 Q And -- and you shortly before that,
21 you had been -- you had been down for a visit.

22 A I came -- I -- not for a visit, to
23 take care of her.

24 Q Okay.

25 A Okay. So I had to go to New Jersey.

1 I informed my brothers and sisters that I was
2 leaving. They -- whenever I come down, they know
3 I'm coming. And whenever I leave, they know when
4 I'm leaving.

5 Q Did --

6 A Okay.

7 Q -- did -- did you tell them you were
8 leaving --

9 A Abs---

10 Q -- shortly before 2016?

11 A Absolutely. I -- I just wouldn't
12 leave my mother without them knowing it.

13 Q Okay.

14 A Without them knowing -- they knew when
15 I was leaving.

16 Q Now --

17 A And as far as the incident with her
18 walking around, she was left home alone. Police
19 officers from South Carolina called me in New
20 Jersey and said they couldn't contact anybody.
21 Nobody was there.

22 Q He -- Willie came. They contacted him
23 and he came.

24 A After --

25 Q That's what --

1 A -- after Clara called him. The
2 police --

3 Q He was there immediately. And they --

4 A Not immediately because they called
5 me. They called me and I talked to the police
6 officer on the phone for like 10 or 15 minutes.
7 And then when I called them back, then he said
8 Willie came.

9 Mr. Johnson: Objection to that, Your
10 Honor. The police officer is not here and that's
11 not -- certainly wasn't in that report.

12 By Mr. Johnson:

13 Q Well -- well, let's move on. But on
14 April 9, 2016, your mother was found in the street
15 on a walker disoriented and didn't know where her
16 house was. That is true, is it not?

17 A That's what the report said.

18 Q You don't doubt that? Do you doubt
19 the officer's testimony and the report that was
20 introduced? You don't doubt that police report,
21 do you?

22 A I don't think the police officer is
23 not telling the truth, sir. I believe they're
24 telling the truth, yes.

25 Q Okay.

1 A That she didn't know where she was.

2 Q Well, let's move on. About 10 weeks
3 later on June 19, 2016, you drove your mother to
4 Hawkins Tax Service and she signed a power of
5 attorney?

6 A My mother -- I can't say what my --
7 you can't say what my mother said.

8 Q I know.

9 A Okay.

10 Q But -- but she didn't have the
11 wherewithal --

12 A I --

13 Q -- to call Hawkins Tax Service and
14 schedule an appointment and ask for help with a
15 power of attorney?

16 A She asked me to take her to see Vera.
17 Now, what they discussed, I really do not know.

18 Q Do you deny that you contacted Hawkins
19 Tax Service and made an appointment for a power of
20 attorney and then took your mama to -- to the tax
21 service and she signed a power of attorney
22 appointing you as her power -- attorney in fact?

23 A What year was this?

24 Q Ma'am?

25 A What year was this?

1 Q I'm sorry. I didn't understand.

2 A I said -- I didn't hear. What year
3 was this?

4 Q It was June 19 -- 29, 2016.

5 A Oh.

6 Q Before she sign -- the day she signed
7 the power --

8 A My mother had --

9 Q -- of attorney.

10 A -- my mother had relationships with --
11 with Vera. And periodically sometimes I'd take
12 her to Vera. So whatever they discussed, I really
13 do not know, sir.

14 Q Do you deny instructing or telling the
15 people at Hawkins Tax Service to prepare a power
16 of attorney appointing you as your mother's --

17 A Absolutely. No, I did not do that.

18 Q Do you think your mother at that
19 stage, 10 weeks before she's wandering around the
20 street, she's asking where her husband who had
21 been dead for 10 years and now all of a sudden she
22 wants a power of attorney?

23 A My mother was a strong minded woman,
24 sir. My mother knew exactly what she wanted. My
25 mother knew exactly what she wanted.

1 Q She -- Hawkins Tax Service paid for
2 that -- or charged you for that power of attorney,
3 did they not?

4 A I paid the bill, so I really don't
5 know what I give --

6 Q You did --

7 A -- to taxes.

8 Q -- pay that bill?

9 A Whatever tax bills she had, I paid her
10 bills.

11 Q And you heard the testimony that
12 Catherine McWhite and Vera Lewis were investigated
13 by SLED and the South Carolina Attorney General
14 sent her a cease and desist letter and said if she
15 continued to prepare powers of attorneys and
16 wills, she would be criminally charged with
17 practicing law without a license?

18 A That was --

19 Q You --

20 A That was before or after? This was
21 before or --

22 Q No, that was --

23 A That was before --

24 Q -- after.

25 A It was after the will was done?

1 Q Yes.

2 A So they did it after the will was
3 done?

4 Q Yes.

5 A So I don't know anything about what
6 happened before that. So I really don't know.

7 Q You don't have anything -- you don't
8 have any con---

9 A No, I did not know that.

10 Q And you --

11 A I'm not -- I'm unaware of that. I
12 didn't know it until -- until I heard it in here.
13 No, I did not know that.

14 Q Do you deny that Hawkins Tax Service
15 prepared the power of attorney for your mother?

16 A No.

17 Q You don't deny that do you?

18 A You -- they said it in the court she
19 did. I don't know.

20 Q Okay.

21 A I don't know.

22 Q Now, let's -- let's move forward.

23 The Court: Let me just give some
24 instruction.

25 Mr. Johnson: Okay.

1 The Court: Ms. Ryles, you're under
2 oath, so please be forthcoming with your answers.

3 The Witness: Yes.

4 The Court: The -- some answers should
5 be yes or no and --

6 The Witness: Okay.

7 The Court: -- some require
8 explanation. Please do not be evasive with your
9 answers to the questions.

10 The Witness: All right. Sorry, Your
11 Honor.

12 The Court: Your -- your own attorney
13 will ask cross examination and get clarification
14 as well. And he will also have eyewitness
15 testimony as well and he'll -- and -- and do the
16 same thing.

17 The Witness: Okay.

18 The Court: So -- and he'll want
19 clarified answers. So make sure you answer the
20 questions --

21 The Witness: Yes, sir.

22 The Court: -- because the Court needs
23 these answers as well. So if you don't answer it
24 of these -- of these attorneys, you're going to
25 have to answer to me.

1 The Witness: Okay.

2 The Court: Thank you.

3 By Mr. Johnson:

4 Q Ms. Ryles --

5 A Yes.

6 Q -- before taking your mother to
7 Hawkins Tax Service on June 29, 27 -- '16, did you
8 tell Willie, your brother or Theresa, your sister
9 that you were going to do that?

10 A To take them to the tax office?

11 Q Take your mother to Hawkins Tax
12 Service?

13 A No.

14 Q You did not take --

15 A No. No.

16 Q Now -- now, at that time, your mother
17 was having -- she had to have problems or she had
18 to have assistance with paying her bills. She was
19 on a walker. She could not prepare her own meals.
20 She had personal hygiene issues. She did -- had
21 not driven a car in years. And she was found
22 wandering around the street 10 weeks earlier not
23 knowing where she was. Do you agree with that,
24 don't you?

25 A No.

1 Mr. Blake: Your Honor, and I think
2 those questions have been asked and answered in
3 regards to each element in that question. She's
4 already responded in terms of what her mom could
5 and could not do during that time period.

6 The Court: I sustain.

7 By Mr. Johnson:

8 Q Is it your testimony that you did not
9 know about this power of attorney?

10 A I knew I was the power of attorney,
11 yes.

12 Q You certainly did and you took full
13 advantage of it, didn't you?

14 A No.

15 (Redacted testimony at this point stricken from
16 the record by order of The Court appears at the
17 end of the transcript, after the certification
18 page, not as a part of the official record.)

19 By Mr. Johnson:

20 Q There -- there were three accounts.
21 Your mother had three accounts. One was a
22 performance select interest account. The account
23 number -- or the last four digits 4456. There was
24 a standard checking account, the last numbers was
25 6875. And there was a premium money market

1 account, the number 5731. And you took complete
2 control of all three of those accounts, didn't
3 you?

4 A Yes.

5 Q You could write checks. You had a
6 debit card. You could go to the bank and -- and
7 take out cash and you spent this money. Spent
8 this money as if it were yours with no regard for
9 the welfare of your mother. Isn't that true --

10 A No.

11 Q -- Ms. Ryles?

12 A No, it's not.

13 Q You spent this money with reckless
14 abandonment, complete disregard of your mother's
15 welfare. Isn't that true?

16 A No.

17 Q Let me ask you about how you spent
18 this money. Let's first of all, let's consider
19 the money market account. This was an old
20 account. I think it was started by your father
21 and your mother. Do you remember -- are you
22 familiar with that, the -- the --

23 A Yes.

24 Q -- money market account?

25 A Yes, my father --

1 Q We sub---

2 A -- told me about it.

3 Q We subpoenaed those loan --

4 A Okay.

5 Q -- records.

6 A Yes.

7 Q And they are now exhibits in this
8 case. In 2016, January of 2016, the balance of
9 the money market account was 105,373.39. Do you
10 remember that?

11 A Something similar to that.

12 Q Well, it was very clear to that.

13 A Yes.

14 Q And we -- we took your deposition,
15 your testimony here in Florence on October 25,
16 2019. And at that time, you were asked what the
17 current balance was. Do you --

18 A Uh-huh.

19 Q -- remember what your response was?

20 A No.

21 Q Around 400 -- 4,000 dollars.

22 A Could have been.

23 Q So from that short of period of time
24 when you were appointed P.O.A. until in -- in
25 2016, June 2016 until we took your deposition in

1 October of 2019, you spent 101,000 dollars.

2 A No, I didn't.

3 Q You did. The -- the bank records show
4 that. You spent -- and I assume, by the way, I
5 assume that the other 5,000 dollars has been
6 spent.

7 A Do you want me to say yes or no?

8 Q Has it been spent?

9 A The money has been spent, but I didn't
10 -- it wasn't spent on me.

11 Q It was spent on your property.

12 A It was spent on Edith Ryles' property.

13 Q Edith --

14 A Edith and Wille Ryles' property,
15 absolutely.

16 Q Right. Which you inherited through
17 the will?

18 A That's what Edith Ryles wanted.

19 Q You spent -- so that 105,000 dollars
20 is gone? You -- you --

21 A I --

22 Q -- you're not -- you had -- you -- you
23 have Edith Ryles on two houses up in New Jersey?

24 A Absolutely. Do you want me to explain
25 what happened?

1 Q She owned -- well, you can answer my
2 question. She owned two houses in New Jersey.
3 During the last several years of her -- of her
4 life while she was still alive, you lived in one
5 of those houses?

6 A Uh-huh.

7 Q And you are living in that house now?

8 A No.

9 Q You're not?

10 A No.

11 Q What happened to that three-story
12 house you --

13 A It's not a three-story. It's a
14 two-story.

15 Q Two-story.

16 A Two. Person live on the first floor
17 and the second floor.

18 Q Didn't you live on the second floor?

19 A Yes.

20 Q And didn't you do a lot of remodeling?

21 A Then -- yes, I did.

22 Q With your mother's money?

23 A Not a lot of remodeling. The money
24 was spent because my brother didn't pay the taxes
25 and the houses went into foreclosure.

1 Q And you saved that -- you saved that
2 house from foreclosure. You paid those back
3 taxes.

4 A Paid all of them.

5 Q And then your brother, Alonzo deeded
6 his interest in the property to you?

7 A No, that's not true. That's not true.

8 Q No?

9 A Not true.

10 Q Didn't -- didn't he -- didn't you end
11 up with -- you ended up with both houses only --

12 A That's not -- that's not true. My
13 father deeded that house to my brother before he
14 passed. So that's not true, sir.

15 Q Are you denying that you own -- you
16 inherited those two houses in New Jersey? I think
17 your brother had a life estate --

18 A No.

19 Q -- or was it --

20 A That's not true, sir. When my father
21 was living -- my mother and father was living,
22 while he was living, he put that house into my
23 brother's name for -- for -- for a reason. For a
24 family personal reason.

25 Q Well, he was doing time.

1 A He was doing what kind of time, sir?

2 Q He was up the river. He was in the
3 big house. He was in jail.

4 A Who?

5 Q Your brother --

6 A No.

7 Q -- Alonzo.

8 A No, he was not.

9 Q Are you denying that he did time in --

10 A I -- you -- you asked me during the
11 time --

12 Q No --

13 A -- my --

14 Q -- I'm asking you, when you said --

15 Mr. Blake: Let her finish her --

16 By Mr. Johnson:

17 Q -- your brother had not --

18 Mr. Blake: If she could finish her
19 answer, Your Honor.

20 The Court: I -- I will allow for the
21 witness to explain her answer. Yes.

22 The Witness: No, my brother was not
23 in jail when my father left the house to him.

24 By Mr. Johnson:

25 Q Well, he was at --

1 A Okay.

2 Q -- one --

3 A It was my parents had two houses. One
4 that they raised us in, okay? The entire family
5 raised us in one of the houses. And then they had
6 another house, right? When my father -- my
7 parents moved to South Carolina, that's when my
8 father was -- because my mother didn't handle most
9 of the bills. My father did because he was better
10 at it. So my father decided to put my brother
11 Alonzo's name on that one house. And -- and --
12 and -- and -- and we all know, I'm not going to
13 lie, for tax reasons with too much income coming
14 in. So when my brother took over the house after
15 my father died -- my father kept up on him about
16 making sure the bills and taxes was paid. When my
17 father died, my mother who trusted my son to -- my
18 brother Alonzo to the fullest, did not carry out
19 that act. The -- the tenants wasn't paying any
20 rent. Both houses went into foreclosure. Had
21 double -- triple liens on the house. Water bill
22 -- water was shut off. Lights was shut off. I
23 come down here and stayed with my mother. I go
24 back. I don't have any water. It was crazy. I
25 just did what I thought was right. My parents

1 told my -- my mother --

2 Mr. Johnson: Objection, Your Honor.

3 I -- I --

4 The Witness: Okay. My fault. I --

5 Mr. Johnson: I don't think --

6 The Witness: -- apologize.

7 Mr. Johnson: -- this is --

8 The Witness: I apologize.

9 Mr. Johnson: -- proper. She ought to
10 be testifying, not just --

11 The Witness: But I explained to you
12 what happened with the property. My brother --

13 The Court: I understand.

14 The Witness: -- was not incarcerated
15 when the house was left to him.

16 By Mr. Johnson:

17 Q Oh, I know it wasn't -- okay. During
18 that particular time he was not.

19 A Okay.

20 Q But you said that -- you said he fell
21 behind on the -- fell behind with the taxes?

22 A And may -- may --

23 The Witness: And Your Honor, not only
24 did he almost lost those two houses, he lost the
25 house he lived in, where his family lived in. He

1 wouldn't --

2 The Court: But that's not --

3 The Witness: -- pay the taxes on it.

4 The Court: But that house is not part
5 of this estate. Correct?

6 Mr. Johnson: That's correct, Your
7 Honor.

8 The Court: Okay.

9 Mr. Johnson: That's not.

10 The Court: I -- I -- I just want us
11 to -- to give testimony relevant --

12 The Witness: Okay.

13 The Court: -- to the estate.

14 The Witness: I'm sorry.

15 The Court: Okay?

16 By Mr. Johnson:

17 Q Ms. Ryles --

18 A Yes.

19 Q -- let's focus on how you spent this
20 money.

21 A I -- I spent it on --

22 Q And we -- we talked about the money
23 market. And -- and it -- is it gone, all of the
24 -- all --

25 A Yes.

1 Q -- the --

2 A Yes.

3 Q -- hundred and --

4 A Yes.

5 Q -- five thousand is gone?

6 A Five --

7 Q And you -- and you put it -- you used
8 some of that money to remodel your own residence,
9 did you not?

10 A But that's not my residence. That's
11 through Edith Ryles' estate, sir.

12 Q That -- well, who -- you -- you say --

13 A I had to take --

14 Q -- you don't own it. You inherited it
15 from that bogus will. That will that we say is
16 completely invalid, you inherited that house and
17 the other house?

18 A What -- oth--- what other house? The
19 one down here?

20 Q No, there's one --

21 Mr. Blake: Your -- Your Honor and --
22 of course, he's allowed to ask leading questions,
23 but he's -- he's including testimony that has not
24 been -- that is not even valid at this point. She
25 has not inherited it. The property is -- it's --

1 it's pursuant to the will. So -- and she's
2 testified -- and she has testified -- and -- and
3 again, she -- it's been -- the question's been
4 asked the same way over and over that the property
5 when she did the repairs was Edith Ryles'
6 property. You know, for him to get up and -- and
7 ask her about, well, the bogus will -- again, he's
8 -- he's asserting legal conclusions that have not
9 been ruled on by Your Honor.

10 The Court: I will sustain.

11 Mr. Blake: Specifically, that the
12 will is bogus, for example. I mean, clearly, he's
13 taking liberties that he should not be with these
14 questions.

15 The Court: I'll sustain.

16 Mr. Johnson: Your Honor, I'm just
17 stating -- explaining my position.

18 Mr. Blake: He -- he's not allowed to
19 testify and -- and -- and state that this -- that
20 he thinks the will is bogus. Again, Your Honor, I
21 just ask that counsel stay within the rules with
22 these questions.

23 The Court: I'll sustain. And I will
24 ask that counsel not to be argumentative. You are
25 allowed to treat the witness as a hostile witness,

1 but you can't badger the witness.

2 Mr. Johnson: I'm sorry, Your Honor.

3 I -- I won't.

4 By Mr. Johnson:

5 Q Now, we've already talked about the --
6 the money market account, the 105,000 is gone.

7 A Yes.

8 Q That's right? Now, you also made
9 withdrawals using your power of attorney. You
10 wrote checks, signed your mother's name and to the
11 right of that P.O.A.

12 A I done that.

13 Q Okay.

14 A Yes.

15 Q Done that. To the extent of from
16 2016 -- sometime in 2016 to July 27, 200 -- 2018,
17 using the P.O.A., you took over 42,805.07?

18 A Went towards taxes.

19 Q Is it your testimony that the -- the
20 money you took out of these three accounts was
21 spent just for your mother or your mother's
22 property?

23 A Yes.

24 Q You're not denying that you used some
25 of this money from these three accounts for your

1 own personal use, are you?

2 A Depend --

3 Q I mean, you used that money. You were
4 spending money. It was grocery money. It was gas
5 money. It was paid traffic fines money.

6 A My mother knew I was doing it.

7 Q And -- and it would go to the rest of
8 the money. It was to go to Mickey Finn's and buy
9 wine. You didn't do that for your mother, did
10 you?

11 A No, I -- I -- I -- I occasionally have
12 some wine. I'll occasionally have a glass of
13 wine.

14 Q And you paid for it with your mother's
15 money. And you -- you use that money and spent --
16 and you had that debit card. Did you -- how did
17 you pay for the tickets to Yankee's stadium?

18 A I did go to Yankee's stadium. I made
19 a mistake. Didn't have my card and I -- I didn't
20 have my card. And it -- and it was a fundraiser.
21 It wasn't to go see a Yankee game. Because I --
22 it -- because a Yankee game would cost you five,
23 600 dollars to go see. That was a fundraiser at
24 Yankee stadium I went to.

25 Q And you used your mother's money?

1 A I used that -- I used -- I think it
2 was like 20, 25 dollars for the ticket. It wasn't
3 much.

4 Q You spent it.

5 A But I did not go to see a Yankee
6 baseball game.

7 Q Whether it was a ballgame, might have
8 been a --

9 A It was a -- it -- it was amateur
10 playing. It was a fundraiser. Parents and -- was
11 playing there. I forget who sponsored it. I did
12 do that.

13 Q Just 20.00?

14 A Yes.

15 Q The records that we have an have
16 introduced, included you used the train up there
17 to go and from -- go -- to go to places.

18 A Yes.

19 Q Amtrak, spent money for Amtrak tickets
20 or passes?

21 A Some -- most of the time I use my own
22 ticket. But the time -- I possibly used the
23 Amtrak ticket with her. She traveled with us two
24 of them years. I took her with me.

25 Q Okay. You also spent money for

1 traffic tickets to the Newark Municipal Court.
2 Traffic tickets. Your mother didn't get those
3 traffic tickets.

4 A No, she didn't get them tickets.

5 Q Those were those tickets?

6 A Probably -- I -- yes, I -- I -- it --
7 it was Newark. It was mine.

8 Q Okay. An outfit called Donte Brothers
9 Towing up in New Jersey. You need to tow a car.
10 You -- you gave -- you made a payment.

11 A Towing a car. I don't recollect that.
12 Well, I have Triple A, so I don't really remember
13 that. I might have been --

14 Q Okay.

15 A But if it's on there, you said I did
16 it, I did it. But I -- basically, I have Triple
17 A, so I don't know what happened in that case
18 right there.

19 Q Okay. If it's on there, you paid it?

20 A Possibly.

21 Q If that's what the check -- that's
22 what --

23 A Yes.

24 Q We subpoenaed the records --

25 A Okay. I see.

1 Q -- on those three accounts.

2 A From?

3 Q We asked --

4 A I'm --

5 Q -- you --

6 A -- trying to think about who's Donte
7 Peppie is. But you said I -- how much was that
8 charge?

9 Q Okay. And you went to a restaurant
10 called Chateau of Spain. That must have been a
11 big event. Is that a good restaurant up there?

12 A It's nice. It's okay.

13 Q Nice.

14 A It's okay.

15 Q You go there often?

16 A No, I --

17 Q Well, more than once?

18 A Yeah, I've been there more than once.

19 Q Okay. Well, you used your mother's
20 money --

21 A I probably did.

22 Q -- to -- to go to the restaurant.

23 A Uh-huh.

24 Q And you also had your nails done. Had
25 your nails done at N.J. Nails. Is that correct?

1 A Sometimes my mother and I went and got
2 our nails done.

3 Q Oh, you're not saying you took your
4 mother to have her nails done?

5 A She -- we went to the nail shop. I
6 told you --

7 Q You also --

8 A -- that.

9 Q -- spent money at Toys R Us. You've
10 got grandchildren. Was that for your
11 grandchildren?

12 A Probably.

13 Q Do you admit that?

14 A Yeah. Oh, if you mean Toys R Us for
15 my grandkids, yes.

16 Q Also you spent money at Costco.
17 Costco, the big department -- the big store?

18 A Yeah.

19 Q Well, it's in --

20 A Costco.

21 Q -- East Hanover, New Jersey. That
22 wasn't your mother. Your mother was here in South
23 Carolina.

24 A Uh-huh.

25 Q You were up there spending your

1 mother's money with reckless abandonment.

2 A It's not reckless, sir.

3 Q How about Picture People? You get
4 pictures of you and the grandchildren or the
5 grandchildren?

6 A Yes.

7 Q Okay. You also went to Grammy Museum
8 Experience. Do you remember that?

9 A Grammy Experience. No.

10 Q You don't remember it?

11 A No.

12 Q Well, that's what the records
13 indicate. You're not arguing with that, are you?

14 A I'm not sure.

15 Q Okay. There's a grocery store up in
16 New Jersey, Shop Rite.

17 A Uh-huh.

18 Q There are numerous payments to Shop
19 Rite Grocery Store. And that was -- you bought
20 your groceries? You've got to buy them. You --
21 you've got to have food. You've got -- and -- and
22 -- but you used these accounts to buy groceries,
23 Ms. Ryles. Isn't that correct?

24 A If it's on there, yes, sir.

25 Q You -- you're familiar with Shop Rite?

1 A Yes.

2 Q You go there all the time?

3 A Fav--- yes.

4 Q Is that your favorite grocery store?

5 It would indicate that it is.

6 A Yeah, Shop Rite is the store I go to.

7 Q You also have -- you also spent money

8 at Deluxe Diner -- Diana in New Jersey for 8.02.

9 Do you deny that?

10 A Deluxe Diner?

11 Q Deluxe Diner. Do you not remember

12 that?

13 A Huh-uh.

14 Q What about, you paid city taxes, City

15 of Newark tax of almost 800.00?

16 A That's her property.

17 Q Apple Store in Shore Hill, New Jersey,

18 what is that?

19 A You know Apple.

20 Q What?

21 A You know Apple. Apple. Mobile Apple.

22 Q I don't know what that -- what's

23 Apple?

24 A Apple iPhone.

25 Q Oh, phones. Tele -- that Apple?

1 A That -- yeah, that Apple. Yes.

2 Q Okay. Also Care Car Center in Newark.
3 You had your car serviced. You've got to have
4 your car serviced, the oil changed, that sort of
5 thing. Maybe tires or gasoline.

6 A Uh-huh. I do use Car Care service in
7 West Market Street, Newark. Yes.

8 Court Reporter: I'm sorry. What was
9 that? Market? Ma'am --

10 The Witness: He said car service. I
11 said, yes.

12 Court Reporter: On West Market?

13 The Witness: And he said West Mark---
14 I asked him was it West Market Street in Newark.
15 By Mr. Johnson:

16 Q Is Car Care Center in Newark, New
17 Jersey?

18 A Yes.

19 Q Well, it's apparent, Ms. Ryles, that
20 you used this money for every day expenses. Going
21 to the grocery store. Going to restaurants.
22 Paying parking tickets. You treated it as if it
23 were your own money. Do you know what your duties
24 are as power of attorney?

25 A To take care of my mother and her --

1 her -- her business.

2 Q To do everything in your mother's best
3 interest.

4 A Well, I think I done that.

5 Q Complete loyalty.

6 A I did do that.

7 Q And you are not allowed, as power of
8 attorney, to spend money for things like Yankee's
9 stadium and having your nails done.

10 A My mother said -- my mother allowed me
11 to do certain things.

12 Q And you are -- are you aware that
13 there's nothing in the power of attorney that's
14 been introduced here that gives you the right to
15 gift yourself? Were you aware of that?

16 A Can you repeat that?

17 Q You cannot gift yourself.

18 A I cannot get -- get --

19 Q You cannot take.

20 A Okay. Yeah.

21 Q Are you aware of that?

22 A No.

23 Q Well, I can understand the way you
24 spent the money you did not understand what your
25 obligations are. This was not your money. As

1 power of attorney, you are obligated to do the
2 best you can in good faith, complete loyalty to
3 your mother. Not have your nails done or go to
4 Mickey Finn's to buy wine. Your mother in
5 December '15, 2017, did not have the mental
6 capacity to call Hawkins Tax Service and ask them
7 to prepare a will. Did she, Mr. Ryles?

8 A She has the mental capacity because
9 she call -- because she calls New Jersey -- she
10 used to call New Jersey and talk to her sister.
11 So I'm not -- I don't agree with that.

12 Mr. Johnson: Anything else?

13 Mr. Crawford: No.

14 Mr. Johnson: Thank you, Ms. Ryles.

15 The Witness: You're welcome, sir.

16 C R O S S - E X A M I N A T I O N

17 By Mr. Blake:

18 Q Ms. Ryles --

19 A Yes.

20 Q -- you indicated that you had to pay
21 certain taxes and expenses in order to save these
22 estate properties. Is that correct?

23 A Yes.

24 Q Okay. And those properties are still
25 in the name of Edith Ryles. Is that correct?

1 A Yes.

2 Q Now, let's talk about some of the
3 repairs that you did on these properties. What
4 are some of the repairs that you did on these
5 properties?

6 A Well, when I came home it was from the
7 roof. They had to repair the pipes from the third
8 floor all the way to the basement because it was
9 leaking from the basement -- I mean, from the --
10 from the roof all the way down into the basement.
11 So we had to repair all of those pipes there. And
12 we -- we did the first floor over, so we can rent
13 the apartment out for the first floor. Because my
14 cousin was living there, but he wasn't paying any
15 rent. That caused my brother to -- to not have
16 money to pay the taxes.

17 So after he left, we -- I had to pay a
18 guy to come in to do the floors, over the paint,
19 do all of that, so we can get that done. We did
20 the back porch because the insurance company
21 wouldn't insure the apart--- the house unless we
22 got that back done. Then I had to replace the
23 boiler. The -- which was a 5,000 dollar job that
24 we had to do because the girl's boiler on the
25 first floor was gone. And -- and -- and then the

1 other -- and -- and -- and one of the properties,
2 she did have didn't have any income coming in so,
3 we had to pay taxes on that particular property.
4 And the other one because we -- he -- he wasn't
5 collecting any rent money to pay the bills. So I
6 was obligated to -- to try to keep the houses.
7 And not my brother and his family to become
8 homeless.

9 Q And you -- and you have some receipts
10 where you paid some of these taxes?

11 A It was a -- it was a lot. It was a
12 lot. And I used other --

13 Q I'm going to show you a receipt. Is
14 that a receipt for where you paid some of the
15 properties --

16 A Yes, it's -- it's --

17 Q -- property taxes in New Jersey?

18 A Yeah, it's more than this.

19 Q Okay.

20 A This is just the beginning.

21 Q All right. And which property is that
22 receipt for?

23 A I don't have my reading glasses. Can
24 I get my reading glasses?

25 Q Yes, if you have them.

1 The Court: That's fine.

2 The Witness: This is 86 house, 22,000
3 dollars.

4 By Mr. Blake:

5 Q So property -- in order to catch it
6 up, it was 20 -- over 22,000 dollars in
7 property --

8 A It was more -- it was more than that
9 because he -- it was like he had like three
10 different liens on -- like really four to five
11 different liens on the -- the properties. So it
12 was a lot more than that.

13 Q Okay. So out -- out of that money
14 that you've been testifying to, you -- you used
15 that money to save that estate property. Is that
16 correct?

17 A Yes.

18 Q I'm going to show you another one.
19 The same question, which property is that on?

20 A Yeah, that's the same one for 7,000.
21 Yes. To save. Uh-huh.

22 Q Okay. And again, the same thing, you
23 -- you -- you needed to --

24 A Use the money.

25 Q -- save these --

1 A Uh-huh.

2 Q -- these properties from being lost.

3 Is that correct?

4 A Yes.

5 Q Other than paying the taxes and the
6 repairs, did you keep these properties insured?

7 A On -- yes. Because he didn't even
8 have -- he didn't have insurance on the property.
9 I had to get insurance to put on -- on -- on the
10 -- on the property. I had to do that, yes. And
11 it had to replace -- yeah, replace like two or
12 three boilers in that house.

13 Q You said boilers?

14 A Yes. And that -- and these boilers
15 are like 5,000. Taxes on that -- them properties
16 up there is 7,000 a year, easily.

17 Q Okay.

18 A And then -- and -- and -- and they
19 wasn't paying any rent and had no tenants. So it
20 just went into foreclosure.

21 Q Okay. What about maintaining the
22 yard, maintaining the outside, did you handle that
23 as well?

24 A I -- I had a friend that's got a
25 little landscaping business and he'd come and cut

1 the grass. And then I had to hire somebody to do
2 the snow removal, come by and shovel the snow, all
3 that. And also paid somebody to -- to clean and
4 sweep and take care of the hallways and stuff of
5 those apartments. It -- it -- it's just -- it's
6 just -- it's just a blessing that I -- I had a
7 friend. His name was George Amos. He did a lot
8 of handwork and he -- and he saved me some money.

9 Q Okay.

10 A But he's -- I can't use him because he
11 just passed this year. But he was a blessing to
12 me.

13 Q I'm going to show you -- this is an
14 invoice to refresh your memory. You testified
15 that you had to get boiler work done on --

16 A Yes.

17 Q -- that particular property.

18 A Yeah, Continental Plumbing is who I
19 used as my -- my boiler people. They do all my
20 plumbing work.

21 Q Okay.

22 A Because you've got --

23 Q And how much -- and how much did you
24 pay for that?

25 A Four-thousand-five-hundred dollars.

1 Q So again, this -- this notion of --
2 the -- the notion that, you know, you start out
3 with 105,000 and I guess, that was taxes --

4 A Taxes.

5 Q -- repairs?

6 A Repairs.

7 Q Okay. Now, you do -- you do admit
8 that you should not have bought wine or went out
9 to dinner --

10 A Yeah.

11 Q -- with that money. Is that correct?

12 A Yes, I shouldn't --

13 Q Excuse me?

14 A Yes.

15 Q And -- and you do admit, you should
16 not have ever used that money to buy your own
17 groceries?

18 A Right. I admit it.

19 Q Okay. But is it -- are you -- are you
20 asserting that those were -- were minor expenses,
21 the bulk of the money --

22 A Minor expenses.

23 Q -- was used for the estate?

24 A And my mother let me do certain
25 things.

1 Q Okay. So you -- you're testifying
2 that your mother allows you to -- to use the
3 money. Is that correct?

4 A Yes.

5 Q Okay. Did you have a really great
6 relationship with your mother?

7 A Yes. My mother and my father.

8 Q Okay. So I'll show you a -- of
9 course, you just testified that your -- your --
10 you had a strong relationship with your mother and
11 your father.

12 A Uh-huh.

13 Q Have you seen that document that's in
14 front of you today?

15 A Yes.

16 Q Is that a deed?

17 A McGowan and Ro--- yes. I guess. Yes.

18 Q Okay. You indicated that's -- that
19 was prepared by McGowan and Rogers?

20 A Yes. Yeah, I see. Yes.

21 Q Okay. And -- and that deed shows
22 Edith Ryles as the grantor. Is that correct?

23 A Yes.

24 Q Okay. It shows that she gave the
25 property in Florence to you. Is that correct?

1 A And -- and she -- she willed it over.

2 Yes, in --

3 Q She --

4 A -- 2011.

5 Q In 2011. Is that correct?

6 A Yes.

7 Q She -- she gave this property to you.

8 She maintained a life estate. Is that correct?

9 A Yes.

10 Q So your mother said that the home in

11 Florence is yours. Is that correct?

12 A Yes.

13 Q And that was way back in 2011?

14 A 2011. And I was still working.

15 Q And I -- I don't think there was any
16 -- we hadn't heard -- you hadn't had any issues or
17 any concerns back in 2011 about your mama's
18 capacity?

19 A No.

20 Mr. Blake: Your Honor, we put that --
21 this deed in as exhibit 1.

22 Mr. Johnson: That's fine.

23 The Court: All right. Without
24 objection, that'll be respondent's exhibit 1.

25 (Respondent's exhibit number 1

1 marked for identification.)

2 By Mr. Blake:

3 Q So the property in Florence pursuant
4 to that exhibit we just put in, that's -- that's
5 actually your -- your house?

6 A Yes.

7 Q Okay. And again, that was done in --
8 way back in 2011?

9 A 2011.

10 Q Okay.

11 A And she --

12 Q And --

13 A -- died in 2018.

14 Q Okay. And then that -- that really
15 just leaves the two properties in New Jersey that
16 are in your mother's name?

17 A Yeah. Well, one is in my brother's --
18 yes.

19 Q Okay. And again, you -- a lot of the
20 expenses were for taxes --

21 A Taxes.

22 Q -- and the upkeep of those properties.
23 Is that correct?

24 A The taxes killed it.

25 Q Now, Hawkins Tax Services, how long

1 had your mother been using Hawkins Tax Services?

2 A My -- my mother and father talked
3 about --

4 Q You can't say what they talked about.

5 A Oh.

6 Q How long have they --

7 A They've been using it since they've
8 been down here. Like, I'm going to say they came
9 in 2006, possibly 2008, maybe.

10 Q And you testified that she had a
11 relationship with Vera. Is that correct?

12 A Yes.

13 Q And Vera was with Hawkins Tax
14 Services?

15 A Yes.

16 Q Okay.

17 A They had a real close relationship.

18 Q Okay. And you indicated when she
19 would need something, she would run and go see
20 Vera. Is that correct?

21 A Absolutely. Take me to go too -- all
22 the time. That's who she goes to, Vera.

23 Q Okay. When -- when your mother went
24 to prepare those -- prepare that will, did you go
25 in?

1 A No. No, I don't -- I don't know what
2 she -- she -- she asked me to take her to Vera.
3 Take her to Vera. Now, what -- whatever they
4 talked about was on them.

5 Q You were not in the room. Is that
6 correct?

7 A Huh-uh. Absolutely not.

8 Q Okay. And did your mother know what
9 she owned?

10 A Yes.

11 Q And she included it in the will, those
12 two properties in --

13 A Yes, she knew --

14 Q -- in New Jersey. Is that correct?

15 A She knew exactly what she owned. And
16 everybody -- everybody knew what she -- they know.

17 Q All right. The automobile that she --
18 she included in the will an automobile. Did she
19 own an automobile?

20 A Yes.

21 Q Pursuant to that will, isn't it true
22 that she left a small amount of -- of money for
23 the plaintiffs in this case?

24 A I -- yes. I -- I -- I've -- I feel
25 for them, but that's what she did.

1 Q So if that will is valid, they would
2 each receive about 100 dollars. Is that correct?

3 A Sim--- similar to that.

4 Q Now, you indicated -- or you testified
5 upon Attorney Johnson's examination, your mama had
6 a strong mind. Is that correct?

7 A Very strong minded. She knew exactly
8 what she wanted and what she wanted to do and you
9 couldn't change her mind. Nobody.

10 Q Okay. And of course, you did indicate
11 she had some -- some physical issues or --

12 A Right.

13 Q -- in -- in her knee?

14 A Knee -- knee. She fell down with the
15 wheelchair with my brother, that caused her to
16 have the -- the walker. And she had surgery on
17 her back, would also cause her to -- for the
18 walker. The incident of the walker.

19 Q Okay. Were those physical ailments
20 part of the reason why somebody kind of had to be
21 there to help her?

22 A Right.

23 Q And other than one incident with the
24 -- with law enforcement, were there any other
25 issues with law enforcement having to come out to

1 -- to check on your mother?

2 A No. She went to the center -- I got
3 her ready for the center three times a week. She
4 went to the center. They came and picked her up,
5 transportation. I built a ramp -- got her a ramp
6 built in the garage, so she could be good. I got
7 the nurse for her, three -- come -- you know, to
8 help out to make sure -- to do her therapies and
9 stuff. I retired early to -- to help out with
10 her.

11 Q Right. So yeah, that's, of course,
12 some of the things you just mentioned. You -- you
13 got -- you got a ramp for her. Is that correct?

14 A Yep. I researched it. They've been
15 asking for the ramp for the longest. My siblings
16 didn't get it. They -- for some reason, I don't
17 -- maybe they was working. They just didn't have
18 the time. I really don't know why it wasn't got.
19 But I -- I forget what program I researched and
20 they paid for the wood for her. And I just paid
21 the guy to -- to build the ramp inside the garage
22 for her. And instead of her being home all day, I
23 got in contact with the center. Paid for
24 transportation for them to pick her up to take
25 her, so she can be at the center. I took her out

1 with me. She -- we went to Florence after Five.
2 We went to -- we went on church trips. She went
3 to church every Sunday.

4 Q And you also indicated that she was --
5 you got her involved in several programs?

6 A Yes.

7 Q Is that correct?

8 A Ab--- yeah. So she -- yeah. Uh-huh.

9 Q So describe or explain some of those
10 programs that she was involved in.

11 A She went to -- it's off of Cashua. I
12 forget the name of it, but transportation picked
13 her up. They go -- they had -- they did singing,
14 sewing. She interact with other people her age,
15 so she wouldn't be in the house all day long every
16 day.

17 Q Okay.

18 A So she went, like, three times a week.
19 You know, you had to get her up early. You -- you
20 had to get her up early in the morning, so
21 transportation could get her up at 8:00, so I -- I
22 was there and got her ready and prepared by 6:00.
23 Get her up. Got her -- fed her. Off she went
24 until 4:00 or 5:00 in the afternoon. Matt---
25 matter of fact, when -- when I go back to New

1 Jersey, that center stated that my mother couldn't
2 come --

3 Q You can't -- you can't say what --

4 Mr. Johnson: Objection.

5 By Mr. Blake:

6 Q -- anybody said.

7 A Okay. My fault. I apologize again.

8 Q Was that center New -- that you took
9 her to in Florence or that -- or that picked her
10 up, was that New Generations?

11 A Yes, New Generations. That's exactly
12 who it was. New --

13 Q Okay.

14 A -- Generations.

15 Q And was that paid for out of her
16 money?

17 A Yes.

18 Q I'm going to show you a quick picture
19 here.

20 A Yeah. That's the ramp I had built,
21 that I got built for her, so she could get up and
22 access with her -- up and down the stairs, so she
23 don't have to worry about the stairs being
24 accessible for her.

25 Q And you don't deny, of course, she

1 needed a ramp? She needed --

2 A She needed a ramp.

3 Q Meaning that issue could --

4 A Yes.

5 Mr. Blake: Your Honor, we're going to
6 put the ramp in as 2.

7 Mr. Johnson: Is there a bill for the
8 ramp?

9 By Mr. Blake:

10 Q Do you -- do you recall how much you
11 paid or spent on the ramp?

12 A I think -- I think that guy -- I
13 thought I had -- I submitted the bill. I had to
14 be like four to 500 dollars he built that ramp for
15 me.

16 Q Okay.

17 A A -- a guy and his son.

18 The Court: I'll admit exhibit 2
19 without objection.

20 (Respondent's exhibit number 2

21 marked for identification.

22 By Mr. Blake:

23 Q Did your mother have a family doctor
24 that she would see?

25 A She -- her doctor was doctor --

1 Dr. Tracy Brown.

2 Q Okay. And did -- did Dr. Brown see
3 her all the way up to the time of her death?

4 A Yes.

5 Q Was there a nurse that would come out
6 and see her?

7 A Only when she, maybe had to do
8 therapy, something in that nature --

9 Q Okay.

10 A -- somebody came out.

11 Q Okay. Of course, you haven't seen any
12 of them today. Is that correct?

13 A Excuse me?

14 Q None of them are here today in terms
15 of --

16 A No. No.

17 The Court: Give me just a minute. It
18 appears one of our petitioners need to be excused
19 to use the men's room.

20 Mr. Blake: No objection, Your Honor.

21 The Court: You may be excused. All
22 right. And if you'll repeat what your testimony
23 was concerning the cost of the ramp.

24 The Witness: I'm going to say between
25 450 and 500, I -- I paid for that ramp.

1 The Court: Okay. Thank you, ma'am.

2 The Witness: You're welcome.

3 By Mr. Blake:

4 Q And -- and what are some of the
5 activities that you -- you did with your mother?
6 You indicated you got your nails done.

7 A Yeah, we went -- sometimes we went on
8 church -- they had little outings out with the
9 church. We went out to eat. And took her to the
10 Pecan Festival one year because they had the guy
11 she loved -- gospel. So we -- we -- we hung out
12 at -- at the Pecan Festival, while she enjoyed the
13 gospel music all day. We -- we went and ate. We
14 went to Florence After Five. She enjoyed the --
15 the blues, the music. When -- whenever I got a
16 chance to take her out, I took her out. I -- I
17 didn't -- I took her to Walmart. Wherever I went,
18 she went.

19 Q And you testified earlier that your
20 mother had a plan that she used in terms of paying
21 her -- her bills. Is that correct?

22 A Excuse me?

23 Q You -- you testified earlier that your
24 mother kind of had a plan that she did to pay her
25 bills?

1 A Yes.

2 Q You testified she would write her own,
3 lay her own --

4 A Lay her bills out, what she had to
5 pay. She's very particular, yes.

6 Q You said she's very particular about
7 that. Is that correct?

8 A Well, who -- who -- she's very
9 particular when -- who was with her when she wrote
10 her bills. Absolutely.

11 Q All right.

12 Mr. Blake: No further questions, Your
13 Honor.

14 The Court: Okay.

15 Mr. Johnson: I want to make sure do I
16 have all the -- the bills? I have these two.
17 What are the others? Got the ramp for 500
18 dollars. Is there any other --

19 Mr. Blake: No, I -- I didn't enter
20 the -- she testified as to the tax -- some of the
21 taxes --

22 Mr. Johnson: Right.

23 Mr. Blake: -- that she had paid.

24 Mr. Johnson: These?

25 Mr. Blake: I -- I --

1 Mr. Johnson: Are there any other
2 bills?

3 Mr. Blake: She testified as to the
4 taxes.

5 Mr. Johnson: Oh, okay.

6 Mr. Blake: And -- and I -- I put that
7 -- I don't think I even entered that one. I just
8 wanted her to testify as to some of the expenses,
9 examples of expenses that she had incurred out of
10 the money that had been spent.

11 R E D I R E C T E X A M I N A T I O N

12 By Mr. Johnson:

13 Q Ms. Ryles, the taxes that you paid on
14 the houses in New Jersey were for your benefit.
15 You prevented the tax sale foreclosure to protect
16 your property, not your mother's property?

17 Mr. Blake: Your Honor, I -- I think
18 that question's been asked and answered. She's --
19 she's indicated multiple times that the property
20 is in the name of Edith Ryles.

21 Mr. Johnson: Well, it isn't. No,
22 she's not in the name of --

23 The Court: I'm -- I'm going to
24 overrule. I -- I think it -- it is perfectly
25 acceptable to establish whether or not there is

1 self dealing in -- in this matter. And that goes
2 to the crux of the petitioner's case.

3 Mr. Blake: Yes, sir.

4 The Court: And that's -- I think
5 where petitioner's counsel is going with his line
6 of questioning.

7 Mr. Blake: Yes, sir.

8 By Mr. Johnson:

9 Q The bill for Continental Plumbing for
10 4,500 dollars, that was for -- for you, Doris
11 Ryles. And that 86th -- S. 8th Street, is that
12 where you live today?

13 A I live in Florence.

14 Q Well, the house before coming --

15 A Florence, that's where I live.

16 Q No. No, but that was yours. That's
17 where you've been for the last several years. Is
18 that the three unit --

19 A Two units.

20 Q Two units?

21 A Yes.

22 Q Okay. That's where you lived?

23 A Yes.

24 Q And that's in your name?

25 A No.

1 Q Whose name is it in?

2 A Edith Ryles.

3 Q But you are the owner?

4 A No.

5 Q Edith Ryles doesn't -- well, the
6 estate does, but it's -- it's in her name only?

7 A Right.

8 Q It's your property?

9 Mr. Crawford: It's going to you under
10 the will.

11 By Mr. Johnson:

12 Q It's going to you -- went to you --

13 A Oh.

14 Q -- under the will?

15 A Oh, what you mean under the will, then
16 that case. But before that --

17 Q Well, I -- I know before that, when
18 she was alive, that was her property.

19 A Yes.

20 Q But you lived there?

21 A Yes.

22 Q And --

23 A Not only me. You had people living at
24 that building was for -- home for -- affordable
25 homes.

1 Q But they paid you rent?

2 A Paid -- they paid the rent.

3 Absolutely.

4 Q Okay. And that --

5 A Right. So that --

6 Q -- went to you?

7 A -- home was for -- no.

8 Q Let's see. The ramp at your mother's
9 house here in Florence --

10 A Florence.

11 Q -- was --

12 A Yes.

13 Q -- 500 dollars. Then there was a
14 plumbing bill for 4,500 dollars at one of the
15 houses in New Jersey?

16 A Yes.

17 Q Okay. And then there's another bill
18 for 4,000 -- 4,300. What was that? This bill,
19 what is that for?

20 A I -- I think that -- I think this goes
21 with one of them pages that you have, sir. This
22 might be a second sheet of the first sheet.

23 Q Well, was the total bill -- oh, I see.
24 Here it is, 4,500 dollars you paid 200 dollars, so
25 the balance was 4,300.

1 A Yes, sir.

2 Q Okay.

3 Mr. Johnson: Your Honor, that's all I
4 have.

5 The Court: Okay. What was that 4,500
6 dollar bill for?

7 The Witness: It was plumbing.

8 The Court: All right. And just to
9 clarify, this 86th Street property is in New
10 Jersey?

11 The Witness: Yes.

12 The Court: And it's one of your
13 mother's properties that belongs in the estate
14 currently?

15 The Witness: Yes.

16 The Court: On the will that is
17 currently in question as to whether or not it is
18 valid?

19 The Witness: Yes.

20 The Court: Okay. And now that 86th
21 Street property, is that also the property that
22 you grew up in that your mother and father lived
23 in?

24 The Witness: Yes, we all grew up --
25 the whole -- all our siblings.

1 The Court: I understand.

2 The Witness: We had aunts and just
3 family lived in the house. That's all that lived
4 that house was just family.

5 The Court: But there is a second
6 property that your brother Alonzo was in charge of
7 taking care of?

8 The Witness: Right.

9 The Court: Okay. And your testimony
10 just for clarification sake, was that you spent
11 money from this estate to take care of both of
12 those properties, paying the taxes on both of
13 those properties?

14 The Witness: Yes.

15 The Court: Paying upkeep on both of
16 those properties?

17 The Witness: Yes.

18 The Court: The insurance on both of
19 those properties? The landscaping and general
20 maintenance of both of those properties?

21 The Witness: Yes.

22 The Court: Okay. In addition to,
23 without doubt, admittedly some self-dealing with
24 regard to personal groceries and shopping and
25 things of that nature. Correct?

1 The Witness: I didn't hear that last
2 part, sir.

3 The Court: I said in addition to some
4 personal dealings with regard to groceries,
5 manicures and things like that --

6 The Witness: Yes.

7 The Court: -- wine? Thank you,
8 ma'am. Is there anything further from either
9 attorney?

10 Mr. Blake: Nothing further, Your
11 Honor.

12 The Court: Okay.

13 Mr. Johnson: Your Honor, you -- can I
14 ask one more question?

15 The Court: Yes, sir.

16 (Further) R E D I R E C T E X A M I N A T I O N

17 By Mr. Johnson:

18 Q You -- you -- you had submitted some
19 expenses on some houses there. The records from
20 the money market account show that on the day
21 before your mother died, you withdrew 15,000
22 dollars. Isn't that true?

23 A That was to pay for taxes at 8889
24 South 8th Street. You see this? That -- that's a
25 -- it's not a house. It's an empty -- it's like

1 land. That also was in foreclosure, 8890 South
2 8th Street.

3 Q Okay. You withdrew 20,000 dollars,
4 but actually the -- the day before your mother
5 passed away. And a month before that you took out
6 8,000 dollars.

7 A All for taxes.

8 Q And then up in -- here's another big
9 withdrawal, 15,000 dollars on October 26th, 2017.
10 And here's that 23,000 dollars.

11 A Taxes. Taxes. It was so many liens
12 on that house -- all those houses.

13 Mr. Crawford: Everything goes to her.
14 By Mr. Johnson:

15 Q Yeah. And -- and under that will
16 that's being contested, everything goes to you.
17 You were preserving your -- your -- that property?

18 A I wasn't thinking along those lines at
19 that time, sir.

20 Q You what?

21 A I wasn't -- I wasn't thinking like
22 that, that my mother was going die to -- to -- to
23 -- for -- for -- for -- for the property, sir.

24 And I just want to clear this up. My
25 grandparents -- and let me just explain this to

1 you, from Georgia --

2 Mr. Johnson: Objection, Your Honor.

3 I don't want to hear what her --

4 The Witness: I just --

5 Mr. Johnson: -- her grandparents was

6 -- were --

7 The Witness: Can I just say this,

8 Your Honor?

9 The Court: If it does not have to do
10 with -- with the --

11 The Witness: I just want to --

12 The Court: -- estate then no, ma'am.

13 The Witness: I understand the -- the
14 -- the -- what -- what our parents instilled in us
15 as growing up and what they taught us, what we
16 should and should not do.

17 The Court: I'm -- I'm pretty certain
18 it's an emotional appeal with regard to
19 maintaining the property. And I think I know
20 where you're probably going to go with it and I
21 don't --

22 The Witness: Okay.

23 The Court: -- think it's appropriate
24 testimony.

25 Mr. Johnson: Thank you, Your Honor.

1 The Court: I will allow for you to be
2 seated. But I will state, have you provided
3 through your counsel any documentation or receipts
4 or evidence of these tax payments or maintenance
5 of this estate?

6 The Witness: Yes. And if -- if you
7 need any additional, I can -- it's no problem
8 going to the City of Newark and -- and -- and
9 getting all of those liens for -- for the property
10 that was paid. And I -- I can do that if -- if
11 all of them are not there. I -- I -- I thought I
12 gave him everything.

13 The Court: And while I have you on
14 the stand, it's my understanding that prior to
15 coming to court, this Court has ordered mediation
16 between the parties, which would have resolved, I
17 think a lot of these issues had this stuff been
18 discussed. And -- and you refused to mediate.

19 The Witness: I -- I really -- no.

20 Mr. Blake: Your Honor --

21 The Witness: That's not true.

22 Mr. Blake: -- if I may. I do have an
23 issue with what -- that being included in the
24 pre-trial brief. We mediate in South Carolina
25 under the guidelines that what happens at

1 mediation is confidential. We should not be
2 coming in court or submitting briefs recounting
3 what happened at mediation. That would be the
4 same as if -- if I had an insurance company or
5 someone else saying you came and -- and -- and the
6 other lawyer came and said, well, we offered you
7 100,000 dollars; you didn't take it.

8 We're not allowed to get into what
9 happened at mediation. I -- I did notice that in
10 the pre-trial brief. I did not say anything, but
11 my plan today was if that was going to be advanced
12 any further than just that -- that very loose
13 reference in the pre-trial brief, I was going to
14 put on the record that we object to that for
15 purposes of appeal.

16 The Court: All right. Duly noted.
17 Well, then, you may be seated with counsel.

18 The Witness: Okay. Thank you.

19 The Court: And that'll be stricken
20 from the record.

21 The Witness: Thank you.

22 Mr. Johnson: Your Honor, that is the
23 petitioner's case.

24 The Court: Okay. No additional
25 witnesses, then? All right. Then Mr. Blake, do

1 you have any witnesses you'd like to call?

2 Mr. Blake: No, sir, Your Honor.

3 Mr. Blake: Ms. Ryles is my witness,
4 and of course, she's testified.

5 The Court: Okay. All right. I'll
6 take this matter under advisement. And I will get
7 back to the parties' counsel -- through their
8 counsel with the ruling on this matter and a
9 memorandum with regard to my ruling. And I will
10 request one of the parties' attorneys to draft an
11 appropriate order with regard to my ruling at the
12 appropriate time and ask that that attorney submit
13 the proposed order to the other attorney.

14 And then once it's agreed upon, the
15 language pursuant to my memorandum, then submit it
16 to me for final approval and signing.

17 Mr. Johnson: One more thing. Thank
18 you, Your Honor. I would request a 10-day period
19 to submit my request for attorney fees.

20 The Court: I'll allow it.

21 Mr. Johnson: Thank you.

22 The Court: Mr. Blake?

23 Mr. Blake: No objection to that, Your
24 Honor.

25 The Court: Okay.

1 Mr. Johnson: Thank you.

2 The Court: We'll stand adjourned.

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CERTIFICATE OF REPORTER

State of South Carolina
County of Florence

I, Roger Williamson, Court Reporter and
Notary Public for the State of South Carolina, do
hereby certify that the transcript of the
foregoing proceedings contains a true record of
the hearing in the above-captioned cause.

I further certify that I am neither attorney
nor Counsel for, nor related to or employed by any
of the parties connected to the action, nor am I
financially interested in the action.

Witness my hand at Florence, South Carolina,
this the 1st day of September, 2021.

Roger Williamson

MY COMMISSION EXPIRES:
March 18, 2022

1 STRICKEN FROM THE RECORD BY ORDER OF THE COURT:

2 By Mr. Johnson:

3 Q At the time when you got that power of
4 attorney when you were appointed, you didn't
5 hesitate to take full control of your mother's
6 finances, did you?

7 A My mother --

8 Q Didn't you?

9 A -- my mother -- I knew -- my mother
10 knew exactly what I was doing -- she told me to
11 do. Do exactly what she told me to do.

12 Mr. Johnson: Your Honor, again, I
13 would ask that that be stricken from the record.
14 She's repeating her mother. Now --

15 The Court: That'll be stricken.

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AGENCY I.D.
SC0210100

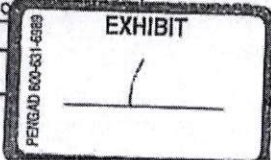
CITY OF FLORENCE
INCIDENT REPORT

CASE NUMBER
2016-003036

NCIC
INO. ENTD

INCIDENT TYPE		COMPLETED	FORCED ENTRY	PREMISE TYPE	UNITS ENTERED	TYPE VICTIM
1. NRP - ALTERED MENTAL STATUS		<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/> YES <input type="checkbox"/> NO	13		<input checked="" type="checkbox"/> Individual <input type="checkbox"/> Business <input type="checkbox"/> Financial Inst <input type="checkbox"/> Government <input type="checkbox"/> Relig. Orgn <input type="checkbox"/> Soc./Public <input type="checkbox"/> Other <input type="checkbox"/> Unknown <input type="checkbox"/> Police Off.
2.		<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/> YES <input type="checkbox"/> NO			
3.		<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/> YES <input type="checkbox"/> NO			
INCIDENT LOCATION (SUBDIVISION, APARTMENT AND NUMBER STREET NAME AND NUMBER)				ZIP CODE	WEAPON TYPE	
2105 TWIN BRIDGE DR, FLORENCE SC				29505		
INCIDENT DATE	24 HR. CLOCK	TO DATE	24 HR. CLOCK	DISPATCH DATE/TIME 24 HR. CLOCK		LOCATION NO
04/09/2016	2215	04/09/2016	2324	DISP. DATE	DISP. TIME	TIME ARRIVED
				04/09/2016	2216	2229
						2324
COMPLAINANT'S NAME (LAST, FIRST, MIDDLE)			RELATIONSHIP TO SUBJECT	RESIDENT	RACE	SEX
FOX, KYREEQ DERIUS HEYWARD			#1 ST	J	S	O
			#2	U	B	M
			#3			
ADDRESS			CITY	STATE	ZIP CODE	LOCATION NO.
106 PEPPER DR			DARLINGTON	SC	29532	00
VICTIM'S NAME (LAST, FIRST, MIDDLE)			RELATIONSHIP TO SUBJECT	RESIDENT	RACE	SEX
RYLES, EDITH MAE			#1	D	S	O
			#2	U	B	F
			#3			
ADDRESS			CITY	STATE	ZIP CODE	LOCATION NO.
2105 TWIN BRIDGE DR			FLORENCE	SC	29505	01
HEIGHT	WEIGHT	HAIR	EYES	FACIAL HAIR, SCARS, TATOOS, GLASSES, CLOTHING, PHYSICAL PECULIARITIES, ETC.		
ADDRESS			CITY	STATE	ZIP CODE	LOCATION NO.
2105 TWIN BRIDGE DR			FLORENCE	SC	29505	01
VISIBLE INJURY (VICT. 1) <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO EXPLAIN -						
VICTIM (NO. 1) USING: ALCOHOL. <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> UNK. DRUGS: <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> UNK.						
<input type="checkbox"/> TWO-MAN VEH <input type="checkbox"/> ONE-MAN VEH. <input type="checkbox"/> DETECTIVE/SPLASMT. <input type="checkbox"/> OTHER <input type="checkbox"/> ALONE <input type="checkbox"/> ASSISTED J - This Jurisdiction S - State O - Out of State U - Unknown						
SUBJECT	SUBJECT NAME (LAST, FIRST, MIDDLE)			RACE	SEX	AGE
	NO OFFENDER,			U	U	00
	FACIAL HAIR, SCARS, TATOOS, GLASSES, CLOTHING, PHYSICAL PECULIARITIES, ETC.					
	ADDRESS			CITY	STATE	ZIP CODE
						00
#1	SUBJECT (NO. 1) USING: ALCOHOL: <input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> UNK.			ARRESTED NEAR OFFENSE SCENE <input type="checkbox"/> YES <input type="checkbox"/> NO		DATE/TIME OF OFFENSE
	DRUGS: <input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> UNK. TYPE.			TOTAL # ARRESTED	0	04/09/2016 2215
Offenses: ALTERED MENTAL STATUS						
ON SATURDAY 04/09/2016, THIS OFFICER AND SPO CARLSON RESPONDED TO THE INCIDENT LOCATION IN REFERENCE TO AN ELDERLY FEMALE WALKING DOWN THE MIDDLE OF THE STREET. SPO CARLSON RESPONDED FIRST AND SPOKE WITH THE COMPLAINANT (KYREEQ FOX), WHO STATED HE WAS DRIVING DOWN THE STREET AND SAW THE FEMALE (EDITH RYLES) WALKING DOWN THE MIDDLE OF THE STREET. SPO CARLSON STATED RYLES DID NOT HAVE A JACKET ON AND WAS USING HER WALKER TO GO DOWN THE STREET. SPO CARLSON STATED SHE KNEW HER ADDRESS, BUT DID NOT THINK THAT THE HOUSE SHE WAS IN FRONT OF WAS HERS, WHICH IT WAS. SPO CARLSON GOT RYLES TO GO INSIDE HER RESIDENCE AND HE LOOKED AT HER PHONE BOOK THAT SHE HAS WITH NUMBERS IN IT. SPO CARLSON GOT IN TOUCH WITH HER FRIEND CARLA, WHO CALLED HER SON (WILLIE RYLES). W RYLES CAME TO THE RESIDENCE AND STATED HE WAS GOING TO STAY WITH HER THE REST OF THE NIGHT. W RYLES STATED SHE HAS NEVER DONE THIS BEFORE. W RYLES STATED THAT THE MAJORITY OF THE TIME HE OR ONE OF HIS SISTERS STAYS WITH RYLES. EMS RESPONDED TO THE INCIDENT LOCATION AND RYLES STATED SHE DID NOT WANT TO GO TO THE HOSPITAL. THIS INCIDENT IS RECORDED ON MY DVR. THERE IS NO FURTHER INFORMATION AT THIS TIME.						

Print Date: 07/03/2019 10:57:43 AM		JURISDICTION OF THEFT LAW ENFORCEMENT AGENCY		JURISDICTION OF RECOVERY LAW ENFORCEMENT AGENCY	
PROPERTY	TYPE (GROUP)				TOTAL VALUE
	Burned				
	Count/Forged				
	Dist/Damaged				
	Recovered				
	Seized				
ADMISS	SUBJECT IDENTIFIED	SUBJECT LOCATED	<input checked="" type="checkbox"/> ACTIVE <input checked="" type="checkbox"/> ADM. CLOSED	<input type="checkbox"/> ARRESTED UNDER 18	<input type="checkbox"/> EX-CLEAR UNDER 18
	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/> UNFOUNDED	<input type="checkbox"/> ARRESTED 18 AND OVER	<input type="checkbox"/> EX-CLEAR 18 AND OVER
REASON FOR EXCEPTIONAL CLEARANCE: 1 <input type="checkbox"/> OFFENDER DEATH 2 <input type="checkbox"/> NO PROSECUTION 3 <input type="checkbox"/> EXTRADITION DENIED 4 <input type="checkbox"/> VICTIM DECLINES COOPERATION 5 <input type="checkbox"/> AVEHICLE - NO CUSTODY					
REPORTING OFFICER		UNIT NUMBER	APPROVING OFFICER		DATE
PO J CHATLOSH		333B	CPL M HAPP		04/09/2016
FOLLOW-UP INVESTIGATION OFFICER		UNIT NUMBER			
<input type="checkbox"/> YES <input type="checkbox"/> NO		334C			



Received 6/30/2016 09:35:44 AM

Book B 638 Page 0807

Power of Attorney

CONNIE REEL-SHEARIN
FLORENCE COUNTY CLERK OF COURT
FLORENCE COUNTY COMPLEX, 180 N. IRBY ST., MSC-E
FLORENCE, SOUTH CAROLINA 29501
(843) 665-3031

RECEIVED FROM: EDITH RYLES 5966
ADDRESS: 2105 TWIN BRIDGE DR
FLORENCE SC 29505

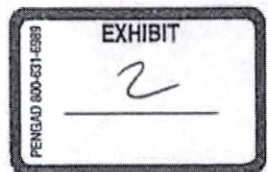
DATE: 063016

RECEIPT NO: 401136-000000

DESCRIPTION

# OF INST.	AMOUNT	FEES	#PAGES	** FEE **		TOTAL
				STATE	COUNTY	
Power of Attorney	.00	16.00	6	BOOK: B638 FROM PAGE: 807	THRU PAGE: 812	16.00

THIS SHEET IS NOW PART OF THIS DOCUMENT
===== PLEASE LEAVE ATTACHED =====



TOTAL RECEIPT: 16.00 .00 .00 16.00

TOTAL	CHECK	CASH	CHANGE
16.00	16.00	.00	.00

CR2 CLERKPAY 25 JM 093544

ELECTRONICALLY FILED - 2022 Mar 18 11:17 AM - FLORENCE - COMMON PLEAS - CASE#2021CP2102467

684
67

- 3. To buy every kind of property, real, personal, tangible, or mixed, upon such terms and conditions as my Agent shall deem appropriate; to obtain with respect to such purchases:
- 4. To invest and reinvest all or any part of my property in any property or interests (including undivided interests) in property real, personal, tangible or mixed wherever located, including without being limited to commodities. Contracts of all kinds, securities of all kinds, bonds debentures, notes (secured or unsecured), stocks and corporations regardless of class, interests in limited partnership, real estate / whether or not productive at the time of investment, interest in a trust, / Whether of the open and/ or closed fund types, and participation in common collective or pooled trust funds or annuity contracts without being limited by the Statute or rule of law concerning investments by fiduciaries; sell (including short sales) and terminate any investments whether made by me or any Agent; to establish, utilize, and terminate savings and money market accounts with financial institutions of all kinds;
- 5. With respect to real property that I may now or in the future; to lease, sublease, release,; to eject, remove, or relieve tenants or other personal form, and recover possession or by all lawful means; to accept real property as a gift or as security for a loan; to collect, sue for receive, and receipts for the purposes described in the paragraph; t do any act of management and conservation, to pay compromise, or to contest tax Assessments and to apply for refunds in connection there within; to mortgage and/or convey by deed of trust or otherwise encumber any real property now or hereafter owned by me, whether acquired by me or by my Agent.
- 6. With respect to personal property; to lease, sublease, and release; to recover possession of by all lawful means; to collect, sue for, receive and receipt for rent and profits therefore; to maintain, protect, repair, preserve, insure, alter, or improve all or any part thereof; to mortgage and/or grant security interests in any personal property or tangibles now or hereafter owned by me, whether acquired by me or for me by my Agent;
- 7. To ensure my life on the life of anyone of whom I have an insurable interest; to continue life insurance policies now or hereafter owned by me or either my life or the lives of others; to pay all insurance premiums; to select any options under policies; to purchase and/or any personal or either my life or the lives of others;

General Durable Power of Attorney for Edith Ryles

Initials E. R.

I am obligated or may have assumed the obligation to support; to carry insurance of such kind and in such amounts as my Agent shall deem appropriated to protect my assets against any hazard and/or to protect my assets against any hazard and/or to protect me from any liabilities.

08/11

- 8. To represent me in all tax matters; to prepare, sign, and file federal, state and/or local income, gifts, and other tax returns of all kinds, including joint returns, FICA returns, payroll tax returns, claims for refunds, requests for extensions of time, petitions to the tax court or other courts regarding tax matters, and any all other tax related documents, with respect to any year between the years of 2014 and 2034; to pay taxes due, collect and to make such disposition of refunds as my Agent shall deem appropriate; post bond, receive confidential information and contest deficiencies determined by the Internal Revenue Service and/or any state and/or local tax law matters and proceedings of all kinds and for all periods between the Years 2014 and 2034 before all officers on the Internal Revenue Service and state and local authorities;
- 9. To do all acts necessary for maintaining my customary standard of living, Quarters and normal domestic help for the operation of my house hold, to provide clothing, transportation, medical care, food and incidentals, and if necessary to make all necessary to make all necessary arrangements, contractual or otherwise, for me at any hospital, hospice, nursing home convalescent home or similar establishment.
- 10. To execute, see and deliver any documents, and papers necessary. Appropriate, incident or convenient to the exercise of any power granted herein, including without limitation deeds, notes, mortgages, checks, contracts, receipts and releases;
- 11. To employ, compensate, and discharges such domestic, medical, and professional personnel including lawyers, accounts, doctors, nurses, brokers, financial consultants, advisors, companions, servants, and employees as my Agent deems appropriate; and
- 12. To engage in, do, and transact all and every kind of business that may said Agent may think proper.

General Durable Power of Attorney for Edith Ryles

Initials ER

(3 of 5)

8/10

In respect to the foregoing, the following provisions shall apply:

1. I do ratify that my said Agent may lawfully do, or cease to be done, by virtue thereof and this instrument shall take effect thereafter until revoking in writing as hereinafter set forth. All persons from whom my Agent may request information regarding me are hereby authorized to provide such information to my Agent without limitation and are released from any liability whatsoever for complying with my Agents requests.
2. This Power of Attorney shall not be affected by physical disability or mental incompetence of the Principal which renders the Principal incapable of managing his/her own estate.
3. This instrument may be amended or revoked by me, and my Agent may be removed by me or any time by the execution by me of a written instrument of revocation, amendment, or removal delivered to any Agent. If this instrument has been recorded in the public records, then the instrument of revocation, amendment, or removal shall be filed or recorded in the same public record. My Agent may resign the execution of a written resignation delivered to me or, is I am residing or who has care and custody of me.
4. My Agent shall be entitled to reimbursement for all reasonable costs and expenses actually incurred and paid by my Agent on my behalf under any provision of this instrument.
5. My Agent is authorized to make photocopies of this instrument as frequently and in such quantity as my Agent shall deem appropriate. All photocopies shall have the same force and effect as any original.

ER

IN WITNESS WHEREOF, have hereto set my hand and affixed my seal
This 12th, day of June, 2016.

Edith Ryles
Edith Ryles

General Durable Power of Attorney for Edith Ryles

Initials ER

Signed, sealed, publish, and declared by the said **Edith Ryles**, as and for his/her Power of Attorney, in the presence of each of us, who, in his/her presence, in the presence of each other and at his/her request, have hereto set our hands and seals as witness hereto at the end of the Power of Attorney.

Vera J Lewis of Florence S.C.
Willie Thomas of Florence, S.C.

STATE OF SOUTH CAROLINA)
COUNTY OF FLORENCE)

PROBATE

10/20/21

PERSONALLY appeared before me Vera J Lewis, and made oath that he/she was present and saw the within name, **Edith Ryles** deed delivered the foregoing Power of Attorney and that he/she with Willie Thomas witnessed the execution and delivery thereof.

Vera J Lewis

SWORN to before me this 29th

Day of June, 2016

Catherine H. McWhite
Notary Public for South Carolina

My Commission Expires: May 12, 2020

General Durable Power of Attorney for Edith Ryles

Initials ER

(5 of 5)

8/2

LAST WILL AND TESTAMENT
IN THE NAME OF GOD AMEN.

2022 MAR 26 AM 8:49

I, Edith Ryles of the County of Florence, State of South Carolina, being of sound and disposing mind, and memory, but realizing the uncertainty of life and the certainty of death do make, ordain publish and declare this as and for my Last Will and Testament, hereby revoking any and all other wills heretofore made by me. It is my intention herein to dispose of all property of every kind, real, personal, tangible and intangible and in possession and in expectancy, which I own or possess at my demise or have a right to dispose of by will.

The worldly goods with which it has pleased God to endow me, I dispose of in the following manner:

Edith Ryles

ITEM I. I will direct that all my just debts and funeral expenses be paid out of my estate as soon after my demise as conveniently may be and to that end charge my whole estate real and personal with the same.

ITEM II. I will devise and bequeath unto my beloved daughter, Dorthea Ryles my interest in property located, 86 South 8 Street, Newark, NJ, with love and affection.

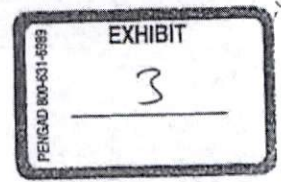
ITEM III. I will devise and bequeath unto my beloved son, Alonzo Ryles and beloved daughter, Dorthea Ryles my interest in property located at, 88-90 South 8 Street, Newark, NJ, they are to share and share alike with love and affection.

ITEM IV. I will devise and bequeath unto my beloved son, Alonzo Ryles and beloved daughter, Dorthea Ryles my interest in property located at, 2105 Twin Bridge Drive, Florence, SC, they are to share and share alike with love and affection.

ITEM V. I will devise and bequeath any auto that is in my possession to my beloved son, Leon Ryles with love and affection.

ITEM VI. I will devise and bequeath unto my beloved sons, Willie Ryles, Jr., and Leon Ryles, One Hundred Dollars each and my beloved daughter, Theresa Williams Fifty Dollars with love

Edith Ryles



and affection.

ITEM VII. I will devise and bequeath all properties of which at my death I possess, real, personal or mixed and where ever situated, to my beloved grandchildren, Micaela R. Presley, Melissa Ryles, Robert Roberts, Brandy Ryles, Brandice Ryles, Dalon Ryles, Hydeia Ryles, and Jonathan Williams they are to share and share alike with love and affection.

ITEM VIII. I hereby nominate, constitute and appoint my beloved daughter, Dorteia Ryles as Personal Representative of this my Last Will and Testament she is to serve without bond.

IN WITNESS WHEREOF, I, Edith Ryles has hereunto set my hand and seal to this my Last Will and Testament this 15th day of December 2017.

Handwritten initials: C, D, R, P, R.

Edith Ryles
Edith Ryles

Signed, sealed, published, and declared by, Edith Ryles as and for her Last Will and Testament, and we in her presence and at her request, and in the presence of each other have subscribed our names as witness thereto.

Vera J Lewis
Lucille R. Rucker

Florence S.C.
Ilana A.C.

PROOF OF WILL

STATE OF SOUTH CAROLINA)
COUNTY OF FLORENCE)

We, Edith Ryles the Testatrix and Vera J Lewis and Lucille Rucker the witness, respectively, whose names are signed to

the attached or foregoing instrument, being first duly sworn, do hereby declared to the undersigned authority that the Testatrix signed and executed it as her free and voluntary act the purpose therein expressed, and that each of the witness, in the presence and hearing of the Testatrix, signed the will as witness and to the best of our knowledge the Testatrix was at the time eighteen years of age or older, of sound mind, and under no constraint or undue influence.

Ed
Vera
J
R

Edith Ryles
Edith Ryles
(Testatrix)
Vera Lewis
Witness
Jucille Richardson
Witness

STATE OF SOUTH CAROLINA)
COUNTY OF FLORENCE)

Subscribed, sworn to and acknowledge before me, Edith Ryles the Testatrix, and sworn to before me by Vera Lewis and Jucille Richardson witness this 15th day of Dec, 20 17.

Catherine H. Myrtle (L.S.)
Notary Public for South Carolina
My Commission Expires: May 12, 2020

5.



ALAN WILSON
ATTORNEY GENERAL

April 23, 2021

VIA CERTIFIED MAIL / RETURN RECEIPT

Hawkins Tax Service
Attn: Katherine McWhite & Vera Lewis
239 North McQueen Street
Florence, South Carolina 29501

Dear Ms. McWhite and Ms. Lewis:

This Office is in receipt of information that you have assisted people with the drafting and providing of various types of legal documents including powers of attorney and last will and testaments.

This action constitutes the unauthorized practice of law in South Carolina. The relevant provision, S.C. Code of Laws § 40-5-310, states that, "No person may practice or solicit the cause of another person in a court of this State unless he has been admitted and sworn as an attorney. A person who violates this section is guilty of a felony and, upon conviction, must be fined not more than five thousand dollars or imprisoned not more than five years, or both." Further, the Courts of this state have made it clear that, in addition to court appearances, certain other actions also constitute the practice of law, these would include, among other things, the drafting of legal documents and providing legal advice.

This office is declining to proceed against you at this time. However, please be informed that should this Office learn of additional instances of the Unauthorized Practice of Law following your receipt of this letter, then appropriate action will be taken to protect the public. If you choose to continue your business, then I urge you to seek the advice of an attorney regarding the services which you provide to ensure compliance with the law.

Sincerely,

Megan B. Burchstead
Senior Assistant Deputy Attorney General

MBB/ns

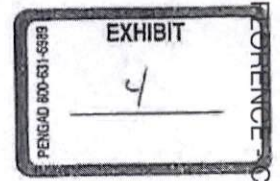
U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)
For delivery information visit our website at www.usps.com

9659 2984 9000 0281 5007

Postage	\$	Postmark Here
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$	

Sent To
Hawkins Tax Service: Katherine McWhite
Street, Apt. No.:
or PO Box No. 239 North McQueen Street
City, State, ZIP+4: Florence SC 29501

HS Form 3800, June 2007



ELECTRONICALLY FILED - 2022 Mar 11 11:17 AM - JUDICIAL DISTRICT OF COMMON PLEAS - CASE#2021CP2102467

STATE OF SOUTH CAROLINA) IN THE PROBATE COURT
COUNTY OF FLORENCE) CASE NO. 2018ES2100899

IN THE MATTER OF:)
Edith W. Ryles, deceased)
Leon Ryles, Willie N. Ryles, and Theresa Williams,)

Petitioners,)

**PETITIONERS' SECOND SET OF
REQUEST TO ADMIT TO
RESPONDENT**

vs.)

Dorthea Ryles,)

Respondent.

TO: CHARLIE J. BLAKE, JR., ESQUIRE, ATTORNEY FOR RESPONDENT

The petitioners hereby require, pursuant to Rule 36 of the South Carolina Rules of Civil Procedure, that the respondent admit or deny the following matters. Each matter for which an admission or denial is requested shall be deemed admitted unless respondent serves responses in the period required by Rule 36 of the South Carolina Rules of Civil Procedure.

REQUESTS

1. Respondent Doretha Ryles made ATM withdrawals from the PNC Bank account #53-4316-4456 in the name of Edith M. Ryles as follows:

- a. 01/27/2016 ATM withdrawal \$200.00
- b. 02/11/2016 ATM withdrawal \$400.00



c.	03/10/2016	ATM withdrawal	\$300.00
d.	03/14/2016	ATM withdrawal	\$ 40.00
e.	05/10/2016	ATM withdrawal	\$180.00
f.	08/01/2016	ATM withdrawal	\$100.00
g.	08/15/2016	ATM withdrawal	\$200.00
h.	08/23/2016	ATM withdrawal	\$500.00
i.	09/12/2016	ATM withdrawal	\$ 40.00
j.	09/21/2016	ATM withdrawal	\$600.00
k.	11/18/2016	ATM withdrawal	\$120.00
l.	11/21/2016	ATM withdrawal	\$ 30.00
m.	11/22/2016	ATM withdrawal	\$ 21.99
n.	11/23/2016	ATM withdrawal	\$150.00
o.	11/25/2016	ATM withdrawal	\$ 30.00
p.	11/28/2016	ATM withdrawal	\$ 31.99
q.	11/28/2016	ATM withdrawal	\$150.00
r.	11/28/2016	ATM withdrawal	\$ 30.00
s.	11/29/2016	ATM withdrawal	\$ 30.00
t.	11/29/2016	ATM withdrawal	\$ 40.00
u.	11/30/2016	ATM withdrawal	\$ 50.00
v.	12/19/2016	ATM withdrawal	\$100.00

w.	01/17/2017	ATM withdrawal	\$500.00
x.	02/06/2017	ATM withdrawal	\$500.00
y.	02/23/2017	ATM withdrawal	\$500.00
z.	03/01/2017	ATM withdrawal	\$100.00
aa.	03/08/2017	ATM withdrawal	\$600.00
bb.	05/23/2017	ATM withdrawal	\$500.00
cc.	06/26/2017	ATM withdrawal	\$100.00
dd.	06/28/2017	ATM withdrawal	\$141.69
ee.	06/30/2017	ATM withdrawal	\$401.75
ff.	09/13/2017	ATM withdrawal	\$500.00
gg.	09/27/2017	ATM withdrawal	\$120.00
hh.	09/28/2017	ATM withdrawal	\$100.00
ii.	09/28/2017	ATM withdrawal	\$100.00
jj.	10/30/2017	ATM withdrawal	\$310.00
kk.	11/06/2017	ATM withdrawal	\$600.00
ll.	11/06/2017	ATM withdrawal	\$300.00
mm.	11/30/2017	ATM withdrawal	\$200.00
nn.	12/04/2017	ATM withdrawal	\$500.00
oo.	12/04/2017	ATM withdrawal	\$400.00
pp.	01/11/2018	ATM withdrawal	\$500.00

qq.	01/11/2018	ATM withdrawal	\$200.00
rr.	02/06/2018	ATM withdrawal	\$500.00
ss.	02/06/2018	ATM withdrawal	\$300.00
tt.	03/19/2018	ATM withdrawal	\$800.00
uu.	03/29/2018	ATM withdrawal	\$200.00
vv.	04/16/2018	ATM withdrawal	\$100.00
ww.	04/19/2018	ATM withdrawal	\$160.00
xx.	05/04/2018	ATM withdrawal	\$500.00
yy.	05/04/2018	ATM withdrawal	\$500.00
zz.	05/17/2018	ATM withdrawal	\$160.00
aaa.	05/29/2018	ATM withdrawal	\$500.00
bbb.	06/05/2018	ATM withdrawal	\$800.00
ccc.	07/11/2018	ATM withdrawal	\$800.00
ddd.	07/30/2018	ATM withdrawal	<u>\$100.00</u>
			\$15,937.42 total

2. Edith M. Ryles had a Premium Money Market Account at PNC Bank, account #53-4316-5731 with a balance of \$105,373.39 on 01/13/2016. The respondent, Dorthea Ryles had complete access to the above referenced account which enabled her to make withdrawals and transfers from said account resulting in a balance of approximately \$4,000 as of October 25, 2019.

3. From January 13, 2016 through August 13, 2018, Dorthea Ryles made various transfers, including online transfers, from said account.

4. The attached record, (Exhibit 1), is a true and accurate summary of the transactions made by Dorthea Ryles from the Premium Money Market Account, account#53-4316-5731 of Edith Ryles.

5. Willie Ryles, Jr., Edith M. Ryles, and Alonzo Ryles had a joint banking account described as a Performance Select Standard Checking Account at PNC Bank, account #80-0411-6875. The Respondent Dorthea Ryles had complete access to said account either as her power of attorney or as one of the owners of said account. From February 1, 2016 through December 2, 2017, Respondent Dorthea Ryles made certain online transfers to account #8035072967 as shown in (Exhibit 2).

6. Acct #53-4316-4456 – As power of attorney for Edith Ryles, Respondent Dorthea Ryles conducted transactions, withdrawals, and transfers from January 14, 2016 through August 13, 2018 as follows:

a.	10/21/2016	State Farm/POA	\$237.04
b.	10/21/2016	State Farm/POA	\$410.94
c.	10/24/2016	Withdrawal by Dorthea/POA	\$100.00
d.	11/02/2016	Withdrawal by Dorthea	\$200.00
e.	11/04/2016	Withdrawal by Dorthea/POA	\$2,300.00
f.	02/02/2017	Withdrawal by Dorthea/POA	\$160.00

g.	03/13/2017	Withdrawal by Dorthea	\$600.00
h.	08/10/2017	Withdrawal by Dorthea/POA	\$125.00
i.	09/19/2017	Withdrawal by Dorthea/POA	\$1,500.00
j.	09/21/2017	Withdrawal by Dorthea/POA	\$22,395.27
k.	10/03/2017	Withdrawal by Dorthea/POA	\$1,600.00
l.	10/11/2017	Withdrawal by Dorthea/POA	\$2,500.00
m.	03/05/2018	Withdrawal by Dorthea/POA	\$800.00
n.	03/08/2018	Withdrawal by Dorthea/POA	\$1,200.00
o.	04/09/2018	Withdrawal by Dorthea/POA	\$500.00
p.	07/13/2018	Withdrawal by Dorthea/POA	\$7,376.82
q.	07/27/2018	Withdrawal by Dorthea/POA	<u>\$800.00</u>
			\$42,805.07 total

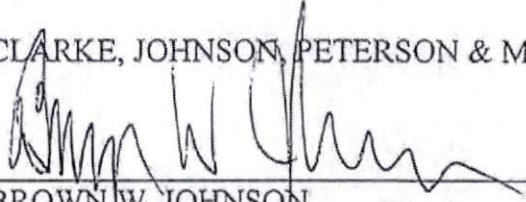
7. (Exhibit 3) The attached withdrawal tickets made by Respondent Dorthea Ryles from the checking account of Edith Ryles are true and accurate copies for the purposes of this litigation and admissible in evidence at the trial of the case as follows:

a.	11/04/2016	Withdrawal	\$2,300.00
b.	09/21/2017	Withdrawal	\$22,395.27
c.	10/03/2017	Withdrawal	\$1,600.00
d.	10/11/2017	Withdrawal	\$2,500.00
e.	10/26/2017	Withdrawal	\$1,535.54

- f. 10/26/2017 Withdrawal \$11,042.66
- g. 07/13/2018 Withdrawal \$7,376.82

8. The attached signature card from PNC Bank showing the signature of Edith Ryles and Doretha Ryles in regards to account numbers #53-4316-4456, #80-0411-6875, and #53-4316-5731 is a true and accurate copy for the purposes of this litigation and admissible in the trial of this case. (Exhibit 4)

CLARKE, JOHNSON, PETERSON & MCLEAN, PA



BROWN W. JOHNSON
 Post Office Box 1865
 Florence, South Carolina 29503
 Tel: (843) 669-2401
 Fax: (843) 662-1779
 Email: bjohnson@cjplaw.com

Attorney for Petitioners

Florence, South Carolina
 March 17th, 2020

Edith M. Ryles - PNC Bank - Acct. #53-4316-5731 (Premium Money Market Account)

Date	Description	Deposit	Withdrawal	Balance
01/13/2016				\$105,373.39
02/01/2016	Transfer to Edith's checking		\$300.00	\$105,073.39
02/10/2016	Interest Payment	\$9.67		\$105,083.06
03/11/2016	Interest Payment	\$10.33		\$105,093.39
04/13/2016	Interest Payment	\$11.37		\$105,104.76
04/25/2016	Transfer to Edith's checking		\$57.20	\$105,047.53
04/26/2016	Transfer to Acct. 5333563082		\$300.00	\$104,747.56
05/10/2016	Transfer to Edith's checking		\$160.00	\$104,587.56
05/12/2016	Interest Payment	\$9.98		\$104,597.54
06/13/2016	Interest Payment	\$10.97		\$104,608.51
07/13/2016	Interest Payment	\$10.06		\$104,618.57
08/11/2016	Interest Payment	\$9.12		\$104,627.69
08/23/2016	Transfer to Edith's checking		\$500.00	\$104,127.69
09/14/2016	Interest Payment	\$10.66		\$104,138.35
10/13/2016	Interest Payment	\$9.07		\$104,147.42
10/21/2016	Transfer to Edith's checking		\$160.00	\$103,987.42
11/04/2016	Transfer to Edith's checking		\$1,300.00	\$102,687.42
11/14/2016	Interest Payment	\$9.96		\$102,697.38
11/28/2016	Transfer to Edith's checking		\$200.00	\$102,497.38
12/07/2016	Transfer to Edith's checking		\$250.00	\$102,247.38
12/13/2016	Interest Payment	\$8.94		\$102,256.32
12/27/2016	Transfer to Edith's checking		\$200.00	\$102,056.32
01/03/2017	Transfer to Edith's checking		\$500.00	\$101,556.32
01/13/2017	Interest Payment	\$9.51		\$101,565.83
01/17/2017	Transfer to Edith's checking		\$500.00	\$101,065.83
02/13/2017	Interest Payment	\$9.45		\$101,075.28
03/13/2017	Interest Payment	\$8.53		\$101,083.81
04/13/2017	Interest Payment	\$9.44		\$101,093.25
05/01/2017	Transfer to Edith's checking		\$1,000.00	\$100,093.25
05/11/2017	Interest Payment	\$8.50		\$100,101.75
05/23/2017	Transfer to Edith's checking		\$1,000.00	\$99,101.75
06/13/2017	Interest Payment	\$7.50		\$99,109.25
06/30/2017	Transfer to Edith's checking		\$500.00	\$98,609.25
07/11/2017	Transfer to Edith's checking		\$600.00	\$98,009.25
07/14/2017	Interest Payment	\$5.87		\$98,015.12
07/24/2017	Transfer to Edith's checking		\$1,000.00	\$97,015.12
08/11/2017	Interest Payment	\$5.23		\$97,020.35
08/18/2017	Transfer to Edith's checking		\$1,000.00	\$96,020.35
09/14/2017	Interest Payment	\$6.27		\$96,026.62
09/19/2017	Transfer to Edith's checking		\$1,500.00	\$94,526.62

09/28/2017	Transfer to Edith's checking		\$23,000.00	\$71,526.62
10/10/2017	Deposit	\$900.00	\$1,800.00	\$69,726.62
10/13/2017	Interest Payment	\$4.21		\$70,630.83
10/25/2017	Promo Interest Adjustment	\$1.95		\$70,632.78
10/26/2017	Online Transfer to Edith's checking		\$15,000.00	\$55,632.78
11/06/2017	Online Transfer from Edith's checking	\$400.00		\$56,032.78
11/13/2017	Online Transfer from Edith's checking	\$400.00		\$56,432.78
11/13/2017	Interest Payment	\$3.66		\$56,436.44
12/11/2017	Online Transfer from Edith's checking	\$500.00		\$56,936.44
12/13/2017	Interest Payment	\$3.25		\$56,939.69
12/18/2017	Online Transfer from Edith's checking	\$200.00		\$57,139.69
01/12/2018	Interest Payment	\$3.28		\$57,142.97
02/12/2018	Online Transfer from Edith's checking	\$800.00		\$57,942.97
02/13/2018	Interest Payment	\$3.51		\$57,946.48
03/05/2018	Online Transfer to Edith's checking		\$800.00	\$57,146.48
03/13/2018	Interest Payment	\$3.10		\$57,149.58
04/05/2018	Online Transfer from Edith's checking	\$900.00		\$58,049.58
04/12/2018	Interest Payment	\$3.30		\$58,052.88
05/03/2018	Online Transfer from Edith's checking	\$900.00		\$58,952.88
05/11/2018	Interest Payment	\$3.24		\$58,956.12
06/04/2018	Online Transfer from Edith's checking	\$900.00		\$59,856.12
06/13/2018	Interest Payment	\$3.75		\$59,859.87
07/13/2018	Online Transfer to Edith's checking		\$8,000.00	\$51,859.87
07/13/2018	Interest Payment	\$3.43		\$51,863.30
08/09/2018	Withdrawal by Dorthea Ryles (POA)		\$20,000.00	\$31,863.30
08/13/2018	Interest Payment	\$3.04		\$31,866.34

Willie Ryles, Jr., Edith M. Ryles, and Alonzo Ryles – PNC Bank – Acct. #80-0411-6875
 (Performance Select Standard Checking Account)

Date	Description	Deposit	Withdrawal	Balance
02/01/2016				\$15.46
02/01/2016	Deposit by Alonzo Ryles	\$700.00		\$715.46
02/01/2016	Online transfer to 8035072967		\$53.00	\$662.46
02/02/2016	Online transfer to 8035072967		\$100.00	\$562.46
02/02/2016	Online transfer to 8035072967		\$75.00	\$487.46
02/03/2016	Online transfer to 8035072967		\$196.00	\$291.46
02/04/2016	Online transfer to 8035072967		\$12.00	\$279.46
02/11/2016	Online transfer to 8035072967		\$25.00	\$254.46
02/16/2016	Online transfer to 8035072967		\$20.00	\$234.46
02/17/2016	Online transfer to 8035072967		\$10.00	\$224.46
02/18/2016	Online transfer to 8035072967		\$50.00	\$174.46
02/18/2016	Online transfer to 8035072967		\$50.00	\$124.46
02/18/2016	Online transfer from 8035072967	\$50.00		\$174.46
03/17/2016	Online transfer to 8035072967		\$20.00	\$154.46
03/17/2016	Online transfer to 8035072967		\$10.00	\$144.46
04/21/2016	Online transfer from 530748376	\$1,000.00		\$1,144.46
04/25/2016	Online transfer from 5307438376	\$150.00		\$1,294.46
04/26/2016	Online transfer to Edith's checking		\$400.00	\$894.46
04/27/2016	Online transfer to Edith's checking		\$100.00	\$794.46
05/02/2016	Online transfer to 8035072967		\$20.00	\$774.46
05/03/2016	Online transfer to 8035072967		\$100.00	\$674.46
05/04/2016	Online transfer from 8035072967	\$50.00		\$724.46
05/05/2016	Online transfer to 8035072967		\$220.00	\$504.46
05/05/2016	Online transfer to 8035072967		\$100.00	\$404.46
05/05/2016	Online transfer to 8035072967		\$25.00	\$379.46
05/18/2016	Online transfer to 8035072967		\$50.00	\$329.46
05/23/2016	Online transfer from 5307438376	\$200.00		\$529.46
05/23/2016	Online transfer to Edith's checking		\$200.00	\$329.46
05/25/2016	Online transfer to 8035072967		\$250.00	\$79.46
05/25/2016	Online transfer to 8035072967		\$20.00	\$59.46
05/31/2016	Online transfer to 8035072967		\$20.00	\$39.46
06/13/2016	Online transfer to 8035072967		\$20.00	\$19.46
06/17/2016	Online transfer to 8035072967		\$10.00	\$9.46
07/26/2016	Online transfer from 5307438376	\$150.00		\$159.46
07/26/2016	Withdrawal (signed by Alonzo)		\$150.00	\$9.46
08/02/2016	Deposit (by Alonzo)	\$750.00		\$759.46
08/03/2016	Withdrawal (signed by Alonzo)		\$150.00	\$609.46
08/04/2016	Direct Payment – PSEG Public Serv.		\$250.00	\$359.46
08/04/2016	Direct Payment – PSEG Public Serv.		\$150.00	\$209.46

08/05/2016	Withdrawal (signed by Alonzo)		\$100.00	\$109.46
08/08/2016	Deposit (by Alonzo)	\$140.00		\$249.46
08/10/2016	Direct Payment - PSEG Public Serv.		\$454.00	-\$204.54
08/11/2016	Overdraft Item Fee		\$36.00	-\$240.54
08/15/2016	Continuous Overdraft - 2 days		\$14.00	-\$254.54
08/16/2016	Continuous Overdraft - 1 day		\$7.00	-\$261.54
08/17/2016	Continuous Overdraft - 1 day		\$7.00	-\$268.54
08/18/2016	Continuous Overdraft - 1 day		\$7.00	-\$275.54
08/19/2016	Continuous Overdraft - 1 day		\$7.00	-\$282.54
08/22/2016	Online transfer from 5307438376	\$550.00		\$267.46
08/22/2016	Withdrawal (signed by Alonzo)		\$255.00	\$12.46
09/06/2016	Online transfer to 8035072967		\$10.00	\$2.46
09/12/2016	Deposit (by Alonzo)	\$700.00		\$702.46
09/12/2016	Online transfer to 5307438376		\$700.00	\$2.46
09/21/2016	Deposit (by Alonzo)	\$600.00		\$602.46
09/21/2016	Tel. transfer from Edith's checking	\$200.00		\$802.46
09/21/2016	Withdrawal (signed by Alonzo)		\$800.00	\$2.46
10/11/2016	Deposit (by Alonzo)	\$700.00		\$702.46
10/11/2017	Online transfer to 5307438376		\$700.00	\$2.46
10/24/2017	Deposit (by Alonzo)	\$300.00		\$302.46
10/24/2017	Web Pmt		\$478.00	-\$175.54
10/25/2017	Overdraft Item Fee		\$36.00	-\$211.54
10/28/2017	Continuous Overdraft - 1 day		\$7.00	-\$218.54
10/31/2017	Continuous Overdraft - 3 days		\$21.00	-\$239.54
11/01/2017	Continuous Overdraft - 1 day		\$7.00	-\$246.54
11/02/2017	Continuous Overdraft - 1 day		\$7.00	-\$253.54
11/03/2017	Continuous Overdraft - 1 day		\$7.00	-\$260.54
11/04/2017	Continuous Overdraft - 1 day		\$7.00	-\$267.54
11/07/2017	Continuous Overdraft - 3 days		\$21.00	-\$288.54
11/08/2017	Continuous Overdraft - 1 day		\$7.00	-\$295.54
11/09/2017	Continuous Overdraft - 1 day		\$7.00	-\$302.54
11/10/2017	Continuous Overdraft - 1 day		\$7.00	-\$309.54
12/02/2017	Auto Charge Off Credit	\$309.54		0



ACCOUNT NUMBER

with Sus *OK*

Checking/Savings Withdrawal Ticket

REGIONAL ID

Date 11-4-2016

53434 64456

\$ 2,130.00

NON-NEGOTIABLE

FORM162753

FORM162753-1015

Dorthea Pyles Hereby Requests the
The Undersigned

Amount Of Two thousand three hundred Dollars

Dorthea Pyles / Edith Pyles
Signature

⑆7409⑉9909⑆

X Dorthea Pyles (POA)

0161104 005400715025 06000068012

⑆7409⑉9909⑆ 005400715025 06000068012

2019080532000047000046
IMAMGR S2
20161104 Arch 000000000054715025
000000000000230000 000000000000 D
000000005343164456

BRE COLEMAN-MITCHELL

DO NOT MAIL
PLACE IN SUBPOENA MAIL BIN



047

Checking/Savings Withdrawal Ticket

ACCOUNT NUMBER

REGIONAL ID

Date 9-26-2017

5343164456

\$ 22,305.27

NON-NEGOTIABLE

FORM162753

FORM162753-1015

Doretha Pyles Hereby Requests the
The Undersigned

Amount Of Twenty two thousand three hundred Dollars

Doretha Pyles
Signature
FOA

⑆7409⑈9909⑆

20170921 005000234071 06000059007

*US BANK
Cash for
PCS
Starting
Mittell*

⑆7409⑈9909⑆

2019080532000047000110
IMAMGR S2
20170921 Arch 000000000050234071
000000000002239527 000000000000 D
000000005343164456

BRE COLEMAN-MITCHELL

DO NOT MAIL
PLACE IN SUBPOENA MAIL BIN



Checking/Savings Withdrawal Ticket

ACCOUNT NUMBER

REGIONAL ID

Date 10-3-17

5 3 4 3 1 6 4 4 5 6

NON-NEGOTIABLE

FORM162753

\$ 1,600.00

FORM162753-1015

Dorthea Ryles

The Undersigned

Hereby Requests the

Amount Of Sixteen hundred 00/100 Dollars

City of Newark.

Dorthea Ryles/POA
Signature

⑆7409⑉9909⑆

⑆0171003 005100811482 06000068001

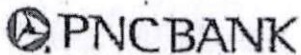
⑆⑆003 005100311482 06000063001

2019080532000047000113
IMAMGR S2
20171003 Arch 000000000051811482
000000000000160000 000000000000 D
000000005343164456

BRE COLEMAN-MITCHELL

DO NOT MAIL
PLACE IN SUBPOENA MAIL BIN

ELECTRONICALLY FILED - 2022 Mar 18 11:17 AM - FLORENCE - COMMON PLEAS - CASE#2021CP2102467



Checking/Savings Withdrawal Ticket

ACCOUNT NUMBER

REGIONAL ID

Date 10-11/2017

5343164456

\$ 2,500.00

NON-NEGOTIABLE

FORM162753

FORM162753-1015

Dorlene Ryles Hereby Requests the
The Undersigned

Amount Of Two thousand five hundred & no/100 Dollars

Dorlene Ryles
Signature

⑆7409⑉9909⑆

⑆0171011 005100104667 06000068012

⑆0171011 005100104667 06000068012

2019080532000047000116
IMAMGR S2
20171011 Arch 000000000051104667
000000000000250000 000000000000 D
000000005343164456

BRE COLEMAN-MITCHELL

DO NOT MAIL
PLACE IN SUBPOENA MAIL BIN

ELECTRONICALLY FILED - 2022 Mar 18 11:17 AM - FLORENCE - COMMON PLEAS - CASE#2021CP2102467



used by



Checking/Savings Withdrawal Ticket

Date 10-26-2017

5343164456

NON-NEGOTIABLE

FORM162753

\$ 1,535.54

FORM162753-1015

Dorthea Ryles Hereby Requests the

Amount Of One thousand five hundred thirty five and 35/100 Dollars

CC# 3023630
payee: City of Newark
⑆7409⑆9909⑆

Dorthea Ryles / PUA
Signature

⑆0171026 005500185665 06000068012

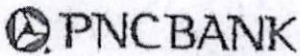
⑆0171026 005500185665 06000068012

City of Newark

2019080532000047000117
IMAMGR S2
20171026 Arch 000000000055185665
00000000000153554 000000000000 D
000000005343164456

BRE COLEMAN-MITCHELL

DO NOT MAIL
PLACE IN SUBPOENA MAIL BIN



ACCOUNT NUMBER

July 25 *OK*

Checking/Savings Withdrawal Ticket

REGIONAL ID

Date 11-26-17

534316 4456

NON-NEGOTIABLE

FORM162753

\$ 11,042.66

FORM1627531015

Dorthea Ryles
The Undersigned Hereby Requests the

Amount Of Eleven thousand forty two & 66/100 dollars

CC# 3023629

payee: City of Newark

Dorthea Ryles POA
Signature

⑆7409⑆9909⑆

0171026 005500185666 06000068012

0171026 005500135666 05000068012

City of Newark

2019080532000047000118

IMAMGR S2

20171026 Arch 000000000055185666

000000000001104266 000000000000 D

000000005343164456

BRE COLEMAN-MITCHELL

DO NOT MAIL

PLACE IN SUBPOENA MAIL BIN



Checking/Savings Withdrawal Ticket

ACCOUNT NUMBER

REGIONAL ID

Date 7/13/19

5343164456

\$ 7,376.82

NON-NEGOTIABLE

FORM162753

FORM162753-1015

Edith Ryles
the Undersigned

Hereby Requests the

and Seventy six

Amount Of Seven thousand three hundred Dollars 82/100

Edith Ryles / Don't know file
Signature

⑆7409⑉9909⑆

0180713 004800870249 06000068010

0180713 004800870249 06000068010

2019080532000047000174
IMAMGR S2
20180713 Arch 000000000048870249
000000000000737682 000000000000 D
000000005343164456

BRE COLEMAN-MITCHELL

DO NOT MAIL
PLACE IN SUBPOENA MAIL BIN

PNC Bank, National Association ph13109

ACCOUNT REGISTRATION AND AGREEMENT

Check appropriate box for federal tax classification (required):

Individual/sole proprietor or single-member LLC C Corporation S Corporation Partnership Trust/estate

Limited liability company. Enter the tax classification (C = C corporation, S = S corporation, P = partnership) _____

Note: For a single-member LLC that is disregarded, do not check LLC; check the appropriate box in the line above for the tax classification of the single-member owner.

Other _____

Certification of Owner: Under penalties of perjury, I certify that:

(1) The number on this form is my correct taxpayer identification number (or I am waiting for a number to be issued to me), and

(2) I am not subject to backup withholding because: (a) I am exempt from backup withholding, or (b) I have not been notified by the Internal Revenue Service (IRS) that I am subject to backup withholding as a result of a failure to report all interest or dividends, or (c) the IRS has notified me that I am no longer subject to backup withholding, and

(3) I am a U.S. citizen or other U.S. person, and

(4) The FATCA code(s) entered on this form (if any) indicating that I am exempt from FATCA reporting is correct.

If you have been notified by the IRS that you are currently subject to backup withholding because you have failed to report all interest and dividends on your tax return, you must cross out item (2) in your certification.

Check this box if you are a non-resident alien and complete W-8 BEN. By checking this box the only purpose this document will serve for is a Signature Card for the account. It will not serve as a W-9.

Account Agreement: By signing this Account Registration and Agreement and/or by using the account, by requesting and/or using and/or later adding any account related services, including but not limited to Debit Card/ATM Card, Overdraft Protection, PNC Bank Online services, I agree to be bound by the terms and conditions of PNC Bank's Account Agreement for Checking Accounts and Savings Accounts, PNC Bank's Account Agreement for Certificates of Deposit, or IRA CDs, as applicable, and Schedule of Service Charges and Fees, as well as other terms and conditions that may apply to my PNC Bank account, account features and/or services. I agree that my account is subject to approval by PNC Bank.

EFFECTIVE DATE	REFERENCE NUMBER
07/28/2016	
DDA / SAVINGS ACCOUNTS AFFECTED	
[Redacted] 534-316-4456 [Redacted] 800-411-6875	534-316-5731

By signing below, I/we authorize that the requested change in title applies to the accounts listed above. The Internal Revenue Service does not require your consent to any provision of this document other than the certifications required to avoid backup withholding.

Edith Ryles _____ X *Edith Ryles*
Signature

Dorthea Ryles POA _____ X *Dorthea Ryles*
Signature

Signature

Signature

Signature

Signature

LEGAL TITLE	TIN	RESIDENCE ADDRESS
	[Redacted] 4-377	2105 Twin Bridge Dr. Florence, SC 29505

PNC Bank internal use only instructions:
 Please forward this form in the clear plastic envelope with the red insert to CIF.
 It can also be mailed via interoffice mail to CIF - Mail Stop: P7-PFSC-04-F

EFGRH123915-0515

EFP

Account Number 5343165731
 Scan Date 2016 Aug 09
 Orig Acct Number 0
 Orig Bank Number 0

FILED

Return to:
McGowan Rogers

THIS PROPERTY DESIGNATED AS
MAP 209-1 BLOCK 01 PARCEL 037
ON FLORENCE COUNTY TAX MAPS
SPLIT FROM _____
FLORENCE COUNTY TAX ASSESSOR
OWNERSHIP CHANGES
SUBJECT TO RECORDING

2011 AUG 31 PM 4:08

CONNIE R. L. BROWN
CCCP & GS
FLORENCE COUNTY, SC



TITLE NOT EXAMINED BY MCGOWAN ROGERS

STATE OF SOUTH CAROLINA)	TITLE TO REAL ESTATE
)	GENERAL WARRANTY
COUNTY OF FLORENCE)	(LIFE ESTATE RETAINED)

KNOW ALL MEN BY THESE PRESENTS: That **Edith Ryles** (Grantor) of the County of Florence, in the State aforesaid, for and in consideration of the sum of Five (\$5.00) Dollars and love and affection to her paid by **Dorthea Ryles** (Grantee) in the State aforesaid, the receipt whereof is hereby acknowledged, has granted, bargained, sold and released, and by these presents does grant bargain, sell and release unto the said **Dorthea Ryles**, reserving a life estate unto **Edith Ryles**, her Heirs and Assigns forever:

All that certain piece, parcel or lot of land lying, being and situate in the County of Florence, State of South Carolina, known and designated as Lot No. 103 as shown on a map of Richmond Hills Subdivision, Phase IIB by Nesbitt Surveying Company, dated May 28, 2001 and recorded in the office of the Clerk of Court for Florence County in Plat Book 76 at page 432. Also reference plat made by Lind, Hicks and Associates, Surveyors, dated June 25, 2002 and recorded in the above mentioned office in Plat Book 79 at page 274.

This being the same property conveyed to Willie Ryles, Jr. and Edith Ryles by deed of Lewis Mack recorded September 23, 2004 in Book A-873 at page 570, office of the Florence County Clerk of Court. The said Willie Ryles, Jr. having died September 4, 2010.

TMS No. 209-1-01-037

GRANTEE'S MAILING ADDRESS: 2105 Twin Bridge Drive
Florence, SC 29505

FEES EXEMPT
SEE AFFIDAVIT

1376-1302

1303

STATE OF SOUTH CAROLINA)
)
COUNTY OF FLORENCE) AFFIDAVIT

PERSONALLY appeared before me the undersigned, who being duly sworn, deposes and says:

1. Property located in Florence County, SC was transferred by Edith Ryles to Dorthea Ryles, reserving a life estate unto Edith Ryles.

The transaction was (Check One):

_____ an arm's length real property transaction and the sales price paid or to be paid in money or money's worth was:

_____ not an arm's length real property transaction and the fair market value of the property is:


X_____ The above transaction is exempt, or partially exempt, from the recording fee as set forth in S.C. Code Ann. Section 12-24-10 et. Seq because the deed is: family transaction.

As required by Code Section 12-24-70, I state that I am a responsible person who was connected with the transaction as: Attorney

I further understand that a person required to furnish this affidavit who wilfully furnishes a false or fraudulent affidavit is guilty of a misdemeanor and, upon conviction, must be fined not more than one thousand dollars or imprisoned not more than one year, or both.

SWORN to before me this 31 day of August, 2011

Linda S. Roberts
Notary Public for South Carolina
My commission expires: 7-27-2016



Purchaser, Legal Representative of the Purchaser, or other Responsible Person Connected with the Transaction

1305

3737 446

This Indenture,

Made the 24th day of August, in the year of our Lord
One Thousand Nine Hundred and Sixty

Witness

ALBERT J. ACIERNO and HELEN A. ACIERNO, his wife

in the City of Newark County of Essex
and State of New Jersey party of the first part;

And

WILLIE RYLES, JR. and EDITH M. RYLES

in the City of Newark County of Essex
and State of New Jersey party of the second part;

RECEIVED A RECORD
REGISTER'S OFFICE
ESSEX COUNTY, N.J.
Aug 26 9 26 AM '66
Catherine M. ...
REGISTER

Witnesseth, That the said party of the first part, for and in consideration of
ONE (\$1.00) DOLLAR AND OTHER GOOD AND VALUABLE CONSIDERATION
lawful money of the United States of America, to them in hand well and truly paid by the said
party of the second part, at or before the sealing and delivery of these presents, the receipt whereof is
hereby acknowledged, and the said party of the first part being therewith fully satisfied, contented and
paid, has given, granted, bargained, sold, aliened, released, encofied, conveyed and confirmed and by
these presents do give, grant, bargain, sell, alien, release, encoff, convey and confirm unto the said
party of the second part, and to their heirs
and assigns, forever.

That certain
tract or parcel of land and premises, hereinafter particularly described, situate, lying and being
in the City of Newark County of Essex
and State of New Jersey

BEGINNING in the easterly line of South Eighth Street at a point
therein distant northerly 775 feet from the intersection formed by the North-
erly side of Eleventh Avenue and the easterly side of South Eighth Street;
and from thence running (1) northerly along said line of South Eighth Street
25 feet; thence (2) easterly at right angles with the same 100 feet; thence
(3) southerly parallel with South Eighth Street 25 feet; and thence (4) West-
erly at right angles with the same 100 feet to the point or place of BEGINNING.

BEING the same premises conveyed to grantors herein by Deed of
Mary Paradise, single, dated January 11, 1952 and recorded January 16, 1952
in the Essex County Register's Office in Deed Book 3009 page 372.

1966
MAY 11 1966

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BOOK 3737 PAGE 447

Together with all and singular the houses, buildings, trees, ways, waters, profits, privileges, and advantages, with the appurtenances to the same belonging or in anywise appertaining:

Also, all the estate, right, title, interest, property, claim and demand whatsoever, of the said party of the first part, of, in and to the same, and of, in and to every part and parcel thereof.

To have and to hold all and singular the above described land and premises, with the appurtenances, unto the said party of the second part, their heirs and assigns, to the only proper use, benefit and behoof of the said party of the second part, their heirs, and assigns forever:

And the said

ALBERT J. ACIENNO and HELEN A. ACIENNO

for themselves, their heirs, executors and administrators, do covenant, promise and agree to and with the said party of the second part, their heirs and assigns that they have not made, done, committed, executed or suffered any act or acts, thing or things whatsoever, whereby or by means whereof the above mentioned and described premises, or any part or parcel thereof, now are, or at any time hereafter shall or may be impeached, charged or encumbered, in any manner or way whatsoever.

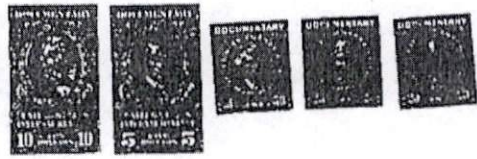
In Witness Whereof, the parties of the first part have set their hand and seal of office on this day and year first above written.

Signed, Sealed and Delivered in the Presence of
Walter J. Antley
Walter J. Antley

Albert J. Acienno (LS)
Albert J. Acienno

Helen A. Acienno (LS)
Helen A. Acienno

1 R.S.
15 25



455
Deed

11/14
ALBERT J. ACIERNO, et ux

TO
MILLIE RILES, JR., et ux

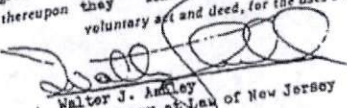
Dated, 11/14/60
Subscribed in the Office of
the County of Essex, N. J.,
on the 24th day of November, 1960,
at 1:00 o'clock, in the presence of
Recorded in Book of DEEDS for
said County, on page

Walter J. Andley
Attorney at Law of New Jersey
1100 N. 1st St.,
Newark, N. J. 07102
H. J. ...
...

State of New Jersey,
County of ESSEX

24
1960
Be it Remembered, that on this
in the year One Thousand Nine Hundred and Sixty
An Attorney at Law of New Jersey
personally appeared

ALBERT J. ACIERNO and HELEN A. ACIERNO, his wife,
are the grantors mentioned in the within Instrument, to
whom I first made known the contents thereof, and thereupon they acknowledged that they
signed, sealed and delivered the same as their voluntary act and deed, for the uses and
purposes therein expressed.

day of August
before me, the subscriber,

Walter J. Andley
An Attorney at Law of New Jersey

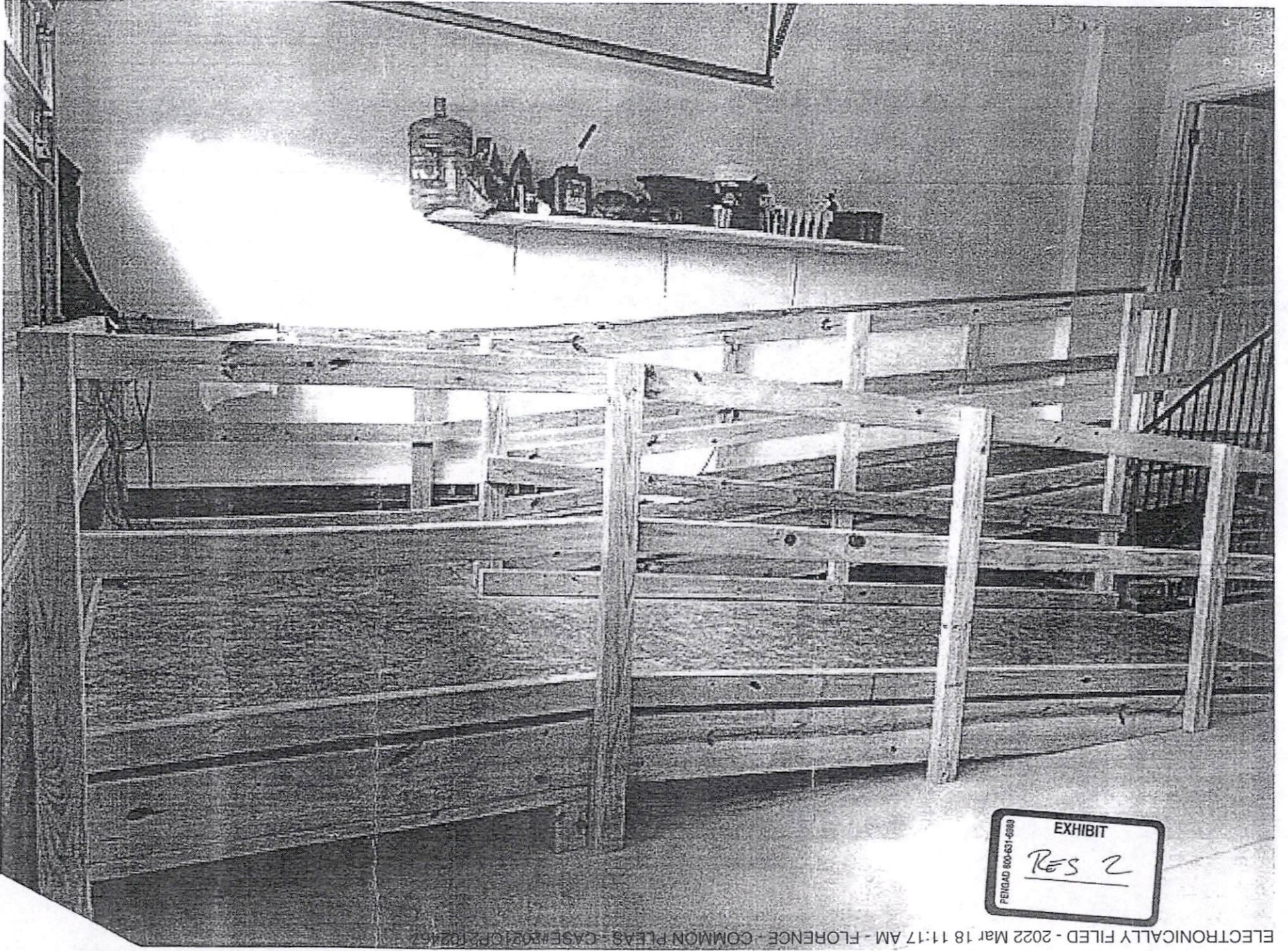


EXHIBIT
RES 2

AGENCY I.D.
SC0210100

CITY OF FLORENCE
INCIDENT REPORT

CASE NUMBER

2016-003036

NCIC

INC. ENTD

E V E N T	INCIDENT TYPE				COMPLETED	FORCED ENTRY	PREMISE TYPE	UNITS ENTERED	TYPE VICTIM								
	1. NRP - ALTERED MENTAL STATUS				<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/> YES <input type="checkbox"/> NO	13		<input checked="" type="checkbox"/> Individual <input type="checkbox"/> Business <input type="checkbox"/> Financial Inst. <input type="checkbox"/> Government <input type="checkbox"/> Relig. Orgn. <input type="checkbox"/> Soc./Public <input type="checkbox"/> Other <input type="checkbox"/> Unknown <input type="checkbox"/> Police Off.								
	2.				<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/> YES <input type="checkbox"/> NO											
3.				<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/> YES <input type="checkbox"/> NO												
INCIDENT LOCATION (SUBDIVISION, APARTMENT AND NUMBER, STREET NAME AND NUMBER)								ZIP CODE	WEAPON TYPE								
2105 TWIN BRIDGE DR, FLORENCE SC								29505									
INCIDENT DATE		24 HR. CLOCK	TO	DATE	24 HR. CLOCK	DISPATCH DATE/TIME 24 HR. CLOCK		LOCATION NO.									
04/09/2016		2215		04/09/2016	2324	DISP. DATE	DISP. TIME	2229									
						TIME ARRIVED	DEPART. TIME	2324									
COMPLAINANT'S NAME (LAST, FIRST, MIDDLE)				RELATIONSHIP TO SUBJECT		RESIDENT	RACE	SEX	AGE	ETH	DAYTIME PHONE	EVENING PHONE					
FOX, KYREEQ DERIUS HEYWARD				#1	#2	#3	J	S	O	U	B	M					
				ST					17	N	(843) 206-6230	H					
ADDRESS				CITY		STATE	ZIP CODE	LOCATION NO.									
106 PEPPER DR				DARLINGTON		SC	29532	00									
VICTIM'S NAME (LAST, FIRST, MIDDLE)				RELATIONSHIP TO SUBJECT		RESIDENT	RACE	SEX	AGE	ETH	DAYTIME PHONE	EVENING PHONE					
RYLES, EDITH MAE				#1	#2	#3	O	S	O	U	B	F					
									85	N	(843) 665-8291	H					
HEIGHT				WEIGHT	HAIR	EYES	FACIAL HAIR, SCARS, TATOOS, GLASSES, CLOTHING, PHYSICAL PECULIARITIES, ETC.										
ADDRESS				CITY		STATE	ZIP CODE	LOCATION NO.									
2105 TWIN BRIDGE DR				FLORENCE		SC	29505	01									
VISIBLE INJURY (VICT. 1) <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO EXPLAIN -																	
#1 VICTIM (NO. 1) USING: ALCOHOL <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> UNK. DRUGS: <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> UNK.																	
<input type="checkbox"/> TWO-MAN VEH <input type="checkbox"/> ONE-MAN VEH. <input type="checkbox"/> DETECTIVE/SPL.ASMT. <input type="checkbox"/> OTHER <input type="checkbox"/> ALONE <input type="checkbox"/> ASSISTED J - This Jurisdiction S - State O - Out of State U - Unknown																	
S U B J E C T	<input type="checkbox"/> SUSPECT				SUBJECT NAME (LAST, FIRST, MIDDLE)				RACE	SEX	AGE	ETH.	DATE OF BIRTH	HEIGHT	WEIGHT	HAIR	EYES
	<input type="checkbox"/> RUNAWAY				NO OFFENDER,				U	U	00	U					
	<input type="checkbox"/> WANTED				FACIAL HAIR, SCARS, TATOOS, GLASSES, CLOTHING, PHYSICAL PECULIARITIES, ETC.												
	<input type="checkbox"/> WARRANT				ADDRESS												
# 1	<input type="checkbox"/> ARREST				CITY		STATE	ZIP CODE	LOCATION NO.								
	<input type="checkbox"/> JAIL								00								
	<input type="checkbox"/> SUMMONS				SUBJECT (NO. 1) USING: ALCOHOL: <input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> UNK.		ARRESTED NEAR OFFENSE SCENE <input type="checkbox"/> YES <input type="checkbox"/> NO		DATE/TIME OF OFFENSE		DATE/TIME OF ARREST						
				DRUGS: <input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> UNK. TYPE.		TOTAL # ARRESTED 0		04/09/2016 2215									
N A R R A T I V E	Offenses: ALTERED MENTAL STATUS																
	ON SATURDAY 04/09/2016, THIS OFFICER AND SPO CARLSON RESPONDED TO THE INCIDENT LOCATION IN REFERENCE TO AN ELDERLY FEMALE WALKING DOWN THE MIDDLE OF THE STREET. SPO CARLSON RESPONDED FIRST AND SPOKE WITH THE COMPLAINANT (KYREEQ FOX), WHO STATED HE WAS DRIVING DOWN THE STREET AND SAW THE FEMALE (EDITH RYLES) WALKING DOWN THE MIDDLE OF THE STREET. SPO CARLSON STATED RYLES DID NOT HAVE A JACKET ON AND WAS USING HER WALKER TO GO DOWN THE STREET. SPO CARLSON STATED SHE KNEW HER ADDRESS, BUT DID NOT THINK THAT THE HOUSE SHE WAS IN FRONT OF WAS HERS, WHICH IT WAS. SPO CARLSON GOT RYLES TO GO INSIDE HER RESIDENCE AND HE LOOKED AT HER PHONE BOOK THAT SHE HAS WITH NUMBERS IN IT. SPO CARLSON GOT IN TOUCH WITH HER FRIEND CARLA, WHO CALLED HER SON (WILLIE RYLES). W RYLES CAME TO THE RESIDENCE AND STATED HE WAS GOING TO STAY WITH HER THE REST OF THE NIGHT. W RYLES STATED SHE HAS NEVER DONE THIS BEFORE. W RYLES STATED THAT THE MAJORITY OF THE TIME HE OR ONE OF HIS SISTERS STAYS WITH RYLES. EMS RESPONDED TO THE INCIDENT LOCATION AND RYLES STATED SHE DID NOT WANT TO GO TO THE HOSPITAL. THIS INCIDENT IS RECORDED ON MY DVR. THERE IS NO FURTHER INFORMATION AT THIS TIME.																

Print Date: 07/03/2019 10:57:43 AM				JURISDICTION OF THEFT LAW ENFORCEMENT AGENCY				JURISDICTION OF RECOVERY LAW ENFORCEMENT AGENCY				
P	TYPE (GROUP)										TOTAL VALUE	
R	Burned											
O	Count/Forged											
P	Dest./Damaged											
E	Recovered											
R	Seized											
T	Stolen											
Y	Unknown											
A D M I N I S T	SUBJECT IDENTIFIED <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO		SUBJECT LOCATED <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO		<input type="checkbox"/> ACTIVE <input checked="" type="checkbox"/> ADM. CLOSED		<input type="checkbox"/> ARRESTED UNDER 18 <input type="checkbox"/> ARRESTED 18 AND OVER		<input type="checkbox"/> EX-CLEAR UNDER 18 <input type="checkbox"/> EX-CLEAR 18 AND OVER			
	REASON FOR EXCEPTIONAL CLEARANCE: 1 <input type="checkbox"/> OFFENDER DEATH 2 <input type="checkbox"/> NO PROSECUTION 3 <input type="checkbox"/> EXTRADITION DENIED 4 <input type="checkbox"/> VICTIM DECLINES COOPERATION 5 <input type="checkbox"/> JUVENILE - NO CUSTODY											
REPORTING OFFICER				UNIT NUMBER	APPROVING OFFICER				DATE	UNIT NUMBER		
PO J CHATLOSH				333B	CPL M HAPP				04/09/2016	334C		
				FOLLOW-UP INVESTIGATION OFFICER								
				<input type="checkbox"/> YES <input type="checkbox"/> NO								

EXHIBIT
1
PENNGAD 800-631-6888

Received 6/30/2016 09:35:44 AM

Book B 638 Page 0807

Power of Attorney

CONNIE REEL-SHEARIN
FLORENCE COUNTY CLERK OF COURT
FLORENCE COUNTY COMPLEX, 180 N. IRBY ST., MSC-E
FLORENCE, SOUTH CAROLINA 29501
(843) 665-3031

RECEIVED FROM: EDITH RYLES 5966
ADDRESS: 2105 TWIN BRIDGE DR
FLORENCE SC 29505

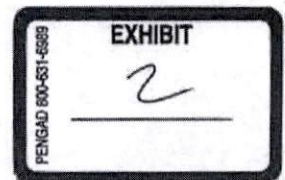
DATE: 063016

RECEIPT NO: 401136-000000

DESCRIPTION

# OF INST.	AMOUNT	FEES	#PAGES	** FEE **		TOTAL
				STATE	COUNTY	
Power of Attorney	.00	16.00	6	BOOK: B638 FROM PAGE: 807 THRU PAGE:	812	16.00

THIS SHEET IS NOW PART OF THIS DOCUMENT
===== PLEASE LEAVE ATTACHED =====



TOTAL RECEIPT: 16.00 .00 .00 16.00

TOTAL	CHECK	CASH	CHANGE
16.00	16.00	.00	.00

CR2 CLERKPAY 25 JM 093544

ELECTRONICALLY FILED - 2022 Mar 18 11:17 AM - FLORENCE - COMMON PLEAS - CASE#2021CP2102467

Mail To: Edith Ryles
2105 Twin Bridge Dr
Florence, SC 29502

FILED

2016 JUN 30 AM 9:37

STATE OF SOUTH CAROLINA)
COUNTY OF FLORENCE)
GENERAL DURABLE
POWER OF ATTORNEY
FLORENCE COUNTY, SC

KNOWN ALL MEN BY THESE PRESENTS THAT I, Edith Ryles of the County and State aforesaid (hereafter sometimes referred to as ("The Principal")), so hereby name, nominate, constitute, and appoint, Dorthea Ryles my true and lawful attorney (Hereinafter sometimes referred to as my "Agent"). My Agent is authorized in my Agents sole and absolute discretion from the time, and follows:

My Agent shall have full power and authority to act on my behalf. This Power and Authority shall authorize my Agent to manage and conduct all of my affairs and to exercise all of my legal rights and powers, including all rights and powers that I may acquire in the future. My Agent's powers shall include, but not limited to power to:

1. Open, maintain or close bank accounts (including, but not limited to, Checking accounts, savings and certificates of deposits), brokerage accounts, retirement plan accounts and other similar accounts with financial institutions;
 - a. Conduct any business with any banking or financial institution with respect to any accounts, including, but not limited to, making deposits and withdrawals, negotiation or endorsing any checks or statements, passbooks, drafts money orders, warrants, and certificates or vouchers payable to me by me any person, firm, corporation or political entity.
 - b. Perform any act necessary to deposit, negotiate, sell transfer any not security, or draft of the United States of America, including US Treasury Securities.
 - c. Have access to any safe deposit box that I might own, including its contents.
2. To sell, convey, or covert and every kind of property that I may now own or in in the future, real personal, tangible, and/or mixed, upon such terms and conditions change such property for other property and to grant options with respect to sales thereof:

OK
ET

General Durable Power of Attorney for Edith Ryles

Initials E. Ryles

(1 of 5)

8638-807

808

3. To buy every kind of property, real, personal, tangible, or mixed, upon such terms and conditions as my Agent shall deem appropriate; to obtain with respect to such purchases:
4. To invest and reinvest all or any part of my property in any property or interests (including undivided interests) in property real, personal, tangible or mixed wherever located, including without being limited to commodities. Contracts of all kinds, securities of all kinds, bonds debentures, notes (secured or unsecured), stocks and corporations regardless of class, interests in limited partnership, real estate / whether or not productive at the time of investment, interest in a trust, / Whether of the open and/ or closed fund types, and participation in common collective or pooled trust funds or annuity contracts without being limited by the Statute or rule of law concerning investments by fiduciaries; sell (including short sales) and terminate any investments whether made by me or any Agent: to establish, utilize, and terminate savings and money market accounts with financial institutions of all kinds;
5. With respect to real property that I may now or in the future; to lease, sublease, release,; to eject, remove, or relieve tenants or other personal form, and recover possession or by all lawful means; to accept real property as a gift or as security for a loan; to collect, sue for receive, and receipts for the purposes described in the paragraph; t do any act of management and conservation, to pay compromise, or to contest tax Assessments and to apply for refunds in connection there within; to mortgage and/or convey by deed of trust or otherwise encumber any real property now or hereafter owned by me, whether acquired by me or by my Agent.
6. With respect to personal property; to lease, sublease, and release; to recover possession of by all lawful means; to collect, sue for, receive and receipt for rent and profits therefore; to maintain, protect, repair, preserve, insure, alter, or improve all or any part thereof; to mortgage and/or grant security interests in any personal property or tangibles now or hereafter owned by me, whether acquired by me or for me by my Agent;
7. To ensure my life on the life of anyone of whom I have an insurable interest; to continue life insurance policies now or hereafter owned by me or either my life or the lives of others; to pay all insurance premiums; to select any options under policies; to purchase and/or any personal or either my life or the lives of others;

WST

General Durable Power of Attorney for Edith Ryles

Initials ER

(2 of 5)

I am obligated or may have assumed the obligation to support; to carry insurance of such kind and in such amounts as my Agent shall deem appropriated to protect my assets against any hazard and/or to protect my assets against any hazard and/or to protect me from any liabilities.

Edith Ryles

- 8. To represent me in all tax matters; to prepare, sign, and file federal, state and/or local income, gifts, and other tax returns of all kinds, including joint returns, FICA returns, payroll tax returns, claims for refunds, requests for extensions of time, petitions to the tax court or other courts regarding tax matters, and any all other tax related documents, with respect to any year between the years of 2014 and 2034; to pay taxes due, collect and to make such disposition of refunds as my Agent shall deem appropriate; post bond, receive confidential information and contest deficiencies determined by the Internal Revenue Service and/or any state and/or local tax law matters and proceedings of all kinds and for all periods between the Years 2014 and 2034 before all officers on the Internal Revenue Service and state and local authorities;
- 9. To do all acts necessary for maintaining my customary standard of living, Quarters and normal domestic help for the operation of my house hold, to provide clothing, transportation, medical care, food and incidentals, and if necessary to make all necessary to make all necessary arrangements, contractual or otherwise, for me at any hospital, hospice, nursing home convalescent home or similar establishment.
- 10. To execute, see and deliver any documents, and papers necessary. Appropriate, incident or convenient to the exercise of any power granted herein, including without limitation deeds, notes, mortgages, checks, contracts, receipts and releases;
- 11. To employ, compensate, and discharges such domestic, medical, and professional personnel including lawyers, accounts, doctors, nurses, brokers, financial consultants, advisors, companions, servants, and employees as my Agent deems appropriate; and
- 12. To engage in, do, and transact all and every kind of business that may said Agent may think proper.

General Durable Power of Attorney for Edith Ryles

Initials ER

(3 of 5)

8/0

In respect to the foregoing, the following provisions shall apply:

1. I do ratify that my said Agent may lawfully do, or cease to be done, by virtue thereof and this instrument shall take effect thereafter until revoking in writing as thereafter set forth. All persons from whom my Agent may request information regarding me are hereby authorized to provide such information to my Agent without limitation and are released from any liability whatsoever for complying with my Agents requests.
2. This Power of Attorney shall not be affected by physical disability or mental incompetence of the Principal which renders the Principal incapable of managing his/her own estate.
3. This instrument may be amended or revoked by me, and my Agent may be removed by me or any time by the execution by me of a written instrument of revocation, amendment, or removal delivered to any Agent. If this instrument has been recorded in the public records, then the instrument of revocation, amendment, or removal shall be filled or recorded in the same public record. My Agent may resign the execution of a written resignation delivered to me or, is I am residing or who has care and custody of me.
4. My Agent shall be entitled to reimbursement for all reasonable costs and expenses actually incurred and paid by my Agent on my Agent on my behalf under any provision of this instrument.
5. My Agent is authorized to make photocopies of this instrument as frequently and in such quantity as my Agent shall deem appropriate. All photocopies shall have the same force and effect as any original.

ER

IN WITNESS WHEREOF, have hereto set my hand and affixed my seal
This 17th, day of June, 2016.

Edith Ryles
Edith Ryles

General Durable Power of Attorney for Edith Ryles

Initials ER

(4 of 5)

STATE OF SOUTH CAROLINA
CERTIFICATION OF VITAL RECORD

DEATH CERTIFICATION

STATE FILE NUMBER : 139-18-030577
DECEDENT'S NAME: *EDITH MAE JACKSON RYLES*
AKA'S: NA
ARMED FORCES: NO
DATE OF BIRTH: JUNE 16, 1930
TYPE OF PLACE OF DEATH: HOSPITAL- EMERGENCY ROOM/OUTPATIENT
NAME AND ADDRESS OF PLACE OF DEATH: CAROLINAS HOSPITAL SYSTEM, FLORENCE, SC 29505
PLACE OF DISPOSITION: FLORENCE MEMORIAL GARDENS
DISPOSITION LOCATION: FLORENCE, SOUTH CAROLINA
METHOD OF DISPOSITION: BURIAL
DECEDENT'S RESIDENCE: 2105 TWIN BRIDGE DRIVE, FLORENCE, FLORENCE COUNTY, SC, 29505
PLACE OF BIRTH: SOUTH CAROLINA
SEX: FEMALE
SOCIAL SECURITY NUMBER: 24-12-4377
AGE: 88 YEARS
COUNTY OF DEATH: FLORENCE
MARRITAL STATUS: WIDOWED (AND NOT REMARRIED)

SURVIVING SPOUSE'S NAME: NA
FATHER'S NAME: HERBERT JACKSON
MOTHER'S NAME PRIOR TO FIRST MARRIAGE: SYLVIA DOUGLAS
INFORMANT'S NAME: DORETHEA RYLES
MAILING ADDRESS: 86 S 8TH STREET, NEWARK, NJ 07102
FUNERAL HOME: IDEAL FUNERAL PARLOR, 106 EAST DARLINGTON ST., FLORENCE, SC, 29506
FUNERAL DIRECTOR: R. DOUGLAS HAWKINS
EMBALMER'S NAME: TORRANCE VSHAUN WHITE
ACTUAL OR PRESUMED DATE OF DEATH : AUGUST 10, 2018
ACTUAL OR PRESUMED TIME OF DEATH: 1737
CAUSE OF DEATH - PART I
ACUTE MYOCARDIAL INFARCTION
CARDIOPULMONARY ARREST
HYPERTENSION
RELATIONSHIP: DAUGHTER
LICENSE NUMBER: 1976
LICENSE NUMBER: 3808
MANNER OF DEATH : NATURAL

OTHER SIGNIFICANT CONDITIONS - PART II:
HYPERTENSION
CORONER CONTACTED? YES
DATE OF INJURY: NA
PLACE OF INJURY: NA
LOCATION OF INJURY: NA
HOW THE INJURY OCCURRED?
NA
AUTOPSY PERFORMED? NO
TIME OF INJURY: NA
AUTOPSY AVAILABLE? NA
INJURY AT WORK? NA

CERTIFIER NAME AND TITLE: MD BRUCE E. BURNER
CERTIFIER'S ADDRESS: 806 PAMPLICO HWY, FLORENCE, SC, 29505
DATE FILED: AUGUST 13, 2018
DATE OF ISSUANCE: AUGUST 15, 2018
SPECIAL INSTRUCTIONS:
NA
LICENSE NUMBER: 12643

2018 NOV 26 AM 8:49
LED - 2022 Mar 18 11:17 AM - FLORENCE - COMMON PLEAS - CASE#2021SP2102467

SC07008440

This is a true certification of the facts on file in the Division of Vital Records, SC Department of Health and Environmental Control.



David E. Wilson, Jr.
Acting Director

Angela P. Saleeby
Assistant State Registrar

This is watermarked paper. Do not accept without noting watermark. Hold to light to verify watermark.

Revision Date: 04/09/2018



2018 NOV 25 AM 8:49

LAST WILL AND TESTAMENT
IN THE NAME OF GOD AMEN.

I, **Edith Ryles** of the County of Florence, State of South Carolina, being of sound and disposing mind, and memory, but realizing the uncertainty of life and the certainty of death do make, ordain publish and declare this as and for my Last Will and Testament, hereby revoking any and all other wills heretofore made by me. It is my intention herein to dispose of all property of every kind, real, personal, tangible and intangible and in possession and in expectancy, which I own or possess at my demise or have a right to dispose of by will.

The worldly goods with which it has pleased God to endow me, I dispose of in the following manner:

Edith Ryles
Handwritten signature

ITEM I. I will direct that all my just debts and funeral expenses be paid out of my estate as soon after my demise as conveniently may be and to that end charge my whole estate real and personal with the same.

ITEM II. I will devise and bequeath unto my beloved daughter, **Dorthea Ryles** my interest in property located, 86 South 8 Street, Newark, NJ, with love and affection.

ITEM III. I will devise and bequeath unto my beloved son, **Alonzo Ryles** and beloved daughter, **Dorthea Ryles** my interest in property located at, 88-90 South 8 Street, Newark, NJ, they are to share and share alike with love and affection.

ITEM IV. I will devise and bequeath unto my beloved son, **Alonzo Ryles** and beloved daughter, **Dorthea Ryles** my interest in property located at, 2105 Twin Bridge Drive, Florence, SC, they are to share and share alike with love and affection.

ITEM V. I will devise and bequeath any auto that is in my possession to my beloved son, **Leon Ryles** with love and affection.

ITEM VI. I will devise and bequeath unto my beloved sons, **Willie Ryles, Jr., and Leon Ryles,** One Hundred Dollars each and my beloved daughter, **Theresa Williams** Fifty Dollars with love

Edith Ryles
Handwritten signature

and affection.

ITEM VII. I will devise and bequeath all properties of which at my death I possess, real, personal or mixed and where ever situated, to my beloved grandchildren, Micaela R. Presley, Melissa Ryles, Robert Roberts, Brandy Ryles, Brandice Ryles, Dalon Ryles, Hydeia Ryles, and Jonathan Williams they are to share and share alike with love and affection.

ITEM VIII. I hereby nominate, constitute and appoint my beloved daughter, Dorthea Ryles as Personal Representative of this my Last Will and Testament she is to serve without bond.

IN WITNESS WHEREOF, I, Edith Ryles has hereunto set my hand and seal to this my Last Will and Testament this 15th day of December, 2017.

Handwritten initials: ER, MR, BR, DR

Edith Ryles
Edith Ryles

Signed, sealed, published, and declared by, Edith Ryles as and for her Last Will and Testament, and we in her presence and at her request, and in the presence of each other have subscribed our names as witness thereto.

Vera J Lewis
Lucille Richardson

Flourence SC
Flourence AC

PROOF OF WILL

STATE OF SOUTH CAROLINA)
COUNTY OF FLORENCE)

We, Edith Ryles the Testatrix and Vera J Lewis and Lucille Richardson the witness, respectively, whose names are signed to

609550

the attached or foregoing instrument, being first duly sworn, do hereby declared to the undersigned authority that the Testatrix signed and executed it as her free and voluntary act the purpose therein expressed, and that each of the witness, in the presence and hearing of the Testatrix, signed the will as witness and to the best of our knowledge the Testatrix was at the time eighteen years of age or older, of sound mind, and under no constraint or undue influence.

Ed R
VOR
SR

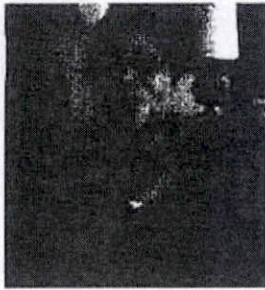
Edith Ryles
Edith Ryles
(Testatrix)
Vera Lewis
Witness
Guille Richardson
Witness

STATE OF SOUTH CAROLINA)
COUNTY OF FLORENCE)

Subscribed, sworn to and acknowledge before me, Edith Ryles the Testatrix, and sworn to before me by Vera Lewis and Guille Richardson witness this 15th day of Dec, 20 17.

Catherine H. Myrick (L.S.)
Notary Public for South Carolina
My Commission Expires: May 12, 2020

5:00:00



Edith Mae Jackson Ryles

June 16, 1930 - August 10, 2018

Born in Florence, SC

Resided in Florence, SC

2018 NOV 25 AM 8:49

Obituary

Mother Edith Mae Jackson Ryles was born on June 16, 1930 in Florence, South Carolina. She was the daughter of Herbert and Sylvia Douglas Jackson. After a brief illness, she departed her earthly life on Friday, August 10, 2018 at 5:05 PM at Carolinas Hospital System.

Edith attended Savannah Grove School located in Florence County. She was formerly employed as a Nurse's Aide at City Hospital and Little Sisters of the Poor in Newark, New Jersey. She was also a member of South Eighth Street Block Association working with children in the community to keep their streets safe and clean. She thoroughly enjoyed putting smiles on children's faces by treating them to ice cream cones after community events. Edith also was a member of the Newark Board of Education P.T.A.

In 1952, she was joined in Holy Matrimony to Willie Ryles, and the two were life two doves joined together forming a heart of loved. This union was blessed with five lovely children, whom were all taught the important value of education and honesty. Edith strongly believed that these two things were essential to their success.

Edith loved spending time with her family and friends. The simplest things in life gave her the most pleasure. She loved cooking and sewing clothes for her children. Her love of cooking eventually evolved into her becoming an entrepreneur partnership with her sister-in-law Bernice Millner to open a restaurant. People came from all over to enjoy fresh cooking that was offered at E & B's Restaurant, which included Edith's famous cakes and pies. She also gave back to her community by providing affordable housing through the several properties that she owned.

Edith was a member of Israel Memorial A.M.E. Church in Newark, New Jersey. She instilled in her children the importance of Sunday School and church activities. She served as a member of the Women's Missionary Society and the Usher Board. She was also a member of Trinity Chapter H14 Order of the Eastern Star, Prince Hall

Affiliation, State of New Jersey.

Edith later returned to Florence, South Carolina and joined Fellowship Church of God Holiness Church under the leadership of Pastor Gloria and Elder Richard Bracey, Sr. Mother Ryles served faithfully on the Mother's Board, Golden Girls Board, and the LOVE Club. She loved the Word of God and especially Sunday School!

Mother Ryles was that "church mother" known for voicing her opinion about value and morals. She loved her Pastor dearly, and she was always praying and supporting the church ministry.

Mother Ryles life will be remembered as she exemplified the characteristics of a Godly woman. As stated in Proverbs 31, her "life has been more precious than rubies...her children arise up, and call her blessed."

Mother Ryles was TRUSTWORTHY and DEPENDABLE, filled with an AN ENDURING LOVE, INDUSTRIOUS, COMPASSIONATE, she SPOKE WORDS OF WISDOM & KINDNESS. She DILIGENTLY SAW TO THE NEEDS OF HER FAMILY and SHE FEARED God and kept His commands.

The love Mother Ryles had for her family was apparent and she also included that love to her church family. The Fellowship Church of God family has always felt like part of the Ryles family because she imparted to each of us love, encouragement and shared her faith openly and lovingly amongst us.

In addition to her parents, she was preceded in death by her husband, Willie Ryles, Sr.; her sister, Ertha Cooper; and two brothers, Norman Fields and Prince Jones.

She leaves to cherish her memories: three sons: Willie Nelson (Beverly) Ryles of Florence, SC; Leon (Barbara) Ryles and Alonza (Dela) Ryles, both of New Jersey; two daughters, Minister Theresa Williams of Florence, SC and Dorthea Ryles of New Jersey; nine grandchildren: Robert L. Roberts, Micaela K. Ryles Pressley, Milisa N. Ryles, Johnathon L. Williams, Lamar Walker, Dalon Ryles, Brandy Ryles, Brandice Ryles and Hydeia M. Ryles; six great-grands; one brother, Alex Jones; two sisters, Lillie Mae Goss and Starlina Hines, both of New Jersey; and a host of nieces, nephews, other relatives and friends.

Guestbook




Barbara J. Dozier
Created : Aug 17, 2018

Sending my condolences to the family. You are in my prayers at this time of sorrow.
Love, Barbara Jean

Dawn Cooper



Essex County Register Document Summary Sheet

ESSEX COUNTY REGISTER OF DEEDS & MORTGAGES HALL OF RECORDS - ROOM 130 465 DR. MARTIN LUTHER KING BLVD NEWARK NJ 07102	Transaction Identification Number	3532129 2992621	
	Recorded Document to be Returned by Submitter to: CITY OF NEWARK 920 BROAD STREET ROOM 316 NEWARK, NJ 07102		
Official Use Only <div style="border: 1px solid black; padding: 5px; width: fit-content;"> DANA RONE REG. OF DEEDS & MORTGAGES ESSEX COUNTY New Jersey DOCUMENT TYPE L INSTRUMENT NUMBER 2018068188 RECORDED ON Aug 06, 2018 11:33:30 AM Total Pages: 4 NJ PRESERVATION ACCOUNT \$5.00 REGISTER RECORDING FEE \$3.00 HOMELESSNESS TRUST FUND \$3.00 TOTAL PAID \$11.00 INV: 223587 USER: BB </div>	Submission Date (mm/dd/yyyy)	08/03/2018	
	No. of Pages (excluding Summary Sheet)	2	
	Recording Fee (excluding transfer tax)	\$11.00	
	Realty Transfer Tax	\$0.00	
	Total Amount	\$11.00	
	Document Type	DEED - GOV	
	Electronic Recordation Level	L2 - Level 2 (With Images)	
	Municipal Codes	NEWARK 14	
	Bar Code(s)	 25 64 84	

Additional Information (Official Use Only)

101
 PH 1.2.136

* DO NOT REMOVE THIS PAGE.
 COVER SHEET [DOCUMENT SUMMARY FORM] IS PART OF ESSEX COUNTY REGISTER FILING RECORD.
 RETAIN THIS PAGE FOR FUTURE REFERENCE.

ELECTRONICALLY FILED - 2022 Mar 18 11:17 AM - FLORENCE - COMMON PLEAS - CASE#2021CP2102467



Essex County Register Document Summary Sheet

DEED - GOV	Type		DEED - GOV			
	Consideration		\$0.00			
	Submitted By		CITY OF NEWARK			
	Document Date		08/03/2018			
	Reference Info					
	Book ID	Book	Beginning Page	Instrument No.	Recorded/File Date	
	GRANTOR		Name		Address	
			CITY OF NEWARK CITY OF NEWARK			
	GRANTEE		Name		Address	
			WILLIE RYLES EDITH RYLES			
	Parcel Info					
	Property Type	Tax Dist.	Block	Lot	Qualifier	Municipality
		14	1829	48		14

* DO NOT REMOVE THIS PAGE.
COVER SHEET [DOCUMENT SUMMARY FORM] IS PART OF ESSEX COUNTY REGISTER FILING RECORD.
RETAIN THIS PAGE FOR FUTURE REFERENCE.

ELECTRONICALLY FILED - 2022 Mar 18 11:17 AM - FLORENCE - COMMON PLEAS - CASE#2021CP2102467

STATE OF SOUTH CAROLINA

IN THE PROBATE COURT

COUNTY OF: FLORENCE

NOTICE TO CREDITORS

IN THE MATTER OF:
EDITH W RYLES

2018 DEC 28 AM 8:49

10:32 BP

CASE NUMBER: 2018ES2100899

(Decedent)

***NOTICE TO CREDITORS OF ESTATES**

All persons having claims against the following estates **MUST** file their claims on FORM #371PC with the Probate Court of FLORENCE County, the address of which is , within eight (8) months after the date of the first publication of this Notice to Creditors or within one (1) year from date of death, whichever is earlier (SCPC 62-3-801, *et seq.*), or such persons shall be forever barred as to their claims. All claims are required to be presented in written statements on the prescribed form (FORM #371PC) indicating the name and address of the claimant, the basis of the claim, the amount claimed, the date when the claim will become due, the nature of any uncertainty as to the claim, and a description of any security as to the claim.

Estate: EDITH W RYLES
Date of Death: 8/10/2018
Case Number: 2018ES2100899
Personal Representative: DOROTHEA RYLES
Address: 86 S 8TH STREET NEWARK, NJ 07107
Attorney, if applicable:
Address:
Co - Personal Representative:
Address:
Attorney, if applicable:
Address:

EDITH W RYLES
NOTICE TO CREDITORS OF ESTATES
All persons having claims against the following estates **MUST** file their claims on FORM #371PC with the Probate Court of Florence County, South Carolina, the address of which is 100 N. 1st St. MSC 1, Florence, SC 29501, within eight (8) months after the date of the first publication of this Notice to Creditors or within one (1) year from date of death, whichever is earlier (SCPC 62-3-801, *et seq.*), or such persons shall be forever barred as to their claims. All claims are required to be presented in written statements on the prescribed form (FORM #371PC) indicating the name and address of the claimant, the basis of the claim, the amount claimed, the date when the claim will become due, the nature of any uncertainty as to the claim, and a description of any security as to the claim.
Estate: EDITH W RYLES
Date of Death: 8/10/2018
Case No. 2018ES2100899
Personal Representative: DOROTHEA RYLES
Address: 86 S. 8th Street, Newark, NJ 07107
Attorney, if applicable:
Address:
Run Dates: 12/6/2018, 12/13/2018, and 12/20/2018

INSTRUCTIONS: Publication to be in COMMUNITY TIMES, a newspaper of general circulation. Publish only this (*) portion of this form. Notices may be combined by listing individualized statements of the information concerning each of the estates under one heading consisting of the notice text. Publish once a week for three successive weeks.

File a copy of this form with proof of its publication with the Probate Court.

CERTIFICATE OF PUBLICATION

I hereby certify that on these dates 12/6/2018, 12/13/2018, and 12/20/2018, I did publish the Notice to Creditors in COMMUNITY TIMES, a newspaper of general circulation in FLORENCE County, South Carolina, in accordance with law.

SWORN to before me this 26th day of December, 2018
Debra A. Smith
Notary Public for South Carolina
My Commission Expires: 3/27/2022

Newspaper Rep.
Signature: _____
Print Name: _____
Address: _____
Telephone: _____
Email: _____

BP
FORM #370ES (1/2014)
62-3-704, 62-3-801, 62-3-803, 62-3-804



PNC Bank, National Association
 P.O. Box 5570
 Cleveland, OH 44101-0570
 Locator: Z1-YB43-02-1

2019 FEB -5 PM 8:49

PROBATE COURT
 FLORENCE COUNTY
 180 N IRBY MSC-L
 FLORENCE, SC 29501

January 25, 2019

The Estate of: EDITH W RYLES
 Case No.: 2018 ES 2100899
 Account Number: xxxx-xxxx-xxxx-6418 ("Account")
 Account Balance: \$618.84

To Whom It May Concern:

PNC Bank, N.A. has recently been informed that our customer is deceased, and we wish to file a claim into the estate of EDITH W RYLES.

Our claim is based upon the referenced Account. As of the date of this letter, the Account Balance of \$618.84 is due and owing. Enclosed is a claim form that we wish to present to this court, and we are forwarding the same to the attorney and/or fiduciary representing the estate.

Please forward correspondence and hearing notices regarding this matter to my attention at the following address:

PNC Bank, N.A.
 One Financial Parkway
 Kalamazoo, MI 49009
 Attn: Probate Department Z1-YB43-01-02

Please forward any disbursements or payments to us at the following address:

PNC Bank, N.A.
 LOC. BR-YB58-01-5
 6750 Miller Road
 Brecksville, OH 44141

We thank you in advance and appreciate your cooperation.

Sincerely,

Sara Houseman X20109
 Probate Specialist
 800-788-9350 Ext. 20109
 Fax No. - -

STATE OF: SC PROBATE COURT: COUNTY OF: FLORENCE	STATEMENT AND PROOF OF CLAIM	CASE NO: 2018 ES 2100899
---	---------------------------------	--------------------------

Estate of: **EDITH W RYLES**

I, PNC Bank, N.A. of One Financial Parkway, Kalamazoo, MI 49009 submit the following claim against the estate for the sum set forth. *

DESCRIPTION OF CLAIM	AMOUNT
Type of Account: CONSUMER CARD Account Number: 4311-9631-1609-6418 Open Date: November 3, 2013	\$618.84
There is now due on the claim, above all legal set-offs, the sum of:	\$618.84

Notice to interested persons: This is a claim by a personal representative for an obligation that arose before the death of the decedent. A hearing will be held to determine whether to allow the claim. You may object to the claim before or at the hearing.

I declare under penalties of perjury that this statement and proof of claim has been examined by me and that its contents are true to the best of my information, knowledge, and belief.

Attorney Signature	Date <u>1-31-2019</u>
Name (type or print)	Claimant <u>Sara Husman</u>
Address	PNC Bank, N.A. One Financial Parkway Z1-YB43-02-1 Address
City, State, Zip	Kalamazoo, MI 49009 City, State, Zip <u>800786-9350 x 20109</u>

*1. Describe nature of the claim or attach statement. Attach copy of receipt or other evidence of payment if submitted by assignee.

2. Claims must be presented either personally or by mail to the fiduciary on or before the last day for presentment of claims. This claim may also be filed with the probate court (see reverse side for proof of service).

PLEASE SEE OTHER SIDE

Do not write below this line - For court use only

PROOF OF SERVICE OF CLAIM

I Sara Houseman X20109 served upon DOROTHEA RYLES a copy of this statement and proof of claim on 1/31/2019 by Ordinary US Mail to 86 S 8TH ST, NEWARK, NJ 07107 declare under the penalties of perjury that this proof of service has been examined by me and that its contents are true to the best of my information, knowledge, and belief.

Date: 1.31.2019	 Signature: Sara Houseman X20109
-----------------	---

ACKNOWLEDGMENT OF SERVICE

Service of the attached statement and proof of claim is acknowledged.

Date:

Signature:

STATE OF SOUTH CAROLINA)

COUNTY OF FLORENCE)

IN THE MATTER OF:
EDITH W RYLES
(Decedent)

IN THE PROBATE COURT

INVENTORY AND APPRAISEMENT

ORIGINAL

AMENDED #

(must restate the unchanged information from the original inventory)

CASE NUMBER: 2018ES2100899

File the original Inventory and Appraisement with the Probate Court within ninety (90) days following the fiduciary appointment. A copy shall be sent to each interested person who has demanded it. A Proof of Delivery must be filed with the Court. The gross fair market value of all probate assets, regardless of location (whether in this state or elsewhere), should be listed as of the date of death. Continue on additional sheets if necessary. An Amended Inventory should be utilized for correcting, adjusting or adding to an original inventory, and must restate the unchanged information from the original inventory. A qualified and disinterested appraiser may be employed to ascertain the value of any asset. If an appraiser is employed, his/her name and address must be indicated with the item or items he/she appraised.

RECAPITULATION

	Non-Probate (OPTIONAL)	Probate
Schedule A - Real Estate		\$ 207,996
Schedule B - Stocks and Bonds		\$ 0
Schedule C - Notes Due Decedent and Cash		\$ 0
Schedule D - Insurance on Decedent's Life - Part 1 - Payable to Estate		\$ 0
Part 2 - Payable to Beneficiary	\$ _____	
Schedule E - Jointly Owned Property	\$ _____	
Schedule F - Other Miscellaneous Assets Payable to Estate		\$ 4,000
Schedule G - Transfers During Decedent's Life	\$ _____	\$ 0
Schedule H - Powers of Appointment	\$ _____	\$ 0
Schedule I - Annuities and Retirement Accounts	\$ _____	\$ 0
GROSS VALUE OF PROBATE ESTATE		\$ 211,996

The undersigned, being sworn, states: That the following schedules contain a complete and accurate inventory and appraisement of all probate real and personal property of this estate so far as the undersigned is informed; that he/she has estimated and/or appraised all listed property at its fair market value, according to the best of his/her knowledge and ability.

SWORN to before me this 10th day of May 2019
[Signature]
Notary Public for South Carolina
My Commission Expires: 6/16/2026

Personal Representative
Signature: *[Signature]*
Print Name: DOROTHEA RYLES
Address: 86 S 8TH STREET
NEWARK, NJ 07107
Telephone (Work): _____
(Home): _____
(Cell): (201)407-8835
(Email): _____

Attorney: _____
Address: _____
Telephone: _____
Email: _____

Co-Personal Representative
Signature (if applicable) _____
Name: _____
Address: _____
Telephone (Work): _____
Telephone (Home): _____
(Cell): _____
(Email): _____

FILED
2019 MAY 10 AM 0:55
CLERK OF PROBATE COURT
FLORENCE COUNTY, SC

ELECTRONICALLY FILED 2019 MAY 10 AM 11:17 AM - FLORENCE - COMMON PLEAS - CASE#2021CP2102467

WHEN COMPLETING THE FOLLOWING SCHEDULES LIST ALL PROBATE ASSETS, REGARDLESS OF LOCATION. ALL OUT-OF-STATE PROBATE ASSETS MUST BE DISCLOSED. NON-PROBATE PROPERTY NEED NOT BE DISCLOSED.

SCHEDULE A – REAL ESTATE. List below any real estate in Decedent's name alone or tenants in common (not as joint with right of survivorship or tenants in the entirety). Describe each property by listing its full address, tax map number, deed book and page, and description consistently (for example: house, lot, buildings, acreage). Also list oil/mineral rights and time shares if it is real property. If none, so state. If the property is encumbered, list the full fair market value of the property here and the encumbrance on the Encumbrance Schedule below. (For jointly owned property with right of survivorship, you may list in Schedule E.)

Item No.	Description	% owned by Decedent	Fair Market Value	Value of Decedent's interest
1. 88-90	50 2 nd St. NJ			
	Tax Map Number: 0714 1829-48 Acreage	100%	34,000	
2. 86	50 2 nd St. NJ			
	Tax Map Number: 0714 1829-50 House	100%	173,700	
3.				
	Tax Map Number:			

TOTAL SCHEDULE A \$ 207,700
 (also enter under recapitulation, page 1)

SCHEDULE B – STOCKS AND BONDS. List below all stocks and bonds in the Decedent's name alone or tenants in common (not as joint with right of survivorship). Identify each type of security and the number of shares. If none, so state. (For jointly owned property with right of survivorship, you may list in Schedule E.)

Item No.	Description	Face Value	Appraised Value
1.	NONE		
2.			
3.			
4.			

TOTAL SCHEDULE B \$ 0
 (also enter under recapitulation, page 1)

SCHEDULE C – CASH, BANK ACCOUNTS, NOTES RECEIVABLES. List all bank accounts owned by Decedent alone or as tenants in common (checking, savings, CDs, money market, brokerage, employment bonus, cash award, final paycheck, etc.), cash on hand, notes payable to Decedent, and survival action proceeds. If none, so state. List each separate account type and institution and last two digits of the account. (For jointly owned property with right of survivorship, you may list in Schedule E.)

Item No.	Description	Value
1.	2006 BUICK LUCERNE	4400
2.		
3.		

TOTAL SCHEDULE C \$ 0
 (also enter under recapitulation, page 1)

SCHEDULE D - LIFE INSURANCE (If none, so state.)
 Part 1 - Life Insurance – List the insurance on the life of the Decedent which is payable to the Estate.

Item No.	Description	Value
1.		
2.		
3.		

TOTAL PART 1 \$ 0
 (also enter under recapitulation, page 1)

(If more space is required, insert additional sheets of same size.)

Part 2 (OPTIONAL) - You may list here the insurance on the life of the Decedent which is payable to beneficiaries.

Item No.	Description	Beneficiary	Value
1.			
2.			
3.			

TOTAL PART 2 \$ 0
(also enter under recapitulation, page 1)

SCHEDULE E - (OPTIONAL) JOINT WITH RIGHT OF SURVIVORSHIP- You may list below any non-probate property jointly owned by the Decedent with another with right of survivorship. List each separate account type and institution and the last two digits of each account.

Item No.	Description	Joint Owner(s)	Percentage Includible	Value of Decedent's Interest
1.				
2.				
3.				

TOTAL SCHEDULE E \$ 0
(also enter under recapitulation, page 1)

SCHEDULE F - OTHER MISCELLANEOUS ASSETS PAYABLE TO ESTATE. List below any tangible personal property, including household goods & furnishings, vehicles, boats/motors/trailers, mobile homes that are not de-titled (Include year/make/model/VIN, if applicable), airplanes, equipment, interest in a partnership or unincorporated business, articles or collections having either artistic or intrinsic value, including coins, guns, artwork, jewelry, etc., and any other miscellaneous probate items not listed elsewhere, including digital assets. If none, so state. (For jointly owned tangible personal property with right of survivorship, you may list in Schedule E.)

Item No.	Description	Value
1.	206 Buick Lucerne	4,000
2.		
3.		
4.		
5.		

TOTAL SCHEDULE F \$ 4,000
(also enter under recapitulation, page 1)

NOTE: FOR SCHEDULES G, H, AND I. LIST VALUES ONLY IF PAYABLE TO ESTATE.

SCHEDULE G - TRANSFERS DURING DECEDENT'S LIFE. List any transfers intended to take effect at death if such property is payable to the Estate. You may list in the "Optional" section below any non-probate transfers intended to take effect at death not payable to the Estate, including United States Government Bonds "Payable on Death," accounts which are "Transfer on Death," a trust created by Decedent in which income for life was retained by the Decedent, power to revoke or other incidents of ownership retained by the Decedent, lifetime transfers of real property in which Decedent retained life estate, etc. If none, so state.

List date and type of transfer and list total amount payable to estate:

1.		
2.		

(OPTIONAL) describe and list amounts not payable to estate:

1.		
2.		

TOTAL SCHEDULE G \$ 0
(also enter under recapitulation, page 1)

(If more space is required, insert additional sheets of same size.)

SCHEDULE H – POWERS OF APPOINTMENT. List property, both real and personal, over which Decedent possessed a Power of Appointment whether testamentary or otherwise, if such property is payable to the Estate. You may list property subject to such power it was not payable to the Estate in the "Optional" section below. If none, so state.

Describe and list total amount payable to estate:

1.		
2.		

(OPTIONAL) describe and list amounts not payable to estate:

1.		
2.		

TOTAL SCHEDULE H

(also enter under recapitulation, page 1)

\$ 0

SCHEDULE I – ANNUITIES AND RETIREMENT ACCOUNTS (IRA's, 401(K), etc.). List any annuities or retirement accounts owned by the Decedent and payable to the Estate. You may list in the "Optional" section below any accounts payable to a beneficiary which is not payable to the Estate.

Describe and list total amount payable to estate:

1.		
2.		
3.		

(OPTIONAL) describe and list amounts not payable to estate:

1.		
2.		
3.		

TOTAL SCHEDULE I

(also enter under recapitulation, page 1)

\$ 0

ENCUMBRANCES (e.g., mortgages, liens, judgments, etc., but not general debts of the estate). List debts of the Decedent secured by assets on the above Schedules and describe the debt and the specific asset encumbered.

Item No.	Schedule & Item Number Encumbered Thereby	Description & Amount
1.		
2.		
3.		

TOTAL ENCUMBRANCES

(also enter under recapitulation, page 1)

\$ 0

(If more space is required, insert additional sheets of same size.)



AscensionPoint Recovery Services, LLC
 200 Coon Rapids Blvd. Suite 210
 Coon Rapids, MN 55433-5876
 (888) 806-9074 Phone - (763) 235-4055 Fax
 (800) 735-2922 TTY for the Hearing Impaired
 Hours: Monday – Friday 7:00AM to 5:00PM CST

ELECTRONICALLY FILED - 2022 Mar 18 11:17 AM - FLORENCE - COMMON PLEAS - CASE#2021CP2102467

05/08/2019

To Whom It May Concern:

Enclosed please find a creditor's claim presented by AscensionPoint Recovery Services, LLC on behalf of Citibank, N.A. - SEARS GOLD MASTERCARD with respect to the following:

Decedent Information:

Balance: \$1,147.55
 Date of Death: 08/10/2018
 Name: EDITH M. RYLES

Edith M. Ryles is correct

If you have any questions please feel free to contact our office at your convenience.

Respectfully,

AscensionPoint Recovery Services, LLC

This communication is from a debt collector. This is an attempt to collect a debt and any information obtained will be used for that purpose. This is an attempt to collect a debt from the estate and not from assets owned by you personally. YOU PERSONALLY ARE NOT REQUIRED TO PAY ANY OF THE DEBTS OF THE ESTATE.

FILED
 MAR 13 PM 12:21
 FLORENCE COUNTY, SC

----- detach coupon -----

Phone Number: (888) 806-9074
 Reference No: 3496539
 Please provide Estate Tax ID Number: _____

All payments should be made payable to Citibank, N.A..

PLEASE SEND PAYMENTS & CORRESPONDENCE TO:

ASCENSIONPOINT RECOVERY SERVICES, LLC
 200 COON RAPIDS BLVD, SUITE 210
 COON RAPIDS, MN 55433-5876

Florence County Probate Court
 180 N Irby St
 MSC-L
 Florence, SC 29501

STATE OF SOUTH CAROLINA)

COUNTY OF FLORENCE)

IN THE MATTER OF:)
EDITH M RYLES)
(Decedent))

IN THE PROBATE COURT

STATEMENT OF CREDITOR'S CLAIM

CASE NUMBER: 2018ES2100899

Decedent's Date of Death (if known): 08/10/2018

Decedent's Last Mailing Address: 86 S 8TH ST, NEWARK, NJ 07107-1423

Creditor:	AscensionPoint Recovery Services, LLC on behalf of Citibank, N.A.
Address:	200 Coon Rapids Boulevard, Suite 200 Coon Rapids, MN 55433
Telephone:	(888) 806-9074
Email:	
Original Creditor:	Citibank, N.A. - SEARS GOLD MASTERCARD
Address (if different from above)	
Claim Amount Due:	\$ \$1,147.55
Account Number:	XXXXXXXXXXXX3104
Other Reference Number:	3496539
Basis of claim (Ex: Contract, Services Rendered for decedent, etc):	Debt owed to Citibank, N.A.
Date claim will become due (if not already due)	05/08/2019
Nature of uncertainty as to the claim, if any (i.e. contingent claim, amount of claim, due date):	N/A
Description of security as to the claim, if any (Ex: Collateral for the debt)	N/A

FILED
MAY 13 PM 12:21
PROBATE COURT
FLORENCE COUNTY, SC

AscensionPoint Recovery Services, LLC o/b/o Citibank, N.A.

Signature: [Signature]
Printed Name: Delaney Hogan-Bakke

Title: APRS Representative

Date: 05/08/2019

INSTRUCTIONS: Claims **MUST** be filed with the Probate Court of the county in which the Decedent's Estate is under administration and may be delivered or mailed to the fiduciary appointed to administer the Estate (see SCPC 62-3-803, 62-3-804, and 62-3-806).

No claim against a Decedent's estate may be presented or legal action commenced against a Decedent's Estate prior to the appointment of a Personal Representative to administer the Decedent's Estate (except see SCPC 62-3-804(1)(b)).

Satisfaction or withdrawal of claim (FORM 325) **MUST** be filed once claim is resolved.

FORM #371ES (1/2016)
62-3-104, 62-3-803, 62-3-804, 62-3-806

STATE OF SOUTH CAROLINA
 COUNTY OF FLORENCE
 IN THE MATTER OF:
 EDITH M RYLES

IN THE PROBATE COURT

PROOF OF DELIVERY

CASE NUMBER: 2018ES2100899

On the 08 day of May, 2019, I mailed or delivered the following document(s):

STATEMENT OF CREDITOR'S CLAIM

- A copy of which is attached hereto and incorporated herein, or
- The original of which is on file with the Court.

Delivery was accomplished by the following method (check appropriate box):

- personal delivery
- certified mail
- commercial delivery
- ordinary first-class mail
- registered mail
- electronic message (Article 7, Trust matters only)

to each of the following persons at the address shown:

NAME	ADDRESS
DOROTHEA RYLES	86 S 8TH ST, NEWARK, NJ, 07107

FILED
 2019 MAY 13 PM 12: 21
 FLORENCE COUNTY, SC

AscensionPoint Recovery Services, LLC/b/o Citibank, N.A.

Signature: *Delaney Hogan-Bakke*

Printed Name: Delaney Hogan-Bakke

Address: AscensionPoint Recovery Services, LLC

200 Coon Rapids Boulevard, Suite 200, Coon Rapids, MN 55433

Telephone (Work): (888) 806-9074

(Home): _____

(Cell): _____

Email: _____

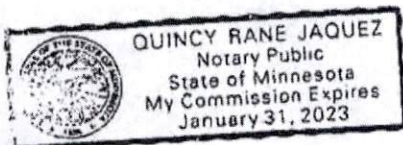
Relationship to Estate: Creditor

SWORN to before me this 08 day of May, 2019

Quincy Rane Jaquez

Notary Public for Minnesota

My Commission Expires: 01/31/2023



Proof of Delivery (7/2014)
 62-1-401, 62-3-1001

STATE OF SOUTH CAROLINA
COUNTY OF FLORENCE

IN THE PROBATE COURT
C/A NO: 2018-ES-21-00899

In the Matter of:
EDITH W. RYLES, Decedent

Leon Ryles, Willie N. Ryles and Theresa Williams,

Petitioner(s),

AFFIDAVIT OF
CHARLIE J. BLAKE, JR.

vs.

Doretha Ryles,

Respondent(s).

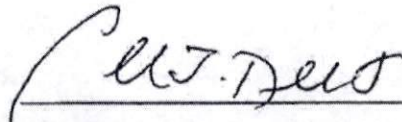
PERSONALLY APPEARED BEFORE ME, Charlie J. Blake, Jr., who, being duly sworn deposes and says as follows:

1. I am Charlie J. Blake, Jr., a practicing attorney in Florence, South Carolina.
2. I represent the Respondent in the above-referenced matter which seeks to overturn the Will of Edith W. Ryles based on her lack of mental capacity and undue influence. The Complaint also alleges breach of fiduciary duty.
3. This suit was commenced by the filing of the Petition for Formal Testacy and a Summons and Complaint on or about May 7, 2019.
4. Attorney Brown W. Johnson represents the Petitioners, Leon Ryles, Willie N. Ryles and Theresa Williams and I represent the Respondent,

JUN 25 2020

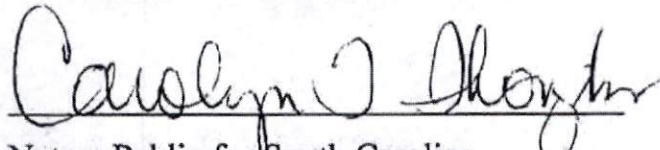
Doretha Ryles. The parties have completed discovery and are prepared to litigate this matter at a final hearing.

5. I was recently contacted by Mr. Johnson and he suggested settlement options. I advised Mr. Johnson that the Respondent denied all liability and was not interested in mediation or a settlement of the case.
6. Both Mr. Johnson and I agreed the case will have to be tried.



CHARLIE J. BLAKE, JR.

Subscribed and sworn to before me
this 25 day of June, 2020.



Notary Public for South Carolina

My Commission Expires: 7-5-2027

LAW OFFICES
CLARKE, JOHNSON, PETERSON & McLEAN, P.A.
620 WEST EVANS STREET
POST OFFICE BOX 1865
FLORENCE, SOUTH CAROLINA 29503

FINLEY B. CLARKE
BROWN W. JOHNSON
JAMES W. PETERSON, JR.
JOSEPH P. McLEAN

TELEPHONE (843) 669-2401
FAX (843) 662-1779
E-MAIL bjohnson@ejpmilaw.com

June 2, 2020

Jesse Cartrette, Judge of Probate
Post Office Box 482
Florence, South Carolina 29503

RE: Leon Ryles, Willie N. Ryles and Theresa
Williams vs. Dorthea Ryles
Case No. 2018ES2100899
Our File 19-054

FILED

JUL 10 2020

Jesse S. Cartrette, Jr., Probate Court Judge
Florence County, South Carolina

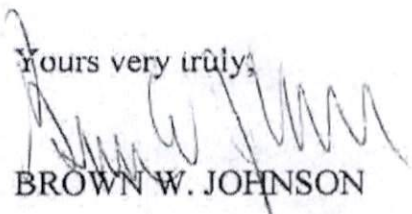
Dear Judge Cartrette:

I am enclosing my Affidavit in the above referenced matter.

Mr. Blake and I agree that mediation would not result in a settlement, and the case will have to be tried. By copy of this letter, I am requesting Mr. Blake advise of his position.

With kind regards,

Yours very truly,


BROWN W. JOHNSON

BWJ:vjc
Enclosure

cc: Charlie J. Blake, Jr., Esquire
Finklea Law Firm
Post Office Box 1317
Florence, South Carolina 29503-1317

ELECTRONICALLY FILED - 2022 Mar 18 11:17 AM - FLORENCE - COMMON PLEAS - CASE#2021CP2102467

STATE OF SOUTH CAROLINA
COUNTY OF FLORENCE

IN THE PROBATE COURT
CA NO. 2018-ES-21-00899

In the Matter of:
EDITH W. RYLES, Decedent

Leon Ryles, Willie N. Ryles and
Theresa Williams,
Petitioner(s),

FILED

JUL 10 2020

Jesse S. Cartrette, Jr., Probate Court Judge
Florence County, South Carolina

vs.

AFFIDAVIT OF
BROWN W. JOHNSON

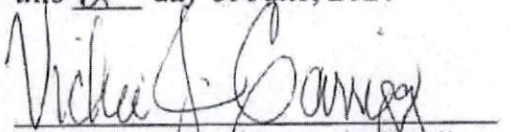
Doretha Ryles,
Respondent.

PERSONALLY APPEARED BEFORE ME, Brown W. Johnson,
who, being duly sworn deposes and says as follows:

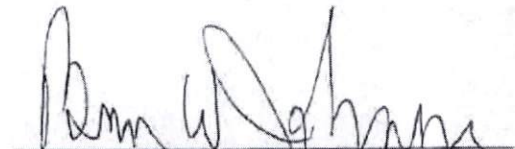
1. I am Brown W. Johnson, a practicing attorney in Florence, South Carolina.
2. I represent the petitioners in the above-referenced matter which seeks to overturn the Will of Edith W. Ryles based on her lack of mental capacity and undue influence. The complaint also alleges breach of fiduciary duty.
3. This suit was commenced by the filing of the Petition for Formal Testacy and a Summons and Complaint on or about May 7, 2019.

4. Attorney Charlie J. Blake, Jr. made an appearance on behalf of the respondent and filed an Answer denying liability. The parties have completed discovery.
5. I recently contacted Mr. Blake and suggested mediation. He advised the respondent denied all liability and was not interested in mediation or a settlement of the case.
6. Both Mr. Blake and I agreed the case will have to be tried.

SWORN to before me
this 2nd day of June, 2020



Notary Public for South Carolina
My Commission Expires: 2/10/30



BROWN W. JOHNSON

U.S. Postal Service
CERTIFIED MAIL RECEIPT
 (Domestic Mail Only; No Insurance Coverage Provided)
 For delivery information visit our website at www.usps.com

9659 7984 9000 029T 5002



ALAN WILSON
 ATTORNEY GENERAL

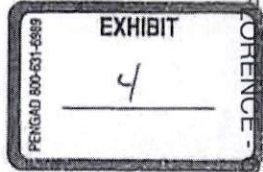
April 23, 2021

VIA CERTIFIED MAIL / RETURN RECEIPT

Hawkins Tax Service
 Attn: Katherine McWhite & Vera Lewis
 239 North McQueen Street
 Florence, South Carolina 29501

Postage	\$	Postmark Here
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$	

Sent To
 Hawkins Tax Service; Katherine McWhite
 Street, Apt. No.:
 or PO Box No. 239 North McQueen St. + Vera Lewis
 City, State, ZIP+4 Florence SC 29501



Dear Ms. McWhite and Ms. Lewis:

This Office is in receipt of information that you have assisted people with the drafting and providing of various types of legal documents including powers of attorney and last will and testaments.

This action constitutes the unauthorized practice of law in South Carolina. The relevant provision, S.C. Code of Laws § 40-5-310, states that, "No person may practice or solicit the cause of another person in a court of this State unless he has been admitted and sworn as an attorney. A person who violates this section is guilty of a felony and, upon conviction, must be fined not more than five thousand dollars or imprisoned not more than five years, or both." Further, the Courts of this state have made it clear that, in addition to court appearances, certain other actions also constitute the practice of law, these would include, among other things, the drafting of legal documents and providing legal advice.

This office is declining to proceed against you **at this time**. However, please be informed that should this Office learn of additional instances of the Unauthorized Practice of Law following your receipt of this letter, then appropriate action will be taken to protect the public. If you choose to continue your business, then I urge you to seek the advice of an attorney regarding the services which you provide to ensure compliance with the law.

Sincerely,

Megan B. Burchstead
 Megan B. Burchstead
 Senior Assistant Deputy Attorney General

MBB/ns

ELECTRONICALLY FILED - 2022 Mar 11 11:17 AM - FLORENCE - COMMON PLEAS - CASE#2021CP2102467

19201CBCT



JESSE S. CARTRETTE, JR.
Judge of Probate Court

September 27, 2021

Mr. Brown W. Johnson, Esquire
Clarke, Johnson, Peterson & McLean, P.A.
620 W. Evans Street
Post Office Box 1865
Florence, SC 29503

Mr. Charlie J. Blake, Esquire
Finklea, Hendrick & Blake, LLP
814 W. Evans Street
Post Office Box 1317
Florence, SC 29503

Mr. Gary W. Crawford, Esquire
Crawford Law Firm
Post Office Box 508
Florence, SC 29503

Memorandum on:

In re: Estate of Edith Ryles; Leon Ryles, Willie N. Ryles, and Theresa Williams v. Dorthea Ryles: Case No: 2018-ES-21-00899;

I find in favor of the Petitioners in this matter.

Based on the testimony and evidence presented to this Court, I find that both the Durable Power of Attorney of Edith Ryles and the Last Will and Testament of Ms. Ryles shall be set aside as the evidence and eyewitness testimony presented to this Court overwhelmingly has proven Edith Ryles lacked the necessary capacity to issue and execute such legal documents long before the dates each of these two documents were signed by her. I find most compelling the testimony of two of the witnesses who are not heirs of Edith Ryles and who had nothing to gain from offering their testimony in this matter. Investigator Justin Chatlosh of the Florence City Police Department testified that he was the officer who responded to the call on April 9, 2016 wherein it was reported that Ms. Ryles was found by neighborhood children wondering the neighborhood with her walker in her bath robe looking for her deceased husband and unable to recognize her own home while she was yet standing in front of it. The second uninterested witness's testimony was that of the Decedent's own niece, Vera Askins, who testified that she was very close with

Florence County Judicial Center
181 N. Irby St., Suite 1300, Florence, SC 29501 – Telephone: (843)665-3085 – Fax: (843)665-3068

ELECTRONICALLY FILED - 2022 Mar 18 11:17 AM - FLORENCE - COMMON PLEAS - CASE#2021CP2102407



JESSE S. CARTRETTE, JR.
Judge of Probate Court

Edith Ryles and visited her several times each month, even spending the night occasionally, and that Mrs. Edith Ryles' mental and physical condition had begun to decline even before the events of April 9, 2016, but certainly had not improved since that unfortunate day. Her testimony most certainly corroborates that of the petitioners, who essentially lived with Ms. Edith Ryles and testified they observed her decline on a near daily as she went from the self-sufficient mother they once knew to someone who was unable to drive herself to and from appointments and necessary errands to even struggling to complete daily functions like preparing a meal for herself, bathing and dressing herself completely without someone else's assistance. It appears the only one of Edith Ryles' loved ones who testified their observations of her behavior caused them to believe that she had the capacity to execute legal documents such as the two subject documents in this action is the Respondent who stands to benefit from these documents not being set aside, largely to the exclusion of her siblings.

As to Undue Influence, I find the Respondent Dorothea Ryles, did indeed influence her mother unduly in executing both of these documents. She took her mother to Hawkins Tax Service to have these legal documents drafted by laypersons her mother trusted to do her taxes instead of taking her to a licensed lawyer who would have been skilled in the art of examining whether Ms. Edith Ryles knew exactly what she was doing, and knew the objects of her bounty, and if she met the other statutory requirements and formalities necessary to execute these very important estate planning devices. What I find particularly disturbing is that, on both occasions, she took her mother to have the Power of Attorney and the Last Will and Testament prepared when she was visiting her mother and family from her home in New Jersey to relieve her brother and sister, the Petitioners, of their regular daily duties of caring for their mother, and that she never told either of her siblings that she was taking her mother to get these legal documents prepared.

As to Breach of Fiduciary Duty, I find that the Respondent Dorothea Ryles has indeed breached the high degree of trust placed in her to protect funds of the Estate of Edith Ryles. By Respondent's own admission she spent large sums of money selfishly in a very lavish fashion from funds of Edith Ryles while operating under the Power of Attorney and as Personal Representative under the Last Will and Testament. She also testified that she used Estate money to pay the property taxes owed by the estate to keep the estate from losing the properties, and paid contractors for parts and labor to have significant and substantial repairs done to the properties and routine yard work and maintenance done, but Respondent's unabashed high degree of self-dealing is absolutely and unequivocally a breach of her fiduciary duty and simply cannot be ignored by this Court.

As to Tortious Interference, I do not find that Petitioners have made the case for this particular cause of action.

Florence County Judicial Center
181 N. Irby St., Suite 1300, Florence, SC 29501 – Telephone: (843)665-3085 – Fax: (843)665-3068



JESSE S. CARTRETTE, JR.
Judge of Probate Court

As to actual damages, I will grant the Petitioners' request for actual damages and require that Respondent must reimburse the estate for all expenditures made from the accounts of Edith Ryles' Estate under the Power of Attorney and Last Will and Testament that cannot be shown to be of direct benefit to Decedent Edith Ryles and ultimately to the Decedent's Estate.

I do not find that this case is one in which an award for punitive damages is necessary; however I am going to award the Petitioner's their request for Respondent to pay their attorney's fees, legal expenses and court costs.

I am asking Mr. Johnson to prepare a proposed Order and to show same to Mr. Blake and Mr. Crawford for any requests to edit that they may have before submitting it to the Court within 14 days of today's date for me to review and sign. If counsel wishes to speak to me with regard to any of the requests in the above memorandum, then my new Clerk of Court/Administrative Assistant, Ms. Danielle Rowell, (843-665-3085, ext.5) will be glad to arrange a conference call for us to address any items necessary to get the Order completed.

Very Respectfully and Sincerely,

J. Cartrette, Jr.

Jesse S. Cartrette, Jr.
Probate Court Judge
Florence County

Florence County Judicial Center
181 N. Irby St., Suite 1300, Florence, SC 29501 – Telephone: (843)665-3085 – Fax: (843)665-3068

STATE OF SOUTH CAROLINA
IN THE COURT OF COMMON PLEAS

Appeal from Florence County
Probate Court
The Honorable Jesse S. Cartrette, Jr., Probate Judge

Court of Common Pleas Case No.: 2021CP2102467

In Re: Estate of Edith W. Ryles
Estate File No.: 2018ES2100899

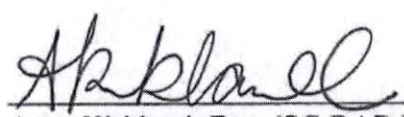
Dorthea Ryles.....Appellant,

v.

Leon Ryles, Willie N. Ryles, and Theresa Williams.....Defendants.

RULE 210 CERTIFICATION

The undersigned hereby certifies that the Record on Appeal contains all material proposed to be included by any of the parties and not any other material.



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March 18, 2022
Lexington, South Carolina

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Florence County
Court of Common Pleas

The Honorable Clifton B. Newman, Circuit
Court Judge for Common Pleas

Appellate Case No.: 2023-001842

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SC Court of Appeals

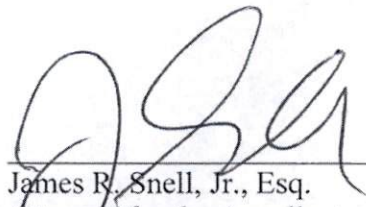
Dorthea Ryles Appellant,

v.

Leon Ryles, Willie N. Ryles, and Theresa Williams, Respondents Respondents.
IN RE: The Estate of Edith W. Ryles, Estate File: 2018-Es-21-00899

RULE 210 CERTIFICATION

The undersigned hereby acknowledges that the Record on Appeal complies with Rule 210
SCACR.



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May 2, 2024
Lexington, South Carolina