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Jan 23 2025

SC Court of Appeals

The South Carolina Court of Appeals

Re: Palmetto Citizens v. Keivan Keon Minter
Appellate Case No. 2024-001529



Richland Common Pleas

Case Caption: Palmetto Citizens Federal Credit Union vs Keiven Keon Minter

Case Number: 2023CP4005766

NOTICE OF REQUEST FOR THE ORDER TO BRING ABOUT THE CORRECTION OF ALL ATTORNEY ERRORS AND PROCEDURAL DEFICIENCIES TO BE INCLUDED IN THE RECORD ON APPEAL

**TO: The Honorable Court Of Common Pleas for Richland County, South
Carolina; and The South Carolina Court of Appeals and The South Carolina
Supreme Court:**

COMES NOW, appellant Keiven Keon Minter who, upon discovery of the attorney errors and procedural deficiencies resulting from the failure to join the Palmetto Citizens Federal Credit Union trustee for the Keiven Keon Minter trust account as the indispensable party to this lawsuit in order for the court to render the

Request for the Order to Compel the Attorneys of Record to act in accordance with applicable federal and state laws regarding the management of all the KEIVEN KEON MINTER trust accounts that include the following:

Federal Laws:

1. Internal Revenue Code (IRC) Sections:

- **IRC §641-§685:** Governing the taxation of trusts and estates.
- **IRC §6724:** Penalties for failure to file correct information returns (Form 1099 or Form K-1).
- **IRC §6012:** Filing requirements for trusts.
- **FATCA (Foreign Account Tax Compliance Act):** Compliance for foreign trusts or trusts with foreign beneficiaries.

2. Fiduciary Duty under Federal Common Law:

- Trustees are required to act in the best interest of the beneficiary, ensuring prudent investment and disbursement of trust funds.

South Carolina State Laws:

1. South Carolina Trust Code (S.C. Code Ann. § 62-7-101 et seq.):

- Governs trust creation, administration, and termination.

Trustee Accounting Request:

The Palmetto Citizens Federal Credit Union trustee for the Keiven Keon Minter trust account is hereby requested to provide the full and detailed accounting of the Keiven Keon Minter trust account. This accounting shall include, but is not limited to, a comprehensive record of all transactions, deposits, payments, distributions, and any other activities conducted under the Keiven Keon Minter trust account. Such accounting must be provided to the *Beneficiary* within thirty (30) days of receipt of this notice of requests.

Trust Protector Authority:

The clerk of court for the South Carolina Court of Appeals Jenny Abbott Kitchens is hereby constituted, appointed, and authorized to act as the trust protector. The trust protector is empowered to supervise the compliance of the Palmetto Citizens Federal Credit Union trustee for the Keiven Keon Minter trust account with the directives outlined herein. This includes ensuring the lawful payment settlement, the return of all deposits received in error as payments, and adherence to the 30-day timeline specified. The trust protector shall have the authority to take any and all necessary actions to enforce compliance with this lawful request and protect the interests of the *Beneficiary* and ensure the trustee fulfills the obligations owed to the *Beneficiary* and direct the Palmetto Citizens Federal Credit Union trustee for the Keiven Keon Minter trust account to send *Beneficiary* the full and detailed

accounting of the Keiven Keon Minter trust account via email and in writing to the mailing address provided below within thirty (30) days of receipt of this notice of request.

Accepted and Approved and Authorized on the 22nd day of January 2024,

By: *Keiven Keon Minter*
Keiven Keon Minter, *Sui Juris Creditor Beneficiary for the*
KEIVEN KEON MINTER Trust
c/o 6729 Two Notch Road
Columbia, South Carolina 29223
(803) 446-7147
kminter85@hotmail.com

NOTARY ACKNOWLEDGMENT

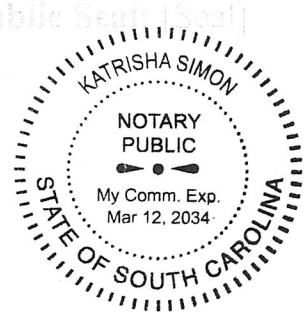
State of South Carolina
County of Richland

On this 22nd day of January, 2024, before me, the undersigned Notary Public, personally appeared Keiven Keon Minter, to me known to be the beneficiary of the KEIVEN KEON MINTER Trust that is described in and who executed this **NOTICE OF REQUEST FOR THE ORDER TO BRING ABOUT THE CORRECTION OF ALL ATTORNEYS ERRORS AND PROCEDURAL DEFICIENCIES TO BE INCLUDED IN THE RECORD ON APPEAL**, and acknowledged to me that he executed the same as his free and voluntary act and deed for the uses and purposes therein mentioned.

Witness my hand and official seal:

Katrisha Simon
(Signature of Notary Public)
KATRISHA SIMON
(Print Name of Notary Public)


My Commission Expires: March 12, 2034



CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing **NOTICE OF REQUEST FOR THE ORDER TO BRING ABOUT THE CORRECTION OF ALL ATTORNEYS ERRORS AND PROCEDURAL DEFICIENCIES TO BE INCLUDED IN THE RECORD ON APPEAL** was served by U.S. Postal Services Certified Mail with Returned Receipt Number 9589 0710 5270 214 4916 41 upon S. Nelson Weston, Jr. using S.C. Bar No. 12902 and Carmen V. Ganjehsani using S.C. Bar No. 73515 and Katherine E. Engels S.C. Bar No. 105389 acting as the attorneys of record for RICHARDSON, PLOWDEN & ROBINSON, PA named as the attorneys for Palmetto Citizens Federal Credit Union with mailing address: 1900 Barnwell Street (29201), Post Office Drawer 2288, Columbia, South Carolina 29202 on this 22nd day of January, 2024.

Accepted and Approved and Authorized on the 22nd day of January 2024,

By: 

Keiven Keon Minter, *Sui Juris Creditor Beneficiary for the*
KEIVEN KEON MINTER Trust
6729 Two Notch Road
Columbia, South Carolina 29223
(803) 446-7147
kminter85@hotmail.com