

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION**

**RECEIVED**

**MAR 13 2026**

**SC Court of Appeals**

IN RE: SAMUEL TUCKER COLLINS, JR., )  
the living man and grantor, )

Miscellaneous Docket No. 2:26-mc-00086-RMG-MGB

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**SUPPLEMENTAL LODGMENT:  
EQUITABLE BILL OF REVOCATION OF TRUST  
AND DEMAND FOR ACCOUNTING**

**COMES NOW** Samuel Tucker Collins, Jr., the living man, appearing in his own proper person, and hereby lodges this Supplemental Equitable Bill of Revocation of Trust and Demand for Accounting in the above-captioned miscellaneous docket, ancillary to his pending appeal in *Collins v. West Palmetto Holdings, LLC*, South Carolina Court of Appeals Case No. 2025-002352, and the underlying Clarendon County proceedings.

**PRELIMINARY STATEMENT**

1. This is an action in equity. It arises from the ancient and inherent jurisdiction of courts of chancery to remedy bad faith, enforce trusts, prevent irreparable injury, and compel accounting.
2. The Petitioner appears as the **living man**, with clean hands, in good faith, and with no intention other than to preserve his rights and property pending full adjudication of his state court appeal.
3. This matter involves a secret profit scheme in which the Respondents—acting as trustees and co-sureties—caused securities to be issued in Petitioner's name, using his court case numbers as identifiers, **without his knowledge, consent, or signature, and without his permission or authorization for the USE of his name.**
4. The Petitioner invokes the equitable doctrines of revocation, constructive trust, accounting, subrogation, and injunction. He seeks no legal damages. He seeks only that which equity requires: a full accounting, the reconveyance of trust property, and an injunction preventing irreparable harm.

## CLARIFICATION OF TRUST LANGUAGE

5. The trusts at issue in this proceeding are **not** Petitioner's private estate planning vehicles. The trusts at issue are the **securitized bond trusts** created by the Respondents using Petitioner's court case numbers, without his knowledge or consent.
6. Petitioner appears as the **grantor** and **cestui que trust** of these trusts. He does not appear as a trustee or representative of any private trust. His capacity is that of the living man whose identity was used to create these trusts.

## THE EQUITY JURISDICTION OF THIS COURT

7. This Court has inherent equity jurisdiction over matters of trust, bad faith, and irreparable injury. Federal courts sitting in equity may:
  - a. Remedy bad faith and unconscionable conduct;
  - b. Enforce trusts and impose constructive trusts;
  - c. Order full accounting;
  - d. Issue injunctions to prevent irreparable harm;
  - e. Act *in personam* against individuals, reaching their assets, reputations, and conduct.
8. No adequate remedy at law exists. The Respondents have concealed the very facts necessary to pursue legal remedies. The Petitioner faces imminent, irreparable harm through execution of a void writ of ejectment scheduled for March 17, 2026.
9. This miscellaneous docket is properly used for ancillary and supplementary proceedings. This Supplemental Lodgment is filed as an equitable pleading ancillary to Petitioner's pending state court appeal.

## THE PARTIES

10. **Petitioner SAMUEL TUCKER COLLINS, JR.** is the living man, a natural person, domiciling in Clarendon County, South Carolina, and the grantor and *cestui que trust* of the trusts described herein.
11. The following are named as **Respondents and co-trustees**, each having participated in the secret profit scheme described herein:
  - a. **Honorable Angela Witherspoon**, Magistrate Judge, Clarendon County, 102 South Mill Street, Manning, SC 29102

- b. **Clerk of Magistrate Court (Susan)** , Clarendon County, 102 South Mill Street, Manning, SC 29102
  - c. **Honorable Bryan Griffin**, Circuit Court Judge, 3 West Keitt Street, Manning, SC 29102
  - d. **Shanita Brangman**, Clerk of Court, Common Pleas, 3 West Keitt Street, Manning, SC 29102
  - e. **Honorable H. Bruce Williams**, Chief Judge, SC Court of Appeals, 1220 Senate Street, Columbia, SC 29101
  - f. **Jenny Abbott Kitchings**, Clerk of Court, SC Court of Appeals, 1220 Senate Street, Columbia, SC 29101
  - g. **Honorable Clifton Newman**, Retired Judge (sitting by assignment), c/o SC Court Administration, 1220 Senate Street, Suite 200, Columbia, SC 29201
  - h. **James Martin Page**, Attorney, 339 Heyward Street, 2nd Floor, Columbia, SC 29201
  - i. **West Palmetto Holdings, LLC**, South Carolina LLC (Registered Agent address - obtain from SC SOS)
  - j. **Clarendon County Treasurer**, Clarendon County (Address - obtain from county website)
12. Each Respondent is named **as a person**, not merely as an office holder. Equity acts *in personam*—against the person. Each Respondent has assets, a reputation, a livelihood, and a duty to act in good faith. The office is an *ens legis*—a legal fiction. The person behind the office is a living man or woman. The office does not shield the person.

## **FACTUAL ALLEGATIONS – THE SECRET PROFIT SCHEME**

- 13. **Without Petitioner's knowledge, consent, or signature, and without his permission or authorization for the USE of his name**, the Respondents caused securities to be issued in Petitioner's name, using his court case numbers as identifiers.
- 14. Petitioner first discovered this scheme upon obtaining official CUSIP reports confirming the existence of these securities. The following trusts were created:

Case	Fund	CUSIP	Amount
CC 2024-CV-1410-100503 (Magistrate)	DFA Municipal Real Return Institutional	25239Y550	\$91,710,000.00
CC 2024-CP-1400-368 (Common Pleas)	AB Intermediate Diversified Municipal	085568483	\$288,469,000.00
2025-002352 (Court of Appeals)	CUSIP pending	—	—

15. These funds are not fictional. They are **real securities**, actively traded on national markets. Public records from the U.S. Securities and Exchange Commission confirm that institutional investors, including Cary Street Partner Investment Advisory LLC, hold positions in these funds.
16. Each of these securities generates income. That income belongs in equity to Petitioner as the grantor and *cestui que trust*. **Petitioner has received none of it. No accounting has ever been provided.**
17. The Respondents acted in **bad faith**. They:
  - a. Used Petitioner's name without authorization;
  - b. Executed bonds in Petitioner's name without his signature;
  - c. Concealed the existence of these trusts;
  - d. Profited from securities issued in Petitioner's name;
  - e. Refused all demands for accounting;
  - f. Struck pleadings and concealed evidence.
18. **The Respondents' conduct violates the most basic duty of good faith. It is unconscionable. It is a breach of trust.**

## THE PLEA OF RELEASE AND EQUITABLE TENDER

19. On February 27, 2026, Petitioner filed his **Plea of Release and Equitable Tender** in this miscellaneous docket (Dkt. No. 5), tendering \$50.00 as equitable security and evidencing his good faith and clean hands.
20. Petitioner invoked **equitable subrogation**, stepping into the place of:
  - a. West Palmetto Holdings, LLC, with respect to any claim for possession or use and occupation;
  - b. The Clarendon County Sheriff's Office, with respect to its duty to execute only valid writs;

- c. The magistrate court, with respect to its equitable power to grant stays;
  - d. The South Carolina Court of Appeals, with respect to its authority to consider equitable relief;
  - e. Any surety that would otherwise be required under S.C. Code § 18-9-170.
21. **Respondent James Martin Page**, having been served with said Plea and tender, has failed to respond, object, or acknowledge said tender. His silence constitutes:
- a. Acquiescence;
  - b. Evidence of bad faith;
  - c. Admission that he has no legitimate objection.

## THE RESPONDENTS' BAD FAITH

22. Each Respondent participated in a scheme to use Petitioner's name for profit. Not one sought his consent. Not one informed him. Not one accounted to him.
23. The Respondents' bad faith is demonstrated by their specific acts:
- a. Creation of securities in Petitioner's name without authorization;
  - b. Concealment of said securities from Petitioner;
  - c. Refusal to provide accounting upon demand;
  - d. Striking of pleadings and concealment of evidence;
  - e. Silence in the face of equitable tender;
  - f. Proceeding with execution of a void writ despite actual notice.
24. In equity, silence in the face of a proper tender is deemed acquiescence. A party who acquiesces cannot later be heard to complain.

## EQUITABLE MAXIMS APPLIED

25. **Equity regards as done that which ought to be done.** The Respondents ought to have accounted to Petitioner. Equity will treat the accounting as already done and compel its production.
26. **Equity will not suffer a wrong to be without a remedy.** The wrong perpetrated against Petitioner is profound. Without this Court's intervention, he will be left without remedy, dispossessed of his home and defrauded of his property.
27. **He who seeks equity must do equity.** Petitioner has done equity. He has given notice. He has tendered security. He has demanded accounting. He has exhausted every available avenue.
28. **He who comes into equity must come with clean hands.** Petitioner's hands are clean. He has committed no wrong. He is the victim. The Respondents' hands are unclean. They have acted in bad faith.

29. **Equity aids the vigilant, not those who slumber on their rights.** Petitioner has been vigilant. Upon discovering the CUSIP reports, he acted immediately. He filed notices. He obtained evidence. He documented every step.
30. **Equity imputes an intention to fulfill an obligation.** The Respondents had an obligation to account to Petitioner. Their concealment is treated in equity as a breach of that obligation.
31. **Equity acts in personam.** This Court has the power to compel each Respondent—individually and personally—to act. It can order Judge Witherspoon to vacate the writ. It can order Attorney Page to cease his efforts. It can order West Palmetto Holdings to reconvey the property.
32. **Where there is equal equity, the law must prevail.** Here, the equities are not equal. Petitioner's equity is superior. He is the true owner, the grantor, the *cestui que trust*. The Respondents have no equitable interest whatsoever.
33. **Equity follows the law.** The law, as expressed in Title 26 of the United States Code, establishes that Petitioner is the grantor of these trusts. Equity adopts this as fact and applies its own remedies.

## CAUSES OF ACTION IN EQUITY

### COUNT I – REVOCATION OF TRUST

34. A trust may be revoked by the grantor where the grantor has the inherent power to revoke, where the trust was procured by bad faith, or where the trustee has breached fiduciary duties so fundamentally as to warrant revocation.
35. In this case, all three grounds exist:
  - a. Petitioner, as grantor, has the inherent equitable power to revoke trusts created in his name without his consent;
  - b. The trusts were procured by bad faith;
  - c. The Respondents have breached their fiduciary duties so fundamentally that they cannot be trusted to continue as trustees.
36. Petitioner hereby exercises his equitable power of revocation and revokes each and every trust created in connection with the following case numbers:
  - a. CC 2024-CV-1410-100503 (Magistrate Court);
  - b. CC 2024-CP-1400-368 (Court of Common Pleas);
  - c. 2025-002352 (South Carolina Court of Appeals).
37. As a consequence of revocation, all trust property, including all bond funds and their income, must be reconveyed to Petitioner.

## **COUNT II – ACCOUNTING**

38. A trustee is obligated to provide a full and complete accounting to the beneficiary. This duty is fundamental and cannot be waived or concealed. Revocation of the trust does not waive this duty. The former trustee must account for the entire period of stewardship.
39. The Respondents have never provided any accounting. They have concealed the existence of the trusts themselves.
40. Petitioner is entitled to a full accounting of:
  - a. All funds deposited into or held in connection with each trust;
  - b. All income, interest, dividends, and capital gains generated by said funds;
  - c. All fees, commissions, or other compensation taken by any Respondent;
  - d. All transactions involving the CUSIP numbers identified herein;
  - e. All records of any kind pertaining to these trusts.

## **COUNT III – CONSTRUCTIVE TRUST**

41. Where property has been acquired by bad faith, or where one who holds property would be unjustly enriched if allowed to retain it, equity imposes a constructive trust in favor of the true owner.
42. The Respondents have acquired, through bad faith, property that rightfully belongs to Petitioner. They would be unjustly enriched if allowed to retain it.
43. A constructive trust is hereby imposed over:
  - a. All funds identified in the CUSIP reports attached hereto;
  - b. All income generated therefrom;
  - c. All property acquired with said funds;
  - d. The Property itself, which was taken through these bad faith proceedings.

## **COUNT IV – INJUNCTIVE RELIEF**

44. Petitioner will suffer irreparable harm if the writ of ejectment is executed. He will lose his home, his sanctuary, his property. No amount of money damages can compensate for this loss.
45. The Respondents have no adequate remedy at law. They have only the void judgment, which cannot support equitable relief.
46. Petitioner requests that this Court immediately issue a preliminary and permanent injunction:
  - a. Enjoining the Clarendon County Sheriff from executing the writ of ejectment;
  - b. Enjoining all Respondents from taking any further action to dispossess Petitioner;

- c. Enjoining all Respondents from concealing or destroying any records related to these trusts;
- d. Enjoining all Respondents from transferring or dissipating any trust funds.

### **COUNT V – RECONVEYANCE OF PROPERTY**

- 47. The deed by which West Palmetto Holdings claims title to the Property was procured from the Office of the Clarendon County Treasurer through a tax sale. West Palmetto then entered the magistrate court with this deed already in its name, seeking to enforce a right to possession. Petitioner has filed a Lis Pendens in the Clarendon County Register of Deeds, providing public notice that title to the Property is disputed and that the deed is void.
- 48. Title to the Property remains in Petitioner. West Palmetto Holdings holds only the void deed, which constitutes a cloud on Petitioner's title.
- 49. Petitioner requests that this Court order West Palmetto Holdings to reconvey the Property to Petitioner and to cancel the void deed of record.

### **INCORPORATION OF SUBROGATION**

- 50. Petitioner incorporates herein his invocation of equitable subrogation as set forth in his Plea of Release (Dkt. No. 5). By operation of subrogation, Petitioner stands in the shoes of each Respondent with respect to:
  - a. The right to demand strict compliance with all lawful requirements before removal, arising in equity, not by statute alone;
  - b. The duty to provide complete and accurate information regarding any claimed right to possession;
  - c. The right to demand an accounting of any claimed damages or use and occupation value;
  - d. The duty to act in good faith and with clean hands.

### **NOTICE OF RESPONDENTS' SILENCE**

- 51. Respondents have been served with Petitioner's Plea of Release, his Response to Court Order, and this Supplemental Lodgment.
- 52. Their silence in the face of these filings constitutes:
  - a. Acquiescence to the facts alleged;
  - b. Evidence of bad faith;
  - c. Unclean hands;
  - d. Waiver of any right to object.

53. In equity, silence is assent. A party who remains silent when good faith requires speech cannot later be heard.

## PRAYER FOR RELIEF

**WHEREFORE**, Petitioner respectfully prays that this Honorable Court of Equity:

1. Accept this Supplemental Lodgment as part of Miscellaneous Docket No. 2:26-mc-00086-RMG-MGB;
2. Take judicial notice of all facts alleged herein, supported by the attached exhibits;
3. Decree that the trusts created in connection with Case Nos. CC 2024-CV-1410-100503, CC 2024-CP-1400-368, and 2025-002352 are hereby **REVOKED**;
4. Order the Respondents to provide a **full and complete accounting** of all trust property within 14 days;
5. Impose a **constructive trust** over all funds, income, and property identified herein;
6. Issue a **preliminary and permanent injunction** staying execution of the writ of ejectment and prohibiting all Respondents from taking any further action to dispossess Petitioner;
7. Order West Palmetto Holdings to **reconvey** the Property to Petitioner and to cancel the void deed;
8. Declare that Petitioner's tender of \$50.00 satisfies any equitable security requirement;
9. Grant such other and further relief as the nature of the case may require and as equity and good conscience may demand.
- 10.

Respectfully submitted this 12th day of March, 2026.

Samuel Tucker Collins, Jr.

Samuel Tucker Collins, Jr.

GRANTOR, GRANTOR-BENEFICIARY, AND GRANTEE ABSOLUTE

2398 Hotel Street

Alcolu, South Carolina 29001

(803) 410-6608

stcnetwork@proton.me

## VERIFICATION

I, Samuel Tucker Collins, Jr., being first duly sworn, depose and say that I have read the foregoing Supplemental Lodgment: Equitable Bill of Revocation of Trust and Demand for Accounting, and that the facts stated therein are true and correct to the best of my knowledge and belief.

Samuel Tucker Collins Jr.

Samuel Tucker Collins, Jr.

GRANTOR, GRANTOR-BENEFICIARY, AND GRANTEE ABSOLUTE

Sworn to and subscribed before me this \_\_\_\_ day of March, 2026.

\_\_\_\_\_  
Notary Public for South Carolina

\_\_\_\_\_  
Print

My Commission Expires: \_\_\_\_\_

## EXHIBIT LIST

Exhibit	Description
A	CUSIP Report – DFA Municipal Real Return Institutional (DMREX / 25239Y550)
B	CUSIP Report – AB Intermediate Diversified Municipal Portfolio (AIDYX / 085568483)
C	SEC Filing Evidence – Cary Street Partners Form 13F-HR
D	Magistrate Court "Return" Order
E	Unsigned Magistrate Court Order (December 12, 2024)

Exhibit	Description
F	Writ of Ejectment (January 27, 2025)
G	Court of Common Pleas Order
H	Court of Appeals Case Filing Information
I	Petitioner's Plea of Release and Equitable Tender (Dkt. No. 5)
J	Proof of Service on Attorney Page (with \$50 tender)
K	Petitioner's Response to Court Order (filed March 11, 2026)
L	Petitioner's LR 26.01 Interrogatories (filed March 11, 2026)
M	Lis Pendens Filing

Recipient	Address	Method
Sheriff Timothy Baxley	217 Commerce Street, Manning, SC 29102	Hand Delivery
Major Graham	217 Commerce Street, Manning, SC 29102	Hand Delivery
James Martin Page, Attorney	339 Heyward Street, 2nd Floor, Columbia, SC 29201	Certified Mail
Magistrate Angela Witherspoon	102 South Mill Street, Manning, SC 29102	Hand Delivery

Recipient	Address	Method
Clerk of Magistrate Court (Susan)	102 South Mill Street, Manning, SC 29102	Hand Delivery
Honorable Bryan Griffin	3 West Keitt Street, Manning, SC 29102	Hand Delivery
Shanita Brangman, Clerk of Court	3 West Keitt Street, Manning, SC 29102	Hand Delivery
Honorable H. Bruce Williams	1220 Senate Street, Columbia, SC 29101	Certified Mail
Jenny Abbott Kitchings, Clerk of Court	1220 Senate Street, Columbia, SC 29101	Certified Mail
Honorable Clifton Newman	c/o SC Court Administration, 1220 Senate Street, Suite 200, Columbia, SC 29201	Certified Mail
Clarendon County Treasurer	411 Sunset Drive Manning, South Carolina 29102	Certified Mail
West Palmetto Holdings, LLC	C/o Robert L. Thomas jr.	Certified Mail
West Palmetto Holdings C/O Robert L. Thomas Jr. 2917 W. Palmetto Street Darlington, South Carolina 29532/ <b>Certified Mail</b>		
Tax Brake SC LLC. / <b>Certified Mail</b> Northwest Registered Agent LLC 6650 Rivers Ave., Ste. 100 Charleston, South Carolina 29406		

## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Supplemental Lodgment: Equitable Bill of Revocation of Trust and Demand for Accounting, together with all exhibits, was served upon the following by hand delivery / overnight mail / certified mail on this 13<sup>th</sup> day of March, 2026:

Samuel Tucker Collins Jr.

Samuel Tucker Collins, Jr.

GRANTOR, GRANTOR-BENEFICIARY, AND GRANTEE ABSOLUTE

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**MAR 13 2026**

**SC Court of Appeals**

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MAR 13 2026

SC Court of Appeals

Your CUSIP Results are as follows:

**SAMUEL TUCKER COLLINS JR (CC 2024-CV-1410-100503 [SC] [CASE])**

**DFA Municipal Real Return Institutional**

Symbol:	DMREX
CUSIP:	25239Y550
MINOR:	BRUSX
	108747304
	\$91,710,000.00
Inception Date:	11/4/2014
Net Assets:	\$1,846,100,000.00 as of
	1/26/2026

**A little about the Fund:**

The investment seeks inflation protection and current income from municipal securities. The fund seeks its investment objective by investing primarily in a universe of investment grade municipal securities, including inflation-protected municipal securities, and in derivative instruments to provide inflation protection. It will invest at least 80% of its net assets in municipal securities that pay interest exempt from federal income tax. No more than 25% of the fund's assets will be invested in municipal securities that, at the time of purchase, are rated in the lowest quarter of the investment grade spectrum.



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SC Court of Appeals

Your CUSIP Results are as follows:

**SAMUEL TUCKER COLLINS JR (CC 2024-CP-1400368 [SC] [CASE])**

**AB Intermediate Diversified Municipal Portfolio**

Symbol:	AIDYX
CUSIP:	085568483
MINOR:	RUDAX
	05588D308
	\$288,469,000.00
Inception Date:	06/26/2015
Net Assets:	\$5,427,974,000.00 as of
	1/28/2026

**A little about the Fund:**

AB Intermediate Diversified Municipal Portfolio seeks safety of principal and maximize total return after taking account of federal taxes by investing in municipal securities issued to raise money for a variety of public or private purposes. The Fund comparative indices are Bloomberg 5-Year General Obligation Municipal Bond Index and Bloomberg 1-10 Year Blend Index.



Case Number -

2024-CV-1410 00503

Home &gt; Cusip Lookup

# Cusip Lookup

Search ~~REQUIRE~~ CUSIP to get the details about the company associated with it, its traded symbols and security descriptions (data obtained from OpenFigi.com).

The search will also retrieve the most recent mentions of the CUSIP in SEC filings (if any), utilizing data obtained from our database.

Example search: 586001109

25239Y550

Search

Our records indicate that the CUSIP number 25239Y550 belongs to the following entity

## Data from OpenFigi

Symbol	Name	Type	Market Sector	Exchange Code	FIGI	Composite FIGI
DMREX	DFA MUNICIPAL REAL RET-INST	Open-End Fund	Equity	US	BBG006W729Y6	BBG006W729X7

## Latest Mentions

cik	Cusip	Referenced as	File date	Filer	Form type	Filing
	25239Y550	DFA MUNICIPAL REAL RETURN INSTITUTIONAL	2024-02-13	Strategic Investment Solutions, Inc. /IL	13F-HR	View Filing

EXHIBIT C  
SEC FILING EVIDENCE

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Latest Filings

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MAR 13 2026

# Filing Detail

SC Court of Appeals

[SEC Home](#) » [Company Search](#) » [Current Page](#)

Form 13F-HR - Quarterly report filed by institutional managers, Holdings:

**Filing Date**

2024-02-13

**Period of Report**

2023-12-31

SEC Accession No. 0001062993-24-002891

**Accepted**

2024-02-13 10:48:13

**Effectiveness Date**

2024-02-13

**Documents**

2

**Document Format Files**

Seq	Description	Document	Type	Size
1		<a href="#">primary_doc.html</a>	13F-HR	
1		<a href="#">primary_doc.xml</a>	13F-HR	2016
2	FORM 13F INFORMATION TABLE	<a href="#">form13fInfoTable.html</a>	INFORMATION TABLE	
2	FORM 13F INFORMATION TABLE	<a href="#">form13fInfoTable.xml</a>	INFORMATION TABLE	869432
	Complete submission text file	<a href="#">0001062993-24-002891.txt</a>		872717

**Strategic Investment Solutions, Inc. /IL (Filer) CIK:**

**0001960144 (see all company filings)**

EIN: 203715756 | State of Incorp.: IL | Fiscal Year End: 1231

Type: 13F-HR | Act: 34 | File No.: 028-23025 | Film No.: 24623396

**Business Address**

9501 W. 144TH PLACE,  
SUITE 101  
ORLAND PARK  
IL  
60462  
7086458820

**Mailing Address**

9501 W. 144TH PLACE,  
SUITE 101  
ORLAND PARK  
IL  
60462

EXHIBIT C

SEC FILING EVIDENCE (next page)

4 Pages

CASE #number - 1400368  
2024-CP-

Home > Cusip Lookup

# Cusip Lookup

Search for any CUSIP to get the details about the company associated with it, its traded symbols and security descriptions (data obtained from OpenFigi.com).

The search will also retrieve the most recent mentions of the CUSIP in SEC filings (if any), utilizing data obtained from our database.

Example search: 586001109

085568483

Search

Our records indicate that the CUSIP number 085568483 belongs to the following entity

## Data from OpenFigi

Symbol	Name	Type	Market Sector	Exchange Code	FIGI	Composite FIGI
AIDYX	AB INTER DIVER MUNI-ADV	Open-End Fund	Equity	US	BBG009BNZVH2	BBG009BNZVG3

## Latest Mentions

cik	Cusip	Referenced as	File date	Filer	Form type	Filing
	085568483	AB FUNDS	2020-11-12	CARY STREET PARTNER INVESTMENT ADVISORY LLC	13F-HR	View Filing

EXHIBIT C  
SEC FILING EVIDENCE

SEC.gov | EDGAR Latest Filings Filings search tools

# Filing Detail

[SEC Home](#) » [Company Search](#) » [Current Page](#)

**Form 13F-HR** - Quarterly report filed by institutional managers, Holdings:

<b>Filing Date</b> 2020-11-12	<b>Period of Report</b> 2020-09-30	<b>SEC Accession No.</b> 0001104659-20-124345
<b>Accepted</b> 2020-11-12 15:38:21	<b>Effectiveness Date</b> 2020-11-12	
<b>Documents</b> 2		

**Document Format Files**

Seq	Description	Document	Type	Size
1		<a href="#">primary_doc.html</a>	13F-HR	
1		<a href="#">primary_doc.xml</a>	13F-HR	1911
2	INFORMATION TABLE	<a href="#">a20-35688_1informationtable.html</a>	INFORMATION TABLE	
2	INFORMATION TABLE	<a href="#">a20-35688_1informationtable.xml</a>	INFORMATION TABLE	445409
	Complete submission text file	<a href="#">0001104659-20-124345.txt</a>		448584

**CARY STREET PARTNER INVESTMENT ADVISORY LLC**  
**(Filer) CIK: 0001766904 (see all company filings)**

EIN: 260070474 | State of Incorporation: VA | Fiscal Year End: 1231  
Type: 13F-HR | Act: 34 | File No.: 028-19037 | Film No.: 201306342

<b>Business Address</b>	<b>Mailing Address</b>
901 EAST BYRD STREET	901 EAST BYRD STREET
SUITE 1001	SUITE 1001
RICHMOND	RICHMOND
VA	VA
23219	23219
8043408100	

STATE OF SOUTH CAROLINA

COUNTY OF CLARENDON

Samuel Tucker Collins, Jr

APPELLANT

VS

West Palmetto Holdings, LLC  
C/O Bell Carrington Price & Gregg

RESPONDENT

**2024-CP-14-00368**  
APPELLATE CASE NUMBER

IN THE COURT OF COMMON PLEAS  
(NON-JURY TRIAL)

RETURN

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**MAR 13 2026**

SC Court of Appeals

Mr. Samuel T. Collins, Jr. appeared before the Clarendon County Clerk of Court on August 15, 2024, wishing to appeal the decision rendered with regards to civil case number: 2024CV1410100503. The content of the appeal submitted by Mr. Collins, asserts the following points of contention and alleges that:

1. "Whenever there is a variance between law & equity pertaining to the same matter, equity shall prevail."
2. "I hereby invoke my Equitable Right to Subrogation and Substitution to the rights of all creditors-Subrogors. Subrogee does hereby Subrogate and Substitute to the Above Referenced Account Creditors concerning all transactions abinintio of the principal debtors. Now as a matter of course Subrogee Order Creditors – Subrogors to discharge and extinguish the liens, levies, seizures and obligations against Debtors and Subrogee and restore to Subrogee Creditor's interest secured, any and all Subrogees collateral, payments, rents, interest and securities of Account(s) of Principal Debtor."

The previous referenced civil matter was presented before the Clarendon County Magistrate Court on August 15, 2024. The following is provided for the Appellate Court's Consideration:

On July 1, 2024, Respondent, D. Max Sims, Esquire filed an "Application for Ejectment (Eviction)" on behalf of West Palmetto Holdings, LLC with the Magistrate Court. The Notice lists Appellant, Samuel T Collins along with Frank B Jones, Jr, Taurice C. Collins, and all other occupants as defendants (see attachment).

On July 10, 2024, at 10:45 AM, the Appellant, Mr. Collins, was served with a Rule to Vacate or Show Cause (Eviction) by the Magistrate Court, and on July 19, 2024, he submitted to the court his answer to the Rule to Vacate or Show Cause (Eviction), Actual and Unambiguous Notice of Authorized Representative, along with additional documents Exhibits A – F (see attachments).

On July 25, 2024, the Court mailed out magistrate summons requesting all parties to serve as a part in a Bench Trial for aforementioned civil case on August 15, 2024, at 9:00 AM (see attachment).

On August 15, 2024, D. Max Sims Esq, Counsel for West Palmetto Holdings, LLC, and Samuel T Collins Jr. came before the court. Counsel Sims argued that the Appellant, Mr. Collins, and co-defendants be ejected from 2398 Hotel Street Alcolu, SC 29102 so that West Palmetto Holdings, LLC may take physical possession of the property. Counsel explained that the property was acquired by West Palmetto Holdings during a tax sale for the tax year

2021 and that the Appellant and co-defendants had a year to pay taxes and interest accrued and failed to do so, submitting the Tax Sale Deed(Exhibit A) which showed receipt of payment from March 17, 2022 for said property - including the delinquent tax amount (\$589.86) and interest (\$90) making a total of \$679.86 along with the South Carolina QuitClaim Deed showing transfer of ownership to West Palmetto Holdings, LLC as evidence.

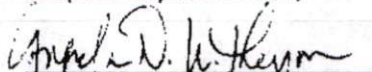
The Appellant, Mr. Collins responded by requesting for a dismissal by the court stating, "When there's a variance between Law and Equity pertaining to the same matter, Equity shall prevail." He argued that prior to this hearing he made written requests to the court and because he had not received any responses, this case should be dismissed. Mr. Collins referred to this in his answer to Rule to Vacate or Show Cause, labeled Exhibit A, denoting previous cases heard by the court (case numbers 2022CV1410100107 and 2022CP1400173).

The court granted the Ejectment (Eviction) based on the testimony and evidence presented.

As for the basis of Mr. Collins appeal:

1. The Appellant, Mr. Collins, did not provide sufficient evidence for a dismissal by the court; case number 2024CV1410100503 is an independent case based on an application for ejectment filed on July 1, 2024.
2. Mr. Collins did not present evidence supporting payment of past-due taxes and interest accrued nor supporting documentation of ownership of said property.
3. Counsel Sims provided documentation supporting ownership by providing the tax sale receipt and transfer of deed to West Palmetto Holdings, LLC giving them authority to gain physical possession.

Respectfully submitted,



Angela D. Witherspoon  
Clarendon County Magistrate  
Third Judicial Circuit  
State of South Carolina

September 4, 2024  
at Manning, SC

EXHIBIT E  
Unsigned order

RECEIVED

MAR 13 2026

SC Court of Appeals

ELECTRONICALLY FILED - 2025 Jul 18 5:18 PM - CLARENDON - COMMON PLEAS - CASE#2024CP1400368

FORM 4

JUDGMENT IN A CIVIL CASE

STATE OF SOUTH CAROLINA  
COUNTY OF Clarendon  
IN THE COURT OF COMMON PLEAS

CASE NO. 2024-CP-14-00368

Frank B. Jones, Samuel T. Collins, et al.

West Palmetto Holdings, LLC

Plaintiff(s)

Defendant(s)

Submitted By: J. Martin Page, Esq.  
339 Heyward St., 2<sup>nd</sup> Floor  
Columbia, SC 29201  
File No.: 25-40371

Attorney for:  Plaintiff  Defendant  
or  
 Self-Represented Litigant

DISPOSITION TYPE (CHECK ONE)

- JURY VERDICT.** This action came before the court for a trial by jury. The issues have been tried and a verdict rendered.
- DECISION BY THE COURT.** This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered.
- ACTION DISMISSED (CHECK REASON):**  Rule 12(b), SCRPC;  Rule 41(a), SCRPC (Vol. Nonsuit);  Rule 43(k), SCRPC (Settled);  Other: \_\_\_\_\_
- ACTION STRICKEN (CHECK REASON):**  Rule 40(j), SCRPC;  Bankruptcy;  Binding Arbitration, subject to right to restore to confirm, vacate or modify arbitration award;  Other: \_\_\_\_\_
- DISPOSITION OF APPEAL TO THE CIRCUIT COURT (CHECK APPLICABLE BOX):**  
 Affirmed;  Reversed;  Remanded;  Other: \_\_\_\_\_  
 NOTE: ATTORNEYS ARE RESPONSIBLE FOR NOTIFYING LOWER COURT, TRIBUNAL, OR ADMINISTRATIVE AGENCY OF THE CIRCUIT COURT RULING ON THIS APPEAL.

IT IS ORDERED AND ADJUED:  See attached order (formal order to follow);  Statement of Judgment by the Court: Appeal denied. Judgment affirmed

ORDER INFORMATION

This order  ends  does not end the case.

Additional Information for the Clerk: Writ of Possession can be requested by Plaintiff after entry of this Judgment.

INFORMATION FOR THE PUBLIC INDEX

Complete this section below when the judgment affects title to real or personal property or if any amount should be enrolled. If there is no judgment information, indicate "N/A" in one of the boxes below.

Judgment in Favor of (List name(s) below)	Judgment Against (List name(s) below)	Judgment Amount To be Enrolled (List amount(s) below)



EXHIBIT F

RECEIVED

STATE OF SOUTH CAROLINA )  
 )  
COUNTY OF CLARENDON )  
 )

2024CV1410100503 MAR 13 2026  
CIVIL CASE NUMBER  
MAGISTRATE'S COURT  
RULE TO VACATE OR SHOW CAUSE (EVICTION) SC Court of Appeals

West Palmetto Holdings, Llc  
C/O Bell Carrington Price & Gregg  
Columbia, SC 29201

339 Heyward Street 2Nd Floor  
Phone: (803) 509-5078

PLAINTIFF(S)

Vs

Frank B. Jones Jr.  
All Other Occupants 2398 Hotel Street  
Alcolu, SC 29001

Samuel T. Collins  
*(Handwritten signature and initials SCT)*

Taurice Collins  
Phone:

DEFENDANT(S)

TO Frank B. Jones Jr. Samuel T. Collins Taurice Collins: West Palmetto Holdings, Llc is asking this Court to evict you from the property located at All Other Occupants 2398 Hotel Street Alcolu, SC 29001 because they claim that:

- You have failed to pay rent when due or demanded in the amount of \$.
- The terms of your tenancy or occupancy have ended.
- You have violated the terms or conditions of your lease by:

You the defendant(s) and lessee(s) of the premises listed at the address listed above, and all others, are ordered to vacate the premises immediately pursuant to S.C. Code Ann. §27-37-10 OR contact the:

Clarendon County Magistrate  
102 South Mill Street  
P O Box 371  
Manning, SC 29102  
(803) 435-8925, FAX 8034350885  
clarendontraffic@sc.rr.com

within ten (10) days of receiving this notice, for the purpose of scheduling a hearing to show why you should not be evicted from these premises.

FAILURE TO VACATE THE PREMISES OR RESPOND WITHIN TEN (10) DAYS MAY RESULT IN THE ISSUANCE OF A WRIT OF EJECTMENT.

*(Handwritten signature)*

07/02/2024

Judge, Clarendon County Magistrate

Personally appeared before me, the undersigned deponent, being duly sworn, says s/he is a person over 18 years of age, not a party or attorney in this action and s/he to serve the Rule to Vacate or Show Cause on Frank B. Jones Jr. Samuel T. Collins Taurice Collins on the following dates/times:

DATE	TIME	INITIALS	DATE OF SERVICE	TIME OF SERVICE
1. _____	_____	_____	7-10-24	10:45AM
2. _____	_____	_____	SETTLED/DATE _____	VACANT/DATE _____
3. _____	_____	_____	PERSON SERVED & RELATIONSHIP IF NOT DEFENDANT <u>Samuel T. Collins</u>	

Sworn to and subscribed before me  
This 10 day of JULY, 2024

NOTARY PUBLIC OR JUDGE  
*(Notary Seal: STATE OF SOUTH CAROLINA, NOTARY PUBLIC, November 22, 2033)*

*(Handwritten Signature)*  
SIGNATURE OF SERVER

ON \_\_\_\_\_ UNITED STATES MAIL IN AN ENVELOPE ADDRESSED TO THE DEFENDANT(S) ABOVE WITH FIRST CLASS POSTAGE AFFIXED THERETO. A COPY OF THIS DOCUMENT.

MAGISTRATE'S CLERK

*(Handwritten notes and stamps)*

EXHIBIT G  
Signed order

RECEIVED

MAR 13 2026

SC Court of Appeals

ELECTRONICALLY FILED - 2025 Oct 23 11:23 AM - CLARENDON - COMMON PLEAS - CASE#2024CP1400368

FORM 4

JUDGMENT IN A CIVIL CASE

STATE OF SOUTH CAROLINA  
COUNTY OF Clarendon  
IN THE COURT OF COMMON PLEAS

CASE NO. 2024-CP-14-00368

Frank B. Jones, Samuel T. Collins, et al.

West Palmetto Holdings, LLC

Plaintiff(s)

Defendant(s)

Submitted By: J. Martin Page, Esq.  
339 Heyward St., 2<sup>nd</sup> Floor  
Columbia, SC 29201  
File No.: 25-40371

Attorney for:  Plaintiff  Defendant  
or  
 Self-Represented Litigant

**DISPOSITION TYPE (CHECK ONE)**

- JURY VERDICT.** This action came before the court for a trial by jury. The issues have been tried and a verdict rendered.
- DECISION BY THE COURT.** This action came to trial or hearing before the court. The issues have been tried or heard and a decision rendered.
- ACTION DISMISSED (CHECK REASON):**  Rule 12(b), SCRPC;  Rule 41(a), SCRPC (Vol. Nonsuit);  Rule 43(k), SCRPC (Settled);  Other: \_\_\_\_\_
- ACTION STRICKEN (CHECK REASON):**  Rule 40(j), SCRPC;  Bankruptcy;  Binding Arbitration, subject to right to restore to confirm, vacate or modify arbitration award;  Other: \_\_\_\_\_
- DISPOSITION OF APPEAL TO THE CIRCUIT COURT (CHECK APPLICABLE BOX):**  
 Affirmed;  Reversed;  Remanded;  Other: \_\_\_\_\_  
 NOTE: ATTORNEYS ARE RESPONSIBLE FOR NOTIFYING LOWER COURT, TRIBUNAL, OR ADMINISTRATIVE AGENCY OF THE CIRCUIT COURT RULING ON THIS APPEAL.

**IT IS ORDERED AND ADJUED:**  See attached order (formal order to follow);  Statement of Judgment by the Court: Appeal denied. Judgment affirmed

**ORDER INFORMATION**

This order  ends  does not end the case.

Additional Information for the Clerk: Writ of Possession can be requested by Plaintiff after entry of this Judgment.

**INFORMATION FOR THE PUBLIC INDEX**

Complete this section below when the judgment affects title to real or personal property or if any amount should be enrolled. If there is no judgment information, indicate "N/A" in one of the boxes below.

Judgment in Favor of (List name(s) below)	Judgment Against (List name(s) below)	Judgment Amount To be Enrolled (List amount(s) below)





Clarendon Common Pleas

**Case Caption:** Samuel Tucker Collins Jr VS West Palmetto Holdings LLC  
**Case Number:** 2024CP1400368  
**Type:** Order/Form 4

So Ordered

s/ Clifton B. Newman, 2127

Electronically signed on 2025-10-22 19:43:27 page 3 of 3

EXHIBIT H  
3 Pages



RECEIVED

MAR 13 2026

SC Court of Appeals

## The South Carolina Court of Appeals

JENNY ABBOTT KITCHINGS  
CLERK

CATHERINE S. HARRISON  
CHIEF DEPUTY CLERK

POST OFFICE BOX 11629  
COLUMBIA, SOUTH CAROLINA 29211  
1220 SENATE STREET  
COLUMBIA, SOUTH CAROLINA 29201  
TELEPHONE: (803) 734-1890  
FAX: (803) 734-1839  
[www.sccourts.org](http://www.sccourts.org)

November 24, 2025

Samuel Tucker Collins, Jr.  
C/O 2398 Hotel Street  
Alcolu SC 29001

Re: Samuel T. Collins, Jr. v. West Palmetto Holdings, LLC  
Appellate Case No. 2025-002352

Dear Mr. Collins:

This Court has received your notice of appeal, and the case has been assigned the appellate case number that appears above. Please use this number on all future correspondence relating to this matter.

All parties to this matter are advised that all filings must comply with the requirements of Rule 267 of the South Carolina Appellate Court Rules (SCACR). The SCACR are available online at [www.sccourts.org/courtreg](http://www.sccourts.org/courtreg). Additionally, any filings submitted by counsel admitted in South Carolina must include counsel's bar number.

The attention of the parties is directed to the order relating to the inclusion of personal data identifiers and other sensitive information in documents filed with the Supreme Court of South Carolina and the South Carolina Court of Appeals. The order can be found at [www.sccourts.org/courtOrders/displayOrder.cfm?orderNo=2014-04-15-02](http://www.sccourts.org/courtOrders/displayOrder.cfm?orderNo=2014-04-15-02). Please note that the responsibility for insuring that information is redacted or sealed as required by this order rests with counsel and the parties. This office will *not* review

filings for redaction or to determine if materials should be sealed.

This is to advise that the title in the above matter has been changed to read as follows:

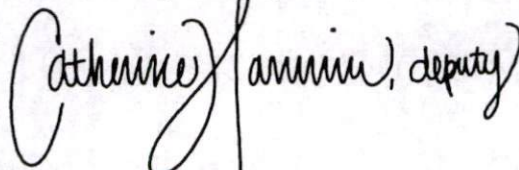
**Samuel Tucker Collins, Jr., Appellant,**

**v.**

**West Palmetto Holdings, LLC, Respondent.**

All future records in this matter should be changed to reflect this title. If you have any questions, please do not hesitate to contact this office.

Very truly yours,

A handwritten signature in cursive script that reads "Catherine Jaminin, deputy". The signature is written in black ink and is positioned above the typed name "CLERK".

CLERK

cc: James Martin Page, Esquire

H

Screenshot (152).png

< 1 of 1 >

↓ ×

Email To Magistrate Court Clerk  
Showing Appeal Pending



**South Carolina Appellate Case Management System**  
C-Track, the browser based CMS for Appellate Courts

CLERK'S OFFICE  
SUPREME COURT  
COURT OF APPEALS

**Cases**

Case Search

Participant Search

**Disclaimer:** The information and documents available here should not be relied upon as an official  
Only filed documents can be viewed. Some documents received in a case may not be available  
Some documents originating from a lower court, including records and appendices, may not be avai

**Case Information: 2025-002352**

<b>Court:</b>	Court of Appeals	<b>Classification:</b>	Appeal - Common Law Summary Ct.
<b>Short Title:</b>	Samuel T. Collins, Jr. v. West Palmetto Holdings, LLC	<b>Case Status:</b>	Pending
<a href="#">View Full Title</a>			
<b>Consolidated:</b>			
<b>Filed Date:</b>	11/20/2025	<b>Oral Argument Date:</b>	
<b>Disposition Date:</b>		<b>Disposition Type:</b>	
<b>Remittitur Date:</b>			
<b>Lower Court or Tribunal:</b>	Clarendon (2024CP1400368)		

**- Party Information**



- 47% +  
30F3

EXHIBIT I

RECEIVED  
MAR 13 2026  
SC Court of Appeals

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA

Charleston Division

MISCELLANEOUS DOCKET NO. 2:26-mc-86-RMG-MGB

IN RE: SAMUEL TUCKER COLLINS, JR., THE LIVING MAN

PLEA OF RELEASE AND EQUITABLE TENDER

UNDER THE MCCALL DOCTRINE

RCVD - USDC COLA  
FEB 26 '26 PM3:30

(Regarding Collins v. West Palmetto Holdings, LLC, South Carolina Court of Appeals Case No. 2025-002352)

**COMES NOW**, Samuel Tucker Collins, Jr., the living man, appearing in propria persona, and hereby files this Plea of Release and Equitable Tender in the court of conscience as a matter of public record, notice, and preservation.

**I. THE MAN APPEARS**

1. I, Samuel Tucker Collins, Jr., am the living man, a natural person, appearing in my own proper person. I am not the ens legis, the fictional entity created by operation of law. I am not the STCJ Network Revocable Living Trust or any other fiction. I am the man.

2. I appear with clean hands, in good faith, and with no intention other than to preserve my right to possession of real property pending full adjudication of my appeal now pending before the South Carolina Court of Appeals, and to resolve all matters in equity.

3. This appearance is made in equity, before the court of conscience, and is deposited in this miscellaneous docket as a permanent record under Miscellaneous Docket No. 2:26-mc-86-RMG-MGB.

**II. THE MATTER IDENTIFIED**

4. I am the Appellant in Collins v. West Palmetto Holdings, LLC, presently pending before the South Carolina Court of Appeals, Appellate Case No. 2025-002352.

5. On February 6, 2026, a writ of ejectment was issued by the magistrate court directing the Clarendon County Sheriff's Office to remove me from real property in dispute.

6. On February 9, 2026, I filed an emergency motion to stay pending appeal in the South Carolina Court of Appeals, seeking to prevent execution and enforcement of the writ.
7. On February 23, 2026, the South Carolina Court of Appeals denied my motion, citing Rule 241(b)(4), SCACR and S.C. Code Ann. 18-9-170, which requires a written undertaking with two sureties to stay execution.
8. The Court's order contains no reference to equity, no consideration of my capacity as the living man, and no recognition of any equitable remedies available to me.
9. I am now subject to imminent removal by the Clarendon County Sheriff's Office. Under South Carolina law, the sheriff must give twenty-four hours' notice before executing a writ of ejectment pursuant to Section 27-37-160, which notice has already been provided or posted.

### III. THE EQUITABLE TENDER

10. In lieu of the statutory undertaking with two sureties required by Section 18-9-170, and as evidence of my good faith and clean hands, I hereby tender the sum of \$50.00.
11. A \$50.00 United States Postal Service money order is attached hereto as Exhibit A, made payable to the Clerk of this Court.
12. This tender is made:
  - a. Unconditionally;
  - b. With clean hands;
  - c. As evidence of my willingness and ability to pay for any lawful use and occupation of the property;
  - d. To create a fund against which any lawful claim may be asserted;
  - e. To invoke the protective custody of this Court;
  - f. To establish that I am not attempting to avoid lawful obligations, but merely seeking to preserve my rights pending appeal;
  - g. To serve as equitable security in place of the statutory sureties.
13. I request that this Court accept this tender into its registry and hold it pending further order, to be applied as may be just and equitable upon resolution of the underlying appeal.

#### IV. INVOCATION OF SUBROGATION

14. I hereby invoke the equitable doctrine of subrogation and step into the place of:

- a. West Palmetto Holdings, LLC, with respect to its right to possession of the property and any claim for use and occupation;
- b. The Clarendon County Sheriff's Office, with respect to its duty to execute the writ;
- c. The magistrate court, with respect to its equitable power to grant stays;
- d. The South Carolina Court of Appeals, with respect to its authority to consider equitable relief;
- e. Any surety that would otherwise be required under Section 18-9-170.

15. By operation of subrogation, I now hold the same rights and duties held by these parties, including:

- a. The right to demand strict compliance with all statutory requirements before removal;
- b. The duty to provide complete and accurate information regarding any claimed right to possession;
- c. The right to demand an accounting of any claimed damages or use and occupation value;
- d. The duty to act in good faith and with clean hands;
- e. The right to seek equitable relief where legal remedies are inadequate;
- f. The right to post equitable security in lieu of statutory sureties.

#### V. INCORPORATION OF THE MCCALL DOCTRINE

16. This filing is made under the McCall Doctrine, which holds that:

The man appears in equity, deposits his plea in a miscellaneous docket ancillary to a main case, tenders' settlement in good faith, invokes subrogation, documents the creditors response, accepts any judgment as grantee, and holds the record as his shield.

17. I adopt this doctrine and incorporate it herein by reference.

18. By this filing and tender, I demonstrate:

Good faith: \$50.00 money order tendered

Willingness: Ready to pay all lawful obligations

Clean hands: No fraud, no deceit, no games

Notice: All parties will be served with this filing

Record: All actions documented in this docket

## **VI. PLEA OF RELEASE**

19. By this Plea of Release, I tender full and complete settlement of all claims, disputes, and questions regarding my possession of the property pending appeal.

20. This Plea constitutes:

- a. An offer to resolve all matters in good faith;
- b. A request that the Court accept this tender as equitable security;
- c. A demand that the sheriff take no action to remove me until this Court has ruled;
- d. A declaration that I stand ready, willing, and able to pay any lawful obligation upon proper verification;
- e. An offer to provide any additional information reasonably required.

21. Upon acceptance of this Plea and the accompanying tender, or upon resolution of the underlying appeal in my favor, I request that the \$50.00 be returned to me. If the underlying appeal is resolved against me, I request that the \$50.00 be applied to any lawful obligation as the Court may direct.

## **VII. NOTICE TO ALL PARTIES**

22. West Palmetto Holdings, LLC, the Clarendon County Sheriff's Office, the magistrate court, and the South Carolina Court of Appeals are hereby notified of this filing and tender.

23. A true and correct copy of this Plea, together with the \$50.00 money order, shall be served upon:

West Palmetto Holdings, LLC

By and through its Attorney James Martin Page

339 Heyward Street

Columbia, South Carolina 29201

Attn: Registered Agent

Clarendon County Sheriff's Office

217 Commerce Street

Manning, South Carolina 29102

Attn: Sheriff Timothy Baxley

Clarendon Magistrate Court  
102 South Mill Street  
Manning, South Carolina 29102  
Attn: Magistrate Angela Weatherspoon

South Carolina Court of Appeals  
Attn: Clerk of Court  
1220 Senate Street  
Columbia, South Carolina 29102

24. All parties are invited to respond within the time provided by law or court rule.

#### **VIII. CONSEQUENCES OF REFUSAL OR SILENCE**

25. In equity, a proper Plea of Release and tender, followed by refusal or silence, does not defeat the claim. It documents the respondents conduct.

26. Should West Palmetto Holdings, LLC, or the sheriff fail to respond or refuse to acknowledge this Plea:

- a. Their refusal shall be deemed inequitable conduct, giving them unclean hands;
- b. The refusal shall be documented in this miscellaneous docket;
- c. The undersigned reserves the right to return to this Court for such equitable relief as may be just, including:
  - i. A declaration that my tender serves as sufficient security;
  - ii. An order directing the sheriff to stay execution pending appeal;
  - iii. An injunction barring removal until the appeal is decided;
  - iv. Such other relief as equity may require.

#### **IX. RESERVATION OF RIGHTS**

27. I expressly reserve all rights under UCC 1-308 and applicable law, including but not limited to:

- a. The right to challenge the validity or amount of any claimed obligation;
- b. The right to dispute the accuracy of any accounting;
- c. The right to tender additional funds upon proper verification;
- d. The right to assert equitable defenses to any claim;

e. The right to demand strict proof of any alleged right to possession.

28. No action or inaction by me shall be deemed a waiver of these rights.

#### **X. RELIEF SOUGHT**

WHEREFORE, I, Samuel Tucker Collins, Jr., the living man, respectfully request that this Court, sitting in equity:

1. Accept this Plea of Release and Equitable Tender for filing in Miscellaneous Docket No. 2:26-mc-86-RMG-MGB;
2. Accept the attached \$50.00 money order into the Court Registry as equitable security and tender;
3. Order the Clarendon County Sheriff's Office to take no action to remove me from the property until the South Carolina Court of Appeals has issued its final decision in Appellate Case No. 2025-002352, or until further order of this Court;
4. Declare that this tender satisfies the equitable purpose of the statutory undertaking requirement;
5. Retain jurisdiction over this matter pending resolution of the underlying appeal;
6. Grant such other and further relief as equity may require.

#### **VERIFICATION**

I, Samuel Tucker Collins, Jr., verify under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge, information, and belief.

I declare that I am the living man, that I appear with clean hands, that I have tendered \$50.00 in good faith, that I face imminent removal from my home, that my appeal is pending before the South Carolina Court of Appeals, and that I come before this Court seeking only the protection that equity provides.

Executed on this 24 day of February, 2026.

By: Samuel Tucker Collins Jr

Samuel Tucker Collins, Jr.

In Propria Persona

2398 Hotel Street

Alcolu, South Carolina 29001

(803) 410-6608

stcjnetwork@proton.me

**EXHIBITS**

Exhibit A: \$50.00 United States Postal Service Money Order made payable to Clerk, U.S. District Court

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing PLEA OF RELEASE AND EQUITABLE TENDER, together with Exhibit A, was served upon the following on this 24 day of February, 2026,

by:  Certified Mail, Return Receipt Requested

Hand Delivery

Electronic Mail

West Palmetto Holdings, LLC  
By and through its Attorney James Martin Page  
339 Heyward Street  
Columbia, South Carolina 29201  
Attn: Registered Agent

Clarendon County Sheriff's Office  
217 Commerce Street  
Manning, South Carolina 29102  
Attn: Sheriff Timothy Baxley

Clarendon Magistrate Court  
102 South Mill Street  
Manning, South Carolina 29102  
Attn: Magistrate Angela Weatherspoon

South Carolina Court of Appeals  
Attn: Clerk of Court  
1220 Senate Street  
Columbia, South Carolina 29102

RCV'D - USDC COLA  
FEB 26 '26 PM 3:29

By: Samuel Tucker Collins Jr  
Samuel Tucker Collins, Jr.

~~XXXXXXXXXX~~

**NO POSTAGE  
NECESSARY  
IF MAILED  
IN THE  
UNITED STATES**

**UNITED STATES  
POSTAL SERVICE**

Serial Number: 38008878996      Year, Month, Day: 2026-02-23      Post Office: 291020      U.S. Dollars and Cents: \$50.00

Amount: Fifty Dollars and 00/100 \*\*\*\*\*

Pay to: United States District Court for SC Charleston Division      Clerk: 07

Address: STCJ Network Revoc. Living Trust  
By: Samuel Collins, Steward Trustee  
2398 Hotel Street Alcolu SC 29008

DISTRICT COURT Registry/Escrow Acct  
Good Faith Tender - Motion to Remand  
Appellate Court Case no [2025-002352]

SEE REVERSE WARNING • NEGOTIABLE ONLY IN THE U.S. AND POSSESSIONS

⑈000001193⑈      38008878996⑈

**CUSTOMER'S RECEIPT**

**UNITED STATES  
POSTAL SERVICE**

SEE BACK OF THIS RECEIPT FOR IMPORTANT CLAIM INFORMATION

**NOT NEGOTIABLE**

Pay to: United States District Court, SC <sup>Charleston</sup> ~~Columbia~~ Division

Address: 85 Broad Street Charleston SC 29401

DISTRICT COURT Registry Account  
Good Faith Tender - Motion to Remand Appellate Case no [2025-002352]

KEEP THIS RECEIPT FOR YOUR RECORDS

Serial Number: 38008878996      Year, Month, Day: 2026-02-23      Post Office: 291020      Amount: \$50.00      Clerk: 07

RECEIVED

MAR 13 2026

SC Court of Appeals

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION**

IN RE: SAMUEL TUCKER COLLINS, JR.,  
the living man and grantor,

Miscellaneous Docket No. 2:26-mc-00086-RMG-MGB

**SUPPLEMENTAL CERTIFICATE OF SERVICE  
(February 26, 2026 Service on James Martin Page)**

I, Samuel Tucker Collins, Jr., Grantor, Grantor-Beneficiary, and Grantee Absolute, hereby certify that on February 26, 2026, immediately after filing the same in the United States District Court, I personally served the following documents upon James Martin Page, Attorney, at his office located at 339 Heyward Street, 2nd Floor, Columbia, South Carolina 29201:

**DOCUMENTS SERVED:**

1. Plea of Release and Equitable Tender (filed February 26, 2026, Misc. Docket No. 2:26-mc-00086-RMG-MGB)
2. \$50.00 United States Postal Service Money Order, made payable to "Clerk, U.S. District Court"

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 13th day of March, 2026.

Samuel Tucker Collins Jr.

Samuel Tucker Collins, Jr.

Grantor, Grantor-Beneficiary, and Grantee Absolute

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION

SAMUEL TUCKER COLLINS, JR.,  
the living man,)

Petitioner,

v.) Case No. 2:26-mc-00086-RMG-MGB

REBECCA MASSEY and  
SHANITA BRANGMAN,

Respondents.

**PETITIONER'S RESPONSE TO COURT ORDER  
AND CLARIFICATION OF PROCEEDING**

**COMES NOW** Samuel Tucker Collins, Jr., the living man, appearing in his own proper person, and hereby files this Response to the Court's Order dated March 3, 2026 (Dkt. No. 7), and provides the following clarification:

**I. PETITIONER'S CAPACITY**

1. Petitioner appears in this proceeding in his own proper person as **Samuel Tucker Collins, Jr., a living man**. He does not appear as a trustee, representative, or agent of any trust, corporation, or other entity.
2. The reference to the STCJ Network Revocable Living Trust in Petitioner's initial filings was informational only, identifying Petitioner's internal estate planning structure. Petitioner does not seek to represent the trust in this proceeding and understands that a non-attorney cannot represent a trust in federal court.
3. To the extent the Court construed any filing as an attempt to represent the trust, Petitioner hereby withdraws any such appearance and clarifies that he appears solely on his own behalf.

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## II. NATURE OF THIS PROCEEDING

4. This miscellaneous docket was opened for the purpose of creating an **ancillary federal record** related to Petitioner's pending state court proceedings, specifically **Collins v. West Palmetto Holdings, LLC**, South Carolina Court of Appeals Case No. 2025-002352.
5. Petitioner understands that miscellaneous dockets are properly used for "ancillary and supplementary proceedings" as noted in the Court's Order. It is Petitioner's intent to maintain this docket for the limited purposes of:
  - a. Lodging equitable notices and pleadings;
  - b. Preserving rights under UCC 1-308;
  - c. Documenting the conduct of parties in the underlying state proceedings;
  - d. Creating a public record of Petitioner's good faith efforts and clean hands;
  - e. Providing a forum for equitable tender and lodgment;
  - f. Preserving all rights pending resolution of the state court appeal.
6. This proceeding is **not a civil action** against any defendant. Petitioner seeks no monetary damages, no judgment against any named party, and no relief that would require an adversarial proceeding.

## III. THE NAMED RESPONDENTS

7. Respondents Rebecca Massey and Shanita Brangman were named solely to satisfy administrative filing requirements imposed by the Clerk's office at the time of filing. Petitioner does not seek any relief against these individuals and has no claim against them.
8. Petitioner hereby **withdraws any and all claims, demands, or requests for relief** against Respondents Rebecca Massey and Shanita Brangman. These individuals are not proper parties to this miscellaneous proceeding.
9. Petitioner requests that the caption be amended to reflect the true nature of this proceeding, with no defendants named, or in the alternative, that the Court treat this matter as:

**IN RE: SAMUEL TUCKER COLLINS, JR.**

**Miscellaneous Docket No. 2:26-mc-00086-RMG-MGB**

#### IV. THE PLEA OF RELEASE AND EQUITABLE TENDER

10. Petitioner's Plea of Release and Equitable Tender (Dkt. No. 5), filed February 27, 2026, remains pending. That pleading is not a motion for relief against any defendant, but rather a **lodgment of equitable tender** and a request that the Court accept said tender into its registry as evidence of Petitioner's good faith and clean hands.
11. Petitioner respectfully requests that the Court **consider the Plea of Release and Equitable Tender as an equitable lodgment, properly filed as part of this miscellaneous docket**. The tender of \$50.00 remains available and Petitioner is prepared to submit the funds to the Court's registry if the Court so directs.

#### V. COMPLIANCE WITH COURT INSTRUCTIONS

12. Petitioner has reviewed the Court's instructions regarding proper form. Because Petitioner is **not initiating a civil action** against any defendant, Petitioner respectfully submits that:
  - a. No complaint is required, as this is not a civil action;
  - b. No filing fee is due, as no civil action is commenced;
  - c. No summons forms are needed, as no defendants are named;
  - d. No USM-285 forms are needed, as no service is requested;
  - e. Petitioner has completed the Local Rule 26.01 Interrogatories and files them concurrently herewith.
13. **Alternatively, if the Court determines that a miscellaneous docket is not proper for the purposes stated herein, Petitioner requests guidance on how to properly preserve his equitable filings.**

#### VI. RESERVATION OF RIGHTS

14. Petitioner expressly reserves all rights under UCC 1-308 and applicable law.
15. Nothing in this Response shall be construed as a waiver of any claim, defense, or right Petitioner may have in any forum.

**WHEREFORE**, Petitioner respectfully requests that the Court:

1. Accept this Response as clarification of Petitioner's capacity and the nature of this proceeding;
2. Confirm that Respondents Massey and Brangman are not proper parties and that no claims are asserted against them;

3. Consider the Plea of Release and Equitable Tender as an equitable lodgment, properly filed as part of this miscellaneous docket;
4. Alternatively, provide guidance on how to properly preserve Petitioner's equitable filings if the Court determines a miscellaneous docket is not proper;
5. Provide such further relief as the Court deems appropriate.

Respectfully submitted this 13th day of March, 2026.

Samuel Tucker Collins, Jr.

Samuel Tucker Collins, Jr.  
 Grantor, Grantor-Beneficiary, and Grantee Absolute  
 2398 Hotel Street  
 Alcolu, South Carolina 29001  
 (803) 410-6608  
 stcnetwork@proton.me

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Petitioner's Response to Court Order and Clarification of Proceeding was served upon the following by hand delivery / U.S. Mail on this 13th day of March, 2026:

Recipient	Address
Rebecca Massey, Clarendon County Register of Deeds	411 Sunset Drive, Manning, SC 29102
Shanita Brangman, Clerk of Court	3 West Keitt Street, Manning, SC 29102

By: Samuel Tucker Collins, Jr.

Samuel Tucker Collins, Jr.  
 Grantor, Grantor-Beneficiary, and Grantee Absolute

EXHIBIT L

3 Pages

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION

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SC Court of Appeals

SAMUEL TUCKER COLLINS, JR.,)  
the living man,)

Petitioner,)

v. Case No. 2:26-mc-00086-RMG-MGB

REBECCA MASSEY and)  
SHANITA BRANGMAN,)

Respondents. )

**PETITIONER'S LOCAL RULE 26.01 ANSWERS TO INTERROGATORIES**

**(A) State the full name, address and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.**

**ANSWER:** None. Petitioner has filed no complaint and asserts no claims against any party. This is a miscellaneous docket for equitable lodgment purposes only, ancillary to Petitioner's pending state court appeal. The equitable doctrine of subrogation has been invoked by Petitioner in his Plea of Release (Dkt. No. 5) as an equitable principle, not as a basis for any claim by a third party.

**(B) As to each claim, state whether it should be tried jury or nonjury and why.**

**ANSWER:** This is not a civil action. Petitioner has filed no complaint and asserts no claims requiring trial. This miscellaneous docket exists solely for equitable lodgment and record preservation ancillary to state court proceedings.

**(C) State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.**

**ANSWER:** Petitioner is a natural person, not a publicly owned company. This subsection does not apply.

**(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).**

**ANSWER:** This miscellaneous docket was filed in the Charleston Division because the underlying state court proceedings involve real property located in Clarendon County, South Carolina, and the state court appeals are pending in Columbia, South Carolina. The Charleston Division is the proper venue for this ancillary miscellaneous proceeding.

**(E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action.**

**ANSWER:** Yes. This miscellaneous docket is ancillary to **Collins v. West Palmetto Holdings, LLC**, South Carolina Court of Appeals Case No. 2025-002352, and the underlying Clarendon County proceedings:

- Magistrate Court Case No. CC 2024-CV-1410-100503
- Court of Common Pleas Case No. CC 2024-CP-1400-368

These state proceedings involve a writ of ejectment against Petitioner's real property. This federal miscellaneous docket exists to lodge equitable filings, preserve rights, and document proceedings related to that state action. The state court appeal remains pending.

**(F) If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.**

**ANSWER:** Not applicable. This is not a civil action against any defendant. Respondents Massey and Brangman were named solely to satisfy administrative filing requirements. Petitioner has filed a Response to Court Order (filed March 11, 2026) withdrawing any and all claims against these individuals and clarifying that they are not proper parties to this miscellaneous proceeding. No amended summons or pleading is contemplated.

**(G) If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.**

**ANSWER:** Petitioner makes no contention of liability against any party at this time. This miscellaneous docket is not an action for liability. Petitioner has, however, filed a Supplemental Lodgment: Equitable Bill of Revocation of Trust and Demand for Accounting naming certain individuals as Respondents and co-trustees in equity, not as defendants in a civil action for

damages. That filing seeks equitable relief—revocation, accounting, constructive trust, and injunction—not legal liability.

**(H) [Parties or Intervenor in a Diversity Case.] In an action in which jurisdiction is based on diversity under 28 U.S.C. § 1332(a), a party or intervenor must, unless the court orders otherwise, name – and identify the citizenship of – every individual or entity whose citizenship is attributed to the party or intervenor.**

**ANSWER:** Not applicable. Jurisdiction is not based on diversity of citizenship under 28 U.S.C. § 1332(a). This is a miscellaneous proceeding ancillary to state court litigation, invoking the Court's inherent equity jurisdiction.

I declare under penalty of perjury that the foregoing answers are true and correct to the best of my knowledge and belief.

Executed this 12th day of March, 2026.

By: Samuel Tucker Collins Jr.

Samuel Tucker Collins, Jr.  
Grantor, Grantor-Beneficiary, and Grantee Absolute  
2398 Hotel Street  
Alcolu, South Carolina 29001  
(803) 410-6608  
stcjnetwork@proton.me

#### CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Petitioner's Local Rule 26.01 Answers to Interrogatories was served upon the following by U.S. Mail on this 12th day of March, 2026:

Recipient

Address

Rebecca Massey, Clarendon County Register of Deeds

411 Sunset Drive, Manning, SC 29102

Shanita Brangman, Clerk of Court

3 West Keitt Street, Manning, SC 29102

Samuel Tucker Collins Jr.

Samuel Tucker Collins, Jr.  
Grantor, Grantor-Beneficiary, and Grantee Absolute

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**RETURN ADDRESS:**

Samuel Tucker Collins, Jr.  
2398 Hotel Street  
Alcolu, South Carolina 29001

**IN THE SOUTH CAROLINA COURT OF APPEALS**

Samuel Tucker Collins, Jr.,  
Appellant,

v.

West Palmetto Holdings, LLC,  
Respondent.

Appellate Case No. 2025-002352

RCVD - USDC COLA, S  
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US District Court Case  
no. 2:26-mc-86-RMB  
MGE

CERTIFIED TRUE COPY  
OF ORIGINAL FILED IN THIS OFFICE

DATE 02-26-2026

Shanita Brangman  
CLERK OF COURT  
CLARENDON COUNTY, SC

**NOTICE OF LIS PENDENS**

**TO ALL PERSONS:**

**TAKE NOTICE** that an action is pending in the South Carolina Court of Appeals affecting the title to real property in Clarendon County, South Carolina, described as follows:

**LEGAL DESCRIPTION:**

All that certain piece, parcel or tract of land, with improvements thereon, if any, lying, being and situate in the County of Clarendon, State of South Carolina, containing 1.05 acres, more or less, and being shown on that certain plat by G. T. Floyd, Surveyor, recorded in the Office of the Register of Deeds for Clarendon County in Plat Book 8 at Page 70; and, on a resurvey by T. G. Gamble, PLS, dated March 1, 1972, recorded in said office in Plat Book 24, at Page 78. This property is known as 2398 Hotel Street, Alcolu, South Carolina 29001, and is designated as Tax Map No.: 183-00-01-005-00.

**THE OBJECT OF THE ACTION** is an appeal from a judgment of the Circuit Court affirming a magistrate's order of ejectment, and includes claims challenging the validity of the tax sale through which Respondent acquired title, seeking an accounting of surplus funds, and requesting other equitable relief affecting the title to the above-described property.

**THE PARTIES TO THE ACTION ARE:**

Party	Role
Samuel Tucker Collins, Jr.	Appellant (former owner of record)
West Palmetto Holdings, LLC	Respondent (current record title holder)

This Notice is given pursuant to S.C. Code Ann. § 15-11-10. From the time of filing this Notice, all persons shall be deemed to have notice of the pendency of this action and shall be bound by all proceedings taken therein.

Dated: February 26, 2026.

Samuel Tucker Collins Jr.  
Samuel Tucker Collins, Jr., Steward Trustee  
STCJ NETWORK REVOCABLE LIVING TRUST