THE STATE OF SOUTH CAROLINA
In The Court of Appeals

APPEAL FROM ORANGEBURG COUNTY
Court of Common Pleas

William B. Jackson, Jr., Master-In-Equity

Case No. 2018-001303

Wells Fargo Bank, N.A., Respondent,

v.

Dorothy Sistrunk, Appellant.

REPLY BRIEF

February 4, 2019

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I. INTRODUCTION

1. This "*Reply Brief*" is being filed pursuant to Rule 208(a)(3), SCACR that clearly states:

> "[A]n appellant may file and serve a brief in reply to the brief of respondent. If a reply brief is prepared, appellant shall, within ten (10) days after service of respondent's brief, serve one copy of the reply brief on all parties to the appeal and file with the clerk of the appellate court one copy of the reply brief with proof of service."

Mortgage Fraud is a serious matter, not a comedy act to be handled by attorneys who seem bent on turning this serious breach of South Carolina and federal law into a comedy routine similar and liken to an Abbott and Costello, a Burns and Allen or the Three Stooges – Larry, Moe and Curly Joe. The lawyers for an insurance company are arguing before a judge and jury that the Plaintiff was making wild accusations about a thunder storm destroying her house. While they are arguing their case, a crew comes in and sets up a motion picture projector and screen in the back of the court room. On the screen behind the lawyers, the jury can see the Plaintiff in the foreground and the thunder storm destroying the house in the background. When the movie comes on, the judge closes his eyes. Every time the lawyers make a claim, the motion picture behind them proves they are lying and the judge has to keep closing his eyes. The lawyers never turn around to see the projector and screen. This is what is happening in the real world, in real time, in the Lower and Upper Court in this case. Every time Wells Fargo's hired attorneys make a statement about the property in a pleading or brief, the Internet is now the parody, running behind them revealing the truth for the Court and the world to see. Unlike the comedy skit, this is no laughing matter. Like the comedy skit, the Lower Court never examined the evidence or the facts. However, unlike the comedy skit, the Appellant never had a jury that could see the evidence and hear the facts.

(a) *18 USC § 1344 SC Code of Laws* clearly states in pertinent parts; "[W]hoever knowingly executes, or attempts to execute, a scheme or artifice – (1) to defraud a financial institution; or (2) to obtain any of the moneys, funds, credits, assets, securities, or other property owned by, or under the custody or control of, a financial institution, by means of false or fraudulent pretenses, representations, or promises; shall be fined not more than $1,000,000 or imprisoned not more than 30 years, or both." (Initial Brief p. 7)

(b) *§ 16-13-10 SC Code of Laws* states in relevant parts.... "[(A)] It is unlawful for a person to: (1) falsely make, forge, or counterfeit; cause or procure to be falsely made, forged, or counterfeited; or willfully act or assist in the false making, forging, or counterfeiting of any writing or instrument of writing; (2) utter or publish as true any false, forged, or counterfeited writing or instrument of writing; (3) falsely make, forge, counterfeit, alter, change, deface, or erase; or cause or procure to be falsely made, forged, counterfeited, altered, changed, defaced, or erased any re-cord or plat of land; or (4) willingly act or assist in any of the premises, with an intention to de-fraud any person. (B) A person who violates the provisions of this section is guilty of a: (1) felony and, upon conviction, must be fined in the discretion of the court or imprisoned not more than ten years, or both, if the amount of the forgery is ten thousand dollars or more;" (Initial Brief p. 9)

(c) *§ 34-3-110 SC Code of Laws* clearly states in pertinent parts... "[(A)] A person knowingly may not execute, or attempt to execute, a scheme or artifice to: (1) defraud a federally chartered or insured financial institution; or (2) obtain monies, funds, credits, assets, securities, or other property owned by or under the custody or control of a federally chartered or insured financial institution by means of false or fraudulent pretenses, representations, or promises. (B) A person who violates the provisions of subsection (A) is guilty of a felony and, upon conviction, must be fined not more than ten thousand dollars or imprisoned for not more than five years, or both. (C) As used in this section, "federally chartered or insured financial institution" means: (1) a bank with deposits insured by the Federal Deposit Insurance Corporation;...." (Initial Brief p. 11)

II. THE FAILURE OF THE LOWER COUT AND THE DECEPTION BY WELLS FARGO'S HIRED AND CORPORATE LAWYERS IS NOW ON DISPLAY ON THE INTERNET FOR THE WORLD TO SEE

2. Just like the comedy skit described above, the Appellate Court Judges no longer need to see a pleading or a brief, Judges can now go on the Internet and see the fraud for themselves. As the Appellant has stated in numerous pleadings and in her *Initial Brief*, Jim H. Austin, III never came to 423 Bayne Street, during October of 2007 to do an

appraisal. He used information and photographs from an earlier point in time. As you can plainly see on the Internet, there are two tall trees in front of 423 Bayne Street, not one as the photograph on his appraisal shows. 423 Bayne was not built during or after 1978 as attorney Debra C. Galloway infers. According to the Tax Assessor in Orangeburg, all houses built before 1950, were legally declared built in 1950. Stating a house is built during or after 1978 when it was not, or omitting this information on a Residential Loan Application is **"Document Fraud"** and attorney Galloway's action of omitting this information during the closing is clear and convincing evidence of **"Unclean Hands"** by Wells Fargo's closing agent. These actions should have ended this case, but they didn't. The verifiable fact that the house is legally declared as being built in 1950 and not built during or after 1978 is now on the Internet.

> *18 USC § 1001*(a) clearly states in pertinent parts.. "[E]xcept as otherwise provided in this section, whoever, in any matter within the jurisdiction of the executive, legislative, or judicial branch of the Government of the United States, knowingly and willfully-- (1) falsifies, conceals, or covers up by any trick, scheme, or device a material fact; (2) makes any materially false, fictitious, or fraudulent statement or representation; or (3) makes or uses any false writing or document knowing the same to contain any materially false, fictitious, or fraudulent statement or entry; shall be fined under this title or imprisoned not more than 5 years, or both. If the matter relates to an offense under 109A, 109B, 110, or 117, or section 1591, then the term of imprisonment imposed under this section shall not be more than 8 years." (Initial Brief, p. 7)

3. Since 423 Bayne Street was built before 1978, the information on the Internet proves by clear and convincing evidence that Debra C. Galloway, knowingly violated *24 CFR Part 35 – Subpart A* in order to get the Appellant to sign the closing documents. She failed to disclose to Wells Fargo and to the Appellant that the closing could not proceed because the law required disclosure about the possibility of lead based paint hazards. (Initial Brief, pp. 5-6) In addition to the fraudulent representations from the Seller, the Appraiser, the Broker and from Debra C. Galloway at the Player Law Firm

that a buyer can prove are fraudulent representations, buyers that come to 423 Bayne Street can prove for themselves without an attorney or a judge sitting without a jury that the information on Jim H. Austin, III's #7-59 appraisals are not just misrepresentations or omissions of material facts or fraudulent representations, they can prove to themselves that his appraisals are outright lies and the $75,000.00 value is based on a fantasy and not reality. Under federal law, **"Appraisal Fraud"** should have ended this case, but it didn't.

4. There is no central air and heating, no patio, no decks, no new ceilings, appliances, floors or fixtures and no working fireplace. The house is not 2,900 + square feet as the broker, David Terrell claims, it is 1,274. The back part is a storage room with access from the inside that the previous owner, Bonceal Dantzler converted. As also stated, this case is a deception by licensed so called professionals, officers of the Court and of course by the seller – Thomas Jacobs. This case embodies the failure of Wells Fargo's Attorneys to tell the truth as Officers of the Court and the failure of the Lower Court to accept the truth, the facts and the evidence that were presented in **Affidavits** and **Notarized** and/or **Verified Pleadings**. The Appellate Court Clerks and Judges can type in the following links on any device with online access to see the Mortgage Fraud that is 423 Bayne Street in real time for themselves:

(a) https://homefinder.com/property/322138850/Bayne-Orangeburg-SC-29115
(b) https://www.trulia.com/p/sc/orangeburg/423-bayne-st-orangeburg-sc-29115--2027497681
(c) https://www.zillow.com/homes/for_sale/423-Bayne-St-Orangeburg,-SC,-29115_rb/

5. The Appellant will remind the Court that Janet Frotscher, the head of Wells Fargo Home Mortgage Executive Resolution Team, in ¶ 1, in her letter dated February 21, 2008, Appellant's Exhibit 45 and the Respondent's Exhibit WF00120, Janet Frotscher acknowledged receiving the Appellant's correspondence that is dated February

5, 2008 and February 7, 2008 and in ¶ 4, she acknowledged receiving the information about the appraisals. What she did not mentioned was she received the Appellant's Exhibits 8-12 that itemized the fraudulent representations and omissions on the #7-59 appraisals. Janet Frotscher knowingly accepted the fact that the value of loan #0174072777 is a false value because it is based on Jim H. Austin, III's fraudulent appraisal and she did nothing about it. In fact, she began accusing the Appellant as being the person that met with Jim H. Austin, III. (Initial Brief, p. 25)

6. As the Appellant stated in her pleading that was filed in the Lower Court on 12-3-2018, attorney Kevin T. Brown misrepresented material facts by stating in his filed pleading that Wells Fargo was a successful bidder, when in fact, Wells Fargo had no bids for the property and simply repossessed the house making it a REO. No individual with reasonable intelligence was going to pay Wells Fargo $159,220.00 for a $15,000.00 house that is literally falling apart and the Appellant was not going to pay Wells Fargo $75,000.00 for it either. The Internet also verifies the year the fraud occurred....2007. (See attachment – Master-In-Equity Court Sales, p. 3)

> **(a)** *12 CFR § 1731.2(c)* states in pertinent parts.. **"[M]ortgage fraud** means a material misstatement, misrepresentation, or omission relied upon by an Enterprise to fund or purchase—or not to fund or purchase—a mortgage, including a mortgage associated with a mortgage-backed security or similar financial instrument issued or guaranteed by an Enterprise. Such mortgage fraud includes but is not limited to, a material misstatement, misrepresentation, or omission in identification and employment documents, mortgagee or mortgagor identity, and appraisals that are fraudulent." (Initial Brief, p. 4)
>
> **(b)** *12 CFR § 1731.2(e)* states in pertinent parts.. "**[P]ossible mortgage** *fraud* means that an Enterprise has a reasonable belief, based upon a review of information available to the Enterprise, that mortgage fraud may be occurring or has occurred. [**Note: Boldness** added for emphasis in **(a)** & **(b)]** (Initial Brief, pp. 4-5)

The above stated federal description and definitions are the legal standard, everything and anything else said beyond this is moot and irrelevant.

7. According to Janet Frotscher's letter, dated June 2, 2008, (WF00125, ¶ 4), Janet Frotscher admits the documents supporting loan #0174072777 were accepted by Wells Fargo on December 4, 2007. No evidence of fraud and ignoring evidence of a fraudulent representation or two entirely different legal matters. Janet Frotscher admits in (WF00120) that the documents were reviewed and found acceptable for lending purposes. (WF00014-WF00026) is an in-your-face fraudulent representation. The Appellant was not the property owner on October 8, 2007 and the document clearly shows Jacobs as the borrower. (See the Upcoming Record on Appeal)

8. The loan's approval date is 12/20/2007 (WF00086, WF00103, WF00115 & WF00119). From 12/04/2007 to 12/20/2007, Wells Fargo had ample time to investigate the fraudulent representations pursuant to *§ 40-58-70(6) – SC Code of Laws* and deliberately chose not to. Wells Fargo had ample opportunity and time to call the Appellant about the appraisal's discrepancies and the loan in general pursuant to *§ 37-23-40(1)-(2) - SC Code of Laws* and deliberately chose not to. "[A]t common law actual knowledge is not necessary to hold a principal liable, if misrepresentations are made by the agent while acting within the scope of his agency." (*West v. Service Life & Health Insurance Co.*, 220 S.C. 198, 66 S.E. (2d) 816 (1951) & *Restatement (Second) of Agency* § 261, comment a (1958))

> *Loving & Evans v. Blick*, 33 Cal. 2d 603 (Cal: S. Ct 1949) "[A]s appellant maintains, it has been repeatedly declared in this state that "a contract made contrary to the terms of a law designed for the protection of the public and prescribing a penalty for the violation thereof is illegal and void, and no action may be brought to enforce such contract" (*Gatti v. Highland Park Builders, Inc.*, 27 Cal.2d 687, 689 [166 P.2d 265]; see, also, *Haas v. Greenwald*, 196 Cal. 236, 247 [237 P. 38, 59 A.L.R. 1493]; *Wise v. Radis*, 74 Cal.App. 765, 774-776 [242 P. 90]; *Holm v. Bramwell*, 20 Cal.App.2d 332, 335-337 [67 P.2d 114]; *Phillips v. McIntosh*, 51 Cal.App.2d 340, 343 [124 P.2d 835]); and that "whenever the illegality appears, whether the evidence comes from one side or the other, the disclosure is fatal to the case." (Initial Brief, p. 43)

9. No where in the brief is the crime of Mortgage Fraud addressed in a serious and forthright manner. Rather than address the issue, the Respondent filed 14 pages of what can be best described as a series of one liners that might be good for a laugh in the office, but not in a court of law and especially not in the Appellate Court. The Appellate Court now has the evidence on the **Internet**, in **Notarized** and **Verified Pleadings** filed in the Lower Court, in the **Appellant's Brief** filed in the Appellate Court and in filed **Exhibits** that prove by clear and convincing evidence and beyond any reasonable doubt that 423 Bayne Street is a Mortgage Fraud by statutory and codified definition. No Affidavit filed by the Appellant has been disputed, denied, countered or disproven. Therefore, in courts of law, Affidavits are statements of fact, not belief and/or conjecture and they cannot be ignored by competent, attorneys or judges. To expedite matters.

(a) The Appellant's Statements of Fact, relative to **Mortgage Fraud** and **Defrauding with Falsified Documents** from 2nd, 3rd , and maybe even a 4th party/ies are absolutely true are in filed Affidavits marked as Exhibits 92, 245, 253 & 378 and are included in the Record On Appeal.

(b) The wrongful and malicious persecution of the Appellant by Wells Fargo and their attorneys, for the crimes of another party/parties that were not before the Court since June of 2008 are in an Affidavit as Exhibit 92.

(c) The ethical violations by attorneys from Nelson Mullins Riley & Scarborough, LLP; most notably, James H. Burns, Elizabeth Scott Moise and Brian A. Calub identified as violations of Professional Conduct **Rules 3.3; 3.4; 4.1; 5.1; 8.3 & 8.4**, can be found in an Affidavit marked as Exhibit 379. The ethical violations of these three (3) attorneys are also in a notarized pleading that will be included in the Record On Appeal.

10. All Courts exist to "Administer Justice" that includes, but is not limited to punishment and/or retribution for an individual's and/or group's participation in or committing crimes, civil torts and/or for violating lawfully enacted rules, laws, regulations and/or ordinances. Therefore, Courts cannot base the "Administration of Justice" on any perceived and/or imagined technical procedure; especially, when any technical procedure in question is not known by...or has not been adequately explained to...a pro se litigant.

(a) "[T]he trial judge should inform a pro se litigant of the proper procedure for the action he or she is obviously attempting to accomplish." *Breck v. Ulmer*, 745 P.2d 66, 75 (Alaska 1987) "[C]ourt errs if court dismisses pro se litigant without instructions of how pleadings are deficient and how to repair pleadings." *Plaskey v CIA*, 953 F .2nd 25.

(b) "[I]mplicit in the right to self-representation is an obligation on the part of the court to make reasonable allowances to protect pro se litigants from inadvertent forfeiture of important rights because of their lack of legal training. While the right "does not exempt a party from compliance with relevant rules of procedural and substantive law," *Birl v. Estelle*, 660 F.2d 592,, 593 (5th Cir.1981)

(c) "[I]n addition, "[w]hen the substance of a legal claim is otherwise present, this court has indicated that 'confusion of various legal theories,' a technical pleading error, should not be dispositive in pro se cases." *Switzer v. Coan*, 261 F.3d 985, 988 (citing *Hall v. Bellmon*, 935 F.2d 1106, 1110 (10th Cir. 1991)). "[A]t the same time, we do not believe it is the proper function of the district court to assume the role of advocate for the pro se litigant." *Hall*, 935 F.2d at 1110.

(d) *Rule 8(f), SCRCP* clearly states in pertinent parts.... "[A]ll pleadings shall be so construed as to do substantial justice to all parties."

11. In addition, if an injustice, an undisclosed criminal act or tort has been discovered during the prosecution of a case, the Court must correct it and attorneys; as Officers of the Court, are mandated to report this to the tribunal or the tribunal can act independently. (See Professional Conduct **Rules 3.3; 3.4; 4.1; 5.1; 8.3 & 8.4**)

(a) In *6 Angels, Inc. v. Stuart-Wright Mortgage, Inc.* (2001) 85Cal.App. 4th 1279 at 1286 where the Court stated: "[I]t is the general rule that courts have power to vacate a foreclosure sale where there has been fraud in the procurement of the foreclosure decree or where the sale has been improperly, unfairly or unlawfully conducted, or is tainted by fraud, or where there has been such a mistake that to allow it to stand would be inequitable to purchaser and parties."

(b) *Trout v. Trout*, (1934), 220 Cal. 652 at 656 clearly states; "[N]umerous authorities have established the rule that an instrument wholly void, such as an undelivered deed, a forged instrument, or a deed in blank, cannot be made the foundation of a good title, even under the equitable doctrine of bona fide purchase...."

(c) "[I]f a party is deprived of his substantial rights in a trial before an actually biased judge, the harm can be remedied (though not costlessly) by a new trial before an unbiased judge. But the harm to the public's perception of the judicial system when a judge who appears to be biased proceeds in a case is more difficult to correct." *United States v. Balistrieri*, 779 F.2d 1191 (7th Cir. 1985)

(d) *Gadson v. Hembree*, 364 S.C. 316, 320, 613 S.E.2d 533, 535 (2005) ("Summary judgment is not appropriate where further inquiry into the facts of the case is desirable to clarify the application of the law.")

A. The Respondent's *"Initial Brief"* does not and did not address any issue in the Appellant's *"Initial Brief"* and did not and does refute, deny or contest any "Statement of Fact" or "Material Fact".

12. As the Appellate Court can plainly see, the Respondent's *"Initial Brief"* did not and does not address any issue in the Appellant's *"Initial Brief"* and did not and does not refute, deny or contest any "Statements of Fact" and "Material Fact" relative to Mortgage Fraud, (Review Appellant's *"Initial Brief"*) and this is after being given additional time by the Appellate Court to do so. (Review the Appellate Court's own order to verify the Respondent's time to respond was extended and review the Respondent's *"Initial Brief"* to verify the Appellant's Statements of Fact)

13. In fact, neither Wells Fargo Bank, N.A., (since December 22, 2007), nor Rogers Townsend & Thomas, P.C., (Since June of 2008), Nelson Mullins Riley & Scarborough, LLP., (since August of 2008) or the Goodstein Court (since June of 2008), Judge Jackson is exonerated, or Womble, Bond and Dickinson has investigated the facts, the material facts and the evidence relative to this case. The Appellate Court's *Rule 212(a)* and *Standard of Review* give the Appellate Court the authority to thoroughly investigate anything and everything relative to C.A. Case #2008-CP-38-1024 for the past 10 years to determine the facts, material facts and the truth, relative to a crime being committed by the broker, appraiser, seller, the Player Law Firm and Wells Fargo's own employees and the unwarranted, wrongful and malicious persecution of the victim of that crime, by Wells Fargo Bank, N.A.'s hired law firms after all the facts were known.

(a) *Rule 212(a) SCACR*, clearly states in pertinent parts; "[T]he appellate court may require copies of all or any part of the transcript of proceedings or other matter which was before the lower court or administrative tribunal to be sent up for its inspection and consideration. It may likewise require a report of the trial or hearing, or of any matter relative thereto, to be made by the trial judge or

administrative tribunal. These matters shall become part of the Record on Appeal."

(b) "[A]s a conclusion of law, the Appellate Court reviews the trial court's grant of summary judgment de novo." *Quality Towing, Inc. v. City of Myrtle Beach,* 340 S.C. 29, 530 S.E.2d 369 (2000) "[T]o obtain summary judgment, the moving party must demonstrate there is "no genuine issue of material fact and the moving party is entitled to a judgment as a matter of law." *Rule 56, SCRCP; Wilson v. Moseley,* 327 S.C. 144, 146, 488 S.E.2d 862, 863 (1997); *Wells v. City of Lynchburg,* 331 S.C. 296, 301, 501 S.E.2d 746, 749 (Ct. App. 1998) ("An appellate court reviews the granting of summary judgment under the same standard applied by the trial court.") "[T]he evidence and all reasonable inferences must be viewed in the light most favorable to the non-moving party." *Law v. S.C. Dep't of Corrs.,* 368 S.C. 424, 434, 629 S.E.2d 642, 648 (2006) "[I]f triable issues exist, those issues must go the jury." *Mulherin-Howell v. Cobb, 362* S.C. 588, 595, 608 S.E.2d 587, 591 (Ct. App. 2005)

B. The Respondent's *"Initial Brief"* does not and did not refute or deny the issue in this case is Mortgage Fraud by second, third and maybe even a fourth party and not foreclosure.

14. In addition to not refuting, denying or contesting any "Statements of Fact" and "Material Fact", the Respondent's *"Initial Brief"* does not refute, deny or contest the issue in this case that is the criminal act of **Defrauding a Bank** by second, third and maybe even a fourth party and not a foreclosure action. Neither did the Respondent challenge any of the *Precedents* and *Authorities* identified in the "Initial Brief", nor any *Authority* relative to the numerous frauds that can be found in Wells Fargo's documents, WF00001-134

15. Wells Fargo and Wells Fargo's attorneys have been victimized by their own lack of personal knowledge relative to the events. Therefore, these attorneys have fabricated a version of the events that best suits what they want to accomplish in court, i.e., a foreclosure by any means necessary, that includes, but is not limited to misrepresenting, misstating, omitting and ignoring material facts, distorting facts, using false testimony, outright LYING and relying on Judges to sign Court Orders drafted by attorneys. This alone borders on ethical violations and a Fraud upon the Court.

C. **Instead of being Rewarded for exposing the scheme or artifice to Defraud Wells Fargo out of $75,000.00, the Appellant has been LIED on by attorneys from Nelson Mullins Riley & Scarborough, LLP., before, during and after the Stay/TRO and by Wells Fargo's own employees....and this is after all the facts were known.**

16. By taking advantage of a Judge's approved practice of signing attorney drafted orders, Wells Fargo's attorneys were able to continue their ruthless and malicious persecution of the Appellant who is an **"Innocent Victim"** of a well executed Scheme or Artifice to **Defraud Wells Fargo Bank** out of $75,000.00.

17. For over 10 years, attorneys willfully and knowingly peddled falsified documents, forgeries, credit report abuse, falsified values in an **"Appraisal Fraud"** as evidence of a brokered loan, thus perpetuating Thomas Jacobs' Home Improvement Fraud upon the Appellant, the Lower Court, the Appellate Court, upon Wells Fargo Bank and now upon the general public and this after all the facts are known.

D. **Defrauding a bank is a criminal offense not a civil tort open to polite discussion in a court room.**

18. Defrauding a bank is a criminal offense, not a civil tort, nor can this felonious criminal activity be legitimately treated as innocent indiscretions. This is what happened in the Lower Court that led to this travesty of justice. What Wells Fargo knew and when Wells Fargo knew it...is also immaterial. Wells Fargo and its attorneys were notified repeatedly for over 10 years about Mortgage Fraud and the falsified, forged, altered and unauthorized documents of the Seller, Broker and the Appraiser and what happened at the Player Law Firm with Debra C. Galloway and Stephanie Hammond.

19. Now that the Appellate Court knows, the Internet can verify the essential element of this case, a "Home Improvement and Mortgage Fraud", that is supported by forged, altered and falsified documents that were falsely certified by Debra C. Galloway and Stephanie Hammond on 12/21/2007, the Appellant will now reply to the "Brief".

III. REPLY TO RESPONDENT'S STATEMENT OF THE ISSUES ON APPEAL

20. The Respondent's issue on appeal is the Appellant's appeal is frivolous. A criminal act is not a frivolity and ending the unwarranted and malicious persecution of an innocent victim of a criminal act is well within the jurisdiction of the Appellate Court to end a **"Manifest Injustice"** or a **"Miscarriage of Justice"** regardless of when it arrives or how it arrives at the Appellate Court. A Mortgage Fraud is not a legitimate real estate transaction. Because it is not legitimate and a violation of federal and state law, it must be canceled to prevent defrauding another innocent victim.

21. The term **"Miscarriage of Justice"** refers to a legal act or verdict that is clearly mistaken, unfair, or improper. Primarily, a **"Miscarriage of Justice"** is the conviction and punishment of a person for a crime they did not commit. The Appellant did not defraud Wells Fargo, that was done by the Seller – Thomas Jacobs, the Appraiser – Jim H. Austin, III, the so called Broker – David Terrell, the closing agent -- Debra C. Galloway and Stephanie Hammond, and Wells Fargo's own employees at Wells Fargo Home Mortgage. **"Manifest Injustice"** means something which is 'obviously unfair' or 'shocking to the conscience.' It refers to an unfairness that is direct, obvious, and observable. Having Judge Goodstein sign a Partial Summary Judgment Order, with glaring misrepresented material facts and outright lies is direct, obvious and observable by anyone with reasonable intelligence. The Appellant did not go to the closing to buy a house for $75,000.00, the Appellant went to the closing to lower the price of the house based on the representations of the Seller – Thomas Jacobs. The Appellant did not go to the closing on 12/21/2007 with an attorney, the Seller never gave the Appellant an appraisal, the Appellant never met with Jim H. Austin, III and the Appellant's spouse did not contact Thomas Jacobs to buy a house. These are outright lies. (Review *Initial Brief*)

(a) *State v. Thompkins*, 78 Ohio St.3d 380 (Ohio: S.Ct.1997) "[W]hen a court of appeals reverses a judgment of a trial court on the basis that the verdict is against the weight of the evidence, the appellate court sits as a "`thirteenth juror"' and disagrees with the factfinder's resolution of the conflicting testimony. *Tibbs*, 457 U.S. at 42, 102 S.Ct. at 2218, 72 L.Ed.2d at 661. See, also, *State v. Martin* (1983), 20 Ohio App.3d 172, 175, 20 OBR 215, 219, 485 N.E.2d 717, 720-721 ("The court, reviewing the entire record, weighs the evidence and all reasonable inferences, considers the credibility of witnesses and determines whether in resolving conflicts in the evidence, the jury clearly lost its way and created such a manifest miscarriage of justice that the conviction must be reversed and a new trial ordered. The discretionary power to grant a new trial should be exercised only in the exceptional case in which the evidence weighs heavily against the conviction.")."

(b) "[A] court will set aside a judgment, or grant a new trial in any cause, on the ground of misdirection of the jury, or of the improper admission or rejection of evidence, or for any error as to any matter of pleading, or for any error as to any matter of procedure, only if the the court is of the opinion that the error complained of has resulted in a miscarriage of justice. However, the court will examine the entire cause, including the evidence, before setting aside the judgment or granting a new trial." (Cal Const, Art. VI § 13).

(c) *Norton v. Norfolk Southern Ry. Co.*, 567 SE 2d 851 (SC: S. Ct. 2002) "[a] new trial is warranted when (1) the verdict is against the clear weight of the evidence; (2) the verdict is based upon evidence which is false; or (3) the verdict will result in a miscarriage of justice."

22. The Respondent also states the Appellant did not appeal the foreclosure, this statement is patently false. On February 8, 2018, the Appellant filed a motion for a Writ of Mandamus and/or Certiorari that Judge Jackson never ruled on and based on what the appellant read, **The writ of certiorari can be issued only by a judge acting within his jurisdiction**, the Appellant waited for a ruling on the motion before filing an appeal, the ruling never came The Writ was filed pursuant to *Rule 65(f)(1), SCRCP* that clearly states in relevant parts:

(a) "[N]o writ of mandamus, habeas corpus, or other remedial writ shall be granted without notice of motion for the writ to the adverse party, which notice shall be served, together with the summons and complaint, in event no summons and complaint have previously been filed and served in the action, upon the adverse party in accordance with the provisions of Rules 4 and 5. Such notice and motion shall be supported by affidavit or

verified complaint setting forth clearly the facts entitling the moving party to such writ. The motion shall be heard upon such notice as the court may prescribe, and the court shall proceed to hear and determine such motion as expeditiously as the ends of justice require. Unless a different time be prescribed by the court, the adverse party shall plead to the complaint and respond to such motion in the time prescribed by these rules for other civil actions."

(b) *City of Columbia v. SC PUB. SER. COMM.*, 131 SE 2d 705 (1963) "[A] writ of certiorari is used to keep an inferior tribunal within the scope of its powers, *Ex parte Schmidt*, 24 S.C. 363; *State ex rel. Martin v. Moore*, 54 S.C. 556, 32 S.E. 700. One of the most important functions of the writ is to determine whether the inferior tribunal acted without jurisdiction, *Patrick v. Maybank et al.*, 198 S.C. 262, 17 S.E. (2d) 530. The Superior Court, in considering the record of the inferior tribunal, must confine its review to the correction of errors of law only and not review findings of fact except when such findings are wholly unsupported by the evidence, *State ex rel. Davis v. State Board of Canvassers*, 86 S.C. 451, 68 S.E. 676; *Jennings v. McCown*, 97 S.C. 484, 81 S.E. 963; *Wyse v. Wolfe*, 129 S.C. 499, 123 S.E. 818; *McKnight v. Smith*, 182 S.C. 378, 189 S.E. 361; *Smoak v. Rhodes*, 201 S.C. 237, 22 S.E. (2d) 685; *Feldman v. South Carolina Tax Commission*, 203 S.C. 49, 26 S.E. (2d) 22; *Jacoby v. South Carolina State Board of Naturopathic Examiners*, 219 S.C. 66, 64 S.E. (2d) 138. **The writ of certiorari can be issued only by a judge acting within his jurisdiction** and unless the authority is inherent, or the jurisdiction is expressly or impliedly conferred by Constitutional or Statutory provision, there is no power to issue the writ, 14 C.J.S. Certiorari § 54; 6 Cyc. 793; See *State ex rel. Canaday v. Black*, 34 S.C. 194, 13 S.E. 361." [Note: **Boldness** added for emphasis and is not in the original.]

23. The final contention in the Respondent's "Statement of the Issues On Appeal" is the Appellate Court rejected the Appellant's arguments. This statement is also patently false. The Appellate Court can respond to this false statement better than the Appellant. The first appeal was sent back to the Lower Court because it was deemed untimely. Bottom line, it was late and it was. The Appellant did not immediately appeal the Judgment Order because she believed she had to file a motion for a new trial and a motion to alter or amend first. That's why the appeal was late and for no other reason.

(a) *Stevens & Wilkinson of South Carolina, Inc. v. City of Columbia*, 409 S.C. 568, 762 S.E.2d 696 (2014)("a party cannot use a Rule 59(e) motion to present to the court an issue the party could have raised to the circuit court prior to judgment, but did not.").

(b) The Appellant had to make a Rule 59(e) motion to ask for a ruling *Elam v. South Carolina Dep't. of Transp.*, 361 S.C. 9, 24, 602 S.E.2d 772, 780 (2004)("A party *must* file such a motion when an issue or argument has been raised, but not ruled on, to preserve it for appellate review.") (emphasis in original).

(c) The Appellant had a choice to appeal or file a Rule 59(e) motion to ask for reconsideration. *Elam*, 361 S.C. at 24-25 and n. 1, 602 S.E.2d at 780-781 and n. 1. A timely Rule 59(e) motion should have tolled the time to appeal, *Rule 203(b)(1), SCACR*, but it didn't in the Appellant's case.

(d) *Pye v. Estate of Fox*, 369 S.C. 555, 565-566, 633 S.E.2d 505, 510-511 (2006)(holding that a second Rule 59(e) motion is not required if the trial judge fails to rule on an issue properly raised by a Rule 59(e) motion). After all the rulings were done, that is when the Appellant filed her appeal.

IV. APPELLANT'S COUNTER TO THE RESPONDENT'S ISSUES ON APPEAL

24. The Lower Court severely violated *Rule 56, SCRCP*. Only the pleadings, depositions, answers to interrogatories, admissions on file, together with the affidavits, if any can be used to determine a summary judgment motion, not a lawyer's argument.

25. By this standard, the Lower Court abused its discretion by conducting no evidence hearings and abused it again by refusing to allow eyewitness testimony. By relying only on attorney Burns' recital of events at the Summary Judgment hearing is also a Rule violation and another discretionary abuse.

26. Based on the evidence and the facts, the Respondent's issues lack any genuine merit relative to this case and border on absurdity. There are 5 issues the Appellant Court needs to decide that will firmly establish this case as a precedent to guide the Appellate Court in all future deliberations relative to brokered loans in a foreclosure action that is the gravamen of this case and the Appellant's Appeal.

(a) The governing law and principles that should be applied as the ***Standard of Review*** when a bank or lender files a **Mortgage Fraud** and/or **Scheme or Artifice to Defraud**, as defined by statutory law, as a foreclosure action.

(b) The governing law and principles that must be applied in the lower courts when the perpetrator(s) of a **Mortgage Fraud** or **Scheme or Artifice**

to Defraud are not the defendant(s) on trial, but another party/parties that are not before the Court.

© The appropriate instructions to lower court judges that will prevent another **Miscarriage of Justice** like C. A. Case #2008-CP-38-1024.

(d) The amount of penalties to be levied against law firms and/or lawyers for deliberately persecuting "Innocent Victims" of a **Mortgage Fraud** and/or a **Scheme or Artifice to Defraud** committed by "Industry Insiders" when the facts can be known.

(e) What recommendations to send to the Judiciary Committee to strengthen laws and/or remedies that will help "Innocent Victims" trapped in fraudulent mortgages initiated by "Industry Insiders", due to lax oversight or **Complicity** by lenders or banks.

V. REPLY & COUNTER TO THE RESPONDENT'S STATEMENT OF THE CASE

27. Now that the Internet can be used to see a parody that is liken to a comedy skit of the Respondent's portrayal of Jim H. Austin, III's **"Appraisal Fraud"** and the **"Document Fraud"** of David Terrell, Thomas Jacobs, attorney Debra C. Galloway and Wells Fargo's own employees as a legitimate sale, did the Respondent file a "Statement of the Case" or is it a narrative of the failure of the Lower Court to address the issue of Mortgage Fraud? The Appellant contends that is the latter and refers the Appellate Court to the links that have been provided in this *Reply Brief*, to the Court's Records, the Pleadings, Depositions, Interrogatories, Admissions, Affidavits, the filed Exhibits and the Appellant's *"Initial Brief"* for even more Truth, more Evidence and more Material Facts.

28. The **Dishonest Conduct** by the hired attorneys from Nelson Mullins Riley & Scarborough, LLP includes the ***Massive Filing Fraud*** during the TRO. For over 5 years, the Lower Court abused its discretion by ignoring the ***Massive Filing Fraud*** and outright lies of attorneys Elizabeth Scott Moise and James H. Burns, the misrepresentations of attorney Brian A. Calub, the "Scam Affidavit" filed by Wells Fargo's attorney Elizabeth S. Hodgson and the ***False Certification of a Mortgage*** by attorney, Debra C. Galloway. It even ignored the outright lies and concealment of material facts by Janet Frotscher.

VI. REPLY & COUNTER TO RESPONDENT'S ARGUMENTS & AUTHORITIES

29. Before the Appellant responds to the Respondent's Arguments and Authorities, the Appellant will briefly address the misinterpretation of her so called Defiant Letter referred to on page 2 in ¶ 3. The Appellant's response is actually based on the following case that is on page 40 in her *"Initial Brief"* that was filed in 2014. Only the relevant parts were filed then. Below is an expanded excerpt from the case. **"Correct errors of law"** is in **bold**. If there is defiance, it comes from the Supreme Court.

> *Moriarty v. Garden Sanctuary Church of God*, 341 S.C. 320, 534 S.E.2d 672 (2000) "[S]ummary judgment should not be granted even when there is no dispute as to evidentiary facts if there is dispute as to the conclusion to be drawn from those facts. *Id.* In determining whether any triable issues of fact exist, the court must view the evidence and all reasonable inferences that may be drawn from the evidence in the light most favorable to the non-moving party. *Manning v. Quinn*, 294 S.C. 383, 365 S.E.2d 24 (1988). An appellate court reviews the granting of summary judgment under the same standard applied by the trial court pursuant to Rule 56, SCRCP. *Wells v. City of Lynchburg*, 331 S.C. 296, 501 S.E.2d 746 (Ct.App.1998)."
>
> "[W]e are free to decide questions of law—in this case whether South Carolina recognizes a certain cause of action and whether the discovery rule may apply when that cause of action is asserted—with no particular deference to the lower court. *See* S.C. Const. art. V, §§ 5 and 9; S.C. Code Ann. §§ 14-3-320 and -330 (1976 & Supp.1999); S.C. Code Ann. § 14-8-200 (Supp.1999) (granting Supreme Court and Court of Appeals the jurisdiction to **correct errors of law** in both law and equity actions); *I'On v. Town of Mt. Pleasant*, 338 S.C. 406, 526 S.E.2d 716 (2000).

A. Reply to Argument 1.

30. As already stated on page 13, in Section III, ¶ 20, the statement is patently false because of the reasons already stated. Even though Judge Jackson never ruled on the motion for a Writ of Mandamus and/or Certiorari, the Appellant did not see a need to engage in futility by filing another motion that was going to be ignored. Every motion filed in this case by the Appellant is ignored or denied without a hearing. Every motion filed by Wells Fargo's attorneys have a hearing. (See Lower Court's Records for Proof.)

31. Even though the Appellant's motion was denied like all the others without a hearing, the damage in this case was done by Judge Goodstein not by Judge Jackson. Judge Goodstein treated the Mortgage Fraud of the Seller, Broker, Appraiser, Wells Fargo's own employees and attorney Debra C. Galloway as indiscretions and not violations of law, the Appellant also exonerates Judge Jackson in this particular case because of the following reason:

> "[I]t is well settled in South Carolina that one circuit judge does not have the power to review, modify, affirm or reverse the findings of another circuit judge." *Cook v. Taylor*, 272 S.C. 536, 538, 252 (1979).

B. Law of the case.

32. To counter the policies or 'Stare Decisis' that support the law of the case, the law of the case is outweighed when there is a clear error of law that will work a **'Manifest Injustice'** or a **'Miscarriage of Justice'** or when it is discovered that false testimony, excluded evidence or judicial indiscretion led to the judgment. In addition, from 2007 to 2018, the Mortgage Fraud, that is 423 Bayne Street, was not on the Internet for Judges and the public to see; especially, when they come to Exhibit 113, the property.

33. With public exposure of the fraud on the Internet and with more pictures and photographic evidence; as well as, public records on the way, the only question that begs an answer, is how deep down the "Rabbit Hole" does it go? With these facts, actuality and reality in mind and with the Internet parody, running in the background, the Appellant will address pages 5-7 and the Respondent's citations to authority.

34. Under the **Legal Doctrine of Substantial Justice**, technical pleading errors are routinely overruled so that the "Administration of Justice" is preserved. The "Administration of Justice" is far more important than a pleading error. It is also worth noting, the Respondent did not request the Appellate Court to validate facts in their review and they did not argue facts, material facts, the truth or mention any evidence. The

law of the case, that is being referenced, relies solely on the results Wells Fargo obtained in the **No Evidence** and **No Eyewitness Testimony** hearings that were held in the Lower Court. In short, the Respondent is indirectly supporting violation of the "Due Process Clauses", whenever an attorney can get away with it. Such thinking is unethical. It is the Court's responsibility to insure attorneys do not violate Constitutional Rights to fairness; especially, in an action that involves a pro se litigant. (Review *Initial Brief*)

35. When you read the complete case file history of the following:

(a) *Judy v. Martin*, 381 S.C.455, 458, 674 SE 2d 151, 153 (2009);

In *Judy v. Martin*, unappealed rulings become the law of the case. "[*I*]*n re Morrison*, 321 S.C. 370 n. 2, 468 S.E.2d 651 n. 2 (1996) (noting that an unappealed ruling becomes the law of the case and precludes further consideration of the issue on appeal); *Cooper Tire & Rubber Co. v. Perry et al*, 261 S.C. 538, 201 S.E.2d 245 (1973) (holding that where a ruling on a demurrer to complaint is not appealed from, it becomes the law of the case); *Watkins v. Hodge*, 232 S.C. 245, __, 101 S.E.2d 657, 658 (1958) (refusing to consider jurisdictional matter of underlying case where issue had been ruled upon and not challenged on appeal)";

(b) *Barth v. Barth*, 293, S.C. 305, 308, 360 S.E. 2d 309, 310 (1987);

In *Barth v. Barth*, the Judges clearly state the following: "[u]nless on re-examination the appellate court is convinced that the first decision was wrong." *Atchison, T. & S.F. Ry. Co. v. Ballard*, 108 F. (2d) 768 (1940)";

(c) *Dreher v. S.C. DHEC*, 412 S.C. 244, 250, 772 S.E. 2d 505, 508 (2015),

In *Dreher v. S.C. DHEC*, The Judges are very clear again, ["("`An] unappealed ruling is the law of the case and requires affirmance.' Thus, should the appealing party fail to raise all of the grounds upon which a lower court's decision was based, those unappealed findings—whether correct or not—become the law of the case." (quoting *Shirley's Iron Works, Inc. v. City of Union*, 403 S.C. 560, 573, 743 S.E.2d 778, 785 (2013))); *Flexon v. PHC-Jasper, Inc.*, 413 S.C. 561, 571, 776 S.E.2d 397, 403 (Ct. App. 2015)",

you will discover, the issue addressed to substantiate the law of case is an unappealed ruling from the Lower Court. The Appellant has appealed every Lower Court ruling and the Appellant has filed a motion to counter every decision filed in the Lower Court and to

counter every pleading filed by attorneys since 2008. Then why is the affirmation or denial of these filed motions not in the Appellate Court's records? Judge Goodstein ignored them and Judge Jackson has yet to rule -- and may never rule -- on the Writ of Mandamus that was filed on February 8, 2018, that opposed his foreclosure ruling. (See upcoming Record On Appeal for the Evidence and the Proof)

36. Since *Ex Parte Morris*, 367 S.C. 56, 66, 624 S.E. 2d 649, 654 (2006); *Eadie v. Krause*, 381 S.C. 55, 66, 671 S.E. 2d 389, 394 (Ct.App.2008) *Huggins v. Winn-Dixie Greenville, Inc.*, 292 S.C. 353, 357, 166, S.E. 2d 297, 299 (1969); *Robert E. Lee & Co. v. Comm'n of Pub. Works*, 250, S.E. 394, 399, 158 S.E. 2d 185, 188 (1967) and *Charleston Lumber Co. v. Miller Hous. Corp.*, 338 S.C, 171, 175, 525 S.E. 2d 869, 871-72 (2000) are only mentioned in other case histories in the search engine used by the Appellant, they are deemed to be supportive of the Respondent's position relative to the law of the case. However, the opinions in the case filed history reviewed, including the aforementioned, clearly show the law of the case is based on a failure to appeal a ruling.

B. Judge Jackson did not abuse his discretion in denying Ms. Sistrunk futile, untimely, post – judgment motion.

37. The Appellant will now address Motion in Moot, Wrong Procedural Rule, Recycled Previous Rejected Arguments, Untimely Post-Judgment Motion, No Extrinsic Fraud, No Meritorious Defense. *Tench v. S. C. Dep't of Edu.*, 347 S.C. 117, 121, 553 S.E. 2d 451, 453 (2001); *Raby Construction*, 358 S.C. @ 20-21, 594 S.E. 2d @ 483 (2004), *Hilton Head Ctr. of S.C., Inc., v. S.C. PSC*, 294 S.C. 9, 11, 362 S.E.2d 176, 177 (1987); *Mitchell Supply Co. v. Gaffney*, 297 S.C. 160, 163, 375 S.E. 2d 321, 324 (Ct,App.1988) and *Wells Fargo Bank, N.A. v. Sistrunk*, Op. No. 2016-UP-472, ¶ 2 (S.C. Ct. App. Nov. 9, 2016). Except for the Appellate Court ruling, the arguments here are the same tired arguments filed in 2014, the rebuttal in the following paragraphs will cover them all.

38. Like the comedy skit parody of the old *Movietone* newsreels that ran from 1928 to 1963 in the United States, the property was not on the Internet in 2014 and it was not there in February of 2018, or when the Appellant filed her *"Initial Brief"*. However, it is there now. Like the lawyers in the comedy skit parody on page 1, Wells Fargo's hired lawyers are filing papers to convince a Judge, not a Jury, and Appellate Judges that a Mortgage Fraud does not exist, when the facts and the evidence prove that it does exist and now an independent source also proves it exist – the Internet. Anything else beyond these undeniable facts is now moot and irrelevant. Frauds are cancelled, not foreclosed.

VII. APELLANT'S SUMMARY BASED ON THE EVIDENCE & THE FACTS & COUNTER TO THE RESPONDENT'S CONCLUSIONS

39. The legal process in South Carolina failed Wells Fargo and it failed the Appellant. It is not the Appellant that is abusing the legal process, it is Wells Fargo's hired lawyers. And they are abusing it for legal tender to pay all debts public and private. In 2009, the Appellant via GreenPath offered to pay for the house on a monthly installment plan for its fair market value. Wells Fargo's hired lawyers prevented this from happening and they have prevented Wells Fargo from pursuing the people that defrauded them out of $75,000.00. Perhaps it is not too late for these people to pay for their crimes...or at least be dragged into Court before a real and strict no nonsense Judge and a real Jury to answer for their nefarious and despicable acts. As for the attorneys – Sanctions.

40. For the reasons stated, this Court should reverse the judgment of the circuit court and put an end to this foreclosure travesty that is nothing but a hardship to the Appellant and her family and an embarrassment to South Carolina's Judicial System.

Respectfully Submitted,

February 4, 2019

/s Dorothy Sistrunk

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Master-in-Equity Court Sales

803-533-6286

www.orangeburgcounty.org

Future Sale Dates:

Monday July 2, 2018 Monday, August 6, 2018 Tuesday, September 4, 2018

MONDAY, JUNE 4, 2018, at 2:00 PM in ROOM 304, COURTHOUSE

	CASE NAME	CASE #	ATTORNEY	DEFICIENY	JUDGMENT	ADDRESS & TMS#
1	Bayview/Young	17-913	Finkel 843-577-5460	W/ 3.625	$ 204,241	117 Copper Road, Orangeburg; 0110-00-02-018.000
2	Deutsche/Myers	17-1545	Scott & Corley 803-252-3340	W/ 3.75%	$89,862	424 Huson Circle (f/k/a 865 West Huson Circle, Orangeburg; 0153-13-05-002.000
3	Ditech/Storrs	18-50	Hutchens 803-726-2700	W/ 4.750%	$ 143,018	222 Youngs Road, Eutawville; 0345-17-00-032.000

4	Guild/Summers	18-171	Hutchens	W/ 4.50%	$ 125,257	1450 Sunset Street, Orangeburg; 0152-08-05-017.000
5	HSBC/Nettles	17-1244	Hutchens	W/ 9.90%	$ 66,963	158 Roland Road, North; 060-06-05-012.000
6	HSBC/Pelzer	17-1688	Hutchens	W/ 3.125%	$ 85,881	144 Jefferson Street, Orangeburg; 0111-00-05-001.000
7	MidFirst Bank/Johnson	2017-1235	Finkel Law Firm	W/ 3.875%	$ 96,996	1099 Hayden Road, North; 0062-00-07-038.000
8	Nationstar/Simmons	17-478	Riley Pope & Laney	W/ 4.50%	$ 225,808	184 Triplett Road, Cordova; 0154-00-02-142.000 (75 acres) 0154-00-02-143.000 (8 acres)
9	Ocwen/Furtick	16-918	Brock & Scott 803-454-3540	W/ 7.5%	$ 113,492	178 Hopewell Road, North; 0023-00-04-007.000
10	Reverse/Detyens	17-548	Grimsley	W/ 5.06 %	$ 314,403	370 Chapel Creek Drive, Santee 0307-15-02-011.000
11	Santee/Browning	17-698	Zickefoose	W/ 0%		Santee Vacation ownership Interest
12	Santee/Kiger	17-699	Zickefoose	W/ 0%		Santee Vacation ownership Interest
13	Santee/Lundberg	17-701	Zickefoose	W/ 0%		Santee Vacation ownership Interest

14	Santee/Pelsmaeker	17-700	Zickefoose	W/ 0%		Santee Vacation ownership Interest
15	SC State Housing Finance/Carter	17-1482	Grimsley	W/ 6.95%	$ 27,840	717 Spring Street, Orangeburg; 0173-10-04-002.000
16	USDA/Shuler	17-964	Tyler	W/ 4.625%	$173,850	100 Heligwood Road, Orangeburg; 0143-18-04-021.000
17	Vanderbilt/Johnson	17-732	Riley Pope & Laney	W/ 11.0%	$85,515	2287 Toney Bay Road, Holly Hill; 0356-00-01-027.001
18	Wells Fargo/Sistrunk	08-1024	Hearn	W/ 7.125%	$ 159,220	423 Bayne Street, Orangeburg; 0173-19-10-006.000
19	Wilmington/Wright	17-489	Riley Pope & Laney	W/ 10.40%	$ 49,595	3467 Belleville Road, Orangeburg; 0209-00-01.003.000
	Deficiency Sales: Thursday, July 5, 2018 at 2:00 pm in Room 305					
20	Anthium/Freeman	16-806	Hutchens	D/ 4.50%	$ 84,419	170 Rio Drive, Orangeburg; 0122-00-03-010.00
21	Deutsche/Colter	17-979	Koehler	D/ 3.750%	$ 16,102	1250 Woodbine Drive, Orangeburg; 0183-06-03-014.000
22	First Citizens/Pelzer	18-185	Scott & Corley	D/	$ 76,719	872 Adden Street, Orangeburg;

				5.0%		0152-16-16-007.000
23	First Citizens/Wolfe	17-1674	Crawford	D/ 3.50%	$ 65,790	Norway Road, Norway; 0049-08-01-001.000; 0049-08-01-002.000; 0049-08-01-003.000; 0049-08-01-004.000