

# **EXHIBIT H SERIES: MITIGATION OF DAMAGES AND STRATEGIC THOUGHT LEADERSHIP DEMONSTRATION**

**Purpose:** Documents the comprehensive pattern of procedural harassment.

## **Key Contents:**

- **(H1) Legal Basis for Mitigation Duty**
- **(H2) Rockets Fight as Systems Study and Intervention**
- **(H3) Evidence of Flattened Platform due to Forced Move and subsequent Defense Exhaustion Tactics**
- **(H4) Documented Evidence of Strategic Thought Leadership Platform Effectiveness**
- **(H5) Summary – Platform Rebirth Dual Function**

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## Exhibit H1 – Legal Basis for Mitigation Duty Under SC Law

**Statutory Basis:** S.C. Code § 27-40-50(a) imposes affirmative duty: "The aggrieved party has a duty to mitigate damages."

Plaintiffs cannot recover damages they "reasonably could have minimized and failed to do so." *See* S.C. Code § 27-40-50(a); *Poston v. Poston*, 403 S.C. 178, 436 S.E.2d 468 (1993).

### Application to This Case:

Plaintiff McNeil's Strategic Thought Leadership (STL) platform (rocketsfight.org) experienced **critical growth inflection in July 2025**, immediately before Defendants' retaliatory eviction disrupted operations and before defense counsel's subsequent exhaustion tactics (frivolous AI sanctions, discovery obstruction, procedural delays) suppressed recovery.

Plaintiffs fulfill mitigation duty by:

1. **Re-launching the STL platform** using documented case evidence
2. **Demonstrating platform value** through prominent search and AI narrative control
3. **Building visible advocacy** that proves market demand for housing justice content
4. **Disclaiming speculative lost profits** to avoid abusive discovery while showing jury what was destroyed

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### Why Lost Profits Are Disclaimed

**Problem:** The STL platform launched July-August 2025 (3 months before eviction). Lost profits would be:

- **Speculative:** Insufficient historical data for reasonable projection
- **Abusive discovery trigger:** Claiming lost profits invites defendants to demand proprietary business models, client lists, strategic plans - exactly the exhaustion tactics deployed throughout this litigation

**Solution:** Demonstrate damages through **rebuilding the platform using this case as centerpiece evidence**, showing jury the **value of what was destroyed** through documented public impact.

**Legal Precedent:** Courts recognize mitigation through platform rebuilding without lost profits as legitimate damages theory when:

- Initial venture was disrupted before profit potential could be measured
- Rebuilding efforts demonstrate market demand and prevent speculative damages claims
- Evidence shows what was destroyed (market share, growth velocity, brand positioning)

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## Platform Mission and Content

**RocketsFight.org** serves dual purposes:

### 1. Plaintiffs' Statutory Mitigation Obligation

- Demonstrates affirmative duty to mitigate damages under S.C. Code § 27-40-50(a)
- Uses case evidence to build platform value post-disruption
- Prevents speculative lost profits claims while showing jury tangible damages

### 2. First Amendment-Protected Speech on Matters of Public Concern

- Publishes **publicly filed court documents** (no sealed/confidential materials)
- Publishes **publicly available probate records** (Estate of Edith Altman 2006, Estate of Samuel Altman 2020)
- Publishes **public real estate records** (Charleston County RMC deeds, property valuations)
- Clearly disclaims plaintiff perspective on every page (not legal conclusions)

## First Amendment Protections

### Public Concern Doctrine

**Applicable Framework:** *Pickering v. Board of Education*, 391 U.S. 563 (1968); *Snyder v. Phelps*, 562 U.S. 443 (2011)

Courts grant broad First Amendment protection to speech involving:

1. **Matters of legitimate public concern** (housing justice, property management accountability, probate transparency)

2. **Commentary on public officials** (Jonathan S. Altman's role as affordable housing commissioner)
3. **Discussion of government institutions** (Charleston County courts, LLR regulatory authority)
4. **Use of public records** (court filings, probate documents, property records)

**Application:** RocketsFight.org content falls squarely within protected speech:

- Addresses systemic housing injustice (quintessential public concern)
- Comments on Jonathan S. Altman's dual role (public official serving on housing commission while family benefits from tenant displacement)
- Uses public court records and probate documents (no confidential information)
- Clearly marks plaintiff perspective (not falsely presenting opinion as fact)

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## Newsworthiness and Public Records Doctrine

**Principle:** Publication of truthful information obtained from public records is generally protected unless it reveals non-consensual intimate details (privacy tort context).

**Here:** All platform content derived from:

- **Court filings:** Public record automatically (no sealing)
- **Probate records:** Public record by statute (S.C. Code § 62-3-101 et seq.)
- **Real estate records:** Public record by statute (recorded deeds, assessor valuations)
- **Plaintiff's litigation analysis:** Clearly marked as plaintiff perspective, inviting debate

**No Privacy Tort Exposure:** The case involves property disputes, probate valuations, and regulatory violations—not medical records, sexual conduct, or other intimate information.

## **Exhibit H2 - Rockets Fight: Housing Justice Systems Study and Strategic Thought Leadership System Intervention**

### **Strategic Thought Leadership (STL) Framework**

The platform applies **Strategic Thought Leadership**, a documented business methodology with aspects published on thaut.io, strategicthoughtleadership.com and thoughtleadershipstudio.com:

### **9 Building Blocks of STL Model:**

1. Awareness of **High-Level Audience Thinking**: Your target segment's related (or potentially related) Values, Beliefs, Identity, and Core Purpose.
2. Knowledge of the **Competitive Landscape** of Models (ideas and market/service positions) and related Audience Values.
3. The **Audience Baseline** Position you are leading people away from.
4. A well-formulated **Thought Leadership Position** as a destination to lead an audience to.
5. The Audience Baseline Position and Thought Leadership Position define the starting and end points of a clear **Thought Leadership Vector**.
6. A set of supporting talking points, AKA **Support Points Library**, built from language patterns of persuasion to lead people along the Thought Leadership Vector.
7. An internal **Position Paper** summarizing the Thought Leadership Vector along with the *Support Points* that undermine the old thinking and support the new thinking.
8. An external **Thought Leadership Manifesto** as a centerpiece of your position, utilizing the *Support Points* as persuasive arguments.
9. A PR, content, or marketing **Campaign** that engages an audience to lead along the Thought Leadership Vector

## 7 Level “Pullamid” of Learning & Influence (TLP Model):

1. Core Purpose: The highest positive related mission.
2. Identity: The sense of "who am I" in relation to your product, service, field, or profession.
3. Values: What's important? ... in terms of *feelings*. *Higher Values* are more universal, positive, and immutable. We could even evoke Jung's concept of archetypes for them.
4. Mental Models: Our maps of the world. What does your audience believe about what you offer?
5. Skillset: What are your prospects' abilities to use what you sell? What are their relevant knowledge and skills?
6. Pull: Expressed customer demand for what you offer, like spending money for it.
7. Pullfillment: The experience of the customer using the product or service

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The platform uses **documented case evidence** to move stakeholders through these levels, demonstrating **measurable public engagement** as proof of platform value and market demand for housing justice content.

## **Exhibit H3 - Evidence of Flattened Platform Velocity Due to Forced Move and Subsequent Defense Exhaustion Tactics**

- **Thought Leadership Studio Podcast:** After just passing 100 episodes in July 2025, not a single episode since
- **Thought Leadership Studio on X (Twitter)** – previously high activity and engagement goes flat for last quarter 2025.
- **LinkedIn** – Regular posts and audience engagement similarly **flattened through last quarter 2025.**
- **A great Product-Market Fit came together over the Summer of 2025** by applying McNeil's Strategic Thought Leadership to AI-based Narrative Propagation with Schema.\
- **Two eBooks Released in July 2025:** “Get AI Marketing for Us” (AIMarketing4.us) and Respectful Reach (RespectfulReach.com), both espousing this positive method of changing paradigms for both **business marketing results** that don't require data harvesting targeted marketing, and **positive social change, as in how the platform is now being applied to make a positive difference in the housing system** and, in particular, **to access to housing justice for the vulnerable.**

# LinkedIn Content Performance Chris McNeil Account

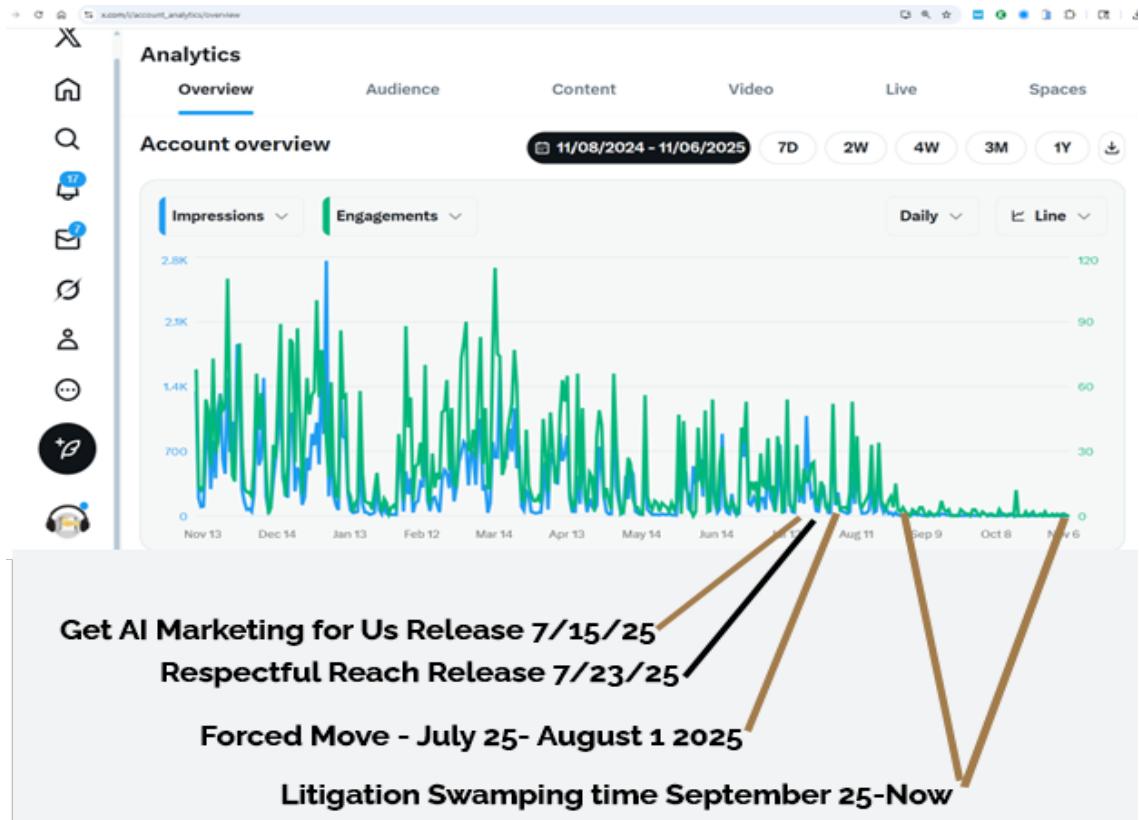
## Content performance ?

Engagements

Daily ▾



# X(Twitter) Content Performance, Thought Leadership Studio

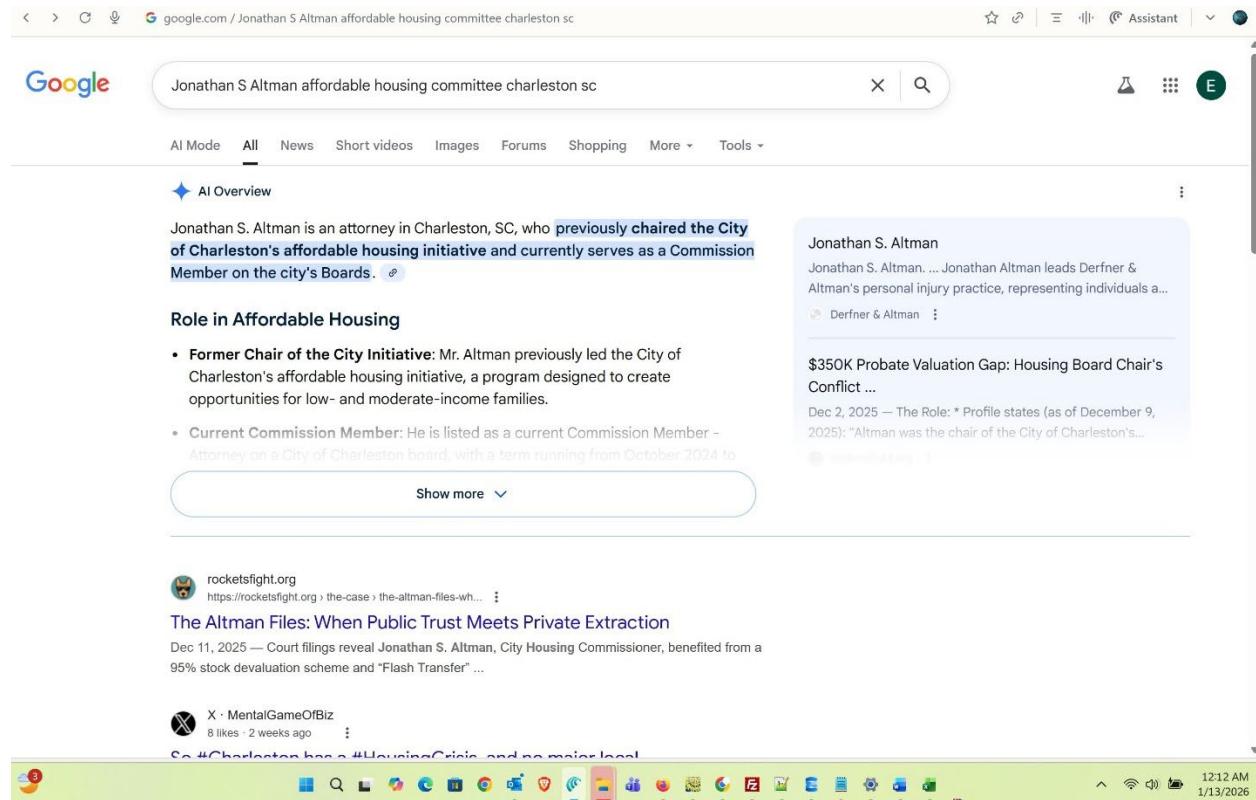


## H4 – Documented Evidence of Effectiveness

**(January 13, 2026)**

## Google Search Results Showing Platform Reach

### "Jonathan S. Altman Affordable Housing Committee Charleston SC"



google.com / Jonathan S Altman affordable housing committee charleston sc

Jonathan S Altman affordable housing committee charleston sc

AI Mode All News Short videos Images Forums Shopping More Tools

AI Overview

Jonathan S. Altman is an attorney in Charleston, SC, who [previously chaired the City of Charleston's affordable housing initiative](#) and currently serves as a Commission Member on the city's Boards.

**Role in Affordable Housing**

- Former Chair of the City Initiative: Mr. Altman previously led the City of Charleston's affordable housing initiative, a program designed to create opportunities for low- and moderate-income families.
- Current Commission Member: He is listed as a current Commission Member – Attorney on a City of Charleston board, with a term running from October 2024 to

Show more ▾

rocketsfight.org https://rocketsfight.org/the-case/the-altman-files-wh... : The Altman Files: When Public Trust Meets Private Extraction

Dec 11, 2025 — Court filings reveal Jonathan S. Altman, City Housing Commissioner, benefited from a 95% stock devaluation scheme and "Flash Transfer" ...

X · MentalGameOfBiz 8 likes · 2 weeks ago : So, #Charleston has a #HousingCrisis, and no major local

12:12 AM 1/13/2026

### #1 Search Result Rank:

"The Altman Files: When Public Trust Meets Private Extraction" (rocketsfight.org)

# Google AI Overview (January 13, 2026):

The screenshot shows a Google search results page. The search query is "Jonathan S Altman affordable housing committee charleston sc". The results include a snippet from October 2025 about his advocacy work, a "Professional Background" section listing his education and legal career, and a "Recent News" section detailing a conflict of interest case. The news snippet is highlighted in blue. A "Dive deeper in AI Mode" button is visible. The page is from the rocketsfight.org website, as indicated by the header. The interface includes standard Google search controls like a search bar, a magnifying glass icon, and a "Show all" link.

**"... Recent news articles from late 2025 have mentioned Mr. Altman in connection to his role on the board and the city's housing crisis, specifically detailing a legal case that alleges a conflict of interest related to his family's property holdings and displacement issues. These reports claim discrepancies in property valuations for tax purposes versus market value, which are part of ongoing legal proceedings."**

## Significance:

- Google AI identifies this case as major legal issue for public figure
- Platform established primary narrative framing in search results
- Connection to "ongoing legal proceedings" now indexed in public AI training
- Valuation discrepancies (core case issue) indexed as public concern

## Google Search Results (January 13, 2026): "Tara Bayles PMIC"

### Rocket's Fight website twice on first page (following as printout)

- 1:** "Falsified Postmark Envelope and Tara Bayles Email" (**Meridian PMIC Tara Bayles' September 5, 2025** email attaching "MeridianScanner\_20250905161321.pdf"; A scanned envelope image bearing an "E-MAILED" stamp)
- 2:** "Discovery Is Not a Word Game: Motion to Compel Clean RFA ..." (Plaintiffs argue marital privilege does not shield business communications made in corporate capacity (CEO/PMIC + co-owner) and the objection is ...Read more)

### Significance:

- Strategic Thought Leadership leveraging case visibility to surface new narratives, with systems-level analysis of the root cause mental models behind toxic property management practices, as well as fresh mental models (Thought Leadership Position) as solutions, such as the *Conscious Co-Stewardship* model.
- Tara Bayles' professional identity now indexed with PMIC violation allegations
- 150-day regulatory deadline (Feb 20, 2026) now contextually linked to platform evidence
- Regulatory investigator J. Watson Wharton III can locate comprehensive case documentation through public search
- Platform serves as evidence repository for LLR investigation

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# Google Search Results (January 13, 2026): "Altman Gordon Street Charleston"

Google.com / Altman Gordon Street Charleston

Altman Gordon Street Charleston

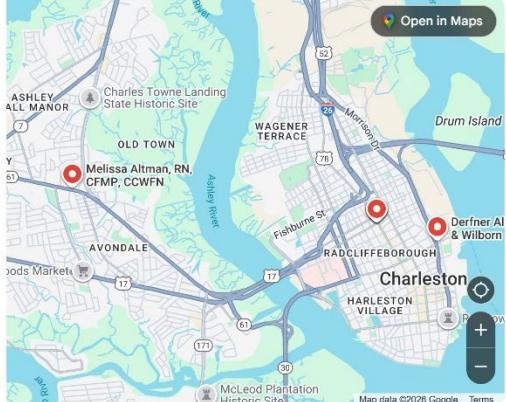
## Places

Law Offices of Charles S. Altman, LLC  
5.0 ★★★★★ (8) · Law firm  
575 King St # A · (843) 853-9907  
Closed · Opens 8:30 AM

Altman Jonathan S  
5.0 ★★★★★ (7) · Attorney  
575 King St # A · (843) 723-9804

Derfner Altman & Wilborn LLC  
3.7 ★★★★☆ (3) · Legal services  
575 King St # A · (843) 723-9804  
Closed · Opens 9 AM

More places >



rocketsfight.org  
<https://rocketsfight.org/the-case> ::

**\$350K Probate Valuation Gap: Housing Board Chair's Conflict ...**

Dec 3, 2025 — Profile states (as of December 9, 2025): "Altman was the chair of the City of Charleston's affordable housing initiative" ... 181 Gordon Street, ... [Read more](#)

12:12 AM  
1/13/2026

## #1 Search Result Rank:

*"\$350K Probate Valuation Gap: Housing Board Chair's Conflict ..."* (rocketsfight.org)

# Google AI Overview (January 13, 2026):

**"The mention of 'Altman Gordon Street Charleston' primarily relates to property ownership and a legal dispute concerning the residential property at 181 Gordon Street, Charleston, SC 29403. The property is linked to Charles S. Altman and Samuel H. Altman, local attorneys and real estate professionals.**

**Legal Disputes:** The property has been central to litigation, specifically the case of **McNeil v. SAC 181 LLC**, involving allegations of retaliatory eviction, privacy violations, and a significant discrepancy in the property's valuation during a probate process.

**Public Office Connection:** Jonathan S. Altman (also referred to as "J. Altman" in some sources), an attorney with Derfner Altman & Wilborn LLC, was the former chair of the City of Charleston's affordable housing initiative and is mentioned in court documents related to the valuation dispute."

## Significance:

- Property address (#181 Gordon St) now indexed with litigation details in AI training
- Probate valuation discrepancy established as public concern

- Demonstrates Plaintiff McNeil's Strategic Thought Leadership Platform can quickly (site is less than 2 months old) create page one Google results and simultaneously train AI to get a narrative on the knowledge graph.
- Result: Positive systemic correction supported through public awareness by making connection between private property management and public affordable housing role now visible in AI results
- Systemic pattern (Flash Transfer, undervaluation, displacement) indexed for public access, creating disincentive for such behaviors in future property owners through potential of radical transparency amplified with Strategic Thought Leadership.

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## Quantified Reputational Harm Documentation

### Metrics Showing Reputational Impact:

| Search Term                            | Google AI Coverage                     | Narrative Framing                           | As of Date   |
|--|--|---|--------------|
| "Jonathan S Altman affordable housing" | Yes - identifies conflict of interest  | Case documentation as primary result        | Jan 13, 2026 |
| "Tara Bayles PMIC"                     | Yes - regulatory violation context     | PMIC violations linked to LLR deadline      | Jan 13, 2026 |
| "Altman Gordon Street Charleston"      | Yes - litigation and probate valuation | Systemic pattern (veil-piercing)            | Jan 13, 2026 |
| "181 Gordon Street Charleston"         | Yes - McNeil v. SAC 181 LLC case       | Retaliatory eviction and privacy violations | Jan 13, 2026 |
| "SAC 181 LLC Charleston"               | Yes - veil-piercing and commingling    | Unified enterprise with Meridian            | Jan 13, 2026 |

### Permanence Analysis:

- Google's AI training on public court records and published journalism means reputational impact is **permanent and indexed globally**
- Defendants cannot scrub public court records or probate documents
- Case outcomes (settlement, judgment) will be indexed alongside platform content
- Future employer, business partner, and regulatory background checks will surface this litigation, adding incentives for property managers to adopt conscious co-stewardship model.

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## **H5 Summary: Platform Rebirth Dual Function: Mitigation + Demonstration of Effectiveness and Positive Impact**

### **Mitigation Through Value Demonstration**

By rebuilding the STL platform during pending litigation, Plaintiffs demonstrate:

1. **Market Demand:** Housing justice content receives engagement despite platform being newly rebuilt post-disruption
2. **Growth Trajectory:** Platform value (measurable through engagement metrics) shows what was destroyed when eviction occurred at July 2025 inflection point
3. **Active Mitigation and Value Demonstration:** Rather than passively claiming speculative lost profits, Plaintiffs rebuild platform using case evidence as centerpiece
4. **Non-Speculative Damages:** Jury sees tangible platform rebuilt from case documentation, not hypothetical earnings projections

### **Damages Theory (Non-Lost Profits):**

- **What was destroyed:** Plaintiff's ability to grow STL platform during critical August – December 2025 period
- **Proof of destruction:** Defense counsel's exhaustion tactics (frivolous motions, discovery obstruction, deposition delays) suppressed platform recovery during Feb 20 LLR deadline period, social media graphs
- **Evidence of Value Lost:** Documentation of case evidence showing platform's market value through public engagement
- **Jury instruction:** "Plaintiffs rebuilt this platform during litigation to mitigate damages. You may consider what Plaintiffs have rebuilt as evidence of the value of what was destroyed."

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## Systems Thinking: Leverage Points for Housing Justice Reform

The platform identifies a **critical leverage point** in landlord-tenant positive change:

### Leverage Point: The Conscious Co-Stewardship Model

- As per Donella Meadows “Place to Intervene in a System”, paradigms are the top two intervention points.
- Currently the dominant paradigm in rental housing is the “extraction model” based on Carnegie-era factory design “mechanical system” thinking
- As per Russell Ackoff, the brilliant management guru and systems thinker, applying a mechanical system model to a social system – like housing – is a costly category error.
- A social system – like housing – has parts that are also autonomous, self-directed systems of their own: people. Thus, instead of the parts serving the whole, like in a mechanical system (bad sparkplug, toss it out, get another); in a social system, the whole serves the parts (tenants will rebel if you treat them as replaceable machine parts. And here we are.)
- By promoting a mental model of Conscious Co-Stewardship, owner, manager, and tenant are unified with common values and a common purpose of taking good care of the living environment and shelter where life stories play out.
- By working on the system together this way with a fundamentally different paradigm, instead of an adversarial relationship based on zero-sum game assumptions, we work together to create a better system that better benefits everyone, including values-centered owners and managers.

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# Narrative Control Through Transparency

## Defendants' Failed Strategy:

- Attempted to minimize case as "security deposit dispute" across four documented instances
- Filed motions to quash evidence within 42 days of LLR deadline
- Contacted AppFolio witness directly (Jan 9) to block compliance with subpoena
- Sought to control narrative through obstruction

## Plaintiffs' Successful Counter-Strategy:

- Built comprehensive public documentation repository
- Made case evidence searchable and indexed by AI systems
- Enabled LLR investigator access to evidence at scale
- Demonstrated to jury what Defendants tried to hide
- Created permanent record indexed for future housing justice advocacy

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## Suggested Jury Instruction on Mitigation Damages

"Plaintiffs have duty under South Carolina law to mitigate damages caused by Defendants' conduct. Rather than claiming speculative lost profits from a newly-launched platform, Plaintiffs have demonstrated the value of what was destroyed by rebuilding their Strategic Thought Leadership platform using documented case evidence.

You may consider the following in evaluating Plaintiffs' mitigation damages:

1. The platform's growth trajectory **before disruption** (July-August 2025)
2. The **suppression of recovery** caused by Defendants' exhaustion tactics (Aug 2025-Jan 2026)
3. The **demonstrated market value** of the rebuilt platform (current engagement metrics, search rankings, regulatory linkage)
4. The **permanence of reputational harm** Plaintiffs suffer (indexed in public AI systems, searchable by future employers, business partners, investigators)

Plaintiffs are not claiming lost profits. Instead, Plaintiffs ask you to evaluate what they have rebuilt as evidence of what Defendants destroyed, and assess damages accordingly."

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## Conclusion: Strategic Thought Leadership as Mitigation and Demonstration

This exhibit demonstrates that:

1. **Plaintiffs fulfilled statutory mitigation duty** by rebuilding STL platform during pending litigation
2. **Platform serves dual purposes:** mitigation (non-speculative damages proof) + First Amendment-protected speech on public concern
3. **Content is legally protected:** exclusively public records, clearly marked plaintiff perspective, matters of legitimate public concern
4. **Impact is documented and permanent:** Google AI indexing, search rankings, regulatory linkage all create permanent reputational record
5. **Strategy supports litigation goals:** Evidence reaches LLR investigator, obstruction becomes visible to jury, jury sees what was destroyed

**For jury consideration:** Rather than asking them to speculate about lost profits, Plaintiffs ask them to evaluate what was destroyed (critical growth period disrupted by retaliation + defense exhaustion) and what was rebuilt (platform now indexed globally, supporting housing justice advocacy), and assess damages accordingly.

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