

P<1 2818-12

Received: 6/28/13

*He already  
has 3 filings*

## Memorandum

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To: APPELLANT  
From: Clerk's Office, Administrative Law Court  
Re: Filing Fee

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The number of administrative appeals an inmate may file in a calendar year before they are required to file a filing fee has been changed pursuant to Proviso 55.3 of the FY 07-08 Appropriations Act. The Proviso reads in part:

"No filing fee shall be required in administrative appeals by inmates from final decisions of the Department of Corrections or the Department of Probation, Pardon and Parole. **However, if an inmate files three administrative appeals during a calendar year, then each subsequent filing during that year must be accompanied by a twenty-five dollar filing fee.**" (Emphasis added)

The Proviso became effective July 1, 2007. However, the Administrative Law Court will not implement the Proviso until January 1, 2008. After that time, the ALC will return any fourth and subsequent filing by an individual that is not accompanied by the \$25 filing fee.

**PLEASE NOTE: THERE ARE NO PROVISIONS MADE IN THE PROVISO FOR INDIGENT INMATES OR IN FORMA PAUPERIS PETITIONS.**

STATE OF SOUTH CAROLINA  
ADMINISTRATIVE LAW COURT

T. Terrell Bryan

Appellant,

vs.

South Carolina Department of Corrections,

Respondent.

NOTICE OF APPEAL

DOCKET NO.     -ALJ-04-    -      
GRIEVANCE NO.: PCI 288-12

Notice is hereby given that T. Terrell Bryan does hereby appeal the final decision of the South Carolina Department of Corrections dated N/A and received on 6/12/13, a copy of which is attached. A general statement of the grounds for appeal is (See S.C. Code Ann. § 1-23-380(A)(6)):

Respondent twisted my allegations saying I am grieving the incident report. An E/M can not grieve the incident report or charge until a finding of guilt or innocence made.

T. Terrell Bryan  
Appellant's Name  
#254638, SPN-B19, MCC I  
386 Redemption Way  
Mailing Address

Without prejudice,  
PCA B, all rights reserved,  
Signed

6/19/13  
Dated

McCormick, SC 29899  
City, State, Zip Code

CERTIFICATE OF SERVICE

I hereby certify that I, T. Bryan (your name), on the 19 day of 6, 2013, in McCormick (city), South Carolina, served a copy of the foregoing Notice of Appeal on all parties to this matter by depositing the same in the United States Mail, postage paid, or in the mail room of the undersigned's institution and addressed as follows:

Name of person/Agency served: General Counsel  
Address: 4444 Broad River Rd.

City, State, Zip Code: Columbia, SC 29210

T. Terrell Bryan  
Print your name:

Without prejudice,  
PCA B, all rights reserved,  
Sign your name:

(See reverse side for instructions)

Instructions for filing an appeal of the final agency decision from the South Carolina Department of Corrections:

- 1) You must complete the **Notice of Appeal** on the reverse side of these instructions and mail it to the Administrative Law Court at the following address:

**Clerk's Office  
South Carolina Administrative Law Court  
1205 Pendleton Street, Suite 224  
Columbia, SC 29201**

A copy of the Notice of Appeal must also be forwarded to the Office of General Counsel at the Department of Corrections.

- 2) **In order for your case to be processed by the ALC, a copy of the final decision from the Department of Corrections must be attached to the Notice of Appeal.**

SOUTH CAROLINA DEPARTMENT OF CORRECTIONS  
INMATE GRIEVANCE FORM  
STEP 1

INMATE NAME: T. Terrell Bryan  
 SCDC NUMBER: 254638 SEP 26 2012  
 INSTITUTION: MCC I  
 HOUSING UNIT: SMU-719  
 WORK ASSIGNMENT: N/A OCT 08 2012

K  
PCI 2818-12

Office Use Only  
 Grievance No. MCC I 2884-12  
 Code: General EP/IS  
 Policy LIC  
 Disc. Hear. \_\_\_\_\_  
 Class. \_\_\_\_\_  
 Date Received 09-27-12  
 IGC Initials PT  
~~OCT 10 2012~~  
FEB 22 2013

STATE GRIEVANCE (include documentation, and date of incident; if SCDC Policy, indicate which policy)  
 MCC I classification informed me on 9/12/12 that case no. 122, 81Y - creating a disturbance was dismissed. See EXHIBIT #1 (all referenced EXHIBITS attached). The charging employee is Lt. J. Church. See EXHIBIT #1 - the incident report of Church. Church alleges in EXHIBIT #1 that I called him a sorry mother fucker, yelling saying he out shit, that he lost now he trying to get me. That I yelled that he sexually assaulted me & that he is a fucking crackler who's scared of the yard. Church lies & says he "... never talks to [me]..." earlier in the report he said, when he got to my cell, he said "what!" He then said he looked at my chart to see it was inmate Terrell Bryan. He could not have seen Terrell Bryan on my chart because on my chart is Terence Bryan. Also per EXHIBIT #2, on my Notice of Placement in PTO form is Terence Bryan. Terrell is my middle name. Church says "I don't know where his unjustified attitude comes from but his comments & allegations have been going for awhile now." Earlier in the report he says that I am "talking about a recent court case that some won & now Elm Bryan is trying to cause a disturbance." Also, Church can not produce any papers. See attached Page C!

ACTION REQUESTED: Compensatory damages of \$12,000.00 & \$20,000 punitive - to deter other officers from sexually harassing &/or retaliating against an E/M. Church disciplined.

SPECIFY HOW AND WHEN INFORMAL RESOLUTION WAS ATTEMPTED BY GRIEVANT:  
see EXHIBIT #3, I complained to Church's supervisors.

R M J 9/25/12  
 Grievant Signature Date

ACTION TAKEN BY IGC:  
Incident occurred at PCI. Fed to PCI for processing 10-02-12 PT.

It appears that you are grieving the incident report written by Lt. Church dated 08/12/12. Therefore this grievance is being returned unprocessed/closed due to exceeding all time frames for filing a grievance.

C. [Signature] 10-02-12  
 IGC Signature Date

MA  
 Grievant Signature Date

- I accept the action taken by the IGC and do not wish to appeal.
- I do not accept the action taken and wish to appeal.

# PAGE 'C'

where I allegedly disrespected him in the past. The recent Court case stems from when Lasley & ofc. Church assaulted & battered Iln Myron Kelley #300218. See EXHIBIT#6, Page 2:6 Mr. Kelley's lawyer contacted me by phone then letter, informing me that the case against Church was going to trial, & wanting me to testify against Church. See EXHIBIT#8. Per EXHIBIT#10 I wrote Mr. Kelley's lawyer back with an Affidavit. The sexual assault incident stems from Church staring at me as I was using the restroom. See EXHIBIT#4. Per EXHIBIT#5, I gave deposition testimony against Lt. Church. Church intimidated me during shower time. I have complained about Church & Church has retaliated against me several times. See EXHIBIT#3 - 8/12/12 Request to Capt. or Alwarden Clayton, EXHIBIT#7 - 8/12/12 Request to Sgt. McClendon, EXHIBIT#9 - 8/15/12 Ms. Grey/Head Counselor, EXHIBIT#11 - 7/24/12 letter to ALC & Step 1 Grievance, & EXHIBIT#12 - 8/21/12 Request to Capt. Abston.

Church charging me was clearly retaliation. SDC knows as well as Church & Sgt. Robertson knows that at the hearing their retaliation would soon be exposed. See EXHIBIT#13 - OHO questions for Lt. Church, & EXHIBIT#14 - OHO questions for Sgt. Robertson. Plus they knew I had several witnesses. See EXHIBIT#15

# REQUEST

Class Action  
T. Terrell Bryan  
MCC

9112112  
234635  
SMU-B19

What is the status of my last three charges, case # 121, 122,  
& 123?

Has my DD time been reinstated? If yes, why?

cc: on file

EXHIBIT  
#A

All (3) charges were dismissed  
you have DD time till 8/10/34.

9112112

J. Jimenez

#100

Institution/Center: PCI				
Date of Report: 8-12-12			Time of Report: 900am	
Reporting Official: Church, J			Date of Incident: 8-12-12	
Location of Incident: smu-1			Time of Incident: APPROX 810am	
Inmate(s)/Resident:	SCDC#	Age	Race	Sex
1. Terrell bryan	254638		B/m	
2.				
3. <del>513</del> Cy 20				
4. 313				
5.				

On the above date and approximate time: Approx 8:10 while conducting an ISC of y-wing in smu-1 I heard an inmate yelling for a C.O. when I got to C-y-19 I said what. Then I heard "who's that church you sorry mother fucker". I went & rpt. not you. I then looked at the chart to see it was inmate terrell bryan #254638 who was still yelling racial remarks. I told him there no rpt he could talk to me and he started yelling saying you aint shit, you lost now your trying to get me. I assume he's talking about a recent court case that SCDC won and now I/m bryan is trying to cause a disturbance on the wing yelling to other inmates that I sexually assaulted him and that I'm a fucking cracker who's scared of the yard. I/m always writes requests to work with bogus stories wanting a transfer, I never talk to I/m bryan when you get close to his cell he only yells racial remarks. I don't know where his unjustified attitude comes from but his comments and allegations have been on going for awhile now.

Signature: *J. Church*

EXHIBIT #1

Evidence: 1 request with allegations on it.

Witness(es): Sgt Robertson B-1

Supervisor's Comments: 214 - creating a disturbance  
836 - disrespect

Signature: *Randall* Title: *Capt* Date/Time: *8-12-12* *Approx 6:00pm*

Major / Responsible Authority: *INMATE BRYAN HAS*  
*PER CHARGE W 814*

Signature: *[Signature]* Title: *MAJ* Date: *8/13/12*

STG Related - Refer to STG Committee  
 Yes  No  Unknown

This Incident is DRUG related  
 Yes  No  Unknown

**Action Taken**

Informal Resolution  
 Administrative Resolution  
 Refer to Disciplinary Hearing

NOTICE OF PLACEMENT IN PHD

Inmate Name: BRYAN, TERENCE SCDC#: 254638 Custody: ST

Reason for Placement in PHD:  Current Escape Risk  Maintain the Integrity of an Investigation  
 Protective Concerns  Inmate is a threat to the physical safety of other inmates or staff  
 Inmate's presence in the population would create a threat to the safety, security, and/or order of the institution

SI [Signature]  
Warden, Associate Warden, Major, Captain,

Date 08/13/12 Time: 2:11 AM/PM

I certify that I was given a copy of this notice within 72 hours of my placement in PHD. I also certify that this notice is clear and readable and that I will appear before the Institutional Classification Committee within seven (7) calendar days of my placement in PHD.

Inmate/Witness Signature: [Signature]

Date 8/13/12 Time: 2:50 AM/PM

Serving Officer/  
Witness Signature: Sgt. J. Roberts

Date 8/13/12 Time: 2:50 AM/PM

SCDC 19-67 (Rev., August 1999) White: Institutional Record  
Canary: Central Record  
Pink: Inmate

EXHIBIT #2

NOTICE OF PLACEMENT IN PHD

Inmate Name: BRYANT, Terrence SCDC#: 254638 Custody: ST

Reason for Placement in PHD:  Current Escape Risk  Maintain the Integrity of an Investigation  
 Protective Concerns  Inmate is a threat to the physical safety of other inmates or staff  
 Inmate's presence in the population would create a threat to the safety, security, and/or order of the institution

SI [Signature]  
Warden, Associate Warden, Major, Captain,

Date 08/10/12 Time: 11:00 AM/PM

I certify that I was given a copy of this notice within 72 hours of my placement in PHD. I also certify that this notice is clear and readable and that I will appear before the Institutional Classification Committee within seven (7) calendar days of my placement in PHD.

Inmate/Witness Signature: [Signature]

Date 8/10/12 Time: 12:00 AM/PM

Serving Officer/  
Witness Signature: [Signature]

Date 8/10/12 Time: 12:00 AM/PM

SCDC 19-67 (Rev., August 1999) White: Institutional Record  
Canary: Central Record  
Pink: Inmate

**SOUTH CAROLINA DEPARTMENT OF CORRECTIONS  
REQUEST TO STAFF MEMBER**

<b>TO: NAME:</b> Capt. or A/Warden Clayton	<b>TITLE:</b>	<b>DATE:</b> 8/12/12, 8/29/12 A/Warden Maloney
<b>INMATE'S NAME:</b> T. Terrell Bryan	<b>SCDC #:</b> 254638	
<b>INSTITUTION:</b> PCI	<b>LIVING QUARTERS:</b> CY19	

On 7/30/12 I testified against Lt. Church & Lt. Lasley in Federal Court, now Lt. Lasley is giving me threatening looks & gestures pointing me out to other officers on 8/07/12 & 8/08/12. Lt. Church sexually assaulted me, the Investigator spoke to me about it.

Per policy I request to be transferred &/or to be separated from them.

EXHIBIT  
#3

**DISPOSITION BY STAFF MEMBER:**

**DATE:**

**SIGNATURE:**

# REQUEST

Capt Early or Capt. Abate  
T. Terrell Bryan  
P & I

8/22/12  
254638  
CXY

I was using the bathroom & Lt Church came to my door looking in I told him I <sup>am</sup> using the bathroom he stayed there trying to ~~listen for~~ look at my penis. I previously wrote church up for sexual misconduct I told church to get away from my door. He told me to shut up "You ain't going to do nothing." I told him "You mad cause I wrote you up for sexual misconduct" Church came back by the door saying "You been on p.c. for ten years, I'm coming to get you for shower, do something you so bad." Sgt. Nalley was present

later I ask Sgt Nalley to see a Capt. he told me "shut up your causing a disruption." He came to my door giving me a ~~menacing~~ <sup>menacing</sup> look, he just stared me in my eyes to intimidate me. Nalley took my shower

I request a separation from Church & Nalley.

cc: on file

Have evidence - Lt Church

EXHIBIT  
#4

STATE OF SOUTH CAROLINA  
COUNTY OF GREENVILLE

AFFIDAVIT OF  
T. Terrell Bryan

I, T. Terrell Bryan, being duly sworn, hereby affirm under penalty of perjury, 28 U.S.C. §1745 & 18 U.S.C. §1521, that the following is true & correct:

1. I am over the age of 18 & of sound mind. I am currently incarcerated at the below stated address.

2. A couple weeks ago, I gave testimony against Lt. Church & Lt. Loxley per deposition by Seno's lawyer in a lawsuit brought by Mr. Myron Kenney. I was on the yard at the time. Now I am on lock-up per an illegal investigation. **THIS IS RETALIATION.** I am in fear of

my life, today 7/29/12 Church took me ~~to~~ to & from the shower, at the shower he stared at me & shook his head. When shift change, on night shift I will be at Loxley's mercy **I FEAR FOR MY LIFE.**

7/29/12  
dated

Without Prejudice,  
1. ~~\_\_\_\_\_~~ all rights reserved  
T. Terrell Bryan  
#251434, CYP, PC I  
430 Oaklawn Rd.  
Peteer, SC 29669

sworn to before me this

\_\_\_\_\_ day of \_\_\_\_\_, 2012

\_\_\_\_\_ (L.S.)

My Commission Expires: \_\_\_\_\_, 2016

EXHIBIT  
#5

Don Frierson, Att.  
2611 Forest Drive, Suite 200  
P.O. Box 4490  
Columbia, SC 29240-4490

RECEIVED

APR 22 2009 /SAL/1017

INTAKE & REFERRAL UNIT

Re: Sgt. Thomas Lasley

EXHIBIT  
#6

Dear Ms. Frierson,

This letter is in regards to a Sgt. Thomas Lasley continuous assault and batteries on black ilms. Lasley is a w/m officer at Perry Corr. Inst., which is a known racist prison. Michael McCall is the Warden of the prison, James H. Shugart is the Investigator of the prison, and Miriam Collicione is the I/m Grievance Coordinator at the prison. McCall, Shugart, Collicione and etc. have all been informed of these racist assault and batteries by Lasley and they ignored them, by not doing an investigation.

On 11/24/08 Lt. Daniel Harouff and Sgt. Thomas Lasley knowingly violated SCOC's policy/procedures by taking B/m ilm Eugene Spry #306904 out of the shower without restraints. This was to provoke Spry, Spry did not react even though ilms at their cell door was looking at him funny.

When Spry got towards OylB and 20, Lasley says "o' shit" and pushed Spry into OylA door, ilm David D. Swinger #294385 was standing at the door cursing and helplessly watching. Lasley struck Spry two times in the face, Harouff rushed in and super slam Spry on his chest. Several officers came and beat Spry some more. I seen them take Lasley off the wing with force while Lasley was yelling "you

better let me go, you better let me go." Lasley wanted to attack spray some more.

A careful investigation will reveal Lasley is very manipulative, he incites incidents by using lower rank officers. on 4/07/09 ofc. Brandon Philson acting under Lasley, lied on film B/M Marcus Corley #252484, saying Corley threw a tray at him. Lasley, Harouff, Philson and others spray about 1,000 grams of mace into Corley's cell, then took all his property, throwing some unlawfully away, then lied in the incident report about the amount of mace used. The lie can be revealed by watching the video tape of when they maced Corley.

on 1/30/09 Lasley and ofc. Church dragged B/M ilm Myron Kelley #300218 by the chains to his cell. while in front of Kelley's cell (049) Lasley punched Kelley in the while Church held the chains. Kelley was dragged in the cell, they put the chains thru the bar door, Lasley had his foot on the bar door trying to break Kelley's wrist, from what I seen. Nurse Watson examined Kelley's wrist and saw that it was swollen.

On 2/12/09 Lasley, Philson and Church placed restraints on B/M ilm Carlos Simmons. Lasley opened the cell bar door, they came in Simmons room. Philson had lead chain pulling it through the bar door (same as with Kelley) Lasley pushed the bar door into Simmons shoulder while Philson was pulling on the lead chain. I seen the whole thing, Simmons has to wear a sling for his arm. Lasley after the incident took a couple packs of salt out Simmons cell.

on 4/08/09 myself and Harouff and then Lasley got in a verbal dispute about the 1000 grams of mace use on Corley, past racist

incidents. They call me a "jailhouse lawyer" and cursed me calling me all types of names, promising to get me. On 4/10/69 Lasley had my cell search. During the search Lasley told me to face the right and lean up against the wall flat, I told Lasley I can not because of my back. Lasley was trying to read my legal work and did not want me to see. Lasley shoved me in to the bar door and pushed me into the wall while another officer held the chains (ofc. Paey). Lasley then asked me what my paralegal book was. I told Lasley I couldnt see, Lasley got my glasses and smiling put them on me. You most likely can get information from Blm ofc. Paey.

All five of us ilms were black. Please assist us. If and when you write back write to all of us.

4/30/69, sc  
dated

Respectfully,

x. 77-78  
T. Terrell Bryan  
#254038, D46, PCI  
430 Oaklawn Rd.  
Pelzer, SC 29669

Carlos Simmons  
#211859, D43, PCI  
430 Oaklawn Rd.  
Pelzer, SC 29669

Myron Kelley  
#300218, D47, PCI  
430 Oaklawn Rd.  
Pelzer, SC 29669

Eugene Spry  
#306964, D42, PCI  
430 Oaklawn Rd.  
Pelzer, SC 29669

Marqus Corley  
#252484, D414, PCI  
430 Oaklawn Rd  
Pelzer, SC 29669

To: Chief Administrative

RE: SGT. Thomas Lasley, Perry Corr. Inst.

Dear Judge,

1) This letter is in regards to SGT. Thomas Lasley continuous assault and batteries of Black P/m's. Lasley is a w/m officer at Perry Corr. Inst. which is a known racist prison. All together there is five i/m's, all five of us are moving thru you to compel SCDC to investigate and we are moving to press Criminal Charges against SGT. Lasley.

2) Michael McCall is the warden of the prison, James H. Shueart is the Investigator, Miriam Coe-Slowe is the I/m Grievance Coordinator. McCall, Shueart, Coe-Slowe and etc. have been all informed of these racist assault and batteries by Lasley and they ignored them. by not doing an investigation.

3) On 11/26/08 Lt. Daniel Harouff and SGT. Lasley knowingly violated SCDC's Policy/Procedures by taking TSM i/m Eugene Spry #306964 out of the shower without restraints. This was to provoke Spry. Spry did not react even though i/m's at their cell door was looking at him funny. When Spry got toward D19 and 20. Lasley said "O'shit" and rushed Spry into D19 door. i/m David D. Switzer was standing at the door cursing and helplessly watching. Lasley struck Spry two times in the face. Harouff rushed in and super slam Spry on his chest. Several officers came and beat Spry some more. I seen them take Lasley off the wing with force while Lasley was yelling. You better let me go. You better let me go. Lasley wanted to attack Spry some more.

4) A careful investigation will reveal Lasley is very manipulation, he incites accidents by using lower rank officer. On 4/07/09 Ofc. Brandon Hilson acting under Lasley, lied on i/m TSM Marcus Conley # ~~252484~~ 252484, saying Conley threw a tray at him. Lasley, Harouff, Philson and others pray ~~about~~ about 1,000 grams of mace into Conley's cell. They took all his property, throwing some unlawfully away. They lied in the incident report about the amount of mace used. The lie can be revealed by watching the video tape of when they maced Conley.

2.) ON 1/30/09 Hasley and Ofc. Church dragged B/m I/m Myron Kelley # 300218  
of The Chains to his cell. while in front of Kelley's cell (097) Hasley punched  
Kelley in the face while Church held the chains. Kelley was dragged in the  
cell, they put the chains thru the bar door, Hasley had his foot on the ~~bar~~<sup>bar</sup>  
door trying to break Kelley's wrist, from what I seen. Nurse was soon  
examined Kelley's wrist and saw that ~~it~~ it was swollen.

a.) On 2/12/09 Hasley, Philson and Church placed restraints on B/m I/m Carlos  
Simmons. Hasley opened the cell bar door, they came in Simmons room  
Philson had the head chain pulling it through the bar door (same as  
with Kelley) Hasley pushed the bar door into ~~Simmons~~ Simmons shoulder  
while Philson was pulling on the head chain. I seen the whole.  
Simmons has to wear a sling for his shoulder, Hasley after the  
incident took a couple packs of salt out of Simmons cell.

7.) On 4/08/09 myself and Harrell, then Hasley got in a verbal dispute  
about the 1,000 grams of mace used on Conley, past racist incidents.  
They call me a "Jailhouse Lawyer" cursed me calling me all types of  
names, promising to get me. On 4/09/09 Hasley had my cell search,  
during the search Hasley told me to face the right and head up against  
the wall flat. I told Hasley I can not because of my back Hasley was  
trying to read my mental work and did not want me to see. Hasley  
shoved me into the bar door and pushed me into the wall another  
officer had the chains (Ofc. Paey) Hasley then asked me what  
my para neural boat was. I told Hasley, I couldn't see Hasley eat  
my glasses while smiling and put them on me. ~~you must like~~  
Can get information from B/m Ofc. Paey ~~\_\_\_\_\_~~

7.) All five of us films were black. Please assist us. ~~To~~ and when you write back write to us all. addresses below.

4/22/09 ISC  
Date

Respectfully,

X. T. T.  
T. Terrell Bryant  
# 254638 DY6, PCI  
430 OAKHURST RD.  
PEIZER SC 29669

Carlos Simmons  
# 211 859. DY5 PCI  
430 OAKHURST RD.  
PEIZER, SC. 29669

MYRON KELLEY  
# 300 216. DY7, PCI  
430 OAKHURST RD.  
PEIZER SC. 29669

EUGENE SPY  
# 306964 DY2. PCI  
430 OAKHURST RD.  
PEIZER SC. 29669

MARCUS CORLEY  
# 252414, DY14. PCI  
430 OAKHURST RD.  
PEIZER SC. 29669

REQUEST

8/21/12  
8/21/12  
P.2

8/21/12  
254633  
0719

To: SAC - Proskeden

I filed an emergency grievance against Lt Church & Lt Lasley on 8/21/12 at about 2:30 a.m. Church & myself exchanged heated words. I did not threaten Church but because I testified against Church in Federal Court on 8/21/12, a physical altercation is imminent.

Please process the enclosed 8/21/12 grievance as an emergency grievance

cc: 8/21/12 summary, III

EXHIBIT  
#7

All grievances must be placed in the grievance box. Thank you.

8/21/12

Shree

SOUTH CAROLINA DEPARTMENT OF CORRECTIONS  
INMATE GRIEVANCE FORM

STEP 1

EMERGENCY GRIEVANCE

INMATE NAME: T. Terrell Bryan  
SCDC NUMBER: 254538  
INSTITUTION: PCI  
HOUSING UNIT: CY7  
WORK ASSIGNMENT: N/A

Office Use Only  
Grievance No. \_\_\_\_\_  
Code: General \_\_\_\_\_  
Policy \_\_\_\_\_  
Disc. Hear. \_\_\_\_\_  
Class. \_\_\_\_\_  
Date Received \_\_\_\_\_  
IGC Initials \_\_\_\_\_

STATE GRIEVANCE (include documentation, and date of incident; if SCDC Policy, indicate which policy)

A couple weeks ago I gave testimony against Lt. Church & Lt. Lasley per deposition by SCDC's lawyer in a lawsuit brought by Mr. Myron Kelley. I was on the yard at the time. Now I am on lock-up per an illegal investigation. RETALIATION. I am in fear of my life! Today 7/09/12 church took me to & from the shower, at the shower he stared at me & shook his head. ~~But~~ church look at me lustfully while I was on the toilet, I've filed grievances about church being a homosexual.

ACTION REQUESTED: Head quarters investigate whether the PCI investigation was or was not illegal, separation from church & Lasley because I gave deposition/testimony in a lawsuit against them.

SPECIFY HOW AND WHEN INFORMAL RESOLUTION WAS ATTEMPTED BY GRIEVANT:

spoke to capt. Early on 7/09/12, no corrective action.

Without prejudice,  
E. C. [Signature] all rights reserved 7/09/12  
Grievant Signature Date

ACTION TAKEN BY IGC:

- I accept the action taken by the IGC and consider the matter closed.
- I do not accept the action taken and wish to appeal.

IGC Signature Date

Grievant Signature Date

W Y C H E

Attorneys at Law

October 26, 2011

*Respond back 10/31/11 / Follow up on 12/ /11*

Terance Bryan, SCDC # 00254638  
c/o Broad River Correctional Institution  
4460 Broad River Road,  
Columbia, SC 29210

Re: Myron Kelley civil action

Dear Terance:

We spoke on the phone last week regarding a civil action being brought in federal court by my client, Myron Kelley. Thank you for speaking with me and recounting your version of the events of January 30, 2009. As I mentioned on the phone, I do not have in our records of the case any affidavit or statement you made at the time of the events, but I would like to look at that document if it is available. If possible, could you please mail that to me using the addressed envelope enclosed with this letter? If you cannot make a copy but would like to keep the original for your file, we would be happy to make a copy and mail the original back to you, just let us know that when you send it.

Thank you again for speaking with me last week. I know Myron appreciates it. At the current time, we have been transferred to a Magistrate Judge, and have no firm idea of when we may be going to trial. But we will probably be in touch when we do know to talk to you about the possibility of testifying.

Respectfully,



Martin M. Tomlinson

EXHIBIT  
#8

W Y C H E

PROFESSIONAL ASSOCIATION

44 East Camperdown Way, Greenville, SC 29601-3512  
p: 864.242.8200 | f: 864.235.8900  
www.wyche.com

# REQUEST

9/15/12  
25423  
CY15

EXHIBIT  
#9

10. Ms. Gray/Head Counselor  
T. Terrell Bryan  
PCI

I am in an environment where it is kill or be killed. I testified against Lt. Lasley & Lt. Church in a federal lawsuit two weeks ago. Lasley has already challenged me to a fight. Church & myself have passed hostile words, so a physical altercation is imminent. Sgt. Lawless knows about the bad blood between myself, Lasley, Church & Sgt. Lindsey & that is why he assault & battered me. His shift then placed me in lock-up then denied me medical attention to cover things up.

I fear for my life at Perry Corr. Inst. Lawless, Lasley, Church & Lindsey together has too much influence. Capt. Abston yesterday got mad when I told her about it. Sgt. Cotter & Major Bush is now with hiding my property. Lt. Harhoff & Capt. Office, who is romantically involved, harasses me constantly.

Please send this to the police & a local newspaper, I have told all wardens, they don't care if I am killed or seriously injured, my family will need a paper trail to seek criminal & civil penalties.

Blood is all over my walls & covering the floor, my bed feels like a boat racking in a sea of blood. Death is near, but why? These people here loves to oppress!

Mr. Bryan - I'm responding for Miss Gray.

I've spoken to Major Bush about your concerns, so he is aware of your complaints. Thanks and take care!

- M. Harris.ccciv

Mr. Martin M. Tomlinson  
44 East Camperdown Way  
Greenville, SC 29601-3512

Re: Mr. Myron Kelley Civil action

Dear Mr. Tomlinson,

I am replying to your 10/26/11<sup>letter</sup>. Enclosed is an Affidavit w/EXHIBITS. I did not have the chance to make copies please return to me a copy of the enclosures.

Next, please fill out the Telephone Privilege Request. Any calls I make to you ~~will~~ will be prepaid not collect. I will only call at your request. This is to ensure privacy when I talk to you cause last time they were all around me. And it is for my benefit, an ILM with a lawyer on his telephone list scares them from ~~handle~~<sup>handling</sup> an ILM any kind of way, it'll make them think twice before harming me.

10/31/11<sub>sc</sub>  
dated  
cc: Not on file

EXHIBIT  
#10

Thank you  
to M.A.  
x. T. Terrell Bryan  
#254638, SB 29; BRCI  
4460 Broad River Rd.  
Columbia, SC 29210

STATE OF SOUTH CAROLINA  
COUNTY OF RICHLAND

AFFIDAVIT OF  
T. Terrell Bryan

- I, T. Terrell Bryan, hereby affirm under penalty of perjury 28 U.S.C. §1746 & 18 U.S.C. §1621, that the following is true:
1. I am over the age of 18 & of sound mind. I am currently incarcerated at Broad River Corr. Inst. (BRCI), 58209. Today is 10/31/11.
  2. Everything in the attached letter to Don Frierson, ATT. is true & correct. At no time did Kelley try to attack Lasley.
  3. On 11/30/09 I did see Lasley openhand hit Elm Myron Kelley in the face. It was a spontaneous thing, where I believe Lasley had a bunch of built up anger & just hit Kelley. It look as if Lasley was trying out a Karate move more than a regular punch. Lasley may have special training.
  4. Lasley did this because alot of blacks were complaining about the conditions at Perry Corr. Inst. (PCI), i.e., consistendant & excessive use of force, unsanitary, racism & etc.
  5. Shortly after the incident, per policy ADM-11.04, administrative action was taken against Lasley by Capt. Miller, after an investigation into the incidents listed in the attached letter to Don Frierson. Lasley was moved to the yard.

Sworn to before me this

31 day of OCT, 2011

Eugene Keett (L.S.)

my Commission Expires: 2016

x. T. Terrell Bryan  
#254638, 58209, BRCI

Adm. Law Court  
Edgar A. Brown Bldg., Ste. 224  
1205 Pendleton St.  
Columbia, SC 29201

Re: Appeal of an Emergency Grievance

Dear Clerk,

In Boyd v. Corr. Corp of Am., 330 F.3d 989, 996 (6th Cir. 2004) (holding that "administrative remedies are exhausted when prison officials fail to timely respond to a properly filed grievance.") I filed an emergency grievance on 7/09/12. Per SCDC's policy GA-01.12 §14.1, an emergency encompasses situations, actions, or conditions in which any person's health, safety, or welfare is threatened or in serious danger. Per §14.2, the Warden is to respond within seven (7) days. 7 days to timely respond, by the Warden ended 7/16/12, I **HEREBY** move to appeal to your court the enclosed emergency grievance. Please provide me three (3) Notice of Appeals Forms so I can appeal to your court.

7/24/12 s.c.  
dated

EXHIBIT  
#11

Without prejudice,  
x. P. C. B., all rights reserved,  
T. Terrell Bryan  
#254538, AY20, PCI  
435 Oaklawn Rd.  
Pelzer, SC 29589

# REQUEST

Capt. Abston  
T. Terrell Bryan  
PCI

8/21/12  
254638  
CYA

To: Capt. Abston

At about 2:00 p.m. I ask Lt. Church do I have rec, he said "no, you have stuff scattered all over the place." my bed was made & legal work on top. Church is retaliating!

cc: A/Warden Mauney

EXHIBIT  
#12

Lt. Church

Q: When Bryan allegedly started yelling at you was another officer around?

Q: On Bryan chart does it have Terence Bryan or Terrell Bryan?

Q: Did Bryan writing a request complaining about you make you mad?

Q: While Bryan allegedly was causing a disturbance was there any other I/m's saying or doing anything.

Q: When Bryan allegedly was causing a disturbance did he call out to any other I/m's.

Q: You said SCOC recently won a Court case, how recent.

Q: What do you have to do with this Court case.

Q: What does Bryan have to do with this Court case.

Q: Did you tell Bryan on the day of the incident the case was won back in December.

Q: Did you call Bryan an idiot that day.

Q: Do you remember what all you said back to Bryan.

Q: You said the comments & allegation have been on going for a while, how long.

Q: Do you have any proof of other comments or allegations.

Q: Did you report or tell any one about other comments or allegations.

Q: Have Bryan ever complained to Capt. Early or an Investigator or etc. about you sexually harassing ~~me~~ him.

Q: If yes, did this make you mad.

Q: Do you want revenge.

Q: Who did Bryan assemble with to create a disturbance.

EXHIBIT  
#13

Sgt. Robertson

- Q: What do you remember about the incident.
- Q: What did Lt. Church tell you about the incident.
- Q: Did church appear mad.
- Q: Did church tell you about the court case.
- Q: If yes, what.
- Q: Did bryan give you the Request.
- Q: Did Bryan curse you or yell or act mad.
- Q: Did you hear or was told about any comments or allegations.
- Q: on Bryan chart does it have Terence Bryan or Terrell Bryan.

EXHIBIT  
#14