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**Feb 18 2025**

**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM SUMTER COUNTY  
Court of Common Pleas

R.Ferrell Cothran, Jr., Circuit Court Judge

Case No. 2024-CP-43-000366

Randal K Freeman,

Appellant,

v.

David Bryan Trapp,

Respondent.

**PROOF OF SERVICE**

I certify that I have served the a copy of the NOTICE OF CONTNUED HARRASSMENT Correspondence on David Bryan Trapp by depositing a copy of it in the United States Mail, postage prepaid, on February 18<sup>th</sup>, 2025, addressed to his attorney of record, J.Benjamin Cahill, Curtis & Croft, LLC 325 West Calhoun Street, Sumter SC 29150.

February 18<sup>th</sup> , 2025

/s/Randal K Freeman  
Randal K Freeman  
8 Warren Ct  
Sumter SC 29150  
(224) 407-1660



**From:** Randal Freeman randal.freeman88@gmail.com   
**Subject:** Formal Legal Notification – Appellate Case 2024-000283  
**Date:** February 18, 2025 at 11:41 AM  
**To:** Ben Cahill bcahill@cahill-lawfirm.com

Dear Mr. Cahill,

Attached, please find a **Formal Legal Notification** regarding the ongoing violations related to **Appellate Case 2024-000283**. This letter addresses the unlawful attempted entry and unauthorized appraisal that occurred on **February 18, 2025, at 11:01 AM**, as well as the continued violations of the **Temporary Restraining Order** and **Fourth Amendment protections**.

As stated in prior correspondence, this case remains under the **jurisdiction of the South Carolina Court of Appeals**, and any further unauthorized actions will result in immediate legal recourse.

Please review the attached document at your earliest convenience. Any future inquiries or legal matters should be addressed through the appropriate judicial channels.

Sincerely,  
Randal Freeman  
(224) 407-1660

2024-00283 TRO and Illegal  
Correspondence .pdf



Randal K Freeman

8 Warren Ct

Sumter, SC 29150

Randal.freeman88@gmail.com

(224) 407-1660

02/18/2025

Mr. J. Benjamin Cahill

Curtis & Croft, LLC

325 W. Calhoun St.

Sumter, SC 29150

RE: Appellate Case 2024-000283 NOTICE OF CONTINUED HARASSMENT AND VIOLATION  
OF SOUTH CAROLINA LAW

Dear Mr. Cahill,

This letter serves as a formal legal notification regarding the ongoing proceedings in Appellate Case 2024-000283, and the continued unlawful actions taken in relation to this matter.

As previously communicated, and as outlined in the letter denying your request, this case remains under the exclusive jurisdiction of the South Carolina Court of Appeals. Per the email sent to you on January 15, 2025, at 3:43 PM, you were explicitly denied inspection rights and informed that any motion to compel must be directed to the South Carolina Court of Appeals. You were also advised that the Temporary Restraining Order (TRO) remains in full effect until a final ruling is issued by the Court of Appeals.

#### A. Unlawful Attempted Entry and Unauthorized Inspection

Despite these clear legal directives, at 11:01 AM on February 18, 2025, an appraiser, claiming to be acting on behalf of Community Resource Bank and David Bryan Trapp, attempted to unlawfully enter the premises and conduct an unauthorized appraisal. This individual's actions were a direct violation of my constitutional rights under the Fourth Amendment and the active TRO in place.

#### B. Violation of the Fourth Amendment and South Carolina Case Law

Taking photographs or attempting to enter private property without court authorization or the owner's consent constitutes an unlawful search and seizure under the Fourth Amendment. South Carolina courts have reaffirmed this protection through key rulings, including:

- *State v. Counts*, 413 S.C. 153 (2015) – Emphasizing that the Fourth Amendment protects against warrantless and unauthorized searches, including private individuals acting on behalf of third parties without legal authority.
- *State v. Missouri*, 352 S.C. 121 (2002) – Holding that photographing and documenting private property without legal authority or consent constitutes an unlawful search.
- *State v. Wright*, 391 S.C. 436 (2011) – Clarifying that entries onto private property without permission or exigent circumstances violate constitutional protections.

The appraiser's statement that he was acting on behalf of Community Resource Bank and David Bryan Trapp further underscores that these parties are actively participating in unlawful attempts to circumvent legal procedures and the authority of the appellate court.

#### C. Formal Legal Notice of Consequences

Be advised that any further attempts to:

1. Conduct unauthorized inspections or appraisals
2. Take photographs or document private property without judicial approval
3. Enter or attempt to enter my residence or property without consent or court order

4. Violate the terms of the Temporary Restraining Order
5. Engage in further acts of harassment, intimidation, or extrajudicial interference

Will result in immediate legal recourse, including but not limited to:

- Filing a motion for contempt against the responsible parties
- Initiating civil action for constitutional and property rights violations
- Submitting a formal complaint with the South Carolina Bar Association
- Pursuing legal remedies for damages resulting from these unlawful actions

The South Carolina Court of Appeals has full possession of the TRO, and all further actions must strictly adhere to the court's directives. Any additional violations will be met with swift and appropriate legal action.

I strongly advise that you cease any further attempts to bypass the judicial process and ensure all legal proceedings comply with established court orders.

Should you have any further inquiries or require additional clarification, direct all future correspondence through proper legal channels.

Sincerely,



Randal Freeman

8 Warren Ct

Sumter, SC 29150

(224) 407-1660