

Appealing Circuit Court Appeal Decision Dated March 3rd 2026

Initial brief and designation of matter For Records of Appeal Rules 208 and 209

Petitioner
Terrence T Tully

Vs

Respondent
Edwin Rogers respondent

RECEIVED

JUN 22 2026

SC Court of Appeals

Index

1. Circuit Court Appeal Dated March 3rd 2026
2. Order of Protection Magistrates court hearing December 5th, 2025
3. My closing argument/Plea
4. Reconsideration of Order of Protection on False accusations given to the Circuit Court of Appeals Dated March 3rd 2026 by Respondents Attorney Mr. John B. Williams

I am asking the courts to go over all the facts and to reverse this order of protection from my record Considering the following facts.

Circuit Court Appeal dated March 3rd 2026

1. The Circuit Court appeal dated March 3rd 2026 Mr. Rogers Attorney John B. Williams Lied with the intent of swaying the court's decision by making untrue accusations. Mr. Willaims stated to the Circuit Court on March 3rd 2026 that I admitted to being arrested three times on assault type charges, one of which was with a handgun, both allegations false and untrue, these accusations are on attached Circuit Court transcript dated March 3rd 2026 lines 20 thru 24 . I was never arrested on any type of pistol or gun charge, it was never brought up in Magistrates court hearing dated December 5th 2025. I was arrested for assault only once in April 1978 (48 years ago) and that charged was dropped. Mr. Willaims knowingly lied and gave false information to the Circuit Court Judge to Incriminate me and to deceit and sway the Circuit Court's decision to keep this unfair order of protection. This Order of Protection that was filed against me should be withdrawn just under this misleading lie. I stated at the Magistrates hearing on December 5th, 2025, that I was charged with the following violations.

The following are arrest in which are on my record.

- A. **50 years ago October 9th 1976 Burglary Charges dropped.** I was arrested October 9th 1976 at 9:00 AM and charged with burglary. My car was stolen from in front of my parents home the night before my arrest and my vehicle was identified at the burglary scene. Perpetrators were caught driving my vehicle and I was immediately released on the same day, charges dropped. This should not be on my record.
- B. **48 Years Ago April 1978 Assault charges dropped charged with a violation.** I had an argument with my girlfriend in front of her home. Police were called and I was arrested for resisting arrest and assault. I had witnesses stating I did not assault anyone and assault charges were indeed dropped leaving me with a violation.
- C. **43 Years Ago November 1983 was charged with telephone harassment.** My older sister called me and told me that her husband who was a Nassau County NY police officer at the time threatened her by pointing his service revolver at her while in a drunken state. I called him and told him that I was reporting him to his commanding officer, I was arrested that night by Suffolk County police for telephone harassment, a violation.

Magistrates Court Order of protection court date dated December 5th 2025

1. In the Magistrates Court proceedings dated December 5th 2025 Mr. Rogers listed Forty false allegations against me. Mr. Rogers stated that he had four witnesses, a camera on his mailbox and a nest camera on his front door. The day of the court hearing on December 5th Mr. Rogers did not have any credible proof supporting these allegations, no camera footage, no photos nor did any of the four witnesses which included his son, his neighbor, and two board members from the homeowners association that supposedly witnessed his claims come forth or supply written statements from any of the supposed witnesses to back up these allegations.

Closing argument/Plea

1. All of these false accusations against me by Mr. Rogers are purely out of retaliation for the sole reason that I had taken Mr. Rogers and homeowner association to court. I was awarded a settlement for assault against me and Mr. Rogers immediately lost his seat as Homeowners Association President due to his actions and the lawsuit. I still cannot believe that on December 5th 2025 the Magistrates Court Judge sided with Mr. Rogers false claims and allegations against me on this Order of Protection without any proof video, photos or witnesses coming forth. This just tells me that anyone can make false accusations against another person without any proof and win a frivolous case.

I have lived at 1908 Rock Fish Road Moncks Corner since September 2013. March of 2015, I witnessed Mr. Rogers and his wife dumping rubbish and yard debris in the park on the right side of my home, Mr. Rogers at the time was the president of the homeowner association. I reported this to the homeowner association Vice President Kristy Martin, she got back to me the next day told me that Mr. Rogers denied it. June 2015 Mr. Rogers was dumping yard debris again. I called Homeowners Association once again and Christy Martin told me he denied doing it, she told me the next time I see him doing it take photos.

August 25th 2015 Mr. Rogers was dumping in the park once again with his golf cart and trailer as I was videotaping him driving into the park with his rubbish As I was instructed to by the homeowner's association. he cut the wheel and ran me over Causing damage to my left leg that needed surgery. I took Mr. Rogers and the homeowner association to court and won and monetary award. **My Law suit against Mr. Rogers and the Homeowners Association was settled August 27th 2018, these false allegations against me started on November 15th 2018.**

2. On May 20th, 2022, my wife called me Frantic just after I left my driveway stating that Mr. Rogers was in my backyard half naked taking photos of the construction that we were doing on our sea wall. I only got as far as down the block came right home and seen Mr. Rogers leaving my yard camera in hand. I never approached Mr. Rogers, he was yelling at me and giving me the finger. I did call police that afternoon and do have a police report in my possession.

If Mr. Rogers felt that I had been harassing him for the past eight years why would he trespass on my property on May 20th, 2022 with a camera in hand taking photos of work that I was having done in my backyard. I have in my possession the police report and actual dated video from my home security system on disk and thumb drive of Mr. Rogers in my backyard on May 20th 2022. Mr. Rogers denied several times in front of Magistrate Judge of being on my property until he was shown the video of him filming on May 20th, 2022, then he admitted that was him on my property filming. Magistrates hearing minutes document enclosed with this statement.

**Reconsideration of order of Protection on False accusations given to the courts
By Attorney John B, Williams on March 3rd 2026**

1. That Attorney John B Williams the Respondents Attorney stated at the Appeal at Circuit court dated **March 3rd 2026 lines 20 thru 24 lied and misled the Circuit Court Judge** bringing up a **fabricated charge against me stating that I had a handgun/Pistol charge on my record and being arrested 3 time on assault charges**, both are totally untrue accusations to make me look like a hardened criminal. The courts do have access to my records and can plainly see I was never arrested or charged with any type of handgun violation, nor do I have three assault arrest on my record. I have one assault arrest on April 1978 and this charge was dropped.
2. Mr. Rogers failed to show any type of proof whatsoever. Mr. Rogers stated at the Magistrates Court hearing On December 5th 2025 that he had a mailbox camera and a nest camera on his front door but did not produce any videos nor photos to back up his false allegations, just his word and a list of 40 False accusations over a period of over 8 years (11-15-18 thru 10-10-25). Mr. Rogers also Stated that his son, neighbor and two members of the homeowner's association also witnessed me harassing him, none of these so-called witnesses showed or gave a written statement to the Magistrates Courts on December 5th 2025 hearing. Mr. Rogers is using the court system as a tool or weapon in revenge solely in retaliation and or revenge over the lawsuit settled November 2018 in which I had won.
3. No video or photo proof even though Mr. Rogers stated that he has a video camera on mailbox and on front door.
4. That Ed Rogers the respondent's Attorney John B Williams **lied and misled the Circuit Court Judge** bringing up a **fabricated charge against me about a handgun/Pistol charge** that is on my record that is untrue **and being arrested 3 time on assault charges**, both are totally untrue accusations to make me look like some kind of felon.

I have been a federal employee from 1994 through 2014 if I indeed had a criminal record the federal government would not have kept me on as an Electronic Technician for the USPS. With all of this said I am asking the court to please consider all these facts and reverse and remove this Order of Protection that was placed upon me on March 5th 2025.

Thank You for your time in this matter
Regards,

Terrence Tully

CC:

- | | |
|---------------------|------------------------------|
| 1. Court of Appeals | 2. Attorney John B. Williams |
| 1220 Senate Street | 209 East Main Street |
| Columbia SC 29201 | Moncks Corner SC 29461 |

From magistrates hearing 12/5/25

was perpetrated by the defendant. Plaintiff testified that he filed the action as a last resort to obtain some level of relief from the harassment he has endured by the defendant.

On recross, the plaintiff was asked to confirm that during the shown video to confirm he was taking photographs of the defendant's home and yard. Plaintiff acknowledged that he may well have been the individual in the video but maintained that he did not recall ever taking photographs of the defendant's property. The video was shown again to the parties. After viewing the video, plaintiff acknowledge that the figure must have been him.

Mrs. Patricia Hazleton Rogers, plaintiff's wife, was called as a witness and was reminded that she was already sworn in. Mrs. Rogers testified that she and the plaintiff have been married for thirty-nine years and she has been a witness to several of the incidents between the parties. Mrs. Rogers testified that she was in the vehicle during an incident in which defendant followed them out of the neighborhood and followed them up to the intersection at Cypress Gardens Road and Highway 52, where at the stop light, he waived his fist in the air at them. Mrs. Rogers testified another incident occurred on Bass Road in which the defendant was driving toward them and came into their lane of travel, swerving back into the appropriate lane at the last minute. Mrs. Rogers testified that at other times, defendant has been heard outside their home, however, she is unable to testify as to what was being said, only that she could hear his voice.

Defense counsel questioned witness concerning the incident in which they were at the intersection of Cypress Gardens Road and Highway 52. Witness testified that she was not able to hear what defendant was saying as the windows were up, but that he appeared to be in an angry state at the time based on his body language. Defense counsel inquired about the incident on Bass Road in which defendant drove into their path. Witness testified that the incident occurred, but she was unable to testify initially to the dates of either incident, and was only able to pull the dates

Inside A
vehicle?

Settlement 4/9/18

STATE OF SOUTH CAROLINA)
COUNTY OF BERKELEY)

IN THE COURT OF COMMON PLEAS
FOR THE NINTH JUDICIAL CIRCUIT
CASE NUMBER: 2017-CP-08-954

TERRANCE TULLY,)
Plaintiff,)

vs.)

SETTLEMENT AGREEMENT

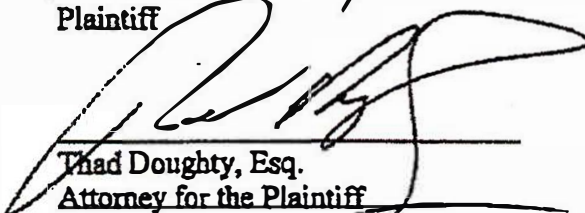
EDWIN D. ROGERS AND THE
PIMLICO CIVIC CLUB, INC.,)
Defendant.)

WHEREAS, the parties have resolved this action between them, it is agreed by the parties and counsel that in exchange for payment of \$29,000.00, which involves all costs, disbursements, attorneys fees and any damages of any sort arising from this action, the Plaintiff, Terrance Tully, will execute a binding release, which document (and accompanying court order, if applicable) shall be prepared by the attorneys for the Defendant.

This Agreement is binding upon all parties to this matter, and is enforceable in any Court of law.


TERRANCE TULLY
Plaintiff

4/9/18
Date


Thad Doughty, Esq.
Attorney for the Plaintiff


Tommy Boger, Esq.
Attorney for Defendant


Trey Nicollette, Esq.
Attorney for Defendant

ED Trespassing 5/20/22

AGENCY I.D.
SC0080000

INCIDENT REPORT
Berkeley County Sheriffs Office
APPROVED (Lieutenant Daniel Morton)

CASE NUMBER

202205004597



DEFENDANT'S EXHIBIT		INCIDENT TYPE		COMPLETED	FORCED ENTRY	PREMISE TYPE	UNIT'S ENTERED	TYPE OF PREMISE	
				☒ YES ☐ NO	☐ YES ☐ NO	20 (Residence/Home)		☐ Individual ☐ Business ☐ Residential ☐ Government ☐ Relig. Org. ☐ Soc./Public ☐ Other ☐ Unknown ☐ Police Off.	
INCIDENT LOCATION (SUBDIVISION, APARTMENT AND NUMBER, STREET NAME AND NUMBER)		ZIP CODE		WEAPON TYPE					
1908 ROCK FISH RD, MONCKS CORNER, SC		29461-							
INCIDENT DATE 24 HR. CLOCK TO DATE		24 HR. CLOCK		REPORT DATE/TIME		REPORT TIME		LOCATION NO.	
05/20/2022 16:40		05/20/2022 16:55		05/20/2022 17:31		05/20/2022 18:01			
COMPLAINANT'S NAME (LAST, FIRST, MIDDLE)		RELATIONSHIP TO SUBJECT		RESIDENT	RACE	SEX	AGE	ETH.	HOME PHONE
				☒ J ☐ S ☐ O ☐ U					
ADDRESS		CITY		STATE		ZIP CODE		LOCATION NO.	
				SC		29461-			
VICTIM'S NAME (LAST, FIRST, MIDDLE)		RELATIONSHIP TO SUBJECT		RESIDENT	RACE	SEX	AGE	ETH.	HOME PHONE
Tully, Terrence				☒ J ☐ S ☐ O ☐ U	W	M	65	N	
HEIGHT		WEIGHT		HAIR		EYES		FACIAL HAIR, SCARS, TATTOOS, GLASSES, CLOTHING, PHYSICAL IDENTIFIERS, ETC.	
6'02"		210		BRO - Brown		HAZ - Hazel			
ADDRESS		CITY		STATE		ZIP CODE		LOCATION NO.	
1908 ROCK FISH RD		Moncks Corner		SC		29461-			
VISIBLE INJURY (VICT. ?) ☐ YES ☐ NO ☐ EXPLAIN -		COMPLAINT OF CRIMINAL INJURY ☐ YES ☐ NO							
VICTIM (NO. 1) ☐ SOLE ☐ OTHER ☐ ALCOHOL ☐ DRUGS ☐ TYPE									
TWO-MAN VIEW ☐ ONE-MAN VIEW ☐ DETECTOR/PLASMA ☐ OTHER ☐ ALONE ☐ ASSISTED ☐ *J - This Jurisdiction S - State O - Out of State U - Unknown									
☐ SUSPECT		NAME (LAST, FIRST, MIDDLE)		RACE	SEX	AGE	ETH.	DATE OF BIRTH	HEIGHT
☐ SUSPECT		Rogers, Edwin		W	M	78	N		
☐ WANTED		FACIAL HAIR, SCARS, TATTOOS, GLASSES, CLOTHING, PHYSICAL IDENTIFIERS, ETC.							
☐ FUGITIVE		ADDRESS		CITY		STATE		ZIP CODE	
☐ ARREST									
☐ JAIL		RECEIVED (NO. 1) ☐ USHER ALCOHOL ☐ COMPUTER EQUIP. ☐ ASSAULTED NEAR OFFENSE SCENE ☐ YES ☐ NO ☐		DATE/TIME OF OFFENSE		DATE/TIME OF ARREST			
☐ EVIDENCE		DRUGS ☐ HOME ☐ TOTAL SEIZED ☐		05/20/2022 16:40					
NARRATIVE On May 20, 2022 I Deputy Moorefield responded to 1908 Rock Fish Rd. in reference to trespassing. Upon arrival I spoke with Terrence Tully who stated that one of his neighbors came onto his property without permission. Mr. Tully stated that his neighbor Edwin Rogers walked onto his property while his wife was home, and started taking pictures. Mr. Tully has video evidence of Mr. Rogers coming onto his property. Mr. Tully stated when he arrived home a short time later, he saw Mr. Rogers walking off of his property and when asked if he needed help, Mr. Rogers flipped him off and cursed Mr. Tully out. Mr. Tully then drove into his driveway and did not confront Mr. Rogers anymore and went inside his residence. Mr. Tully wanted a report to be done, and was issued a case number and advised him on how to obtain a copy of the report. I then tried to contact Mr. Roger but he did not come to the door. There is no further information at this time.									
JURISDICTION OF THEFT LAW ENFORCEMENT AGENCY				JURISDICTION OF RECOVERY LAW ENFORCEMENT AGENCY					
TYPE (GROUP)								TOTAL VALUE	
STOLEN									
DAMAGED									
BURNED									
RECOVERED									
SEIZED									
CONTAMINATED									
SUBJECT IDENTIFIED		SUBJECT LOCATED		☐ ACTIVE ☐ ADL. CLOSED		☐ ARRESTED UNDER 18		☐ EX-CLER UNDER 18	
☒ YES ☐ NO ☐		☒ YES ☐ NO ☐		☐ UNEMPLOYED		☐ ARRESTED 18 AND OVER		☐ EX-CLER 18 AND OVER	
REASON FOR EXCEPTIONAL CLEARANCE: 1. ☐ OFFENSE DEATH 2. ☐ NO FUGITIVE/18 3. ☐ EXTRACTION DENIED		DATE		UNIT NO.		APPROVED OFFICER		DATE	
REPORTING OFFICER		05/20/2022		4444 - Lieutenant Daniel Morton		05/23/2022			
FOLLOW-UP INVESTIGATION OFFICER									
☐ YES ☐ NO ☐									

AGENCY I.D.
SC0080000

INCIDENT REPORT
Berkeley County Sheriffs Office
APPROVED (Sergeant Sean O'Neill)

CASE NUMBER
202008006838

INCIDENT TYPE		COMPLETED	FORCED ENTRY	FORCED ENTRY	ENTRY
1. 753 - Harassment		☒ YES ☐ NO	☐ YES ☐ NO	2019/08/06/2020	
2.		☐ YES ☐ NO	☐ YES ☐ NO		
3.		☐ YES ☐ NO	☐ YES ☐ NO		
INCIDENT LOCATION (SUBDIVISION, APARTMENT AND NUMBER, STREET NAME AND NUMBER)					WEAPON TYPE
1912 ROCK FISH RD, MONCK'S CORNER, SC					29461-
INCIDENT DATE		24 HR. CLOCK	TO	DATE	24 HR. CLOCK
08/06/2020		12:00		08/06/2020	12:05
COMPLAINANT'S NAME (LAST, FIRST, MIDDLE)		RELATIONSHIP TO SUBJECT		RESIDENT	RACE
Rogers, Edwin		NE		☒ YES ☐ NO	W
ADDRESS		CITY		STATE	ZIP CODE
1912 ROCK FISH RD		Moncks Corner		SC	29461-
VICTIM'S NAME (LAST, FIRST, MIDDLE)		RELATIONSHIP TO SUBJECT		RESIDENT	RACE
Rogers, Edwin		NE		☒ YES ☐ NO	W
HEIGHT		WEIGHT	HAIR	EYES	ETH.
5'10"		215	BRO - Brown	BRO - Brown	N
ADDRESS		CITY		STATE	ZIP CODE
1912 ROCK FISH RD		Moncks Corner		SC	29461-
VISIBLE HAZARD (VICT. 1) ☐ YES ☐ NO ☐ EXPLAIN -		USING: ALCOHOL ☐ DRUGS ☐ TYPE:		SEARCH ARMY FOR NARCOTICS ☐ YES ☐ NO	
VICTIM (NO. 1) ☐ NONE ☐ USING: ALCOHOL ☐ DRUGS ☐ TYPE:		TWO-MAN VEH. ☐ ONE-MAN VEH. ☐ DETECTIVE/PLASMT. ☐ OTHER ☐		ALONE ☐ ASSISTED ☐	
SUSPECT		NAME (LAST, FIRST, MIDDLE)		RACE	SEX
☐ RUNAWAY		Tully, Terrance		W	M
☐ WANTED		FACIAL HAIR, SCARS, TATTOOS, GLASSES, CLOTHING, PHYSICAL PECULIARITIES, ETC.		AGE	ETH.
☐ WARRANT		ADDRESS		63	N
☐ ARREST		CITY		HEIGHT	WEIGHT
☐ JAIL		STATE		8'02"	210
☐ SUMMONS		ZIP CODE		BRO - Bro	HAZ - H
SUBJECT (NO. 1) USING: ALCOHOL ☐ COMPUTER EQUIP. ☐		ARRESTED NEAR OFFENSE SCENE ☐ YES ☐ NO ☐		DATE/TIME OF OFFENSE	DATE/TIME OF ARREST
DRUGS ☐		TOTAL # ARRESTED 0		08/06/2020 12:00	
CFS # 2020-110760					
On August 6th, 2020, I responded to 1912 Rock Fish Road, located in the Moncks Corner area of Berkeley County, State of South Carolina in reference to a neighbor dispute.					
Upon my arrival, I spoke with the Complainant, Edwin Rogers. Rogers stated, his neighbor, Terrance Tully who resides at 1908 Rock Fish Road has been bothering the complainant for a couple years. Rogers stated, this incident began of 11/15/2018 when a lawsuit was filed in regards to an altercation between the both parties resulting in a \$30,000.00 settlement.					
Rogers further stated, on 08/06/2020 at approximately 1200 hours Terrance Tully was driving past his house multiple times "creeping" on Rogers and Terrance Tully rolled down his car window and					
JURISDICTION OF THEFT LAW ENFORCEMENT AGENCY			JURISDICTION OF RECOVERY LAW ENFORCEMENT AGENCY		
TYPE (GROUP)		TOTAL # ARRESTED			
STOLEN					
ON RACED					
BURNED					
RECOVERED					
RECEIVED					
COUNTERED					
SUBJECT IDENTIFIED		SUBJECT LOCATED		☐ ACTIVE ☐ ADJ. CLOSED	
☒ YES ☐ NO ☐		☒ YES ☐ NO ☐		☐ UNFOUNDED	
REASON FOR EXCEPTIONAL CLEARANCE: 1. ☐ OFFENDER DEATH 2. ☐ NO PROSECUTION 3. ☐ EXTRADITION DENIED 4. ☐ VICTIM DECLINES COOPERATION		DATE		UNIT NUMBER	
08/06/2020		2547			

AGENCY I.D.
30080000

SUPPLEMENTAL INCIDENT REPORT
Berkeley County Sheriff's Office

202008006838

☐ ORIGINAL REPORT		☐ SUPPLEMENTAL REPORT		☐ ADDITIONAL VICTIM		☐ ADDITIONAL STOLEN PROPERTY		PAGE <u>2</u> of <u>4</u> PAGES	
☐ INCIDENT EXPLOSION		☐ CASE STATUS CHANGE		☐ ADDITIONAL OFFENSE		☐ ADDITIONAL RECOVERED PROPERTY			

VICTIM/SUBJ. I.D. OVERFLOW	☐ COMPLAINT	NAME (LAST, FIRST, MIDDLE)			VICTIM RELATIONSHIP TO SUBJECT			SEX	RACE	DOB	DOB	ETH
	☐ VICTIM 1	HEIGHT	WEIGHT	HAIR	YES	NO	YES	NO	YES	NO	YES	NO
	☐ SUBJECT 2	FACIAL HAIR, SCARS, TATTOOS, GLASSES, CLOTHING, PHYSICAL PECULIARITIES, ETC.										
	☐ FUGITIVE	ADDRESS			CITY	STATE	ZIP CODE	LOCATION NO.	HOME PHONE	EMPLOYER PHONE		
	☐ WANTED	☐ VICTIM NO. ☐ VEHICLE INJURY ☐ NO ☐ YES			☐ COMPLAINT OF NON-VEHICLE DAMAGE ☐ NO ☐ YES			☐ VICTIM USED ALCOHOL ☐ NO ☐ YES			☐ TWO-BAN VEHICLE ☐ DETECTIVE PLASMIT ☐ ALONE	
	☐ RESIDENT	EXPLAIN			☐ NO ☐ YES			☐ CRIME ☐ NO			☐ ONE-BAN VEHICLE ☐ OTHER ☐ ASSISTED	
	☐ ARREST	☐ SUBJECT NO. ☐ USED ALCOHOL ☐ NO ☐ YES			☐ CRIME ☐ TYPE							
	☐ JAIL	COMPUTER EQUIP. ☐ NO ☐ YES										
	☐ SURRENDER											
	☐ OTHER											

VICTIM/SUBJ. I.D. OVERFLOW	☐ COMPLAINT	NAME (LAST, FIRST, MIDDLE)			VICTIM RELATIONSHIP TO SUBJECT			SEX	RACE	DOB	DOB	ETH
	☐ VICTIM 1	HEIGHT	WEIGHT	HAIR	YES	NO	YES	NO	YES	NO	YES	NO
	☐ SUBJECT 2	FACIAL HAIR, SCARS, TATTOOS, GLASSES, CLOTHING, PHYSICAL PECULIARITIES, ETC.										
	☐ FUGITIVE	ADDRESS			CITY	STATE	ZIP CODE	LOCATION NO.	HOME PHONE	EMPLOYER PHONE		
	☐ WANTED	☐ VICTIM NO. ☐ VEHICLE INJURY ☐ NO ☐ YES			☐ COMPLAINT OF NON-VEHICLE DAMAGE ☐ NO ☐ YES			☐ VICTIM USED ALCOHOL ☐ NO ☐ YES			☐ TWO-BAN VEHICLE ☐ DETECTIVE PLASMIT ☐ ALONE	
	☐ RESIDENT	EXPLAIN			☐ NO ☐ YES			☐ CRIME ☐ NO			☐ ONE-BAN VEHICLE ☐ OTHER ☐ ASSISTED	
	☐ ARREST	☐ SUBJECT NO. ☐ USED ALCOHOL ☐ NO ☐ YES			☐ CRIME ☐ TYPE							
	☐ JAIL	COMPUTER EQUIP. ☐ NO ☐ YES										
	☐ SURRENDER											
	☐ OTHER											

NARRATIVE	shouted curse words at him. Rogers stated, Terrance Tully then drove back to his residence of 1908 Rock Fish Road and went inside his residence.											
	Rogers stated, he wanted his incident documented for his attorney. Rogers was provided a case number on scene.											
	Nothing further at this time.											

VEHICLE/INVEST	STATUS		TYPE		VIR AND/OR LICENSE NO.				VEHICLE NO. AND/OR REG. NO.			
	☐ STOLEN	☐ VEHICLE	SERIAL AND/OR CHASSIS APPLIED NO.				STATE					
	☐ RECOVERED	☐ CAR	YEAR OF REGISTRATION		YEAR OF EXPIRATION		YEAR		MAKE		TYPE	
	☐ FOUND	☐ BOAT	MODEL		STYLE		COLOR		BRAND NAME		CALIBER	
	☐ TONED	☐ LICENSE PLATE	REG. NO.		DENOMINATION		ISSUER		SECURITY DATE			
	☐ SUSPECT	☐ RECOVERED/STOLEN, STOCK	RECEIVED AND/OR									
	☐ VICTIM	☐ ARTICLE										

PROPERTY EST.	TYPE (PROPERTY)										TOTAL VALUE	
	☐ STOLEN	☐ DAMAGED										
	☐ FOUND	☐ RECOVERED										
	☐ SUSPECT	☐ VICTIM										
	COUNTERFEIT											

ADMINISTRATIVE	SUBJECT IDENTIFIED		SUBJECT LOCATED		☐ ACTIVE ☐ ADJ. CLOSED ☐ EXPUNDED		☐ ARRESTED UNDER 18 ☐ ARRESTED 18 AND OVER		☐ EL. CLEAR UNDER 18 ☐ EL. CLEAR 18 AND OVER			
	☐ YES ☐ NO		☐ YES ☐ NO									
	REASON FOR OCCUPATIONAL CLEARANCE: 1. ☐ OFFENSE CRIMINAL 2. ☐ NO PROSECUTION 3. ☐ EXTRAJURISDICTION 4. ☐ VICTIM DECLINED COOPERATION 5. ☐ OTHER: NO CUSTODY		DATE		LAST MODIFIED		APPROVED OFFICER		DATE			
	6880 - Deputy Patrick Dohy		08/06/2020				2517 - Sergeant Sean O'Neill		08/06/2020			
							FOLLOW-UP INVESTIGATION OFFICER					
							☐ YES ☐ NO					

TERRANCE TULLY

Plaintiff,

v.

**EDWIN ROGERS AND THE PIMLICO
CIVIC CLUB, INC.**

Defendant.

IN THE COURT OF COMMON PLEAS
NINTH JUDICIAL CIRCUIT

CASE NO: 2017-CP-08

SUMMONS

FILED
2017 APR -7 PM 2:04
CLERK OF COURT
BERKELEY COUNTY, SC

TO: THE DEFENDANTS, EDWIN ROGERS AND PIMLICO CIVIC CLUB, ABOVE-NAMED:

YOU ARE HEREBY SUMMONED and required to answer the Complaint in this action, a copy of which is herewith served upon you, and to serve a copy of your answer to the said Complaint on the subscribers at their office at the address below, within thirty (30) days after service hereof, exclusive of the day of such service.

YOU ARE HEREBY GIVEN NOTICE FURTHER that if you fail to appear and defend and fail to answer the Complaint as required by this summons within thirty (30) days after service hereof, exclusive of the day of such service, judgment by default will be entered against you for the relief demanded in the complaint.

~~Respectfully Submitted,~~

Thad J. Doughty
ATTORNEY FOR PLAINTIFF
6650 Rivers Avenue
North Charleston, SC 29406
Tel.: (843) 576-1400
Fax.: (843) 576-5401

April 3, 2017
N. Charleston, SC

STATE OF SOUTH CAROLINA

COUNTY OF BERKELEY

TERRANCE TULLY

Plaintiff,

v.

EDWIN D. ROGERS, AND THE PIMLICO
CIVIC CLUB, INC.

Defendants.

IN THE COURT OF COMMON PLEAS

CASE NO: 2017-CP-08-954

COMPLAINT

(JURY TRIAL REQUESTED)

FILED
2017 APR - 7 PM 2:04
CLERK OF COURT
BERKELEY COUNTY, SC
KDC

TO: THE DEFENDANTS, EDWIN ROGERS AND THE PIMLICO CIVIC CLUB, INC.:

NOW COMES THE PLAINTIFF STATING AND ALLEGING THE FOLLOWING:

1. Plaintiff, Terrance Tully is a resident of Berkeley County.
2. Defendants Edwin Rogers and the Pimlico Civic Club, Inc., are residents of Berkeley County.
3. Defendant, Edwin Rogers is a resident of the neighborhood, Pimlico and a member of the Pimlico Civic Club, Inc.
4. The incidents that are the subject of this action occurred in Berkeley County in the Neighborhood of Pimlico which has a board known as the Defendant, Pimlico Civic Club, Inc. that oversees the neighborhood and sets regulations regarding the Neighborhood and its common areas and parks.
5. On August 25, 2015, the Defendant, Edwin Rogers was attempting to dump refuse into the wetlands of the park and struck the Plaintiff with his golf cart and trailer causing severe injuries to the Plaintiff.
6. Defendant, Rogers was a member of the Defendant, Civic Club and had used his authority as a member to dump in the park area on this occasion and previous Occasions.

7. The Plaintiff received treatment at the scene for his injuries and was then transported to the hospital for further treatment.
8. The Plaintiff required further treatment, rehabilitation, therapy and surgery for his injuries.

FOR A FIRST CAUSE OF ACTION
(NEGLIGENCE EDWIN ROGERS)

9. Plaintiffs restate and reallege each and every allegation as if fully contained herein.
10. The Defendant, Rogers, owed a duty of care to the plaintiff.
11. The Defendant, Rogers, breached his duty of care to the plaintiff.
12. The Defendant, Tollen's, breach was the proximate cause of the injuries suffered by the Plaintiff.
13. Plaintiffs are entitled to actual, compensatory and punitive damages from the Defendant, Rogers.

FOR A SECOND CAUSE OF ACTION
(INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS)

14. Plaintiffs restate and reallege each and every allegation as if fully contained herein.
15. The Defendant, Rogers, intentionally and/or recklessly inflicted severe emotional distress from their conduct on the Plaintiff.
16. The Defendant, Rogers', conduct was extreme and outrageous and exceeded all possible bounds of decency.
17. The Defendant, Rogers' conduct caused the Plaintiff emotional distress.
18. The Plaintiff's emotional distress was severe so that no reasonable person could be expected to endure it.

19. Plaintiff is entitled to actual, compensatory, special and punitive damages.

FOR A THIRD CAUSE OF ACTION
(NEGLIGENCE DEFENDANT PIMLICO CIVIC CLUB, INC.)

20. Plaintiffs restate and reallege each and every allegation as if fully contained herein.

21. The incident occurred in an area of the neighborhood controlled by Defendant, Civic Club, Inc.

22. Defendant, Civic Club, Inc. owed a duty of care to Plaintiff to control this area And to control its board member, Defendant Rogers.

23. Defendant, Civic Club, Inc. breached their duty of care.

24. Plaintiff was injured as a result of this breach and the breach was the proximate cause of this injury.

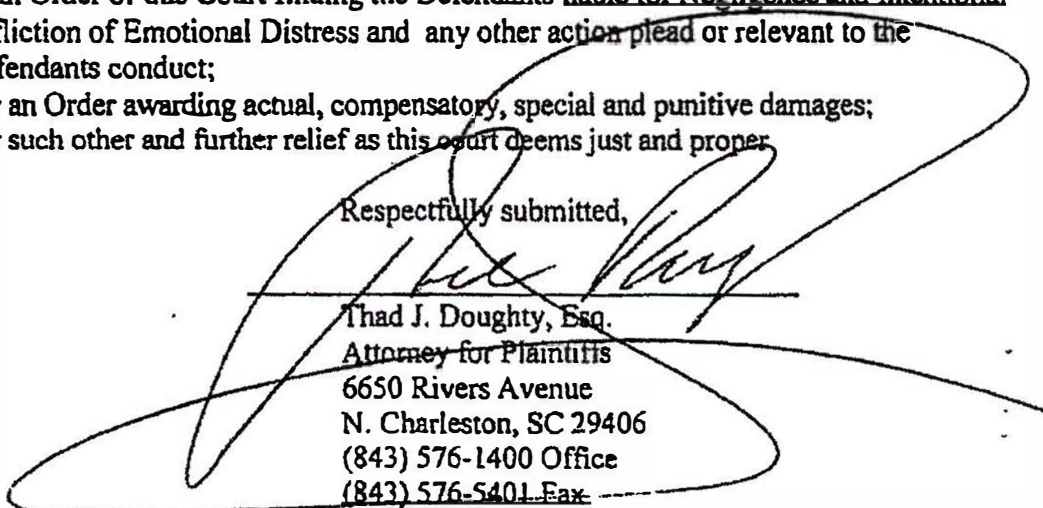
25. Plaintiff suffered damages as a result of this breach of duty.

26. Plaintiff is entitled to actual, compensatory, special and punitive damages.

WHEREFORE, Plaintiff respectfully requests that the following relief be granted:

- A. For an Order of this Court finding the Defendants liable for Negligence and Intentional Infliction of Emotional Distress and any other action plead or relevant to the defendants conduct;
- B. For an Order awarding actual, compensatory, special and punitive damages;
- C. For such other and further relief as this court deems just and proper

Respectfully submitted,


Thad J. Doughty, Esq.
Attorney for Plaintiffs
6650 Rivers Avenue
N. Charleston, SC 29406
(843) 576-1400 Office
(843) 576-5401 Fax

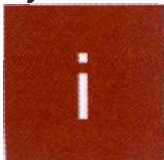
RE: Transcript Request - Terrence Tully vs. Edwin Rogers 3-3-26

Inbox

AI Overview

- You confirmed proceeding with transcript request for Tully vs. Rogers.
- Legal Eagle sent final invoice Invoice 110419.pdf on May 5th.
- Your payment was received; final transcript TULLY v. ROGERS 3-3-26 Transcript.pdf attached.

By Gemini; there may be mistakes. Learn more



info

Tue, May
19,
12:23 PM

to info, me, Alexandria

Terrence,

Thank you for your payment. Attached is the transcript.

Kevin Dehlinger

Director of Operations

T: 864.467.1373 | M: 864.444.4219

E: kdehlinger@legaleagleinc.com | www.legaleagleinc.com/

107 LeGrand Blvd., Greenville, SC | 29607

RECEIVED

JUN 22 2026

SC Court of Appeals

From: info <info@LegalEagleInc.com>

Sent: Tuesday, May 5, 2026 9:12 AM

To: Terrence Tully <terrencetully448@gmail.com>

Cc: info <info@LegalEagleInc.com>; Velvet Mills <vmills@LegalEagleInc.com>

Subject: RE: Transcript Request - Terrence Tully vs. Edwin Rogers 3-3-26

Terrence,

Your transcript is complete. The final invoice is attached to this email. Payment can be made by mailing a check made out to Legal Eagle at the address below:

Legal Eagle, PO Box 5682, Greenville, SC 29606

You may also go to our website and make payment through our portal. Please be sure to reference the invoice number. The web address is below:

<https://app.fluidpay.com/spp/legal-eagle>

Once payment has been received, we will email you the transcript. Thank you.

Kevin Dehlinger

Director of Operations

T: 864.467.1373 | **M:** 864.444.4219

E: kdehlinger@legaleagleinc.com | www.legaleagleinc.com/

107 LeGrand Blvd., Greenville, SC | 29607

STATE OF SOUTH CAROLINA
COUNTY OF BERKELEY
IN THE CIRCUIT COURT
C.A. NO.: 2025-CP-08-3987

TERRENCE TULLY,

PETITIONER,

VS.

EDWIN ROGERS

RESPONDENT.

H E A R I N G
BEFORE THE HONORABLE MAITE MURPHY

DATE: MARCH 3, 2026
LOCATION: SOUTH CAROLINA CIRCUIT COURT 9
TRANSCRIBED BY: KRISTEN PRIMM

RECEIVED
JUN 22 2026
SC Court of Appeals

LEGAL EAGLE
Post Office Box 5682
Greenville, South Carolina 29606
864-467-1373
depos@legaleagleinc.com

APPEARANCES:

THADDEUS JAMES DOUGHTY, ESQUIRE
THAD J. DOUGHTY, ATTORNEY AT LAW
6650 RIVERS AVENUE
N. CHARLESTON, SOUTH CAROLINA 29406

ATTORNEY FOR THE PLAINTIFF

JOHN B. WILLIAMS, ESQUIRE
WILLIAMS & HULST, LLC
209 E. MAIN STREET
MONCKS CORNER, SOUTH CAROLINA 29461

ATTORNEY FOR THE DEFENDANT

INDEX

PROCEEDINGS	4
CERTIFICATE OF TRANSCRIBER	12

(THIS TRANSCRIPT MAY CONTAIN QUOTED MATERIAL. SUCH MATERIAL IS
REPRODUCED AS READ OR QUOTED BY THE SPEAKER.)

P R O C E E D I N G S

UNIDENTIFIED SPEAKER: Next case is *Terrence Tully* versus *Edwin Rogers*.

MR. DOUGHTY: Good morning, Your Honor. Thad Doughty here for Mr. Tully.

THE COURT: Good morning, Mr. Doughty.

MR. WILLIAMS: Jack Williams here for Mr. Rogers. And Mr. Rogers is here, also including him on this.

THE COURT: All right. Now, it looks like this is a motion; is that correct? An appeal?

MR. DOUGHTY: Yes, ma'am.

THE COURT: And whose appeal is this?

MR. DOUGHTY: This is Mr. Tully's appeal, my client, Your Honor.

THE COURT: All right. Mr. Doughty, I'll be happy to hear from you, sir.

MR. DOUGHTY: All right. Thank you, Your Honor. There was a motion for -- a restraining order was filed in this case on October 14, 2025. The hearing was held on December 5th of 2025, and the court -- magistrate court in this case, issued a ruling from the bench on December 5th of 2025, and the order was issued on December 10th of 2025.

Your Honor, in this case, the Respondent brought several allegations against -- against my client, the Appellant, claiming various allegations from November 15th of 2018 to

1 October 8th of 2025. The parties had previously been
2 involved in a lawsuit in which the Respondent in this case
3 settled with my client over an assault, and they've had
4 problems ever since, Your Honor.

5 In the -- in the application, there were some 40
6 incidents between November of 2018 -- 40 allegations, I'm
7 sorry, between November of 2018 until October of 2025. We
8 entered a video basically showing that on a specific date,
9 that the -- in 2022, that the Respondent was actually on the
10 property of the Appellant.

11 And there was also testimony from the Respondent that in
12 2022, or thereabouts, he had -- he was on the property of the
13 Appellant to bring some workers some beer. Your Honor, first
14 claim is that the Respondent did not provide evidence in
15 support of his harassment, second degree, charge.

16 Your Honor, the court's -- first point is, the court's
17 order does not specify which allegations or allegations on
18 which they base their ruling on. And I think that's
19 important, Your Honor, because, as you know, the statute
20 requires a continuity of purpose, a pattern which -- meaning
21 a continuity of purpose.

22 Therefore, it's hard for us to directly address the
23 specifics of the court's findings, and we believe that, based
24 on that, the order is insufficient. As you know, Your Honor,
25 the -- a restraining order deprives the Appellant of certain

1 rights and privileges and also affects job opportunities.

2 It comes on background checks, and it subjects you to
3 criminal prosecution if there's an alleged violation of the
4 restraining order. And Your Honor, I think it's important if
5 -- if a restraining order can be issued without proof, then -
6 - you know, then next step, a violation, is possible for -- a
7 violation of the -- alleged violation of the restraining
8 order to also be offered without proof.

9 The Respondent made over 40 allegations in his
10 complaint, Your Honor, yet he only produced three police
11 reports. The dates of these reports were, October 8th of
12 2025, August 6th of 2020, and December 5th of 2018. None of
13 these reports led to an arrest or even the police talking
14 with the Appellant, Mr. Tully.

15 And December -- on the December 28th report, the officer
16 mentions that the Respondents make -- the Respondent made
17 reference to an incident in which he was sued by the
18 Respondent -- I mean, by the Appellant, Mr. Tully, my client.

19 Also in the August 2020 report, the officer notes that
20 the Respondent, Mr. Rogers, mentioned the lawsuit again, the
21 amount of the settlement, and he -- he wanted this alleged
22 incident documented for his attorney.

23 And I say that to say, Your Honor, that we believe that
24 the basis of this suit, or this application for restraining
25 order, was based on the fact that my client was successful in

1 suing for assault prior -- you know, prior to him making
2 these allegations.

3 And then in the report of October 8, 2025, he alleges
4 that the -- the -- my client, the Appellant, drove by and
5 shouted some words at him. The officers made a report, but
6 they never met or talked with my client. I think it's
7 important for the -- the court to note that the Appellant,
8 which is my client, we showed a home video from his cameras -
9 - a home -- I mean, not a home video, but footage from his
10 home cameras that showed the Respondent in 2022, on the
11 Appellant's property.

12 And that's important because one of the allegations
13 brought by the Respondent is that this is allegedly one of
14 the days he's alleging that my client confronted him. The
15 Respondent testified that he had doorbell cameras on his
16 home, another camera on his mailbox, and alleged several
17 incidents that occurred near his home.

18 However, he presented no evidence from his doorbell
19 camera or his mailbox camera. Respondent named other
20 witnesses in his allegations. However, no witness came to
21 court or testified other than his wife.

22 The Respondent's wife testified that at times she heard
23 the Respondent and Appellant talking outside, but could not
24 hear what was said. She also stated that none of the
25 conversations were caught on camera or by their mailbox

1 camera.

2 She described one incident that they were -- both
3 parties were on the road, but she -- in her testimony, she
4 says that she could not tell what was being said because
5 everybody's windows were up. And Your Honor, these are more
6 than just factual issues.

7 I'm getting to whether there was proof or anything
8 offered to substantiate these allegations.

9 THE COURT: So Mr. Doughty, I don't mean to interrupt
10 you, but we do have a limited time for each of these appeals.

11 MR. DOUGHTY: Yes, ma'am.

12 THE COURT: If you could just hit the highlights as far
13 as, you know, the legal issues, as far as where the judge
14 made an error of law, rather than highlighting on the facts.

15 MR. DOUGHTY: Yes, ma'am.

16 THE COURT: Obviously, I'll read the entire record of
17 appeal and look at everything.

18 MR. DOUGHTY: Yes, ma'am. Well, Your Honor, here's the
19 thing. The statute requires that you show a pattern, okay?
20 The only thing that was admitted into evidence was three
21 police reports. And, you know, the -- the statute requires a
22 pattern, a continuity of purpose, not just isolated
23 incidents.

24 It requires that you prove that. Since the judge in
25 this case did not outline what she's basing her findings on,

1 then there -- you cannot establish a pattern. It just -- you
2 know, she just says, you know, that they were -- she said
3 that, you know, that he -- I'll read directly. She said that
4 -- that he yelled at him in a -- in a profane manner.

5 And also, she found that something about him, you know,
6 on a -- there were incidents where he was reckless and
7 purposely operating a vehicle in the victim's vicinity,
8 causing the Plaintiff to fear for his life on more than one
9 occasion. But she doesn't specify when those were, and
10 there's nothing in the order to specify how she came to her
11 findings or what -- what she's basing her findings on, and
12 that's important.

13 THE COURT: Let me ask you this, Mr. Doughty, then, did
14 you file a motion for her to issue a more comprehensive
15 ruling to explain her findings?

16 MR. DOUGHTY: No, ma'am, I did not.

17 THE COURT: Okay.

18 MR. DOUGHTY: I did not, but Your Honor, the statute
19 specifically says a continuity of purpose -- and it uses the
20 word, however short, meaning, you know, that it has to be
21 continued, and it gives an examples of like cell phone
22 messages and, you know, constant harassment, things of that
23 sort.

24 But a police report from 2018, 2020, and 2025, even if
25 believed, which we don't -- we don't concede that those

1 things happened, but even if believed, would not constitute a
2 continuity of purpose. It wouldn't establish a pattern. So
3 Your Honor, I think the -- the statute 16-3-700(b) has not
4 been met in this case, and they didn't offer testimony to --
5 to -- that would satisfy that statute, and the judge's order
6 also does -- her findings does not -- does not satisfy the
7 requirements of that statute.

8 So therefore, Your Honor, we are asking that the case
9 either be reversed or remanded.

10 THE COURT: All right. Thank you, Mr. Doughty. Your
11 response, counsel, Mr. Williams?

12 MR. WILLIAMS: Your Honor, I'll be brief. The
13 magistrate's return to the issue of her order is probably one
14 of the most thorough I've ever seen in matters like this.
15 The allegations by the petition of Mr. Rogers were well
16 documented.

17 Mr. Doughty cross-examined him on those, and in this
18 matter, Your Honor, it's just how the judge viewed
19 credibility of the two witnesses. The Respondent and
20 Defendant responded -- Appellant, excuse me, Defendant
21 admitted that he had been arrested three times previously,
22 all on assault-type charges, and one of them involved a
23 pistol, which I think also assisted the magistrate in
24 reaching her decision.

25 We were there for four hours, and the judge listened

1 attentively. I don't think there's any question of law. Mr.
2 Rogers had a list of the incidents. As I said, he testified
3 to them. Mr. Doughty cross-examined him on them. The judge
4 sat there and heard every word and issued her decision, which
5 we -- our position is, it should be sustained by the court.
6 Thank you, Your honor.

7 MR. DOUGHTY: Your Honor, can I respond briefly?

8 THE COURT: Very briefly.

9 MR. DOUGHTY: Yes, ma'am. The -- none of the arrests
10 led to convictions, and all of them were over 30 years ago.
11 So I just wanted to -- yes, ma'am.

12 THE COURT: Yes, sir. Thank you, gentlemen. I'll
13 certainly take a look at the return as well as the record on
14 appeal, and issue an opinion.

15 MR. DOUGHTY: All right. Thank you, Your Honor.

16 MR. WILLIAMS: You have a good day.

17 MR. DOUGHTY: Thank you, sir.

18 THE COURT: You all have a good day.

19
20
21
22
23
24
25 (THERE BEING NOTHING FURTHER, THE HEARING CONCLUDED.)

CERTIFICATE OF TRANSCRIBER

I, Kristen Primm, a court-approved transcriber, do hereby certify that the foregoing is a true, accurate and complete Transcript of Record of the proceedings had and evidence introduced in the trial of the captioned case, relative to appeal, in the South Carolina Circuit Court for Berkeley County, South Carolina, on the 3rd day of March 2026.

I do further certify that I am neither of kin, counsel, nor interest to any party hereto.

May 5, 2026



Kristen Primm
Certified Transcriber

Appealing Circuit Court Appeal Decision Dated March 3rd 2026

Initial brief and designation of matter For Records of Appeal Rules 208 and 209

Petitioner
Terrence T Tully

Vs

Respondent
Edwin Rogers respondent

RECEIVED
JUN 22 2026
SC Court of Appeals

Index

1. Circuit Court Appeal Dated March 3rd 2026
2. Order of Protection Magistrates court hearing December 5th, 2025
3. My closing argument/Plea
4. Reconsideration of Order of Protection on False accusations given to the Circuit Court of Appeals Dated March 3rd 2026 by Respondents Attorney Mr. John B. Williams

I am asking the courts to go over all the facts and to reverse this order of protection from my record Considering the following facts.

Circuit Court Appeal dated March 3rd 2026

1. The Circuit Court appeal dated March 3rd 2026 Mr. Rogers Attorney John B. Williams Lied with the intent of swaying the court's decision by making untrue accusations. Mr. Williams stated to the Circuit Court on March 3rd 2026 that I admitted to being arrested three times on assault type charges, one of which was with a handgun, both allegations false and untrue, these accusations are on attached Circuit Court transcript dated March 3rd 2026 lines 20 thru 24 . I was never arrested on any type of pistol or gun charge, it was never brought up in Magistrates court hearing dated December 5th 2025. I was arrested for assault only once in April 1978 (48 years ago) and that charged was dropped. Mr. Williams knowingly lied and gave false information to the Circuit Court Judge to Incriminate me and to deceit and sway the Circuit Court's decision to keep this unfair order of protection. This Order of Protection that was filed against me should be withdrawn just under this misleading lie. I stated at the Magistrates hearing on December 5th, 2025, that I was charged with the following violations.

The following are arrest in which are on my record.

- A. **50 years ago October 9th 1976 Burglary Charges dropped.** I was arrested October 9th 1976 at 9:00 AM and charged with burglary. My car was stolen from in front of my parents home the night before my arrest and my vehicle was identified at the burglary scene. Perpetrators were caught driving my vehicle and I was immediately released on the same day, charges dropped. This should not be on my record.
- B. **48 Years Ago April 1978 Assault charges dropped charged with a violation.** I had an argument with my girlfriend in front of her home. Police were called and I was arrested for resisting arrest and assault. I had witnesses stating I did not assault anyone and assault charges were indeed dropped leaving me with a violation.
- C. **43 Years Ago November 1983 was charged with telephone harassment.** My older sister called me and told me that her husband who was a Nassau County NY police officer at the time threatened her by pointing his service revolver at her while in a drunken state. I called him and told him that I was reporting him to his commanding officer, I was arrested that night by Suffolk County police for telephone harassment, a violation.

Magistrates Court Order of protection court date dated December 5th 2025

1. In the Magistrates Court proceedings dated December 5th 2025 Mr. Rogers listed Forty false allegations against me. Mr. Rogers stated that he had four witnesses, a camera on his mailbox and a nest camera on his front door. The day of the court hearing on December 5th Mr. Rogers did not have any credible proof supporting these allegations, no camera footage, no photos nor did any of the four witnesses which included his son, his neighbor, and two board members from the homeowners association that supposedly witnessed his claims come forth or supply written statements from any of the supposed witnesses to back up these allegations.

Closing argument/Plea

1. All of these false accusations against me by Mr. Rogers are purely out of retaliation for the sole reason that I had taken Mr. Rogers and homeowner association to court. I was awarded a settlement for assault against me and Mr. Rogers immediately lost his seat as Homeowners Association President due to his actions and the lawsuit. I still cannot believe that on December 5th 2025 the Magistrates Court Judge sided with Mr. Rogers false claims and allegations against me on this Order of Protection without any proof video, photos or witnesses coming forth. This just tells me that anyone can make false accusations against another person without any proof and win a frivolous case.

I have lived at 1908 Rock Fish Road Moncks Corner since September 2013. March of 2015, I witnessed Mr. Rogers and his wife dumping rubbish and yard debris in the park on the right side of my home, Mr. Rogers at the time was the president of the homeowner association. I reported this to the homeowner association Vice President Kristy Martin, she got back to me the next day told me that Mr. Rogers denied it. June 2015 Mr. Rogers was dumping yard debris again. I called Homeowners Association once again and Christy Martin told me he denied doing it, she told me the next time I see him doing it take photos.

August 25th 2015 Mr. Rogers was dumping in the park once again with his golf cart and trailer as I was videotaping him driving into the park with his rubbish As I was instructed to by the homeowner's association. he cut the wheel and ran me over Causing damage to my left leg that needed surgery. I took Mr. Rogers and the homeowner association to court and won and monetary award. **My Law suit against Mr. Rogers and the Homeowners Association was settled August 27th 2018, these false allegations against me started on November 15th 2018.**

2. On May 20th, 2022, my wife called me Frantic just after I left my driveway stating that Mr. Rogers was in my backyard half naked taking photos of the construction that we were doing on our sea wall. I only got as far as down the block came right home and seen Mr. Rogers leaving my yard camera in hand. I never approached Mr. Rogers, he was yelling at me and giving me the finger. I did call police that afternoon and do have a police report in my possession.

If Mr. Rogers felt that I had been harassing him for the past eight years why would he trespass on my property on May 20th, 2022 with a camera in hand taking photos of work that I was having done in my backyard. I have in my possession the police report and actual dated video from my home security system on disk and thumb drive of Mr. Rogers in my backyard on May 20th 2022. Mr. Rogers denied several times in front of Magistrate Judge of being on my property until he was shown the video of him filming on May 20th, 2022, then he admitted that was him on my property filming. Magistrates hearing minutes document enclosed with this statement.

**Reconsideration of order of Protection on False accusations given to the courts
By Attorney John B, Williams on March 3rd 2026**

1. That Attorney John B Williams the Respondents Attorney stated at the Appeal at Circuit court dated **March 3rd 2026 lines 20 thru 24 lied and misled the Circuit Court Judge** bringing up a **fabricated charge against me stating that I had a handgun/Pistol charge on my record and being arrested 3 time on assault charges**, both are totally untrue accusations to make me look like a hardened criminal. The courts do have access to my records and can plainly see I was never arrested or charged with any type of handgun violation, nor do I have three assault arrest on my record. I have one assault arrest on April 1978 and this charge was dropped.
2. Mr. Rogers failed to show any type of proof whatsoever. Mr. Rogers stated at the Magistrates Court hearing On December 5th 2025 that he had a mailbox camera and a nest camera on his front door but did not produce any videos nor photos to back up his false allegations, just his word and a list of 40 False accusations over a period of over 8 years (11-15-18 thru 10-10-25). Mr. Rogers also Stated that his son, neighbor and two members of the homeowner's association also witnessed me harassing him, none of these so-called witnesses showed or gave a written statement to the Magistrates Courts on December 5th 2025 hearing. Mr. Rogers is using the court system as a tool or weapon in revenge solely in retaliation and or revenge over the lawsuit settled November 2018 in which I had won.
3. No video or photo proof even though Mr. Rogers stated that he has a video camera on mailbox and on front door.
4. That Ed Rogers the respondent's Attorney John B Williams **lied and misled the Circuit Court Judge** bringing up a **fabricated charge against me about a handgun/Pistol charge** that is on my record that is untrue **and being arrested 3 time on assault charges**, both are totally untrue accusations to make me look like some kind of felon.

I have been a federal employee from 1994 through 2014 if I indeed had a criminal record the federal government would not have kept me on as an Electronic Technician for the USPS. With all of this said I am asking the court to please consider all these facts and reverse and remove this Order of Protection that was placed upon me on March 5th 2025.

Thank You for your time in this matter
Regards,

Terrence Tully

CC:

- | | |
|--|--|
| 1. Court of Appeals
1220 Senate Street
Columbia SC 29201 | 2. Attorney John B. Williams
209 East Main Street
Moncks Corner SC 29461 |
|--|--|

Terrence Tully
1908 Rock Fish Road
Moncks Corner SC
29461

CERTIFIED MAIL



9589 0710 5270 0330 3267 92

Retail



RDC 99



29201

U.S. POSTAGE
FCM LG EN
NORTH CH
SC 29418
JUN 17, 20

\$12.4

S2324D500

Court of Appeals
1220 Senate Street
Columbia SC 29201

RETURN RECEIPT
REQUESTED

RECEIVED

JUN 22 2026

SC Court of Appeals