

RECEIVED

BEFORE THE SUPREME COURT OF SOUTH CAROLINA

Appellate Case No. 2016-002541

NOV 28 2017

State of South Carolina, and City of Columbia, SC
v. Marie Assa'ad-Faltas, MD, MPH

On Petition for a writ of certiorari
To the Court of Appeals of South Carolina

S.C. SUPREME COURT

THIRD SUPPLEMENT TO MOTION to Appoint Counsel for Rehearing or to Allow Petitioner to Argue Rehearing pro se; and, in either case, to Extend the Time to File for Rehearing.

"All fair judges are alike. Tyrannical judges are tyrants each in his/her own way."

Second paraphrase of Leo Tolstoy's opening of *Anna Karenina*

"Pinocchio told me so probable cause" caused Dr. Faltas to be falsely arrested on 2 December 2010. But Pinocchio [Teresa Ingram] wanted *permanent* free rent from Chief-Pinocchio [Dinah Steele] which the latter did not ^{want} to continue shelling out indefinitely. Classic thieves exposed in fighting over the loot. So evil Prosecutor Weiss rushed the trial to 22-26 February 2010, always under her self-made illusion that the Pyramids-DNA-ed Dr. Faltas will nonetheless collapse in the face of lying paper tigers.

Ingram's lies failed to procure a conviction and Steele evicted her on 15 March 2010 for non-payment.

Evil Weiss had to concoct a reason for Ingram's refusal to testify for Dr. Faltas other than the truth: the then-unemployed Ingram was being paid in free rent by Steele to testify against Dr. Faltas.

Evil Weiss knew or should have known that Ingram was unemployed and a drug addict; yet prodded her repeatedly to perjure herself and pretend that she was "gainfully employed" and "not a prostitute" and receiving innocent "friend" Corey Lamont Corey, whom Weiss herself had previously convicted of PWID crack cocaine and permanently prohibited from 300-304 Byron Road (close to a school.)

The attached complete, extracted, highlighted and annotated transcript of Ingram's 23 February 2010 testimony in Dr. Assa'ad-Faltas' 22-26 February 2010 GS jury trial **adds proof that false criminal charges were KNOWINGLY brought and maintained against Dr. Faltas to thwart her CIVIL demands to have Steele's and Mason's sewer lines rerouted away from the land which Dr. Faltas and her mother had unsuspectingly bought to build a residence on it.**

The additional attachments hereto are objective proof that Weiss should have known, after February 2010 at the very latest that Dr. Faltas is innocent and the true criminals are Ingram, Mason and Steele.

Dr. Faltas lets objective facts and records speak for themselves and reminds this Court that it can not cabin cruelty. What this Court inflicts on Dr. Faltas (by baselessly branding her "frivolous, abusive" for having successfully defended herself pro se against attempts to frame her for crimes of which she is innocent and even by refusing to scan in color the color documents she painstakingly prepares and files with this court) is of the same species, albeit only arguably of a lesser degree than the Las Vegas mass shooter. Jesus Christ equated unkind words with murder. If words do not kill, the indifference to human suffering underlying cruel words does. The essential ingredient for any crime is dehumanizing the victim. The Las Vegas mass shooter likely thought of himself as shooting as targets, not human beings.

Weiss, in causing Dr. Faltas to be falsely repeatedly arrested, and this Court in punishing Dr. Faltas for having repeatedly exonerated herself, most likely think of Dr. Faltas as an animal, not a human being.

"Conservative" jurists of this Court are descendants of those who thought of, and treated, other human beings as animals. "Conservatives" can neither stop history's march nor strip Dr. Faltas' humanity.

Dr. Faltas shall, God willing and this Court permitting, soon finish annotating the extracted Parts II and III of Ingram's testimony and hopes this Court will at least cause them to be scanned in color.

Submitted on 28 November 2017 and served by personal delivery of a copy to the office of SC's Attorney General.

Marie-Thérèse Assa'ad-Faltas, MD, MPH, Petitioner pro se for purpose of this motion
P.O. Box 9115, Columbia, SC 29290



SLED CATCH
Citizens Access to Criminal Histories



Results

Name **Teresa Ingram Jackson**

Date of Birth **1976 08 22**

Maiden Name

Gender **Female**

SSN

Transaction **004974418**

Date of Check **November 10, 2012 at 22:22**

ARREST RECORD
S.C. Law Enforcement Division
WWW

This record is based on a search using Last name, First initial, Gender, and Date of Birth only. Compare all identifying data given for record subject with screening subject. Fingerprint comparison is recommended as the most reliable means to identify a record subject.

INTERNET RAP SHEET REQUEST
ORI-SCLED0000 SID-SC01238631 FBI-***** PUR-E
ATN-WEB, ACCOUNT

AUTHORIZED USE ONLY. ***** CONTACT CONTRIBUTING
AGENCY FOR SPECIFIC/MORE DATA ABOUT CHARGES AND/OR DISPOSITIONS.
BECAUSE ADDITIONS OR DELETIONS MAY BE MADE AT ANY TIME, A NEW COPY
SHOULD BE REQUESTED WHEN NEEDED FOR SUBSEQUENT USE.

PAGE-01 DATE-11/10/2012 TIME-22:15:14
REQ ORI-SCLED0000 S C LAW ENF DIV
SID-SC01238631 FBI-
NAME-INGRAM, TERESA FALICIA SEX-F RACE-B
HEIGHT-504 WEIGHT-122 EYES-BRO HAIR-BLK SKIN- BORN-SC
FPC-POPI14230922PI121910 HENRY-14 O 17 W IOO 9
L 19 W IOO

PHOTOGRAPH AVAILABLE AUTHORIZED USE ONLY
1-FINGERPRINT IMAGES ON THIS SUBJECT ARE STORED ON SCAFIS

DATE RECORD ENTERED--N/A DATE OF LAST UPDATE--10/09/2012

ADDITIONAL IDENTIFIERS BIRTH
NAME DATES MARKS SOC SEC MISC NUM
INGRAM-JACKSON, TERESA FELICI 08221976 000000000
INGRAM, TERESA FELICIA JACKSO 000000000

INGRAM, TERESA FELICIA

000000000

CONTRIBUTOR/SUBJECT

DOA/RCVD CHARGE/DISPOSITION/ETC

INGRAM, TERESA FALICIA
SC0400400 FOREST ACRES PD
CASE-FA82198
WARR-F920142

10/14/1998

ARREST CHARGE 01-FTC FRAUD
OFFENSE DATE-10/14/1998
PHOTOGRAPH AVAILABLE

WARR-F920143

ARREST CHARGE 02-FTC FORGERY
OFFENSE DATE-10/14/1998

CIT-16-14-60 (A) DOC-99GS4036573
FINAN
CIAL
WARR-F920142

COURT CHARGE 01-

TRANS CARD FRAUD VALUE
\$500 OR LESS
COURT DISP-CONVICTED;JAIL 6
MOS AND FINE \$500 SUSPENDE
D WHILE ON PROBATION
COURT DATE-06/06/2000

CIT-16-14-60 (A) DOC-99GS4036584
FINAN
CIAL
WARR-F920143

COURT CHARGE 02-

TRANS CARD FRAUD VALUE
\$500 OR LESS
COURT DISP-CONVICTED;JAIL 6
MOS AND FINE \$500 AND

PAYMENT \$200

COURT DATE-06/06/2000

INGRAM-JACKSON, TERESA FELICIA 12/22/2010
SC0210100 FLORENCE PD
CASE-201000012053
ATN-21D000529526
WARR-83433FQ
CIT-16-13-110 (B) (1) -MISDEMEANOR

ARREST CHARGE 01-SHOPLIFTING
<\$2000
OFFENSE DATE-12/22/2010
PHOTOGRAPH AVAILABLE
PALM PRINTS AVAILABLE

INGRAM, TERESA FELICIA JACKSON 07/12/2011
SC0210100 FLORENCE PD
CASE-2011-006794

ATN-21D000533962
WARR-87314FQ
CIT-44-53-370 (D) (4) -MISDEMEANOR

ARREST CHARGE 01-POSS 28G OR
LESS MARIJ/10G OR LESS
HASH 1ST
OFFENSE DATE-07/12/2011
PHOTOGRAPH AVAILABLE
PALM PRINTS AVAILABLE

WARR-87313FQ
CIT-N/A-MISDEMEANOR

ARREST CHARGE 02-SOLICITING
FOR PROSTITUTION
OFFENSE DATE-07/12/2011

CIT--MISDEMEANOR
DOC-21
WARR-87314FQ

COURT CHARGE 01-POSS 28G OR
LESS MARIJ/10G OR LESS
HASH 1ST
COURT DISP-CONVICTED;Fine
\$500.00 / Jail 30 Days /
GP-\$500 OR 30 DAYS - PAY
BY 8/31/11
COURT DATE-07/25/2011
ATN-21D000533962

INGRAM, TERESA FELICIA 10/09/2012
SC0400000 RICHLAND CNTY SO
CASE-1583433
ATN-40D200034839
WARR-WWS @
CIT-44-53-370 (D) (4) -MISDEMEANOR

ARREST CHARGE 01-POSS 28G OR
LESS MARIJ/10G OR LESS
HASH 1ST
OFFENSE DATE-10/09/2012
PHOTOGRAPH AVAILABLE
PALM PRINTS AVAILABLE

WARR-WWS @
CIT-44-53-370 (D) (2) -MISDEMEANOR

ARREST CHARGE 02-POSS OTHER
CONTROLLED SUB IN SCHED I
TO V-1ST
OFFENSE DATE-10/09/2012

WARR-WWS @
CIT-44-53-370 (D) (2) -MISDEMEANOR

ARREST CHARGE 03-POSS OTHER
CONTROLLED SUB IN SCHED I
TO V-1ST
OFFENSE DATE-10/09/2012

@ - WARRANT OCCURS WITH MORE THAN ONE SID NUMBER

BASED ON SEARCH OF SCLED CJIS CCH FILE USING SID/SC01238631
THIS CRIMINAL HISTORY RECORD IS FOR SOUTH CAROLINA ARRESTS AND
CONVICTIONS ONLY AND IS BASED ON THE INFORMATION PROVIDED. SINCE
CHANGES MAY OCCUR DAILY A NEW INQUIRY SHOULD BE MADE AND NO SUBSEQUENT
USE OF THIS RECORD IS ALLOWED.

** S C CJIS END OF RECORD **

Credit Card Transaction Number **1352603845ICE322121110222007**

Return

Another Check



National Personnel Records Center

Military Personnel Records, 9700 Page Avenue St. Louis, Missouri 63132-5100

April 15, 2010

E. COOK
1416 PARK ST
COLUMBIA, SC 29201

RE: Veteran's Name: INGRAM, Teresa
SSN/SN: *****080
Request Number: 1-7559070555

Dear Madam:

Thank you for contacting the National Personnel Records Center. Unfortunately, your request must be returned without action because it did not include the signed consent of the individual whose records are involved and your court order/subpoena does not meet the requirements as outlined below.

Access to military or civilian personnel and medical records on file at the National Personnel Records Center, St. Louis, Missouri, may be gained pursuant "to the order of a court of competent jurisdiction." Valid court orders should be addressed to this Center. Subpoenas qualify as orders of a court of competent jurisdiction only if they have been signed by a judge. To be valid, court orders must also be signed by a judge. Authority for these requirements is 5 U.S.C. 552a(b)(11), as interpreted by Doe vs. DiGenova, 779 F. 2d 74 (D.C. Cir. 1985), and Stiles vs. Atlanta Gas and Light Company, 453 F. Supp. 798 (N.D. Ga. 1978).

The military service information provided in this reply has been extracted from records on file at the Center and is released to you under the Freedom of Information Act (FOIA), as amended in 1974.

The veteran served in the United States Naval Reserve from November 6, 1995 to November 27, 1995.

If additional information is needed, the Privacy Act of 1974 requires the written consent (signature) of the individual to whom the record pertains. If the individual is deceased we must have the written consent of the next of kin. The next of kin is defined as: unmarried widow or widower, son, daughter, father, mother, brother or sister.

If you have questions or comments regarding this response, you may contact us at 314-801-0800 or by mail at the address shown in the letterhead above. If you contact us, please reference the Request Number listed above. If you are a veteran, or a deceased veteran's next of kin, please consider submitting your future requests online by visiting us at <http://vetrecs.archives.gov>.

Sincerely,

TRACY M. MCELROY
Archives Technician (1D)

65951

SOFTDOCS, INC. (803) 695-8044



MIDLAND TECHNICAL COLLEGE
P.O. BOX 2408
COLUMBIA, SC 29202-2408
FICE CODE: 003993
PHONE: (803) 738-8324

**OFFICIAL
UNDERGRADUATE
TRANSCRIPT**

ALL COURSES DISPLAYED ON THIS TRANSCRIPT REFLECT SEMESTER CREDITS. SUMMER 1988 THRU SPRING 1992 ARE QUARTER COURSES CONVERTED TO SEMESTER CREDITS AT A 3:2 RATIO. COURSES TAKEN PRIOR TO SUMMER 1988 ATTACHED IN A SEPARATE DOCUMENT, REFLECT QUARTER CREDITS

STUDENT NAME		
Ms. Teresa F. Ingram		
BIRTH DATE	ISSUE DATE	MTC STUDENT ID
08/22/76	04/06/10	0132305
		24

Course Title	Grd R	Hrs Att	Hrs Cmt	Grade Points	Course Dates	Course Title	Grd R	Hrs Att	Hrs Cmt	Grade Points	Course Dates	Course Title	Grd R	Hrs Att	Hrs Cmt	Grade Points	Course Dates	
BAF 101 Personal Finance	C	3.00	3.00	6.00	01/18/96-05/10/96													
HIS 101 Western Civ to 168	C	3.00	3.00	6.00	01/18/96-05/10/96													
PSY 201 General Psychology	C	3.00	3.00	6.00	01/18/96-05/10/96													
19952 Totals:		9.00	9.00	18.00	GPA = 2.000													
Cumulative Totals:		9.00	9.00	18.00	GPA = 2.000													
HIS 202 Amer Hist: 1877 to W		3.00	0.00	0.00	05/27/96-08/09/96													
19953 Totals:		3.00	0.00	0.00	GPA = 0.000													
Cumulative Totals:		12.00	9.00	18.00	GPA = 2.000													

OFFICIAL TRANSCRIPT IS PRINTED ON SECURITY PAPER WITH EMBEDDED SEAL AND REGISTRAR'S SIGNATURE

Susan Houck
SUSAN HOUCK REGISTRAR

RELEASE OF INFORMATION:
In accordance with the Family Educational Rights & Privacy Act of 1974, as amended, this information is released on the condition that it will not be released to a third party without the prior written consent of the individual.

COLLEGE ACCREDITATION:
Midlands Technical College is accredited by the Commission On Colleges of the Southern Association of Colleges and Schools to award associate degrees, diplomas, and certificates.

QUESTIONS:
Any discrepancies or questions concerning credits, etc. must be brought to the attent Student Records Office within 30 days aft of the term. The student is responsible fo the accuracy of his/her record.

DegreeVerify Certificate

Transaction ID#: 017942797 Date Requested: 03/30/2010 11:18 EST
Requested by: ELIZABETH COOK Date Notified: 04/07/2010 09:06 EST

Status: Enrollment Only Confirmed by E-mail
Fee: \$6.50

INFORMATION YOU PROVIDED

Subject Name: TERESA INGRAM
First Name Middle Name Last Name

Name Used While Attending School: (if different from above)
First Name Middle Name Last Name

Date of Birth: 08/27/1976
mm/dd/yyyy

School Name: SOUTH CAROLINA STATE UNIVERSITY

Attempt To: Verify dates of attendance for someone who has not received a degree.

Your Case ID: Assaad

INFORMATION VERIFIED

Name On School's Records: TERESA INGRAM
Date Awarded: N/A
Degree Title: No Degree -- Enrollment Only
Official Name of School: SOUTH CAROLINA STATE UNIVERSITY

Major Course(s) of Study ACCOUNTING
(and NCES CIP Code, if available):

Dates of Attendance: 01/01/1997 to 05/03/1997

DegreeVerify Certificate

Transaction ID#: 017942983

Date Requested: 03/30/2010 11:26 EST

Requested by: ELIZABETH COOK

Date Notified: 03/30/2010 11:26 EST

Status: Confirmed

Fee: \$6.50

INFORMATION YOU PROVIDED

Subject Name: TERESA INGRAM
First Name Middle Name Last Name

Name Used While Attending School:
(if different from above)

Date of Birth: 08/22/1976
mm/dd/yyyy

School Name: BENEDICT COLLEGE
Attempt To: Verify dates of attendance for someone who has not received a degree.
Your Case ID: Assaad

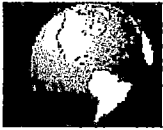
INFORMATION VERIFIED

Name: TERESA F INGRAM
Address: 2825 LOWDER ROAD
 SUMTER, SC 29153

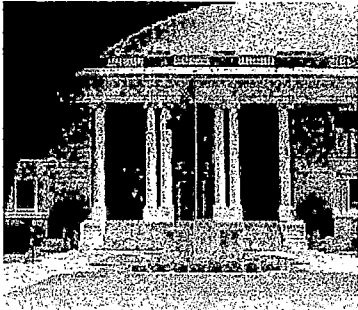
This enrollment history reflects all enrollment since 01/18/2000. If the subject claims enrollment prior to this date, please email the attendance dates he/she claims to degreeverify@studentclearinghouse.org. We will research your request and e-mail the results to you.

Certified by School	Enrolled	Term Start	Term End	School Name
05/22/2002	Full Time	01/14/2002	05/11/2002	BENEDICT COLLEGE

All information verified was obtained directly and exclusively from the individual's educational institution. The Clearinghouse disclaims any responsibility or liability for errors or omissions, including direct, indirect, incidental, special or consequential damages based in contract, tort or any other cause of action, resulting from the use of information supplied by the educational institution and provided by the Clearinghouse. The Clearinghouse also does not verify the accuracy or correctness of any information provided by the requestor.



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Sumter County, SC
Electronic
Government
Access

You are Here: [homepage](#) > [e-services](#) > [Real Property Search](#) > [Assessor Info](#)

Assessor Ownership, Location, and Tax Information

The below information represents all pertinent assessor data based upon the parcel number that you selected. To view the Real Property with Mapping interface simply click the "Map/Assess.Info" button.

Ownership & Location Information

Tax Information

Map/Assess. Info.

Property Card

Ownership & Location Information:

Parcel #:	2730004070
Location:	2925 SHONGLENNIKY
Legal Description:	PB02-393
	1.00
Current Owner:	INGRAM TERESA
Deed Book/Page:	848/528
Plat Book/Page:	2002 /393
Taxpayer Name:	INGRAM TERESA
Lendor Name:	
District:	2
Neighborhood:	200/N SUMTR W OF HWY15
	TO 261
# of Lots:	0
# of Buildings:	0
# of Acres:	1
Land Fair Market Value:	2,750
Building Fair Market Value:	0
Fair Market Value:	2,750
Assessed Value:	170

[back to top](#)

Tax Information:

Tax Year	Receipt #	Assessed Value	Tot Amt Due	Total Amt Paid	Due Date	Collection Sts	Paid Sts	Date Paid
2009	6112131	170	54.84	54.84	01/15/2010	NONE	FULL	01/29/2010
2008	5905140	170	57.84	57.84	01/15/2009	NONE	FULL	03/06/2009
2007	5590016	170	55.69	55.69	01/15/2008	NONE	FULL	03/14/2008
2006	5361172	170	48.90	48.90	01/16/2007	NONE	FULL	03/12/2007
2005	5122122	150	44.00	44.00	01/17/2006	NONE	FULL	01/30/2006
2004	4829216	150	45.86	45.86	01/18/2005	NONE	FULL	03/14/2005
2003	4563976	150	45.03	45.03	01/15/2004	NONE	FULL	03/16/2004

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2002 JUL -5 AM 11:15

JANICE M. REARDEN
REGISTER OF DEEDS
SUMTER CO., S.C.

RECORDED

VOL. 848 PG. 528

SUMTER COUNTY, S.C.

RETURN TO: Morris D. Mazursky, Atty.
File: 02-135

STATE OF SOUTH CAROLINA)

TITLE TO REAL ESTATE

COUNTY OF SUMTER)

KNOW ALL MEN by these presents that the undersigned grantor, for and in consideration of the sum of Five (\$5.00) Dollars and other valuable consideration to me in hand-paid at and before the sealing of these presents (the receipt whereof is hereby acknowledged), has granted, bargained, sold and released, and by these presents does grant, bargain, sell and release (subject to (1) any liens, reservations and limitations, inclusive of any life interests or estates and any appurtenant easements for egress and ingress, referred to herein and (2) any visible and/or recorded easements, covenants or rights of way, all of which are separately and collectively referred to herein as "said restrictions") unto:

TERESA INGRAM

That lot of land in Sumter Township, Sumter County, State of South Carolina, containing one acre and shown on a plat by Joseph R. Edwards, RLS, dated May 21, 2002 and recorded in the Office of Register of Deeds for Sumter County in Plat Book 2002, at Page 393; said parcel of land is shown as 2925 Shonglenniky Road and has such shape, metes, bounds and measurements as shown on said plat.

Also conveyed hereby to the grantee is a perpetual easement and right-of-way on a private road shown on said plat designated as Shonglenniky Road, such easement to be a perpetual easement for ingress and egress to be used jointly by the grantee, the grantor and other grantees of the grantor.

This conveyance is made subject to the Restrictive Covenants placed thereon by Curtis Ingram, Teresa Ingram, Rodney Ingram and Eric Ingram dated the 21st day of June, 2002, and recorded on the 5 day of July, 2002, in the Office of Register of Deeds for Sumter County in Volume 848, at Page 521.

The property hereby conveyed is a portion of the property conveyed to Curtis Ingram by deed of Albertus Baker, Individually and as Attorney-in-Fact for Hayes Baker, James Baker, Wilhelmina Wertz, Alice Baker, Howard Baker and Edna Baker by deed dated and recorded on January 15, 1997 in the Office of Register of Deeds for Sumter County in Volume 665, at Page 478.

The consideration for this conveyance is love and affection for my daughter, the grantee herein, and the sum of \$5.00.

RECORDING FEE:	\$	<u>10.00</u>
NOTARY TRANSFER FEE:	\$	<u>Exempt</u>
TITLE TRANSFER FEE:	\$	<u>Exempt</u>
TOTAL PAID:	\$	<u>10.00</u>

Unless provided to the contrary in this document, it is intended to convey to the grantee(s) a title in fee simple absolute and the entire interest of the grantor.

Together with all and singular the rights, members, hereditaments and appurtenances to the said premises belonging or in anywise incident or appertaining.

TO HAVE AND TO HOLD (subject to said restrictions) all and singular the said premises mentioned unto the within named grantee(s), his, her, its or their assigns and heirs or successors forever. And (subject to said restrictions) I do hereby bind myself and my heirs, executors and administrators to warrant and forever defend all and singular the said premises unto the said grantee(s), his, her, its or their assigns and heirs or successors against me and my heirs and all other persons lawfully claiming or to claim the same or any part thereof.

WITNESS my hand and seal this 28th day of June, 2002.

IN THE PRESENCE OF:

Marcia W. Mazzurco
Witness (1)
[Signature]
Witness (2)

Curtis Ingram (Seal)
Curtis Ingram

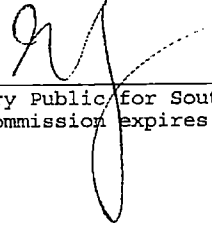
THIS DOCUMENT WAS FILED ON:
July 5 2002 AT 11:15 am
RECORDED: VOL. 848 PG. 528
JANICE M. REARDEN
REGISTER OF DEEDS
SUMTER COUNTY, S.C.

STATE OF SOUTH CAROLINA)
COUNTY OF SUMTER)

ACKNOWLEDGMENT

I, the undersigned Notary Public for South Carolina, do hereby certify that Curtis Ingram personally appeared before me this day and acknowledged the due execution of the foregoing instrument.

Witness my hand and seal this 28th day of June, 2002.

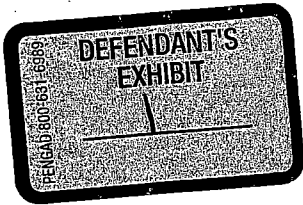

_____(Seal)
Notary Public for South Carolina
My commission expires: 08-18-2010

TITLE TO THE PROPERTY HEREIN CONVEYED WAS NOT EXAMINED BY MORRIS D. MAZURSKY, ATTORNEY

GRANTOR(S): Curtis Ingram

GRANTEE(S): Teresa Ingram
2925 Shonglenniky Road
Sumter, SC 29153

[Print Property Card](#) [Close Window](#)



Note for Teresa Ingram on 3/13/2008 - Chart INGTE000

Fields Chiropractic Clinics, P.A.

Dr. James M. Fields

Dr. Andrew J. Fields

Dr. Sander M. Fields

4732-C Devine Street, Columbia SC 29209

Phone (803) 787-7050 Fax (803) 787-0502

www.fieldschiro.com

This 31 year old female presents today for an evaluation of the effects of a motor vehicle accident. She indicates the problem location is left mid back, left lower back, right lower back, posterior aspect of neck and left upper back. The accident occurred on 2/29/2008. Ms. Ingram was the driver of a vehicle making a left turn when hit on driver's side. Her body was jerked upon impact. The patient was wearing a seatbelt. An accident report was completed by police. The ambulance did respond to the accident scene. Patient did seek treatment at the Palmetto Health Richland emergency room. At the hospital the patient was examined, x-rayed, medicated and prescribed medication upon release. Because of her continued pain and discomfort, the patient decided to seek additional help, and came to our office on that basis. Patient is experiencing low back stiffness. Condition has existed constantly and for 2 weeks. Patient indicates standing worsens condition and walking worsens condition. Condition is described as sharp and shooting. Severity of condition is a 7 on a scale of 1-10 with 10 being the worst.

Medication History: Active: Flexeril (active), Vicodin (active), Zoloft (active).

Past Medical History: Past medical history is unremarkable.

Past Surgical History: No previous surgeries.

Social History: Patient/Guardian denies smoking, alcohol abuse, illicit drug use and STDs.

Review of Systems: Musculoskeletal: (+) joint or musculoskeletal symptoms.

Objective: To exam patient and diagnose and define severity of injuries resulting from auto accident.

Physical Exam: BP Sitting: 120/80 Height: 5 ft. 5.000 in. Weight: 157 lbs. BMI: 26

Patient is a 31 year old female who aside from today's complaints, appears pleasant, her given age, alert and in good mental health.

Musculoskeletal: Left mid back, posterior aspect of neck and left upper back shows segmental hypomobility and tenderness. Neck:

Neck is supple and trachea is midline without palpable adenopathy or crepitation.

Foramina Compression was performed and local pain was listed on left and Shoulder Depression was performed and local pain was listed on left.

Cervical ROM shows normal flexion with pain, normal extension with pain, normal L Tilt with pain, normal R Tilt with pain, normal L Rotation with pain, normal R Rotation with pain.

Cervical vertebrae demonstrate no evidence of dislocation or laxity. Lumbosacral:

Lumbar ROM shows normal flexion with pain, normal extension with pain, normal L Side bend with pain, normal R Side bend with pain, normal L Rotation with pain, normal R Rotation with pain.

Lumbar vertebrae demonstrate no evidence of dislocation or laxity. Walking gait exam reveals

Ingram, Teresa 3/13/2008 - INGTE000

James Fields D.C.

no abnormal findings. Standing posture exam reveals no abnormal findings. Deep tendon reflexes are normal.

No objective shoulder instability.

Shoulder demonstrates no evidence of dislocation or laxity.

Left shoulder ROM shows normal flexion with pain, normal extension without pain, normal adduction with pain, normal abduction with pain, normal internal rotation without pain, normal external rotation without pain.

Shoulders appear to be normal upon visual inspection.

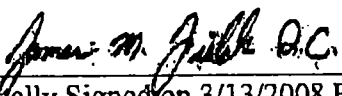
Orders & X-Ray Results: See reports.

Assessment: Cervical sprain/strain. Thoracic sprain/strain. Lumbar sprain/strain. Pain in shoulder joint left.

Procedures: New Patient Exam 4. Self Care/Home Management. The following modalities and/or procedures were applied to Teresa: The right lower back, left upper back and left lower back was treated with EMS unit, attended and hot pack. The Cervical Spine was treated in the supine position and using adjustment. Mid Thoracic Spine T5-T9 and Lumbar Spine was treated in the prone position and using adjustment. CMT-spinal, three to four regions.

Plan: The patient has been seen today, and will continue 3 times per week for 5 weeks. Goals for treatment are: Decrease pain. Patient received instruction on good posture. Instructed patient on application of heat. Patient received verbal and written instructions regarding home exercises. I have discussed the findings of this examination with the patient. The discussion included a complete verbal explanation of the examination results, diagnosis and planned treatment(s). A schedule for future care needs was explained. She verbalizes understanding of these instructions at this time. If any questions should arise after returning home I have encouraged the patient to feel free to call the office.

Follow-up: Return to the office in 1 day(s).


James Fields, D.C.
Digitally Signed on 3/13/2008 By: James Fields, D.C.

Note for Teresa Ingram on 5/6/2008 - Chart INGTE000**Fields Chiropractic Clinics, P.A.**

Dr. James M. Fields

Dr. Andrew J. Fields

Dr. Sander M. Fields

4732-C Devine Street, Columbia SC 29209**Phone (803) 787-7050 Fax (803)787-0502****www.fieldschiro.com**

Subjective: This 31 year old female presents today for follow-up of spinal pain. Patient is experiencing low back back stiffness, neck stiffness, upper back stiffness and left shoulder pain. The condition occurred as a result of a MVA. Back pain is described as stiffness. Severity of condition is resolved.

Objective: The physical exam is updated as follows.

Patient is a 31 year old female who appears in no apparent distress, oriented and alert.

Cervical Spine and Upper Thoracic Spine T1-T4 reveals no paraspinal tenderness, muscular hypertonicity, or interarticular hypomobility.

Inspection and palpation of bones, joints and muscles is unremarkable.

Cervical ROM is normal, with full flexion/extension and rotation. Patient does not have pain with cervical ROM.

Thoracic ROM within normal limits. Pain with thoracic ROM? no.

Test Results: No tests to report at this time.

Assessment: Cervical sprain/strain. Thoracic sprain/strain. Lumbar sprain/strain. After today's clinical assessment it has been determined that the patient's condition is seemingly resolved.

Cervical spine subluxation. Thoracic spine subluxation. Lumbar spine subluxation. Shoulder contusion left.

Procedures: Established Patient Exam 3.

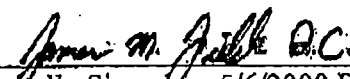
Plan:

Goals for treatment are: Supportive care.

Orders:

Follow-up:

She should return to the clinic as needed, or if any other concerns arise.


Digitally Signed on 5/6/2008 By: Fields Chiropractic,

INCIDENT REPORT

INCIDENT TYPE	COMPLETED	FORCED ENTRY	PREMISE TYPE	UNITS ENTERED	TYPE VICTIM
1. 16-03-1710(A) Stalking/Harassment 13C INTIMIDATION	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/> YES <input type="checkbox"/> NO	APARTMENT/CONDO		<input checked="" type="checkbox"/> Individual <input type="checkbox"/> Business <input type="checkbox"/> Financial Inst <input type="checkbox"/> Governmen <input type="checkbox"/> Relig. Orgn. <input type="checkbox"/> Soc./Public <input type="checkbox"/> Other <input type="checkbox"/> Unknown <input type="checkbox"/> Police Off.
2. 14-91 Disorderly Conduct 90C 90C DISORDERLY CONDUCT	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/> YES <input type="checkbox"/> NO	APARTMENT/CONDO		
3.	<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/> YES <input type="checkbox"/> NO			

INCIDENT LOCATION (SUBDIVISION, APARTMENT AND NUMBER, STREET NAME AND NUMBER) 300 BYRON RD, 4, COLUMBIA, SC

ZIP CODE 29209-0000 WEAPON TYPE

INCIDENT DATE	24 HR. CLOCK	TO	DATE	24 HR. CLOCK	DISPATCH DATE/TIME 24 HR. CLOCK				LOCATION NO.
DISP. DATE	DISP. TIME	TIME ARRIVED	DEPART. TIME						
02/14/2009	19:00		02/15/2009	08:30	02/15/2009	08:35	08:40	09:00	639

COMPLAINANT'S NAME (LAST, FIRST, MIDDLE) INGRAM, TERESA

RELATIONSHIP TO SUBJECT #1 AQ #2 #3

RESIDENT J RACE B SEX F AGE 22 / ETH N DAYTIME PHONE 803-972-0933 EVENING PHONE 803-972-0933

ADDRESS 300 BYRON RD, 4 CITY COLUMBIA STATE SC ZIP CODE 29209-0000 LOCATION NO. 639

VICTIM'S NAME (LAST, FIRST, MIDDLE) INGRAM, TERESA

RELATIONSHIP TO SUBJECT #1 AQ #2 #3

RESIDENT J RACE B SEX F AGE 22 / ETH N DAYTIME PHONE 803-972-0933 EVENING PHONE 803-972-0933

HEIGHT WEIGHT HAIR EYES FACIAL HAIR, SCARS, TATOOS, GLASSES, CLOTHING, PHYSICAL PECULIARITIES, ETC.

ADDRESS 300 BYRON RD, 4 CITY COLUMBIA STATE SC ZIP CODE 29209-0000 LOCATION NO. 639

VISIBLE INJURY (VICT. 1) YES NO EXPLAIN- COMPLAINT OF ANY NON-VISIBLE INJURIES: YES NO

VICTIM (NO. 1) USING: ALCOHOL YES NO UNK. DRUGS: YES NO UNK. TYPE:

TWO MAN VEH. ONE MAN VEH. DETECTIVE FLASMT. OTHER ALONE ASSISTED *J-This Jurisdiction. S-State. O-Out of State. U-Unknown.

SUSPECT NAME (LAST, FIRST, MIDDLE) SMITH, GREGORY, D RACE B SEX M AGE 41 / ETH N DATE OF BIRTH 4/28/1967 HEIGHT 507 WEIGHT 191 HAIR EYES

RUNAWAY FACIAL HAIR, SCARS, TATOOS, GLASSES, CLOTHING, PHYSICAL PECULIARITIES, ETC. DAYTIME PHONE 803-447-5493 EVENING PHONE phone2

WANTED

WARRANT ADDRESS 624 COLUMBIA COLLEGE DR CITY COLUMBIA STATE SC ZIP CODE 29203- LOCATION NO. 120

ARREST

JAIL SUBJECT (NO. 1) USING: ALCOHOL YES NO UNK. ARRESTED NEAR OFFENSE SCENE YES NO DATE/TIME OF OFFENSE 02/14/2009 19:00 DATE/TIME OF ARREST

SUMMONS DRUGS: YES NO UNK. TYPE TOTAL # ARRESTED

DAY OF THE WEEK	HOW REPORTED	A= OFFICER DISPATCHED ON CALL	D= COMPLAINT WRITTEN IN	DIFF. FACTOR	A= RESISTANCE/HOSTILITY	E= COMPLAINANT FRE-QUENTLY INTOXICATED
S M T W T F S UNK		B= REPORT TAKEN BY PHONE	E= OFFICER INITIATED	N	B= WEAPONS	F= DOMESTIC
		C= COMPLAINANT WALKED IN	F= OTHER		C= UNFOUNDED CALLS	N= NORMAL
					D= MENTAL SUBJECT	

Original

VICTIM STATED THE LISTED SUBJECT CAME TO HER APARTMENT ON 02/13/2009 AND BEGAN BEATING ON HER DOOR ASKING HER TO COME OUT OF HER APARTMENT TO TALK. ONCE SHE REFUSED THE SUBJECT BEGAN SHOUTING AND THREATENING HER WITH BODILY HARM. SHE FURTHER STATED THE SUBJECT HAS CALLED AND TEXT SPECIFIC FAMILY MEMBERS THREATENING HER IF SHE KEEPS REFUSING TO TALK WITH HIM. THE SUBJECT AND THE VICTIM WERE GIRLFRIEND AND BOYFRIEND UP TO FOUR MONTHS AGO. SHE STATED ONCE SHE ENDED THE RELATIONSHIP HE HAS MADE HER LIFE MISERABLE. SHE STATED SHE IS NOW SCARED OF THE SUBJECT BECAUSE ON SEVERAL OCCASIONS HE HAS PERSONALLY THREATEN TO KILL HER. THE SUBJECT TOLD THE VICTIMS BROTHER IF SHE CONTINUES TO IGNORE HIM SHE GOING TO REGRET IT AND HE DOES NOT CARE ABOUT GOING TO JAIL. THE VICTIM ALSO PRODUCED A HAND WRITTEN NOTE THE SUBJECT

JURISDICTION OF THEFT LAW ENFORCEMENT AGENCY JURISDICTION OF RECOVERY LAW ENFORCEMENT AGENCY

TYPE (GROUP)	TOTAL VALUE
STOLEN	0
DAMAGED	0
BURNED	0
RECOVERED	0
SEIZED	0

SUBJECT IDENTIFIED YES NO SUBJECT LOCATED YES NO S.F. AI ACTIVE ADM. CLOSED UNFOUNDED ARRESTED UNDER 18 ARRESTED 18 AND OVER EX-CLEAR UNDER 18 EX-CLEAR 18 AND OVER

REASON FOR EXCEPTIONAL CLEARANCE: 1. OFFENDER DEATH 2. NO PROSECUTION 3. EXTRADITION DENIED 4. VICTIM DECLINES COOPERATION 5. JUVENILE NO CUSTODY

REPORTING OFFICER(S)	DATE	UNIT NUMBER	APPROVING OFFICER	DATE	UNIT NUMBER
RIVERS JAMES L	2/15/2000 8:35:00 AM	13269	ROBERTS CHRISTOPHER B	2/15/2009	11993
			FOLLOW UP OFFICER		
			INVESTIGATION <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		

INCIDENT TYPE
 VISIBLE INJURY
 SUBJECT NO.
 FINGERPRINTS
 ADMINISTRATIVE

ADDITIONAL NARRATIVE

Agency Name: Columbia Police Department	ORI #: SC0400100	Report Date/Time: 02/14/2009 19:00	OCA #: 090004067
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HARASSMENT DISORDERLY CONDUCT

LEFT ON HER DOOR THREATENING HER. SHE STATED SHE HAS TOLD THE SUBJECT NUMEROUS TIMES SHE DOES NOT WISH ANY CONTACT WITH HIM BUT APPEARS TO HAVE NO AFFECT.

AGENCY : Columbia Police Department
 ORI # :
 Report Date/Time : 02/14/2009 19:00
 Incident # : 090004067

**INCIDENT REPORT
 ADDITIONAL OTHERS**

PERSON TYPE OTHER	NAME (LAST, FIRST, MIDDLE) INGRAM, TERESA				RELATIONSHIP SUBJECT #1 AQ #2 #3			RESIDENT J	RACE B	SEX F	AGE 22 /	D.O.B.	ETH N
	HEIGHT	WEIGHT	HAIR	EYES	FACIAL HAIR, SCARS, TATOOS, GLASSES, CLOTHING, PHYSICAL PECUALIARITIES, ETC.								
	ADDRESS 300 BYRON APARTMENT 4 RD				CITY COLUMBIA	STATE SC	ZIP CODE 29209- XXXX	LOCATION NO. 639	DAYTIME PHONE 803-972-0933		EVENING PHONE 803-972-0933		
VISIBLE INJURY <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> EXPLAIN-												COMPLAINT OF ANY NON-VISIBLE INJURIES: <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	
USING: ALCOHOL <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> UNK. <input type="checkbox"/> DRUGS: <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> UNK. <input type="checkbox"/> TYPE:													

PERSON TYPE OTHER	NAME (LAST, FIRST, MIDDLE) SMITH, GREGORY				RELATIONSHIP SUBJECT #1 AQ #2 #3			RESIDENT J	RACE B	SEX M	AGE 41 /	D.O.B. 4/28/1967	ETH N
	HEIGHT 507	WEIGHT 191	HAIR	EYES	FACIAL HAIR, SCARS, TATOOS, GLASSES, CLOTHING, PHYSICAL PECUALIARITIES, ETC.								
	ADDRESS 524 COLUMBIA COLLEGE DR				CITY COLUMBIA	STATE SC	ZIP CODE 29210- XXXX	LOCATION NO. 120	DAYTIME PHONE 803-447-5493		EVENING PHONE		
VISIBLE INJURY <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> EXPLAIN-												COMPLAINT OF ANY NON-VISIBLE INJURIES: <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	
USING: ALCOHOL <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> UNK. <input type="checkbox"/> DRUGS: <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> UNK. <input type="checkbox"/> TYPE:													

PERSON TYPE OTHER	NAME (LAST, FIRST, MIDDLE)				RELATIONSHIP SUBJECT #1 #2 #3			RESIDENT	RACE	SEX	AGE /	D.O.B.	ETH
	HEIGHT	WEIGHT	HAIR	EYES	FACIAL HAIR, SCARS, TATOOS, GLASSES, CLOTHING, PHYSICAL PECUALIARITIES, ETC.								
	ADDRESS				CITY	STATE	ZIP CODE	LOCATION NO.	DAYTIME PHONE		EVENING PHONE		
VISIBLE INJURY <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> EXPLAIN-												COMPLAINT OF ANY NON-VISIBLE INJURIES: <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	
USING: ALCOHOL <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> UNK. <input type="checkbox"/> DRUGS: <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> UNK. <input type="checkbox"/> TYPE:													

PERSON TYPE OTHER	NAME (LAST, FIRST, MIDDLE)				RELATIONSHIP SUBJECT #1 #2 #3			RESIDENT	RACE	SEX	AGE /	D.O.B.	ETH
	HEIGHT	WEIGHT	HAIR	EYES	FACIAL HAIR, SCARS, TATOOS, GLASSES, CLOTHING, PHYSICAL PECUALIARITIES, ETC.								
	ADDRESS				CITY	STATE	ZIP CODE	LOCATION NO.	DAYTIME PHONE		EVENING PHONE		
VISIBLE INJURY <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> EXPLAIN-												COMPLAINT OF ANY NON-VISIBLE INJURIES: <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	
USING: ALCOHOL <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> UNK. <input type="checkbox"/> DRUGS: <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> UNK. <input type="checkbox"/> TYPE:													

PERSON TYPE OTHER	NAME (LAST, FIRST, MIDDLE)				RELATIONSHIP SUBJECT #1 #2 #3			RESIDENT	RACE	SEX	AGE /	D.O.B.	ETH
	HEIGHT	WEIGHT	HAIR	EYES	FACIAL HAIR, SCARS, TATOOS, GLASSES, CLOTHING, PHYSICAL PECUALIARITIES, ETC.								
	ADDRESS				CITY	STATE	ZIP CODE	LOCATION NO.	DAYTIME PHONE		EVENING PHONE		
VISIBLE INJURY <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> EXPLAIN-												COMPLAINT OF ANY NON-VISIBLE INJURIES: <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	
USING: ALCOHOL <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> UNK. <input type="checkbox"/> DRUGS: <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> UNK. <input type="checkbox"/> TYPE:													

PERSON TYPE OTHER	NAME (LAST, FIRST, MIDDLE)				RELATIONSHIP SUBJECT #1 #2 #3			RESIDENT	RACE	SEX	AGE /	D.O.B.	ETH
	HEIGHT	WEIGHT	HAIR	EYES	FACIAL HAIR, SCARS, TATOOS, GLASSES, CLOTHING, PHYSICAL PECUALIARITIES, ETC.								
	ADDRESS				CITY	STATE	ZIP CODE	LOCATION NO.	DAYTIME PHONE		EVENING PHONE		
VISIBLE INJURY <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> EXPLAIN-												COMPLAINT OF ANY NON-VISIBLE INJURIES: <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	
USING: ALCOHOL <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> UNK. <input type="checkbox"/> DRUGS: <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> UNK. <input type="checkbox"/> TYPE:													

ADDITIONAL NARRATIVE

Agency Name: Columbia Police Department	ORI #: SC0400100	Report Date/Time: 02/14/2009 19:00	OCA #: 090004067
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HARASSMENT DISORDERLY CONDUCT

THE COMPLAINANT DOES NOT WISH TO PROSECUTE THE CASE SHE INDICATED THAT THE SUSPECT NO LONGER CONTACTS HER. I ADVISED THE VICTIM THAT THE CASE WOULD BE CLOSED WITH NO PROSECUTION.

ADDITIONAL NARRATIVE

Agency Name: Columbia Police Department	ORI #: SC0400100	Report Date/Time: 02/14/2009 19:00	OCA #: 090004067
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Administrative Values

Reporting Officer: 02/25/2009 14142 MONTGOMERY WAYNE H

Approving Officer: 02/27/2009 09161 DRAFTS GEORGE A

Assisting Officer:

Follow Up Officer: 02/25/2009 14142 MONTGOMERY WAYNE H

The State of South Carolina
County of Richland
The State of South Carolina : PARTIAL TRANSCRIPT OF RECORD
vs. :
Dr. Marie Assa'ad Faltas :

Court of General Sessions
2010-GS-40-11980 and 2010-GS-40-11987

February 23, 2010
Columbia, South Carolina

BEFORE: The Honorable Clifton Newman, Judge, and jury.

APPEARANCES: Heather Weiss, Esquire :
Alexander Campbell, Esquire, Attorneys for the State
Dr. Marie Assa'ad-Faltas, *pro se* defendant.

Also present: Mark Sawyer, Esquire Daphne D. Helms, Circuit Court Reporter

[Transcript A, page 15, lines 1-7] (Court reporter's note: This is a partial transcript of record, per the request of Ms. Weiss who requested only the testimony from the trial proceedings be transcribed. Prior to the beginning of testimony, there was over a day's worth of colloquy that took place, as well as the impaneling of the jury, and opening statements. The testimony began in the presence of the jury as follows:)

[Transcript B, page 54, lines 2-5] (Whereupon, the jury was brought into open court at 4:33 p.m.)

[6] The Court: Okay. Your first witness.

[7] Ms. Weiss: Thank you, Your Honor. May it please the Court?

[9] The Court: Yes.

[Transcript B, page 54, line 10 = Transcript A, page 15, line 8] Ms. Weiss: The State calls Teresa Ingram.

[9] The Court: Ms. Ingram?

[10-11] Teresa Ingram, after being duly sworn, testified as follows:

[12-13] The Clerk: Have a seat in the witness stand and give the court reporter your name, please.

[14] The Witness: My name is Teresa Ingram.¹

[15-16] Direct Examination By Ms. Weiss:

[17] Q. Good afternoon, Ms. Ingram.

[18] A. Good afternoon.

[19] Q. Your name is Teresa Ingram?

[20] A. Yes.²

[21] Q. Do you mind if I call you Teresa?

[22] A. That's fine.

[23] Q. Teresa, where are you from?

[24] A. I'm from Sumter, South Carolina.

[25] Q. Were you born and raised there?

[page 16, line 1] A. Yes.

[27] Q. Did you go to high school there?

[28] A. Yes, high school in Sumter, South Carolina, as well.

[29] Q. Where did you graduate from?

[30] A. Maywood High School in 1994.

[31] Dr. Faltas: I'm sorry, I didn't hear. Did she say Maywood?

[32] The Court: Yes, Maywood High School. Can you scoot up a little and close to the mic?

[10-12] By Ms. Weiss: Q. If you want to move the mic over towards you... There you go. After you left Maywood in 1994, where did you go?

[13-14] A. Initially after high school I sat out a year.³ Then I went in the Navy.

[34] Dr. Faltas: I'm sorry, I still can't hear.

[35] Ms. Weiss: May I continue, Your Honor?

[37] The Court: Yes.

[18-19] By Ms. Weiss: Q. And what did you do in the Navy?

[20] A. I was aviation.⁴

[21] Q. How long did you remain with the Navy?

[22-23] A. I only stayed in the Navy a year and a half.⁵ I got out on a medical discharge.⁶

[24] Q. An honorable discharge?

[25] A. Yes, honorable medical discharge.⁷ Yes.

[page 17, lines 1-2] Q. Honorable medical. When you left the Navy, where did you go?

[36] A. I attended South Carolina State, and after South Carolina State work was in between a few years, and my last schooling was at Benedict College, a junior at Benedict College in 2003, Spring of 2003.⁸

[37] Q. Spring of 2003.

[38] A. Uh-huh.⁹

[39] Q. And when you left there, did you go to work?

[40] A. Yes.¹⁰

¹ Her formal name then was "Teresa Felicia Ingram-Jackson." Her stage/FaceBook name is "Nikki Icecream Ingram." She went by "Jackson" in: (1) SC's Department of Juvenile Justice; (2) Florence, SC; (3) Central Court case C356700; (4) Shandon Crossing Apartments whence she got evicted in 2007 for non-payment/misconduct per case numbers 2006CV401062491, 2007CV401061256, and 2007CV401060650; and (5) at least one hospital in Florence, SC, from which she obtained at least one "shot for pain" circa May 2008 according to her testimony in *Ingram v. Trifon* 2008CP4004243.

² Vide note 1, *supra*.

³ Teresa did not "sit out" but worked as a nightclub stripper, most likely at BJ's Lounge of Sumter, later closed due to shootings.

⁴ VA's Response to FOIA Request # 1-755907055 shows Teresa was in the Naval Reserve, never in aviation, and only for three weeks, specifically from 6 to 27 November 1996, not a year and a half.⁴

⁵ Vide note 4, *supra*.

⁶ Teresa had no medical discharge and no diagnosis of "migraine" because her stint was too short for that. Her medical records, entered in *Ingram v. Trifon*, case number 2008CP4004243, show no past history of any condition warranting medical discharge.

⁷ Vide note 4, *supra*.

⁸ Teresa enrolled in: (1) Midlands Technical College from 18 January to 10 May 1996 (one semester, 9 credit hours, GPA 2.00); (2) South Carolina State (one semester from 1 January to 3 May 1997); and (3) Benedict College from 14 January to 11 May 2002. She never advanced to "Junior" because she never completed enough courses anywhere.

⁹ Vide note 8, *supra*.

¹⁰ She did not work then because she married Brian Aldwin Jackson, a convicted drug dealer and "chop shop" operator.

111 Q. Where did you go to work?

112-114 A. At that time it was APEC, and from APEC I worked at the Department of Juvenile Justice for a few years and then the Mentor Network.

115 Q. The Mentor Network?

116 A. Yes.

117-118 Q. Please tell the jury -- is that where you currently work today?

119 A. Yes.

120-121 Q. Please tell the jury a little bit about the Mentor Network and what it is.

122 to page 18, line 4 A. The Mentor Network -- if some of you are from Columbia, it's very similar to the Babcock Center. We help individuals that have brain injuries, and I work at a house that's in the northeast and there's four young adult males and they have all had brain injuries. And that's just basically assisting them with their daily living duties.¹² It could be doctors' appointments, transportation, activities, meals, medications¹³ just that type of stuff.

124 Q. Did you receive training to work with the Mentor Network?

125 A. Yes, I received training through the Mentor Network itself,¹⁴ but I also received training for the same background with the Disability and Special Needs Board in Sumter.¹⁵

126 Q. How long have you been with the Mentor Network?

127-128 A. I've been with the Mentor Network about two and a half years now.¹⁶

129 Q. So you went straight from D.J.J. to the Mentor Network.

130 A. Yes.

131-132 Q. And during that time, the last three, three and a half years, during that time where have you been living?

133-134 A. I've been living here in Columbia I would say for the past six years, but it was at a different address,¹⁷ not at Byron Road.

135 Q. At what point did you move to the Byron Road address?

136 A. I moved to the Byron Road address in 2007? Yeah, 2007.

137 Q. And who do you live at Byron Road?

138 A. I live alone.¹⁸

139 Q. And are you married?

140 A. I am divorced.¹⁹

¹¹ She was terminated from "The Mentor Network" on 25 June 2009 and never rehired as she testified in her: (1) 21 August 2009 deposition in *Ingram v. Trifon, 2008CP4004243*:

[deposition page 4, line 25] Q: And where are you employed?

[page 5, line 1] A: Unemployed.

[2-3] Q: And where were you employed at the time of the accident?

[4] A: The Mentor Network.

[4] Q: And why did you leave Mentor Network?

[5] A: Terminated.

[6] Q: Do you know why?

[7] A: Unauthorized leave of a client.

[8] Q: And what does that mean?

[19-20] A: The client left without having the proper paper work.

[21] Q: And how long were you there?

[22] A: Two and a half years.

[23] Q: And when did you leave?

[24] A: June 25th of this year, 2009.

and (2) *Ingram v. Trifon, 2008CP4004243* 24-25 August 2009 trial, transcript page 46:

Q. Okay. And are you currently employed?

A: No, I'm unemployed at this moment.

Q. All right. And where was your last place of employment?

A: I was employed with the Mentor Network of South Carolina.

¹² Vide note 6, supra.

¹³ She was never licensed to handle medication.

¹⁴ In her *Ingram v. Trifon* deposition, she testified she had no special training or certification, specifically:

[page 6, line 25] Q: Certificate programs?

[page 7, line 1] A: (Shakes head negatively.)

[2-5] Q: Did you have to take any special training for your job with, and I'm assuming, is Mentor Network the place that you found a job when you left school?

[6] A: No.

¹⁵ Vide note 14, supra.

¹⁶ On 23 February 2010, Teresa had been terminated from "The Mentor Network" for eight months.

¹⁷ She lived at several different addresses in Columbia, Sumter, and Florence, SC, before moving to Byron Road.

¹⁸ By her own testimony, Teresa lived at that apartment with at least two men, Gregory Dion Smith and Richard Cooper.

¹⁹ She testified in the 24-25 August 2009 *Ingram v. Trifon* trial that she was still married, pp 47 and 68, respectively:

Q. Before we get into that, let me ask you a couple more questions. Now, are you single or married?

A: I am legally married but we are separated.

Q. Okay.

A: Legally separated.

Q. All right. Now, your husband's last name is what?

A: Jackson.

Q. Okay. And when you got married, did you acquire the last name of Jackson or not?

A: I did not.

Q. Okay. Now, does all of your mail -- what last name does that come in?

A: It comes in both actually. On my license, it has

Ingram Jackson. ****

***** CROSS-EXAMINATION By Ms. Metts:

Q. Ms. Ingram, do you recall taking a deposition in my office Friday last week?

A. Correct.

Q. And do you recall that you were placed under oath when you took that deposition?

A. Yes.

Q. And do you recall that we had court reporter who transcribed everything you testified to --

A. Yes. [continued on the next page]

[page 19, line 1] Q. How long have you been divorced?

[2] A. About a year and a half.²⁰

[3] Q. Did your husband ever live with you at Byron Road?

[4] A. Never.²¹

[5] Q. How long have you been separated from your husband?

[6] A. Years. Just years. I can't be exact but years.²²

[7-8] Q. You've been actually divorced for at least the last year and a half?

[9] A. Exactly.²³

[10-11] Q. Did you know Dinah Steele-Mason or Larry Mason prior to moving to Byron Road?

[12-14] A. I've never known either of them until at that time I went to rent from them, and it was only on a tenant/landlord basis at that time, still is today.²⁴

[15-16] Dr. Faltas: I'm sorry. At what? I'm sorry. I'm sorry. I can't hear.

[17-18] By Ms. Weiss: Q. It was a tenant/landlord basis?

[19] A. Yes.

[20-21] Q. So you began renting from them in 2007. What is the actual address on Byron Road?

[22] A. My physical address is 300 Byron Road, apartment 4.

[23] Q. And is that in the city of Columbia?

[24] A. I -- Richland County, if that's the city of Columbia.

[25] Q. In Richland County.

[page 20, line 1] A. I'm not sure.

[2] Q. That's fine. That's fine. Is it in Richland County?

[3] A. Yes, it is in Richland County.

[4-5] Q. Okay. All right. And that's -- you're at 300 Byron Road?

[6] A. I'm at 300. Uh-huh.

[7] Q. Are you familiar with 304 Byron Road?

[8] A. That's the building directly next door.

[9] Q. And are you aware of who owns that building?

[10] A. Yes, Mr. and Mrs. Steele.

[11] Q. Or Mason?

[12] A. Mason.

[13] Dr. Faltas: Objection.

[14] The Witness: They own the building.²⁵

[15] Ms. Weiss: Okay.

[16] Dr. Faltas: Objection, Your Honor.

[17] The Court: What's the objection?

[18-19] Dr. Faltas: She has no personal knowledge. This is a matter of public record.

[20] The Court: All right.

[21-22] Dr. Faltas: And she has no personal knowledge that they are Mr. and Mrs. Steele or Mr. and Mrs. Mason.

[23-24] The Court: All right. The witness can testify based on their own -- on her belief or her impression or her opinion.

[25] Dr. Faltas: Well--

[page 21, line 1] The Court: The objection is overruled.

[2-4] By Ms. Weiss: Q. Are you employed in any way by Dinah Steele-Mason or Larry Mason?

Q. -- at that deposition? Do you recall me asking you about whether you were married?

A. Yes.

Q. And do you recall telling me that you were not married?

A. Correct.

Q. Okay. Is there some reason why you didn't tell me the truth about that?

A. To my -- in my mind, I'm not married. I'm legally separated so that's not married.

Q. However, you presented medical records that are in a different last name than Ingram, correct?

A. Correct.

Q. And is there some reason why you wouldn't just explain that this was your married name?

A. It was never an issue or never a real question because -- because it's only Jackson on my license. My name isn't changed other than on my license. My birth certificate, social security, none of that has Jackson.

Q. But I didn't know that at the deposition when I was trying to determine the reason for the last name?

A. (The witness nodded head.)

²⁰ From 24 August 2009 to 23 February 2010 is only six months, not "a year and half," even if she had been divorced right after her Ingram v. Trifon trial. There is no record of a divorce for her at all, much less in that interval.

²¹ Brian Aldwin Jackson has at least one Richland County driving conviction on 4 August 2008: case number 34527EQ.

²² Teresa was physically, not legally, "separated" from Brian Aldwin Jackson only when he was incarcerated.

²³ Teresa was never divorced, much less divorced for "exactly" "at least the last year and a half."

²⁴ Teresa and her co-defendants in civil case number 2009CV401031609 moved for "assistance" in trial by Larry Wayne Mason and/or Dinah Gail Steele, neither of whom is a lawyer. Steele and Mason employed Teresa as a false witness and paid her in kind: rent waiver. Mason and/or Steele prepared and typed legal documents for Teresa and Rodney Ingram to sign and file.

²⁵ There is no "Dinah-Steele Mason." Larry Wayne Mason has no ownership of the quadriplexes at all.

16-21 A. No, neither of the two.²⁴

16-21 Q. Do you have any relationship with them other than a tenant/landlord relationship?

16-21 A. No other relationship.²⁷

16-21 Q. Okay. Back in the Fall of 2008 or early Winter 2009, did you have the opportunity to become aware of Marie Faltas?

16-21 Dr. Faltas: Objection. Leading, Your Honor.

12-13 The Witness: Yes, I knew that she was moving in. I knew that there was a new tenant coming.

114-151 By Ms. Weiss: Q. Okay. And do you know who Dr. Marie Faltas is now?

116 A. Yes.

117 Q. Okay. Can you — is she in the courtroom now?

118 A. Yes, she is.

119 Q. Can you point her out for the jury?

120 A. She's right there.

121-22 Ms. Weiss: Your Honor, let the record reflect she's indicated the defendant.

121 The Court: Okay.

124 to page 22, line 11 By Ms. Weiss: Q. Thank you. And as a way of background, were you dating someone in the early winter, January/February of 2009?

121 A. Yes, I was.

121 Q. And at some point did that relationship end?

121 A. Yes.²⁸

15-61 Q. And around Valentine's Day of last year, was it a good ending?

17 A. It was kind of bad. It was bad.

181 Q. Okay. And did anything happen that began to worry you?

19 A. Well, he came over —

190 Dr. Faltas: Objection. Leading.

11-12 The Witness: — and I didn't want him to come over. **So it was unwanted at that time.**

113-14 Ms. Weiss: Hold on just a second. There's an objection.

115 The Court: The objection is overruled.

116 Ms. Weiss: Thank you.

117-181 By Ms. Weiss: Q. Go ahead.

119-201 A. At that time it was a visit that I did not want because it was the end of the relationship.

121 Q. Okay. And did he leave?

122 A. He left and came back a few times.²⁹

123 Q. Okay.

124 A. But he did — he did ultimately leave.

125 Q. And at any time did he leave anything at your residence?

125 A. No.³⁰

12-31 Q. Did you ever have the opportunity to call law enforcement about that person?

14 A. Yes.

15 Q. And why did you call law enforcement?

16-14 A. I called the law enforcement because, as I stated just now, **it was an unwanted visit, and he made a threatening comment.**

And 9 out of 10, and a lot of times when somebody is saying that they're going to do something, they're going to do it. **And I don't want my mom reading about something that has happened to me and nobody knows what happened or what's been going on. So I called the police to have on record that I have been threatened by this man.** So, yes, there was an incident and the police was called.

11-51 Q. That was around Valentine's Day 2009?

16 A. Yes. Valentine's. Yes.

117-181 Q. And did your report to law enforcement or his visiting have anything to do with Dr. Faltas?

119 A. No, never.

120 Q. Did you even — did you talk to her about that?

121 A. Never.³¹

122-23 Q. Did you — did he have a conversation with her as far as you know? Did you ever see that?

124 A. Never.

125 Q. Okay. And after Valentine's Day did that stop?

125 A. Yes, it did stop, and I just want to make one comment on — when the officer did come —

11 Dr. Faltas: Objection, Your Honor.

14 The Witness: — the officer had to —

15-81 Dr. Faltas: Objection. Objection. Objection. Objection.

11 Ms. Weiss: Hold on one second. There is an objection.

11 Dr. Faltas: Objection. Objection.

11 The Court: Yes, ma'am?

116-111 Dr. Faltas: There is no question before the witness, and the witness is about to go on hearsay.

¹⁶ Vide note 24, supra.

¹⁷ Vide note 24, supra.

²⁸ The relationship did not end. As of 23 February 2010, Gregory Dion Smith informed Private Investigator Elizabeth Cook that he was in phone contact with Teresa Ingram, probably as part of her illegal drug network.

²⁹ Teresa reported to police that her then-boyfriend Gregory Dion Smith "headed home to 624 Columbia College Drive [Columbia, SC 29203]" (Google view: <http://sdvr.ms/YA1d2L> tax map R09212-07-06, Richland County, SC) registered to Smith's mother, Ruby Smith Jones, who had, on 2 February 2009, been sued for \$7,500.00 (case number 2009CV401070090) and later lost her house in foreclosure case 2013CP4000714. **The issue between Teresa and Gregory Dion was thus more likely money than romance.**

³⁰ Teresa's 14 February 2009 call to dispatch and report to police claim that Smith left threatening notes on Teresa's door.

³¹ Teresa's own testimony in this trial suggests she talked to Dr. Assa'ad-Faltas about it later in 2009.

12-14 The Court: All right. The objection is sustained in that the witness is not -- the answer is not responsive to a question.

15-16 Ms. Weiss: Your Honor, may I object to speaking objections?

17-18 The Court: All right. Yes. Dr. Faltas, you only make an argument on an objection when requested by the Court.

19 Dr. Faltas: I'm sorry.

20-21 The Court: You only state the legal basis for the objection, not the factual basis.

22-23 Dr. Faltas: I'm sorry, Your Honor. I didn't know that, but thank you for telling me.

24-25 The Court: You're welcome. You may proceed. Next question.

1 page 25, lines 1-2 Ms. Weiss: Your Honor, may I move this microphone over to defense table?

3 The Court: Yes.

4 Ms. Weiss: Do you mind? Thank you.

5-6 Dr. Faltas: While she accommodated me with that, can it be lowered to where I don't have to stand up?

7 Ms. Weiss: Sure. I'll do that.

8 Dr. Faltas: Thank you. Thank you.

9-11 By Ms. Weiss: Q. And around Valentine's Day was there anything else having to do with the termination of that relationship?

12-13 A: No. That was the end of it completely. **22 He never came back.**

14-15 Q. And when the police came out, did Dr. Faltas have anything to do with the police in that situation?

16-23 A. Yes, she tried. The officers parked directly in -- directly in front of my building.³³ She had her window pulled up and her blinds all the way pulled up yelling and screaming that the police demand to tell her what happened. At that time the police told her that it was none of her business and everything is being taken care of and to go back inside pretty much. At that time she tried to put up an argument with the police --

24 Dr. Faltas: Objection. Objection.

25 The Witness: --saying that he went inside --

1 page 26, line 11 Dr. Faltas: Objection.

26 The Witness: --my apartment.³⁴

1 Court Reporter: I can't take you both at the same time.

3 The Court: Yes, ma'am?

4 Dr. Faltas: May I state the basis of my objection?

5 The Court: Yes.

6-8 Dr. Faltas: Hearsay about what the police said unless a specific officer is coming to testify.

9-10 The Court: The objection is overruled in that you were present when it was stated.

11 The Witness: Correct.

12 Dr. Faltas: She says so, Your Honor.

13-15 By Ms. Weiss: Q. Okay. But after that, after that report was made, that was the end of that situation?

16 A. Yes.

17-19 Q. Okay. And sometime later -- that was Valentine's Day. So now we're moving into March of 2009. Prior to that, did you know Dr. Faltas on a personal basis?

20-23 A: I never knew her on a personal basis, but I would speak just to be cordial and polite as a neighbor or if you would just see anybody, the natural response, if you were raised correct, is to speak, just naturally, wave or say hello.

24 to page 27, line 21 Q. And so other than saying hello to her or with your other neighbors, did you know anything about her personally or did you ever have any conversations, have her over to your apartment or anything like that?

25 A: Never. Never.

26 Q. Okay. And did she live in your building?

27 A. No, she didn't live in my building.

28 Q. What building did she live in?

29 A. She lived in the one next door, and that's 304 Byron Road.

30-31 Q. Okay. And -- but after that, after she was yelling out of the window and you observed all of that, you still were cordial to her?

32 A: Yes. Uh-huh.

33-34 Q. Did you ever talk to her after that date about what had happened and why the police were there?

35 A: No. Surprisingly she never asked me that.

36-37 Q. Okay. But now in March of 2009 did you have an opportunity to speak with Dr. Faltas for any reason?

38-241 A. March -- yeah. I want to say that's when she -- she wanted me to testify against my landlord over property issues or rent issues, and at that time I had already been living there for maybe two years or a little over two years. I've never had a problem with anyone since I've been out there,³⁵ so my natural response was to -- I don't want to get involved in that.

25 to page 28, line 21 Q. Okay. And were you over at her apartment or over on her side of the property over where her building is when she approached you about this?

26 A: No. To this day, I've never -- still have not been over there.³⁶

³² Vide note 28, supra.

³³ On the relevant day, police had to have parked in front of Building 304, where Dr. Assa'ad-Faltas lived, not in front of Building 300 where Teresa lived, for Dr. Assa'ad-Faltas to have heard police talking to Teresa.

³⁴ Teresa testified at p 23, supra, that: (a) the police report had nothing to do with Dr. Assa'ad-Faltas and (b) Dr. Assa'ad-Faltas had never even met Gregory Smith. So, it impossible for Dr. Assa'ad-Faltas to have (a) known why police was talking to Ingram that day and (b) offered that Smith had gone into Teresa's apartment.

³⁵ Before Dr. Assa'ad-Faltas first spoke to her, Teresa had had "problems" with Gregory Smith and was also suing Marjorie Russ Trifon.

³⁶ Teresa admitted crossing Dr. Faltas' car while parked in front Building 304, (Tr. p 278, lines 20-23 **State's exhibit 83**), accosting her when she was "just sitting in her car" on 2 October 2009, and having there and then asked her for "a prescription," "a pill," or "be my doctor." Tr. pp 292-7, infra, Defense Exhibit 1.

Admitted in reverse chronological sequence, State Exhibits 17-19 were identified at Trial tr. p 214 (at lines 24-25 for State Ex. 19) and on cross at Tr. p 268, lines 12-15. They show Teresa standing in front of the south building and with her shadow long in front of her from the eastern sun behind the building and her (<https://ndcv.ms/15Az7w5onXU/PanGfLpK0d3cyMnE>). [Text continued on next page, photos on separate sheet]

15-61 Q. Okay. So where did she -- where did she find you? Where did she talk to you about this?

17 A. At my car downstairs in front of the 300 building.

18-21 Q. Okay. You were at your car. Were you going somewhere or coming? Do you remember?

110-121 A. I'm not sure if I was going or coming. I'm going to say I was coming home from work at that time when she stopped and asked me that.

121 Q. And she approached you.

124 A. Yes.

125 Q. And what specifically did she ask you?

126-128 A. She came and I want to say she introduced herself because she already knew who I was and she said that the landlord --

129 Dr. Faltas: Objection. Objection.

130 Ms. Weiss: Hold on.

131 Dr. Faltas: Objection. Objection.

132 The Court: Basis for the objection?

133 Dr. Faltas: She cannot testify as to my state of mind.

134 The Court: The objection is overruled.

135 to page 29, line 11 By Ms. Weiss: Q. Please proceed.

136 A. I forgot where I was.

137-41 Q. You said she came over to the car. She already knew who you were, but she introduced herself?

138-51 A. Yes, and then she went on to make statements as to regards to everyone's rent and to how much rent I was paying.

172-81 Q. And what was your response to her question about how much you were paying?

19-171 A. My response was, "That's none of your business," and if anything is going on with the rent,³⁷ I would love to pay less rent. But if I was paying less or more, I don't want to get myself involved in anybody else's issues or affairs with their rent. So at that time I told her I didn't want to have any part in that. I never discussed the actual price that I was paying.³⁸ She did go into depth enough to say that how much she paid and two other tenants in her building was paying much, much less than what she's paying.

178-191 Q. And did you make a comment about whether you wanted to continue conversations like that with her?

20-211 A. Yeah, I -- no, I told her I didn't want -- I wished not to talk to her and I wished no parts of it.³⁹

22-231 Q. Okay. And did she continue on about any other issues? You had mentioned possibly something about property.

24 to page 30, line 7 A. Yeah, just a little piece of slab property that she's going on about, and I really have no knowledge about this.⁴⁰

I own acres of land in Sumter.⁴¹ It's this little piece of land that's beside the buildings that she was saying something about the sewer. And I don't own the property; I'm just renting from there. I have no knowledge of the sewer lines.⁴² I have no knowledge as to who owned the buildings before I moved there. I have no knowledge of Mr. and Mrs. Steele's dealings with the property either.⁴³

18-101 Q. Okay. And so did you discuss that with her or did you -- did she ask you to do anything for her as far as that's concerned?

11-121 A. Yeah, she wanted -- well, she wanted me to come to court.

131 Q. Okay.

141 A. To testify.

151 Q. And did you know what court she was referring to?

161 A. Just court in general.

171 Q. Okay.

181 A. I'm not sure.

191 Q. And did you answer her as far as that?

201 A. Yes.

211 Q. What did you say?

221 A. "No."

231 Q. And why?

24 to page 31, line 31 A. Because it wasn't my business. I didn't -- at that time I didn't see and this time still today I just don't see -- I don't get it.⁴⁴ I told her I didn't want any part of it.⁴⁵ I mind my business; you mind your business. I've never had any problems. This has been nine months of --

Public records and trial testimony establish that Building 300, where Teresa lived, is immediately north of Building 304, where Dr. Faltas lived. Teresa planted herself in front of Building 304 to prevent Dr. Faltas from parking the vehicle she is driving there. Richard Cooper ushers Teresa back into Building 300 as Dr. Faltas takes these three photos from the window of the vehicle she is trying to park.

³⁷ Ingram claimed to SC's Human Affairs Commission (SCHAC) in July 2009 and to a jury in the 29 September to 1 October 2009 eviction trial 2009CV401060951 that she paid \$500.00/month, <http://sdrv.ms/X1oJo7>, specifically at <http://sdrv.ms/Vf5673>. So, her claims that she never discussed how much rent she was being charged is proven false beyond any doubt.

³⁸ Vide note 37, *supra*.

³⁹ In addition, she filed for a restraining order and attended a six-hour hearing on it on 10 November 2009.

⁴⁰ It is impossible for Ingram to "know nothing" about the land Dr. Assa'ad-Faltas and her mother own after attending those hearings where the land and the sewer lines were discussed in detail.

⁴¹ Per this Sumter County record, <http://sdrv.ms/W3YWJS>, Ingram owns only one land-locked non-buildable acre valued at \$3,0000 (three thousand dollars), less than the then-appraised value of the land Dr. Assa'ad-Faltas and her mother co-own.

⁴² Vide notes 37-40, *supra*.

⁴³ In each of the 29 September to 1 October 2009 eviction trial 2009CV401060951 and the 10 November 2009 restraining order hearing 2009CV401063495 Teresa testified for hours about that of which she claims to have "no knowledge."

⁴⁴ Teresa testified for hours, and observed all three days of the very same eviction trial she claimed did not concern her.

⁴⁵ Teresa's real reason to avoid testifying was her then-pending *Ingram v. Trifon*, 2008CP4004243, tried on 24-25 August 2009.

117 Q. Okay.

118 **Dr. Faltas:** Your Honor, objection.

119 **The Court:** Basis for the objection?

120 **Dr. Faltas:** When she said this was nonstop, there was no question before.

121 **The Court:** All right. Next question.

122 **Ms. Weiss:** Thank you, Your Honor. Court's indulgence one moment.

123-131 **By Ms. Weiss:** Q. Okay. So did the conversation end there?

132 **A:** The conversation ended.

133 Q. Okay.

134 **A:** Yeah.

135-139 Q. So the conversation ended; you told her, "No." Now, going back just for a moment for the jury, as far as the Mentor Network, how many days a week do you work?

140 **A:** Five.⁴⁶

141 Q. Five days week? And what are your hours?

142 **A:** Seven to three.⁴⁷

143 Q. Okay.

144 **Dr. Faltas:** I'm sorry. I didn't hear.

145 **Ms. Weiss:** Seven to three.

146-151 **By Ms. Weiss:** Q. And you go to work every day.⁴⁸ Do you work for The State or is it a private company?

152 **A:** I want to say it's private because it's not state. I don't have state benefits so ...

153-157 Q. Okay. So going to court -- if you had gone to court, would you be missing work to do that?⁴⁹

158-159 **A:** Yes.⁵⁰ I would have to use like a sick day or -- if I have time built up to use a sick day or I'll just use a day.

160-162 Q. So after you told her, no, you didn't want to testify and it was none of your business, did things change between you and Dr. Faltas?

163 **A:** Yes.

164-165 Q. And at first what was the first thing you started to notice?

166-170 **A:** Like the constant sitting in her car and like stalking, just--

171 **Dr. Faltas:** Objection.

172 **The Witness:** --there.

173 **Dr. Faltas:** Objection.

174 **The Witness:** That's the very first time that I know --

175 **Dr. Faltas:** Objection.

176 **Ms. Weiss:** No, ma'am.

177 **The Court:** Basis for the objection?

178-180 **Dr. Faltas:** She cannot state legal conclusions. Stalking is a legal conclusion.

181 **The Court:** All right. Response?

182-184 **Ms. Weiss:** Your Honor, she was using it in laymen's terms. She was not making a statement about the law. Clearly that's not what we're here for. That's in a stalking claim.

185-186 **Dr. Faltas:** In addition, Your Honor, she cannot testify as to what my intent was.

187-188 **The Court:** The objection is overruled. You may proceed.

189 **Ms. Weiss:** Thank you, Your Honor.

190-191 **By Ms. Weiss:** Q. So you started noticing her in her car. Now, before when you used to just wave and say hi as you saw her in passing, would she reciprocate that?

192 **A:** Yes.

193-194 Q. And what types of things would she do? Prior to this encounter, what types of things would she do? Would she smile or wave?

195-196 **A:** Yeah, she would just smile and wave because it was just in passing.

197 Q. Okay.

198-200 **A:** It was like I'm either coming -- like coming or going or she's coming and going or I'm coming out of my building and she's either at the mailbox, which she's always at the mailbox so... It's just natural for me to speak.

201-202 Q. Okay. And after this encounter did you still see her at the mailbox and seeing her coming and going?

203 **A:** Yes.

204 Q. And what did she do then?

205-206 **A:** I want to say one day she probably spoke and I just didn't speak back anymore just because by that time it was -- and in my own mind I just summed her as being a little eclectic or weird or -- I don't want any dealings with her --

207 **Dr. Faltas:** Objection.

208 **The Witness:** --period.

209 **The Court:** The objection is overruled.

210-211 **By Ms. Weiss:** Q. Keep going, please.

212-214 **A:** So at that time I noticed enough to know that I didn't want to have any conversations with her, speak to her, or anything because by now this -- I'm meeting people that live out there that I've never seen other than just in passing that I've never had a conversation with until March. March, April.

215-216 Q. And so in March and April did Dr. Faltas continue to wave and smile at you?

217-218 **A:** No, not after the one time when she tried and I didn't give her the same like wave or smile.

⁴⁶ Teresa had been terminated from the Mentor Network on 26 June 2009 and remained unemployed long after this trial. *Vide* notes 11-16, *supra*.

⁴⁷ Teresa had been terminated from the Mentor Network on 26 June 2009 and remained unemployed long after this trial. *Vide* notes 11-16, *supra*.

⁴⁸ Teresa had been terminated from the Mentor Network on 26 June 2009 and remained unemployed long after this trial. *Vide* notes 11-16, *supra*.

⁴⁹ Teresa had been terminated from the Mentor Network on 26 June 2009 and remained unemployed long after this trial. *Vide* notes 11-16, *supra*.

⁵⁰ Teresa had been terminated from the Mentor Network on 26 June 2009 and remained unemployed long after this trial. *Vide* notes 11-16, *supra*.

[25 to page 35, line 1] Q. Okay. What did she do when you saw her at the mailbox or coming and going or in her car?

[2] A. After I stopped speaking to her?

[3] Q. Yes.

[4] A. Taking pictures, name-calling, flipping the finger.

[5] Q. Okay. And this started would you say around what month?

[6-9] A. ~~Maybe the end of March, beginning of April.~~ Almost immediately. I'm trying to think back to the ex-boyfriend thing. So it was shortly after that. ~~Maybe a month after that.~~

[10] Q. Okay. Are you dating anyone now?

[11] A. Yes, I am.

[12] Q. And what's his name?

[13] A. His name is Richard Cooper.

[14] Q. And what kind of car does he drive?

[15] A. He drives a G.M.C. Denali.

[16] Q. What color is it?

[17] A. White.

[18] Q. All right. How long have you been dating him?

[19] A. ~~About eight months. Since last May or June.~~

[20] Q. And has Dr. Faltas ever spoken to him in your presence?

[21] A. ~~Yes, in my presence, without me being present, both.~~

[22-25] Q. All right. But in your presence, still talking about the summer when you first started dating Mr. Cooper, did you -- did she approach him while the two of you were together?

[page 36, line 1] A. Yes.⁵¹

[2-3] Q. Okay. Prior to March -- you're a single female. You have friends; you have family?

[4] A. Uh-huh.⁵²

[5] Dr. Faltas: Objection.

[6] The Court: Basis for the objection?

[7] Dr. Faltas: Counsel is testifying, and that's leading.

[8-9] The Court: All right. Ask her does she have friends, does she have family. Then proceed.

[10] Ms. Weiss: Yes, Your Honor.

[11-12] By Ms. Weiss: Q. Do you have friends that come and visit you?

[13] A. ~~Yes, I have very few friends visit me.~~⁵³

[14] Q. Okay. Do you have family --

[15] Dr. Faltas: I'm sorry. I didn't hear.

[16] The Witness: ~~Yes, I do have family.~~

[17-18] Dr. Faltas: Your Honor, I just didn't hear. What did she say?

[19] The Court: Yes.

[20-21] Dr. Faltas: ~~Did she say she has very few friends or very --~~

[22] The Court: Yes.

[23] Dr. Faltas: Thank you.

[24-25] By Ms. Weiss: Q. Do you have family that comes to visit you?

[page 37, line 1] A. Yes, I do.

[2-3] Q. And prior to March, did your friends and family come on a regular basis?

[4-11] A. My family came often, not every day. If I needed something or I missed them or request that they come see me, they would come. My brother works here, so I see him almost every day. My friends come maybe every other day. ~~I only have maybe two or three friends. I just don't have people come to my house.~~ So the two or three friends that I have, one or two might come every other day or if there's seven days in a week, I might see them four days in a week.

[12-13] Q. Okay. And one of them, do you help take care of her child?

[14] A. Yes.

[15] Q. And who is that?

[16] A. That's Ms. Tiffany Lurke.

[17] Court Reporter: I'm sorry. What was the last name?

[18] The Witness: Tiffany Lurke.

[19] Court Reporter: Thank you.

[20] The Witness: You're welcome.

[21-22] By Ms. Weiss: Q. How long have you known Tiffany?

[23-24] A. ~~I've known Tiffany now for over ten years. We're basically like family but not real family.~~⁵⁴ so B.F.E.

⁵¹ Circa 20 September 2009, it was Teresa who headed to Building 304, where Dr. Assa'ad-Faltas lived then. State's Exhibits 17-19 show Dr. Assa'ad-Faltas driving away from, NOT "approaching," Teresa or Richard Cooper, who is seen pulling Teresa back into Building 300, where Teresa lived then. Vide Teresa's testimony, Trial Tr. page 214, lines 2-13, *infra*.

⁵² Teresa was NOT single in, or prior to, March 2009, but was still married to Brian Aldwin Jackson. Vide notes 10 and 18-23, *supra*.

⁵³ On 17 March 2011, in 2009CV401031609, Charles Randolph White (who lived in Apartment 1, 300 Byron Road, Columbia, SC 29209, continually since 2001) testified *in camera* that Teresa often threw strip-dance parties with many guests in her apartment.

⁵⁴ In the 10 November 2009 restraining order hearing 2009CV401063495, the transcript of which then-SC 5th Judicial Circuit Assistant Solicitor Weiss ("JC-5 AS Weiss") caused to be created from the Lykesland Magistrate's audio recordings and delivered to JC-5 AS Weiss on 22 February 2010, ~~Teresa DENIED knowing Tiffany or her daughter, pp184-5;~~ [text continued on next page; photos on a separate sheet]

[25 to page 38, line 1] Q. And what do you call her daughter in relationship to you?

[23] A. Her daughter is my niece.⁵⁵ I call her my niece, and she calls me Auntie.

[4] Q. And how old is her daughter?

[5] A. Her daughter just turned two January 4th.

[6] Q. And so last year did you help take care of her daughter?

[7-11] A. Yes, I watched her for her whenever she had to work long hours at the hospital or if she had to do a different shift versus her first-shift job.⁵⁶ So by her fiancé working in Sumter, that's a five-to-six-hour window gap that she asked can I watch the baby, and I said, "Yeah."⁵⁷

[12] Q. And you enjoy doing that?

[13] A. Yeah.⁵⁸

[14-17] Q. All right. Now, I'm going to go back to the end of the summer. You had indicated to Dr. Faltas -- you testified that you did not want to testify for her or you did not want to testify at all ---

[18] A. Correct.⁵⁹

[19-20] Q. Actually, it's not for or against her. It's just not at all.⁶⁰ Did you receive a notice for you to come and testify?

[21-24] A. I want to say I did, but everything started happening so fast and so many court appearances came. It went from her subpoenaing me to come to court with her ~~to me being sued by her, and I really don't know...~~

[25 to page 39, line 1] Q. Okay. So you said you got a subpoena to come testify for her.

[2] A. Yeah.⁶¹

[3] Q. And you got that in the mail.

[4] A. Yes.⁶²

[5-6] Q. It was after you had told her you did not want to testify?

[7] A. Exactly.⁶³

[8-9] Q. Okay. And do you remember approximately what month that would have been?

[10] A. I don't remember.

[11] Q. And do you even know what that hearing was for?

[12] A. Eviction.

[13] Q. Okay.

[14] A. Yeah. I'm sure of that. Eviction.

[15] Q. And were you a party to that?

[16] A. I was not a party to the ---

[17-18] Q. So you did not have -- you were not on either side of that?⁶⁴

[18-19] Q. You don't know this person. Is that you?

[21] Q. Do you know this woman?

[23] Q. You don't know her.

[25 - page 185, line 1] Q. She's not one of the guests to whom you referred.

[3] Q. Is this your brother?

[5] Q. Are you in this picture?

[7] Q. Do you have a child?

[9] Q. Do you know this child?

[11] Q. You don't know the child.

[13-14] The Court: How is that material as to who the child is?

How is that material to the case?

[16-17] The Court: Sh, sh, sh. How is that material to the case?

[20] A. That's me.

[22] A. No.

[24] A. No.

[2] A. No.

[4] A. Nope.

[6] A. Yes, I am.

[8] A. A child is in the picture.

[10] A. No.

[12] A. No.

[15] Ms. Ingram: Because she wants to know how --

[18-23] Dr. Faltas: Judge, she runs illegal babysitting (inaudible) in the apartment. She is totally careless about the child's welfare. She is totally (inaudible) -- I'm sorry. (Inaudible.) She is giving bad example to the child.

⁵⁵ Vide note 54, *supra*, where Teresa denied even knowing that very same child.

⁵⁶ That clearly conflicts with Teresa's claim that she was then employed "five days a week ... seven to three." Tr. p. 31, lines 17-22, *supra*.

⁵⁷ In fact, having been unemployed since 26 June 2009, Teresa was looking for sundry sources of income, including baby-sitting for a fee.

⁵⁸ As shown in notes 54-57, *supra*, the then-unemployed Teresa did the baby-sitting for a stranger for money, not enjoyment.

⁵⁹ Public records and Teresa's admissions in this trial establish that Teresa testified against Dr. Assa'ad-Faltas in eviction trial of 2009CV401060951 and 10 November 2009 restraining order hearing of 2009CV401063495, both of which brought against Dr. Assa'ad-Faltas by Teresa and by their landlady, Dinah Gail Steele, who falsely used the name "Mason."

⁶⁰ Vide note 59, *supra*.

⁶¹ Vide note 62, *infra*.

⁶² What Teresa received "in the mail" was NOT a subpoena from Dr. Assa'ad-Faltas but a summons from Richland County Magistrate's Court, which, in mandatory mediation of 2009CV401060951, had ORDERED both sides to list all witnesses.

⁶³ Teresa's prior, contemporaneous, and subsequent acts prove she wanted to, and did, testify in several cases, including hers.

⁶⁴ Teresa was 100% on Dinah Steele's side as proven in her audio-recorded testimony in the 2009CV401060951 jury trial, where Teresa testified that Faltas started harassment the day she moved into Building 304 in September 2008. That was done in that trial to support the false pretense that the eviction notice given by Dinah Steele was not a result of Dr. Faltas' purchase of the adjacent vacant lot but is contrary to the story concocted for this case to claim that Dr. Faltas started the harassment after she received the eviction notice in April 2009.

19-20 A. No, I didn't have either side of it, but I knew about it. I was brought into it.⁶⁵

21 Q. Did you ever ask to be brought into it?

22 A. No.⁶⁶

23-24 Q. And did you notice Dr. Faltas's behavior change about the time you started to receive these notices?

25 A. Yes.

page 40, lines 1-3 Q. How did it change from the Spring, early Summer, to end of the Summer, early Fall? Please describe that for the jury.

4-10 A. Okay. It changed from her speaking, for one, to not speaking, then sitting at the mailbox for hours on end. It was almost as if she was waiting for me to come home or leave or come out of the apartment or do anything, and it escalated from that to constant pictures,⁶⁷ pictures, the name-calling, the flipping fingers. It went from the -- well, the pictures never stopped until the restraining order was issued.

11 Q. Okay. And what was that date? Do you remember?

12-13 A. When the restraining order was issued? Sometime in November, I think. I'm not even aware of that.

14-15 Q. Okay. And at any time did you have to call -- did you call law enforcement in regards to her behavior?

16 A. Yes, many times.

17 Q. When did you start calling law enforcement?

18-20 A. I started calling the law officers when she started blocking me in from leaving the property.⁶⁸ That would be the first time from her blocking me in.

21-23 Q. Okay. Prior to that -- well, okay. From her blocking you. Do you know -- are you aware of when that date may have been or about what time that was?

24 A. No.

25 Q. Okay.

page 41, lines 1-4 A. There's so many. I'm sorry, but there's so many. Like every day -- it's impossible for me to keep up with dates and -- and all I know is every single time I call it's the same complaint, but there's so many every day.⁶⁹

5-6 Q. Okay. When she first started this behavior, did you immediately start calling law enforcement?

7-11 A. No, I didn't because she being my elder and I have respect for my elders, I just ignored it. I just tried to ignore it. You know, I talked to my mom about it. "Well, just ignore her. She's an older lady. Don't say nothing." I don't have to speak to her and I tried that. Impossible.

12 Q. And did you ever report it to the landlord?

13-18 A. Yes. Yes. It became so regularly and frequently that every time that anything happened I was informed to call 9-1-1 to get an incident report. So our address was a spectacle of Garners Ferry for a few months. Every officer in Columbia knows about the address and knows what to expect when they come over there.

19 Dr. Faltas: Objection.

20 The Court: Basis for the objection?

21-22 Dr. Faltas: Every officer in Columbia? How could she possibly know what every officer in Columbia knows?

23-24 The Court: All right. I sustain that portion of her statement.

25 to page 42, line 1 Dr. Faltas: May I ask for the jury to disregard, Your Honor?

2-3 The Court: I sustained the objection. That's sufficient.

4 Dr. Faltas: Okay.

5-9 By Ms. Weiss: Q. Teresa, I forgot -- I got sidetracked and forgot to mention one thing. I'm just going to jump back a little bit again. Back in 1998 -- which it would have been a couple of years after you had gotten out of high school?

10 A. Yes.

11 Q. Were you arrested at any time?

12 A. Yes, I was arrested.

13 Q. What were you arrested for?

14-16 A. It was for F.T.C. and that's financial transaction card or vice versa,⁷⁰ but it was with a credit card. Can I go into details as to the--

17 Q. If you would like to, yes.

⁶⁵ Vide notes 63 and 64, supra.

⁶⁶ Vide notes 63 and 64, supra.

⁶⁷ After having thoroughly searched Dr. Assa'ad-Faltas' apartment and car on 2 December 2009, and therefrom removed EVERY computer, memory-holding device, photo-taking device, photo, negative, printout, video and audio tapes, etc., Columbia's Police Department ("CPD") and the Prosecution located ONLY 55 PHOTOS in which Teresa or even her guests appear AND ADMITTED ALL OF THEM IN THIS TRIAL. They are set of photos from exactly nine events in September to November 2009; e.g., note 36, supra; ALL OF WHICH had been offered in evidence supporting Dr. Assa'ad-Faltas in civil actions she initiated or that were brought against her. IN EACH OF THE NINE OCCASIONS DEPICTED IN THE GRAND TOTAL OF 55 PICTURES, Teresa and/or her guest are smiling or waving at Dr. Assa'ad-Faltas, thus APPROVING of her picture-taking, or are photographing, blocking, calling out to, and/or making lewd gestures at, her, thus FORGING HER to take pictures to document their conduct.

⁶⁸ That is physically impossible where two exits are available. If Dr. Assa'ad-Faltas were arguing "blocking" one, Teresa could always use the other since Dr. Assa'ad-Faltas could obviously not be at the two exits at the same time.

⁶⁹ Discovery produced only three complaints to CPD by Teresa: two on 24 September 2009, and one on 21 October 2009, NONE OF WHICH alone caused CPD to seek a warrant or allowed Teresa to swear out a courtesy summons, against Dr. Assa'ad-Faltas. Clearly, the calls were made to build a number of reports against Dr. Assa'ad-Faltas as Teresa admitted at Tr. p. 41, lines 13-18.

⁷⁰ Teresa was charged with, and pled guilty to, TWO FELONIES: F920143, 1999GS4036573, and F920143, 1999GS4036584, 0731-FTC/FRAUD \$500/LESS after and because she had left the store with \$500.⁰⁰ worth of clothes obtained with that stolen credit card, placed the fraudulently-obtained clothes in her car and returned to the store to get more clothes with same card. That is documented in both the police report and the indictments to which she pled. Teresa's insistence that it was only one charge and that she "never left the store" with any stolen clothes is more objectively-provable perjury; she is NOT contrite about her misdeeds: Tr. p. 363, lines 11-16 and 21-24, infra.

[18 to page 43, line 3] A. Okay. It happened in 1998. I was a freshman at Benedict College. Me and two of my friend girls went to the fashion mall to actually go shopping which we did. When I got to the register, the person in front of me left their credit card. The cashier automatically thought it was my card. I could have told her it wasn't my card, I chose not to at that time. She swiped the card and I looked at the card, and I wrote the name on it. I never left the store with the card.⁷¹ Yes, I did swipe the card to get the clothing. I never even left the store so⁷² -- but I was charged with that. So, yes, I do have a record from 1998.

[4] Q. And did you plead guilty to those charges?

[5] A. Yes.

[6] Q. And did you do your probation for that?

[7] A. Yes, I did.

[8] Q. And is that over?

[9-10] A. Yeah, that's been over. That happened over ten years ago, yeah.

[11] Q. Okay. And that was before you lived at Byron Road?

[12] A. Yes.

[13] Q. And before you ever met Dr. Faltas?

[14] A. Yes.

[15] Q. Before you worked at Mentor Network?

[16] A. Yes.

[17-21] Q. Sorry. I just needed to cover that event. Back on September 24th, 2009, approximately 9:00 in the morning, do you recall -- I guess it was about -- about 10:30 in the morning. Do you recall calling law enforcement that morning to Garners Ferry Road, to an address on Garners Ferry?

[22] A. Yeah, I remember but ...

[23-24] Q. Can you please tell the jury what happened involving you and Mr. Cooper on that morning?

[25] A. On that morning we attempted --

[page 44, line 1] Dr. Faltas: Objection.

[2] The Court: Basis for the objection?

[3-4] Dr. Faltas: Coaching, Your Honor. She said she didn't remember, and the solicitor asked her, "What happened with you and Mr. Cooper?" That's coaching, I think.

[5] The Court: Response by the state?

[7-11] Ms. Weiss: Your Honor, it's not coaching. She -- I was just telling her -- which it's an incident on September 24th. There are a couple of different incidents. I did not tell her anything about the incident. She is about to tell the jury about the incident but no coaching.

[12] The Court: The objection is overruled.

[13] Ms. Weiss: Thank you.

[14-25] The Witness: Yes. On that morning me and Richard made an attempt to leave my apartment to go to his house which is on another side of town,⁷³ and I immediately noticed that she came out -- the defendant came out immediately behind us. So right off I can't say, well, she's following us because she can go wherever she wants to go. So after -- well, when we left the apartment and where we lived at, when you come to the light by the Hardee's, she came on the passenger side and she started screaming and yelling and cursing, asking Richard why has he spent the night at my apartment and he does not pay rent there and why does he beat me.⁷⁴ She made an accusation on that day of him having assaulted me.

[page 45, lines 1-2] By Ms. Weiss: Q. Okay. And did she leave at that point?

[1-16] A. [3-10] No, she still didn't leave. She followed me and she knew that I was calling 9-1-1. 9-1-1 instructed that I pull over at the Wachovia Bank after we had -- first we drove on down Garners Ferry through the Woodhill area and made a circle back around to come back the back way back to Byron Road again. So we did the whole circle and came back up on Garners Ferry Road and went back to the Wachovia where she told me to park.⁷⁵ [11-16] At that time the defendant was still like where -- we parked at the Wachovia. She came in her car and was still yelling and screaming, and I'm letting her know that I'm on the phone with 9-1-1 and they'll be here momentarily. That's when she pulled off. As far as what happened on that day, probably nothing.

[17] Q. I'm sorry?

[18-19] A. It said probably nothing happened that day.⁷⁶ You know, I've never heard anything else about it.⁷⁷ you know.

[20-21] Q. Okay. So she -- did she get out of her car when you stopped?

[22] A. No, she never got out of her car.

[23] Q. She was yelling from her vehicle.

[24] A. Uh-huh.

[25] Q. And you --
[page 46, line 1] Dr. Faltas: Objection.

[2] The Court: Overruled.

⁷¹ Vide note 70, supra.

⁷² Vide note 70, supra.

⁷³ Richard had a wife at "his house on another side of town" who knew not of his affair with Teresa. Teresa could not have been with Richard in his car "to go" where his wife was. CPD arrived to find Teresa waiting alone in her car, which proves she had not been with Richard in his car. Dr. Assa'ad-Faltas' having *arguendo* followed Richard is not covered by § 16-3-1700, S.C. Code, which protects a targeted person, not her drug dealers or paramours. Teresa needed to falsely place herself in a car allegedly followed by Dr. Assa'ad-Faltas to bring the act under the statute.

⁷⁴ Teresa had been an affiant against her husband Brian Aldwin Jackson for criminal domestic violence 64259 in Sumter and was clearly using her past experience to falsely impute to Dr. Assa'ad-Faltas a desire to look into Teresa's private life.

⁷⁵ Teresa inadvertently admits she "called 911" was told to "pull over" and "park" at what was then Wachovia Bank, in the singular. CPD's incident report references Teresa alone in her own car. That proves Teresa was driving a car other than that of Richard Cooper, who was neither a targeted person nor a witness. There is no explanation for the "circling back" other than that Richard Cooper had done it alone and then Teresa had followed Dr. Faltas, not the reverse.

⁷⁶ Teresa inadvertently admits the responding CPD officer found no criminality in what was alleged against Dr. Assa'ad-Faltas.

⁷⁷ Teresa did hear about it again when CPD's Amanda Blanton used it to start fabricating the harassment cases.

[3-4] **By Ms. Weiss:** Q. And you were able to hear what she was saying?

[5-7] **A.** Yes, clearly. We had the windows rolled down. She had her window rolled down, and my window was rolled down. **Richard was driving.**

[8] **Q.** Did you, in fact, talk to an officer that day?

[9] **A.** Yes.

[10] **Q.** And did you file a police report that day?

[11] **A.** Yes, I did.

[12-13] **Q.** Later that afternoon did you find yourself calling 9-1-1 again?

[14] **A.** Yes.

[15] **Dr. Faltas:** Objection.

[16] **The Court:** Overruled.

[17-18] **By Ms. Weiss:** Q. And what was the purpose of that call?

[19] **A.** Blocking me. She was blocking me.

[20-21] **Q.** And when you say blocking you in, if you can describe for the jury what you mean by that.

[22 to page 47, line 7] **A.** Okay. Our parking lots are like this. You could say there's two -- there's one entrance on each side. There's an entrance that's on the side of where I live, and there's an entrance or exit on the side where she lives, whichever you choose to use. I parked my car in front of my building on my side. She would physically take her car, park in front of my car,⁷⁸ and take her camera, lean out, lean through her passenger side and snap pictures, like continuously snap away. You can ask her to stop, and it's no crime for her taking a picture. So when I call 9-1-1, the most they can do is give me a report.

[8] **Q.** And did you ask her to stop?

[9-11] **A.** Many times. I've asked her to stop.⁷⁹ The officers that came out there asked her to stop. My friends asked her to stop. My family has asked her to stop.⁸⁰

[12-13] **Q.** Have you ever asked her to come over to your building or to your car to talk to you?

[14] **A.** Never.

[15-16] **Q.** Does she make comments when she's in her car blocking you and taking photos?

[17-18] **A.** Yeah. She likes to call me a bitch and that she's going to bury me in the ground.⁸¹

[19] **Q.** Does she call you any other names?

[20] **Dr. Faltas:** I'm sorry? I didn't hear the question.

[21] **The Witness:** Yes, she calls me a prostitute.⁸²

[22-23] **By Ms. Weiss:** Q. And does she call you that to your face?

[24] **A.** Yes.

[25] **Q.** Have you heard -- has she told other people that?

[page 48, line 1] **A.** Yes.

[2-3] **Q.** To your knowledge, have you ever heard her say that in front of other people?

[4] **A.** Yes, she has.

[5] **Q.** And who has she said that in front of in front of you?

[6-7] **A.** Every judge that we've been in front of, everybody that has been in the courtroom during that time.

⁷⁸ There are absolutely no pictures taken from close proximity to Teresa's car. In the few photos introduced by the State, there are at least 40 feet between the camera and Teresa's car, as proven by the land in the foreground.

⁷⁹ Teresa testified she had stopped talking to Dr. Faltas in April 2009 before picture-taking began; p 34, lines 5-9 and p 35, lines 1-6. The date stamps, the foliage, and the clothing worn prove the earliest photo taken by Dr. Faltas of Teresa is on 21 September 2009, (also p 231, lines 11-17, *infra*) after Dr. Faltas had applied 2009 CV 401031558 on 16 September 2009, for a restraining order against Teresa. Teresa's claims of "call me a bitch and that she's going to bury me in the ground", (p 47, lines 17-18) and "flipping the finger" (p 35, line 4), are lifted verbatim from said complaint. That pattern started with Potiphar's wife in the Bible.

⁸⁰ Only four of Teresa relatives and "friends" appeared: (1) Rodney Ingram testified that he only laughed at Dr. Faltas because he works "with crazy people" and thought she was one but also posed for her; (2) Curtis Ingram testified that he never spoke to Dr. Faltas nor she to him but Curtis' brothers smiled and posed for her to photograph them; (3) Tiffany Lurke testified she only unleashed profanities on Dr. Faltas on their only encounter on 21 October 2009; and (4) Corey Lamont Curry did not testify he ever asked Dr. Faltas to stop anything. All testimony and documents prove Teresa, an adult, never asked for herself and never had family or friends ask for her. Nor would it count if they had: the law expects a competent adult to speak for herself.

⁸¹ Vide note 79, *supra*.

⁸² This Teresa, a former night club stripper, was also arrested for solicitation in Florence, SC on 11 July 2011 and was later convicted of related drug possession. Also, on 9 October 2012, Teresa was, along with a then-new boyfriend, arrested for un-prescribed Oxycontin and marijuana possession, Law Enf. Case: 1210814109-R02, and pled guilty to the latter, case 2012A4010201178, in Richland County, SC:



Q. What about at the apartment?

A. Yeah, any officer that comes there, the Commissioner of HUD, fire department. **Everybody comes looking for the prostitute of 300 Byron Road.**⁸³

Q. Okay. When law enforcement came out on September 24th, 2009, was she still blocking you in? Do you remember?

A. No, she wasn't blocking me in still when they came. Of course, when they come she's going to either stop or run in her apartment and close the door and refuse to come out.

Q. Do you recall -- does her apartment have a window that overlooks the parking lot?

A. She can stand to her window and see -- if she goes partially to the left side of her window, she can see clearly all the right side which is vice versa.

Q. And do you recall if she was commenting when law enforcement came out to the parking lot?

A. I'm not sure, but she was in the window taking pictures.

Q. Okay. On October 21st of 2009 did you have another opportunity to call law enforcement?

A. Yes.

Q. Okay. And did you make another report on that day?

A. Yes.

Q. Please tell the jury why you called -- why you called 9-1-1 and called law enforcement that day.

A. [7-15] On that day myself, my brother, two of my friends, a mechanic was there -- well, a shade-tree mechanic because one of my vehicles was down.⁸⁴ A guy was working on my car. We were all downstairs, and the defendant wants to post at the mailbox to block anybody that's parked in front of my apartment to keep them from leaving.⁸⁵ So I can't control everybody's actions and to how they respond to her. I have to live there, so I have to keep a certain decorum about myself.⁸⁶ [16-23] One of my friends was basically losing it with her like -- you know, like, "I don't have to put up with this or anything." So she gets -- well, she was in her car the whole time. She opens her car door, picks up rocks that's beside the mailboxes, gravel rocks, and throws the rocks at me. **She picks up the rocks and flings them at me.**⁸⁷ I called 9-1-1 to let them know she just threw rocks at me **and I had the rocks in my hand.**⁸⁸

Q. Prior to her throwing rocks, had she been doing anything else?

A. Besides the constant taking pictures and the harassment?

Q. Involving the pictures, you said that you had some of your friends there. Was Tiffany one of the friends that was there that day?

A. Yes, she was.

Q. And why was she there that day?

A. Tiffany came on that day because **I kept her little girl and she came to pick her up,**⁸⁹ and the defendant was **taking pictures so bad the little girl started screaming and crying.**⁹⁰ And it shows in the pictures where -- well, it shows in the pictures just that -- it shows that she takes the pictures almost in movement.

Dr. Faltas: Objection, Your Honor.

The Court: Basis for the objection?

Dr. Faltas: She cannot possibly know why the baby, a two-year-old, is upset and definitely a two-year-old doesn't know what a camera is or what taking pictures is, and if they do, they usually like to ham it up. So I don't know if she's testifying as an expert in child behavior. She has obviously not been qualified as an expert and didn't give in her educational background as far as expertise --

(Someone coughed in the courtroom.)

Court Reporter: I'm sorry. Can you repeat that? I didn't hear that.

Dr. Faltas: When she gave her education, she didn't give anything as far as expertise in child behavior, but definitely an 18-month doesn't know what a camera is and what taking pictures is.

The Court: Ms. Weiss?

Ms. Weiss: Your Honor, she has given testimony as the caregiver of this child, and this is what was going on and what she observed when --

The Court: Restate the question, please, or ask another one.

Ms. Weiss: Okay. Thank you, Your Honor.

By Ms. Weiss: Q. How often do you take care of your niece? At that time how often were you taking care of your niece?

⁸³ Vide note 82, *supra*. On cross-examination, at Tr. pp 310-314, *infra*, Teresa admitted that none of those she claimed went seeking "the prostitute of 300 Byron Road" propositioned her, which would be the only logical motive to seek a prostitute.

⁸⁴ A 25-frame roll was exposed that day. Each frame is numbered in sequence on the negative strip and on the inert side of the CD of the digitalized photos. Teresa's 00:03:36 call to 911 is time-stamped and so transcribed. Thus, the true sequence is objectively established by audio and photo. In the 300 (north)/304 (south) Byron Road parking lot that day, Corey Lamont Curry is at the far north and Dr. Faltas at the far south. Corey's blue truck blocks Teresa's neighbors (in after-analysis, to help Corey conceal a drug drop into Charlene Crouch's car trunk which was left open). When Dr. Faltas took **frames 1 and 2** to document Corey's presence and suspicious parking, he threatened to rape Dr. Faltas in words and in the gestures documented in **frame 3**. When Teresa saw that from her window, she went down to the parking lot and joined Corey's efforts to harass Dr. Faltas away from the location. **Frames 4-9 show Teresa approaching Dr. Faltas' car and calling 911 with no rock in her hand.** Tiffany Lurke arrived at 13:39:30 pm, Frame 10, and unleashed profanity which the dispatcher mistook for Dr. Faltas' words and asked Teresa to move away. Tiffany bids her toddler "Tell Mommy Bye Bye," which the toddler does at 13:41:33; and the call ends three seconds later.

⁸⁵ Tiffany left at 13:41:33; and the known-to-police cocaine-dealer Corey left before police arrived; Dr. Faltas did not "block them in."

⁸⁶ Teresa's outfit is devoid of "decorum." **She hurried to prevent the drug drop from being photographed by Dr. Faltas.**

⁸⁷ **It is physically impossible for Dr. Faltas to have swung her right arm far back enough in her driver's seat to launch a rock through the passenger-side window to hit Teresa who was over 30 feet away.**

⁸⁸ Magnification of all relevant frames shows only Teresa's keys, not a rock, in her hand.

⁸⁹ Tiffany Lurke arrived to drop her toddler off, not pick her up. The toddler remained with the negligent Teresa. Vide notes 94-8 *infra*.

⁹⁰ On the 911 audio, the toddler is heard only saying "bye" at her mother's request, never "screaming" or "crying."

¹¹⁸⁻¹¹⁹ **A:** It may be twice a month or as needed if – like I said, if she has to work a different shift than her normal hours and her fiancé doesn't come to Columbia until six or seven – so I'm available.⁹⁷ So it could range from twice in a month to four times a month.

¹¹⁹⁻²⁰¹ **Q:** Did you spend a lot of time around your niece in general?

¹²¹ **A:** Yes.⁹²

¹²¹ **Dr. Faltas:** I'm sorry, I didn't hear the question.

¹²²⁻²⁴ **Ms. Weiss:** Did you spend a lot of time around your niece in general? And she said, "Yes."

^{125 to page 52, line 4} **By Ms. Weiss:** Q. And on October 21st, 2009, in the afternoon when you were taking care of the child, what did you observe going on as far as the relationship between the defendant and the child, your niece?

¹³¹ **A:** She was leaned out her window—

¹³¹ **Dr. Faltas:** Your Honor, objection.

¹⁷ **The Witness:** She was leaning out her—

¹⁹ **The Court:** The objection is overruled.

¹⁹⁻¹⁸¹ **The Witness:** She was leaning out her window.⁹³ I had the baby in the stroller near where my car was being fixed. Like I said, there was a mechanic there who was at the front end of my car which made it kind of close to her car, and the pictures will clearly show that she took it's close enough to the child to have upset the child,⁹⁴ and if a child does not know you and you're constantly flashing,⁹⁵ whose child will not cry?⁹⁶ A stranger that's constantly (motioning)⁹⁷ – so, yes, it did upset the child.⁹⁸ As to my personal knowledge, it did upset the child.

¹¹⁹⁻²⁰¹ **By Ms. Weiss:** Q. And did you ask Dr. Faltas to stop?

¹²¹⁻¹²¹ **A:** Yes, I asked her. Even her mom asked her. Her mom asked her —

¹²³ **Q:** Her mom being?

^{124 to page 53, line 5} **A:** Her mom being Tiffany Lurke said to the defendant,⁹⁹ "I do not live here. This is my daughter's auntie. She just keeps her. Could you just leave us alone? Why are you doing this? This is a child. Why are you taking pictures of a child?" And she just

⁹¹ Teresa's "availability" to babysit at 3:30 pm on Wednesday, 21 October 2009, belies her pretense to have then been employed "from seven to three," "five days a week," at "the Mentor Network," p.51, line 22 and 19:20 and p.17, lines 17-19; supra, respectively.

⁹² On 10 November 2009, Teresa DENIED knowing that child at all. Teresa babysat Tiffany's toddler only after Teresa was FIRED from the Mentor Network in June 2009, and then only "until it became bothersome" for Tiffany Tr. p 492, line 25. Then and since, each of Tiffany and Teresa had over 500 FaceBook friends but never friended each other. Tiffany knew not of Teresa's panic attacks and had NOT been called in February 2008, when Teresa needed transportation to the very hospital where Tiffany worked when Teresa's vehicle collided with Marjorie Trifon's vehicle. Vide Ingram v. Trifon 2008CP4004243.

⁹³ Dr. Faltas' car was pointed north to align her driver's side to the mailboxes whence she needed to get her mail. All photos taken that day show at least 30 feet between the camera and the toddler.

⁹⁴ The toddler was uncomfortable only with the sun in her eyes as the negligent Teresa pointed the stroller south on a sunny early afternoon without shading the toddler's head or eyes.

⁹⁵ There could have been no "flashing" near high noon on a cloudless day. The shadows in the photos are consistent with the source of light being the high sun, not a ground-level flash.

⁹⁶ The pretense of being upset by the child's pictures being taken is belied by Tiffany, Teresa and Rodney voluntarily posting tens or hundreds of photos of themselves and of their infant daughters/nieces, sometimes posing seductively, on FaceBook; e.g:



⁹⁷ The toddler appears only in Frames 13-22, always 30 or more feet away from the camera, and is never crying.

⁹⁸ Even if the ten frames were taken in quick succession, and even if the toddler could see Dr. Faltas' index finger pressing the shutter from over 30 feet away, such motion is likely to amuse, not upset, a toddler.

⁹⁹ All Tiffany's words are on the 911 audio as she arrived and left during that call. In her testimony, Tiffany admitted she mainly hurled profanity at Dr. Faltas and wanted to do so again even in the courtroom. Tr. p 504, lines 1-8.

laughed.¹⁰⁰ By the time the police came, she had done backed up her car and parked it and ran upstairs and refused to come out.¹⁰¹

16-21 Q. And how did you feel on this day when all this was going on?

16-21 A. I felt as if I was not an adequate provider for my niece because I don't want Tiffany to feel like if she's leaving her child at my house she's going to be harassed by my neighbor. So that made me feel like I wasn't properly taking care of her child,¹⁰² and I would have felt the same way.¹⁰³

16-21 Q. And did that upset you?

16-21 A. Yes, it did.

16-21 Q. Now, these are specific instances where you've called 9-1-1 or ones that are specifically dated. Have there been other times where these types of events have happened?

16-24 A. Yes, almost every single day. I can't have nobody come and visit me without her calling the police demanding the police that they tell her who is at my house, and we're at two different buildings. Not only with my company which is I'd say two or three people, my family. She accuses my father and my uncles of being clients when she clearly knows who my father is as far as seeing him there¹⁰⁴...

16-24 Dr. Faltas: Objection. Objection.

16-24 The Court: The objection is overruled.

16-24 The Witness: [2-9] She refers to my father and my two uncles that came to pick up my dad's truck, when he came to visit one time and stopped -- she came outside and I -- and I warned everybody that comes to my house: You come at your own discretion because your picture will be taken.¹⁰⁵ Your tags will be ran,¹⁰⁶ everything. So I don't want anybody to come to my house knowing that they're going to have to deal with the defendant. [10-14] So when my dad and my uncles were all outside, she comes in her car like no further than from here to right there with her camera taking pictures, taking pictures snapping of my quote/unquote clients. She harasses my brother almost on a daily basis when he comes over. She blocks him --

16-24 Dr. Faltas: Objection.

16-24 The Witness: -- where he can't go to work.¹⁰⁷

16-24 Dr. Faltas: Objection.

16-24 The Court: Objection is overruled.

16-24 The Witness: She blocks him where he can't go to work.¹⁰⁸ We have to call the police, and that's the only time that she's going to move her car so that he can leave.¹⁰⁹

¹⁰⁰ Tiffany Lurke left before Frames 13-22 were taken. She never saw, or mentions, any pictures being taken of her child. She was only "intimidated" by the fact that pictures were being taken at all (probably because they document her leaving her child in the company of the known-to-her drug dealer Corey Lamont Curry). Her exact words on the 911 audio are:

minutes 01:30 - 01:31 Tiffany Lurke: Coo-koos. minutes 01:32 - 01:33 Corey Lamont Curry: What's the fuck. Have you heard something?
minutes 01:34 - 01:34 Tiffany Lurke: Come on. minutes 01:35 - 01:37 Ingram-Jackson: Yeah. And she's just harassing people.
minutes 01:38 - 01:39 Tiffany Lurke: Why is she taking pictures? minutes 01:40 - 01:41 Ingram-Jackson: The police is getting ready to come.
minutes 01:40 - 01:42 Tiffany Lurke: [profanity] minutes 01:41 - 01:42 Dispatcher: What's your name, ma'am?
minutes 01:43 - 01:47 Tiffany Lurke: [profanity] minutes 01:43 - 01:47 Ingram-Jackson: My name is Teresa Ingram. She's out here harassing up everybody that's in front of the building --
minutes 01:52 - 01:53 Tiffany Lurke: I have a small child here and you're intimidating us by taking pictures. minutes 01:50 - 01:51 Dispatcher: Teresa, I'm sorry, okay, Teresa --
minutes 01:52 - 01:53 male voice: [profanity] minutes 01:53 - 01:54 Dispatcher: Okay, What's your last name?
minutes 01:54 - 01:55 Tiffany Lurke: I do not appreciate it. minutes 01:55 - 01:56 Ingram-Jackson: My last name is Ingram.
minutes 01:56 - 01:57 Tiffany Lurke: [profanity] minutes 01:56 - 01:59 male voice: [profanity]
minutes 01:58 - 02:01 Tiffany Lurke: Whatever you have going on with her, you should, you should keep that
minutes 02:01 - 02:03 male voice: [profanity] minutes 02:01 - 02:02 Dispatcher: Ma'am, can you step away from her for a minute?
minutes 02:02 - 02:08 Tiffany Lurke: [profanity] minutes 02:02 - 02:08 Ingram-Jackson: Yes, ma'am.
minutes 02:02 - 02:08 typing sound at dispatch. minutes 02:07 - 02:08 Ingram-Jackson: Okay. I'm listening now.
minutes 02:53 - 02:54 child sounds minutes 02:54: child sounds minutes 02:55 - 03:02 Ingram-Jackson: And I have the rocks in my hand that she threw at me. And I have witnesses at well.
minutes 03:03 - 03:04 child sounds minutes 03:03 - 03:07 child sounds
minutes 03:03 - 03:06 Tiffany Lurke: Tell Mommy Bye Bye minutes 03:06 - 03:07 child sounds
minutes 03:07 - 03:09 Dispatcher: Okay, all right. I'll send someone down there to talk to you. Okay?
minutes 03:07 - 03:12 Dispatcher: What is she, ma'am, what kind of clothing? You said she left in the car.
minutes 03:10 - 03:12 Dispatcher: What is she, ma'am, what kind of clothing? You said she left in the car. minutes 03:10 - 03:12 Dispatcher: What is she, ma'am, what kind of clothing? You said she left in the car.
minutes 03:13 - 03:14 Tiffany Lurke: [profanity] minutes 03:13 - 03:14 Ingram-Jackson: Yes, ma'am. She's in her car.
minutes 03:15 - 03:16 Dispatcher: Okay. What kind of clothing is she wearing? minutes 03:21 - 03:22 Ingram-Jackson: I don't, I didn't even look at it in her car.
minutes 03:23 - 03:24 Dispatcher: You didn't see it? All right. minutes 03:25 - 03:32 Ingram-Jackson: But, but that's her tag number AZE 592.
minutes 03:33 child: Bye And she left as if she's going towards Garners-Ferry. I'm so sorry that it's every single day.
minutes 03:34 - 03:35 Ingram-Jackson: All right, thank you minutes 03:34 - 03:35 Dispatcher: All right.
minutes 03:34 - 03:35 Ingram-Jackson: All right, thank you minutes 03:35 - 03:36 Dispatcher: You're welcome.

¹⁰¹ Teresa had just told the dispatcher that Dr. Faltas is "going towards Garners-Ferry," not "upstairs."

¹⁰² Teresa was indeed a negligent baby-sitter who put the toddler at risk of injury. *Vide notes 94-8, supra.*

¹⁰³ Teresa endangered the toddler by leaning on her stroller, a toppling risk, and by giving her a key chain with keys to play with, which the toddler put in her mouth, a known choking hazard documented in Frames 17 and 18.

¹⁰⁴ Curtis Lee Ingram, aka Curtis English, testified he never spoke to Dr. Faltas nor she to him. Tr. p 418, lines 16-23.

¹⁰⁵ The only photos Dr. Faltas ever took of her neighbors and their "guest" depict the latter in wrong-doing.

¹⁰⁶ No evidence was presented, or even alleged, that Dr. Assa'ad-Faltas ran anyone's tag in the relevant time period.

¹⁰⁷ It is incongruent for Dr. Assa'ad-Faltas to have "blocked [Rodney] in" while also asking him to leave and threatening to call police if he did not. Please compare Rodney Ingram's testimony at Tr. p 382, lines 6-11 with Tr. p 385, lines 10-21.

¹⁰⁸ *Vide note 107 supra.*

¹⁰⁹ There is no police report of Dr. Faltas "blocking [Rodney Ingram] in" at all.

¹²²⁻²⁵¹ By Ms. Weiss: Q. Now, back on November 6th, 2009, did she call the police regarding you and one of your friends that was outside in the parking lot? Mr. Curry?

[page 55, lines 1-20] A. [1-10] From my understanding of that night – she does it so often. Me and my company are inside upstairs, not knowing that she's done called the police. Something said, "Just go look out the window." There's police downstairs. I don't have to go out because I don't know what's going on, but I notice maybe after 15 or 20 minutes that they're still lingering in front of the building because the apartment buildings are – they have a security code. If you don't have a security code to the bottom door, you can't come knock on anybody else's door. [11-20] So I went outside, and the officer told me that the defendant called and stated that my company had had words with her. Well, that was untrue because anybody that comes to my house, I meet them to make sure that nothing is being said because we've been told that she can take pictures.¹¹⁰ So I meet them outside, come upstairs, maybe about 30 minutes or so. The officers are there demanding that he give up his name just for her. She demands to know everybody that comes to my house, and right now she has a list of everybody that comes to my house to harass them next

²²² Q. Okay.

¹²² Dr. Faltas: Your Honor, objection.

¹²³ The Court: The objection is sustained.

¹²⁴⁻²⁵¹ Dr. Faltas: May I ask the jury to disregard, please? May I ask the Court —

[page 56, lines 1-2] The Court: The jury is to disregard the last portion, the last three words that she said

¹³⁻⁴¹ Ms. Weiss: Teresa, I'm going to ask you to look at what's marked as exhibits -- State's exhibits —

¹³⁻⁶¹ Dr. Faltas: Objection, Your Honor. At this point I'd like the suppression hearing.

¹⁷⁻¹⁰ The Court: All right. All right. Ladies and gentlemen, this will be it for you all for today. Thank you very much. We'll see you all at 10:00 tomorrow morning. Please do not discuss the case. 10:00 tomorrow morning we'll need you in the jury room. Have a good evening.

¹¹²⁻¹¹³ (Whereupon, the jury was excused from open court for the day at 5:26 p.m.)

[pages 56 to 203 are extracted in separate documents] *****

[page 203, line 25 to page 204, line 3] The Court: Any witnesses who have been subpoenaed in this case who are wishing to challenge the issuance of the subpoena we will be in touch with you as long as you make it known to us who you are.

¹⁷⁻⁸ (Whereupon, the jury was brought into open court at 2:19 p.m. [on 24 February 2010, vide Part II.]

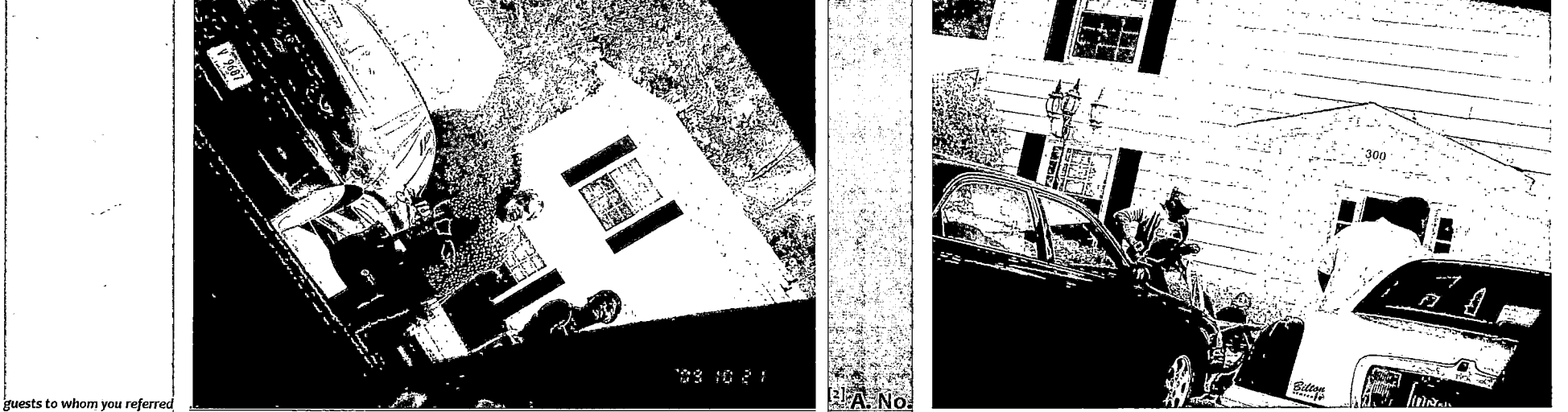
¹¹⁰ Teresa was clearly concerned only about drug exchanges being exposed. She had documented drug-seeking behavior before and after the relevant time period; and her "guest" Corey has several drug possession/dealing convictions before and after the relevant time period. Teresa also admitted accosting Dr. Faltas for "a pill" or "a prescription."

Footnote 36: Admitted in reverse chronological sequence, State Exhibits 17-19 were identified at Trial tr. p 214 (at lines 24-25 for State Ex. 19) and on cross at Tr. p 268, lines 12-15. They show Teresa standing in front of the south building and with her shadow long in front of her from the eastern sun behind the building and her <https://drv.ms/l/s/AszuwSohXLPkhGEEpJXolD3CyMnE>. Public records and trial testimony establish that Building 300, where Teresa lived, is immediately north of Building 304, where Dr. Assa'ad-Faltas lived. Teresa planted herself in front of Building 304 to prevent Dr. Assa'ad-Faltas from re-parking the vehicle she is driving back in front of Building 304. Richard Cooper ushers Teresa back into Building 300 while Dr. Assa'ad-Faltas takes these three photos from the window of the vehicle she is trying to re-park.



Footnote 54: In the 10 November 2009 restraining order hearing 2009CV401063495, the transcript of which then-SC 5th Judicial Circuit Assistant Solicitor Weiss ("JC-5 AS Weiss") caused to be created from the Lykesland Magistrate's audio recordings and delivered to JC-5 AS Weiss on 22 February 2010, Teresa DENIED knowing Tiffany or her daughter, pp 184-5:

[18-19] Q. You don't know this person. Is that you? [20] A. That's me. [21] Q. Do you know this woman? [22] A. No. [23] Q. You don't know her. [24] A. No. [25 - page 185, line 7] Q. She's not one of the



[3] Q. Is this your brother? [4] A. Nope. [5] Q. Are you in this picture? [6] A. Yes, I am. [7] Q. Do you have a child? [8] A. A child is in the picture.

[9] Q. Do you know this child? [10] A. No. [11] Q. You don't know the child. [12] A. No. [13] The Court: How is that material as to who the child is? How is that material to the case?

[15] Ms. Ingram: Because she wants to know how -- [16] The Court: Sh, sh, sh. How is that material to the case?

[18-23] Dr. Faltas: Judge, she runs illegal babysitting (inaudible) in the apartment. She is totally careless about the child's welfare. She is totally (inaudible) -- I'm sorry. (inaudible.) She is giving bad example to the child.

Footnote 82: This Teresa, a former night club stripper, was also arrested for solicitation in Florence, SC on 11 July 2011 and was later convicted of related drug possession. Also, on 9 October 2012, Teresa was, along with a then-new boyfriend, arrested for unprescribed Oxycontin and marijuana possession, Law Enf. Case: 1210814109-R02, and pled guilty to the latter, case 2012A4010201178, in Richland County, SC:



Footnote 96: The pretense of being upset by the child's pictures being taken is belied by Tiffany, Teresa and Rodney voluntarily posting tens or hundreds of photos of themselves and/or their infant daughters/nieces, sometimes posing seductively, on Facebook; e.g:



Footnote 110: Teresa was clearly concerned only about drug exchanges being exposed. She had documented drug-seeking behavior before and after the relevant time period; and her "guest" Corey has several drug possession/dealing convictions before and after the relevant time period. Teresa also admitted accosting Dr. Faltas for "a pill" or "a prescription." Tr. pp 292-7, Defense Exhibit 1, and photos:

