

THE STATE OF SOUTH CAROLINA  
In the Court of Appeals

---

APPEAL FROM BERKELEY COUNTY  
Family Court

---

**RECEIVED**

**Sep 25 2020**

Family Court Case No. 2019-DR-08-1653

**SC Court of Appeals**

Appellate Case No. 2020-001071

---

Ryan E. Terrell,

Petitioner,

v.

Bryan R. Terrell,

Respondent.

---

**MOTION FOR RECONSIDERATION AND AMENDMENT OF JUDGMENT  
OR GRANT FURTHER RELIEF FROM JUDGMENT**

---

Ryan E. Terrell (Mother) filed a motion pursuant to South Carolina Homeland Security Act (The Act) to suppress certain electronic communications between her and non-parties. On September 22, 2020 this Court issued its Order denying Appellant's Motion to Suppress. Appellant, by and through her undersigned attorney, and pursuant to Rules 59 and 60, SCRPC, herein moves for this Court to reconsider and amend its ruling or grant further relief from its Order based upon the following:

Attached hereto is an Affidavit from Appellant's expert, Steven M. Abrams. This Court, in its Order of September 22, 2020, set out that Bryan Terrell (Father) did not intentionally intercept Mother's text messages. The Court stated that these text messages were inadvertently "sent to the child's cell phone." As set out in Mr. Abrams' Affidavit, an "unintentional" securement of these messages is simply not possible. (See Paragraph 10, beginning on Page 3 of the expert's Affidavit.) Further, as set out in the expert's Affidavit at Paragraph 12, Page 5, there is at least one iMessage that was inbound but not read thus resulting in an interception as that message never reached the recipient.

The basis of this Motion is newly discovered evidence, which was not available to the Applicant or the undersigned at the time of the initial Motion being made with this court and, further, that Respondent was not forthcoming to this Court concerning his actions in securing the information from the electronic communications device owned and belonging to Appellant. The interception of at least communications pursuant to statutory and case law results in that all information received associated with that interception should be suppressed.

Respondent's violation of the statute and unlawfully accessing either stored communication of Appellant or intercepting certain communication between Appellant and non-parties still in transit impacts every aspect of this case. Appellant respectfully requests that the Court consider this newly discovered and supplemental information along with the lack of being

forthcoming on the part of Respondent concerning his actions and securing the information which Appellant now seeks to suppress. Accordingly, Appellant herein moves for this Court to modify its prior judgment to now issue an order suppressing any and all information gleaned from the intercepted or stored communication.

Given the newly discovered, substantial evidence of misconduct by Respondent, the Order of Suppression should be granted.

For the foregoing reasons it is respectfully requested that this Court issue its order granting that initial relief sought by Appellant and suppressing any use of any information contained in the unlawfully obtained electronic communications.

Respectfully submitted,



---

Richard G. Whiting, Esquire  
Attorney for Petitioner  
SC Bar No. 6078  
1515 Lady Street (29201)  
Post Office Box 7877  
Columbia, SC 29201  
803.256.9067  
[dick.whiting@whitinglawsc.com](mailto:dick.whiting@whitinglawsc.com)

September 25, 2020

STATE OF SOUTH CAROLINA )  
 )  
COUNTY OF BERKELEY )  
 )  
**BRYAN R. TERRELL,** )  
 )  
Plaintiff, )  
vs. )  
 )  
**RYAN E. TERRELL,** )  
Defendant. )  
\_\_\_\_\_ )

IN THE FAMILY COURT  
NINTH JUDICIAL CIRCUIT

**AFFIDAVIT OF STEVEN M. ABRAMS, JD, MS**

Docket No.: 2019-DR-08-1653

**PERSONALLY** appeared before me the undersigned who being duly sworn says as follows:

**Background**

1. My Name is Steven Marc Abrams. I am a licensed attorney in South Carolina, New York, and Washington, DC. My field of concentration is digital forensics and cyber law. My office address is 1154 Holly Bend Drive, Mount Pleasant, South Carolina 29466. My office phone number is (843) 216-1100. I divide my practice between digital forensics expert services and a civil litigation practice concentrating on cyberlaw and electronic privacy and defamation matters.
2. For 11 years until my retirement in July 2019, I was a commissioned State Constable in South Carolina. Although no longer sworn, I still regularly assist local law enforcement agencies with digital forensics investigations. My full credentials are included in my CV which is appended to this affidavit.
3. I was retained as a digital forensics' expert for Ryan E. Terrell, the Defendant, in the above captioned matter.
4. On September 14, 2020, Jeremy Gilbert, the Senior Manager of the Forensics Department of Dixon Hughes Goodman sent a Bitlocker encrypted flashdrive containing two Cellebrite forensic images of Defendant's iPhone Xr (S/N:C8PXGCARKXKW) which he imaged on May 1, 2019 at approximately 1:30PM to the Andrews Mediation& Law Firm, P.A. in

Mount Pleasant. The Andrews firm delivered the flashdrive to me with the paperwork prepared by Mr. Gilbert at my home office in Mount Pleasant on or about September 17, 2020. On September 18, 2020, I decrypted and extracted the two forensic images and the rest of the contents of Mr. Gilbert's flashdrive in duplicate to two forensically sterile flashdrives. My analysis of Defendant's iPhone XR was made from working copies of the Cellebrite forensic images that I made. I have appended to this affidavit the Blacklight report of the relevant forensic data extracted from Defendant's iPhone.

#### **Providence of iPhone Evidence**

5. I have read the affidavits of the Parties and of Jeremy Gilbert concerning the providence of the iPhone Xr in question for guidance in interpreting the data recovered from the phone. I have also read the emails provided by Mr. Gilbert between himself and Plaintiff regarding a search for specific text streams of Defendant, some which including actual screenshots of Defendant's text messages taken on an older iPhone than the one examined by Mr. Gilbert. I have also reviewed thousands of Defendant's SMS, MMS, and Chats messages undeleted and produced by Mr. Gilbert.
6. According to her affidavit, Defendant, Ryan Terrell, was on a trip out of the country and had no access herself to the phone in the period of April 29, 2019 through May 1, 2019. Before leaving on the trip she had taken affirmative measures that she believed would remove her material from the phone and would terminate access to her iCloud from the phone. This was done so her son, HT, could convert the phone to his own use without access to her previously generated content on the phone and iCloud.
7. The Parties' son HT retrieved the phone from his mother's house sometime on or after April 29, 2019 and brought it to his father's house.

8. According to Plaintiff, Bryan Terrell's, affidavit, he directly observed Defendant's electronic communications. "My concerns all came to light when I became privy to conversations Ryan was having over text on her phone" (Affidavit of Plaintiff, paragraph 2, line 7). After reviewing Defendant's text message communications, Plaintiff took the phone from his son and brought it to forensic examiner Jeremy Gilbert and had him make an image of the phone on May 1, 2019. According to the affidavit of Mr. Gilbert, he was told only that it was the phone of Plaintiff's son, and he was asked to extract information from the phone for Plaintiff and his attorney, Mary J. Murray. Mr. Gilbert does not indicate in his affidavit that he was told in advance of his examination that Defendant's personal information was also on the phone, nor does he indicate that he was asked to search for Defendant's electronic communications with specific individuals other than the son. From the emails between Bryan Terrel and Mr. Gilbert the main focus of the examination was clearly recovering the deleted material of Defendant and searching for specific electronic conversations of Defendant.
9. My examination was focused on finding evidence that Plaintiff, himself and with the aid of Mr. Gilbert, willfully and purposely engaged in the unauthorized access of Defendant's electronic communications by the recovery of Defendant's deleted electronic communications on the iPhone she allowed her son to use, and in at least one case through the interception of Defendant's electronic communications.

**iPhone Examination by Plaintiff and Dixon Hughes aimed at recovering Defendant's deleted electronic communications.**

10. At Plaintiff's direction (via email exchanges provided on Mr. Gilbert's flashdrive), Mr. Gilbert undeleted and extracted all of Defendant's user generated material including

electronic communications and attachments that she carefully deleted prior to allowing her son to use her old phone. There was nothing inadvertent in the discovery of this material. It is explicitly stated in the emails from Plaintiff to Mr. Gilbert that Plaintiff and his wife saw certain text message exchanges and wished Mr. Gilbert to recover them from the iPhone Xr that was being used by the Parties' son. Mr. Gilbert extracted all the material deleted by Defendant and could not find the specific text messages in question on the Xr. Mr. Gilbert determined that Plaintiff had actually seen the text exchanges being referenced in screenshots taken on an older iPhone and could not have taken the screenshots of the text messages using the son's phone as claimed by Plaintiff. (See email exchanges between Plaintiff and Mr. Gilbert appended to this affidavit.)

**Son's brief use of phone used as a pretext to mine volumes of Defendant's data from phone.**

11. These email exchanges undermine any conceivable argument that the discovery of the electronic communications of Defendant on the phone being used by her son was anything but purposeful. Any claim that the phone was only being examined to access the son's communications is quickly seen from the content of these emails between Plaintiff and Mr. Gilbert to be a pretext, as Plaintiff was specifically requesting Mr. Gilbert to locate Defendant's electronic communications with other parties than the son. In fact, Mr. Gilbert provided Defendant and his counsel all of Defendant's deleted electronic communications including personal and HIPAA protected materials. For example, in the ALLSMS.zip file provided by Mr. Gilbert, message 5128 is from Defendant's OBGYN's office, referencing specific doctor and patient information. There are in fact many hundreds of similar

personal electronic communications that were undeleted and produced by Mr. Gilbert, all having nothing to do with the minor son, or his communications with Defendant.

**Interception of Defendant's Electronic Communications**

12. Using Blacklight forensic software I examined the image of the iPhone Xr made by Mr. Gilbert and found that there was at least one text exchange from Defendant to her son that was extracted (intercepted) by Mr. Gilbert prior to being read by son. The message was sent on May 1, 2019 at 00:04:48. It was between Defendant ((843)442-3295) and her two sons (ST x2280, and HT x0292 ). The forensics report indicates that the iMessage was inbound but not read. (See evidence of intercepted text message attached.)

**Screenshot from 4/29/2019 shows access and export of Defendant's data began days before forensic exam, simultaneous with son's first use of the phone.**

13. Using Blacklight I searched the image of the iPhone Xr for screenshots of text message exchanges consistent with that claimed by Plaintiff in his email exchange with Mr. Gilbert. I found only one screenshot of a text exchange in the requisite time period, it deals with a MTC (Motion to Compel), and was taken on April 29,2019 at 20:50:23 UTC. This was after Defendant was on her trip and when HT had first accessed the iPhone Xr in his mother's house. Further the name of the photo, PreviewWellImage.tiff, indicates that the photo was taken as part of an iPhone photo stream, meaning the screenshot was being shared with another device. It appears that someone was looking through this iPhone Xr on April 29, 2019 and sent this screenshot of text messages about the pending litigation to some other iOS device. Plaintiff in his email exchange with Mr. Gilbert claimed to have done something like this after the image of the phone was made on May 1, 2019. This

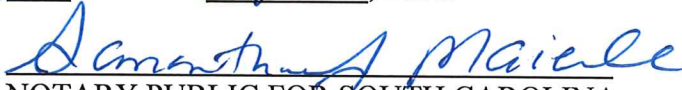
appears to indicate that the phone was searched, and key text messages were saved prior to taking the phone to Mr. Gilbert, and before HT had much if any use of the device.

**14. FURTHER THE AFFIANT SAYETH NOT!**



Steven Marc Abrams, J.D., M.S.

**SWORN TO AND SUBSCRIBED BEFORE ME THIS**  
23 DAY OF September, 2020.



NOTARY PUBLIC FOR SOUTH CAROLINA

MY COMMISSION EXPIRES: March 18, 2024

**APPENDIX A.**

**Steven M. Abrams, J.D., M.S.  
Curriculum Vitae**

**Steven M. Abrams, J.D., M.S.**  
**Attorney, Digital Forensics Examiner and Instructor**  
**1154 Holly Bend Drive**  
**Mount Pleasant, SC 29466**  
**843-216-1100**  
**Steve@AbramsForensics.com**

**Curriculum Vitae**

My key practice areas are Computer Forensics, e-Discovery, and Computer Law.

**Education**

- 2016 -Techno Security 2016, Computer Forensics Training Seminar, Myrtle Beach, SC, June 5-8, 2016
  
- 2014 -Georgia Bureau of Investigations, Internet Evidence Finder Forensics Training, Decatur, Georgia, February 2014
  
- 2013 -Techno Security 2013, Computer Forensics Training Seminar, Myrtle Beach, SC, June 2-5, 2013
  
- 2012 -Techno Security 2012, Computer Forensics Training Seminar, Myrtle Beach, SC, June 3-6, 2012
  
- 2011 -November 9-12: EnCase 7 Training, Salt Lake City, UT  
-November 6 – 9: Paraben Forensics Innovations Conference, Park City, UT  
- South Carolina Assoc. of Legal Investigators (SCALI) Annual Training Seminar, May 2011  
- April 7, 2011: SC Electronic Crime Task Force Quarterly Meeting and Training
  
- 2010 -Techno Security 2010, Computer Forensics Training Seminar, Myrtle Beach, SC, June  
- SCALI Annual Training Seminar, May 2010
  
- 2009 - Cellebrite Mobile Device Forensics Certification (CCMDE), SEMAR, Mexico City, Mexico  
-SCALI Annual Training Seminar, May 2009
  
- 2008 - South Carolina Basic Constable Training, Tri-County Technical College / SC Criminal Justice Academy, October – November 2008  
- Commissioned as a South Carolina State Constable (LEO) on November 20, 2008.  
- Techno Security 2008, Computer Forensics Training Seminar, Myrtle Beach, SC, June
  
- 2007 - Charleston School of Law, Charleston, SC, Juris Doctor (J.D. - Magna Cum Laude)  
  
- GMU2007 Computer Forensics Symposium, Regional Computer Forensic Group of the High Technology Crime Investigation Association, Fairfax VA, Aug. 2007 (40 CEU HTCIA)  
- Techno Security 2007, Computer Forensics Training Seminar, Myrtle Beach, SC, June

- 2006 - University of Aberdeen, School of Law, Kings College, Old Aberdeen, Scotland  
in collaboration with the University of Baltimore Law School  
Summer Law Program in Comparative Criminal Procedure and UK Business Entities &  
Taxation
  - Techno Security 2006, Computer Forensics Training Seminar, Myrtle Beach, SC, June
  - SCALI Annual Training Seminar, May 2006
  
- 2005 - SCALI Annual Training Seminar, May 2005
  - SCALI Fall Training Seminar, October 2005
  
- 2004 - Access Data Advanced Windows Forensics, June 23-25, 2004, New York City. (24  
Credit Hours)
  - SCALI Annual Training Seminar, May 2004 (10 CEU)
  
- 2003 - GMU2003 Computer Forensics Symposium, Regional Computer Forensic Group  
of the High Technology Crime Investigation Association, George Mason University,  
Fairfax, VA. Aug.2003, (40 CEU HTCIA)
  - Techno Security 2003, Computer Forensics and Security Conference (24 CEU)
  - SCALI Annual Training Seminar & PI Training Seminar (16 CEU SLED)
  
- 2002 - SCALI Annual & Fall Training Seminars (16 CEU SLED)
  - GMU2002 Computer Forensics Symposium, Regional Computer Forensic Group  
of the High Technology Crime Investigation Association, Fairfax VA, Aug. 2002,  
(40 CEU HTCIA)
  - Access Data Computer Forensic Boot Camp, North Carolina Justice Academy,  
Edneyville, NC (24 CEU)
  
- 1992-1994 Microsoft Internet Developer Workshops NY, NY
  
- 1992-1993 Novell NetWare CNE Training, IBM Skills Discovery, Jericho NY
  
- 1984-1985 Microcomputer and Electronics Engineering, Hofstra University, Hempstead NY
  
- 1982-1983 Ph.D. Studies, Faculty Fellowship, Columbia University, Graduate School of Arts &  
Sciences
  
- 1981-1982 Columbia University, College of Physicians & Surgeons, Master of Science (M.S.)
  
- 1977-1981 Allegheny College, Meadville PA, Bachelor of Arts (B.A.) (Psychology - Computer  
Science)

**Professional Licenses**

***Current***

Licensed Attorney in South Carolina  
 Licensed Attorney in District of Columbia  
 Licensed Attorney and Counselor at Law in New York

***Previous***

Licensed as a Private Investigator in South Carolina and New York (2002-2008), South Carolina  
 State Constable (Sworn, 2008-2019).

### **Experience (Selected)**

- 2016 – Present, Senior Attorney, Abrams Cyber Law & Forensics, LLC. Mount Pleasant, SC 29466. Concentration on Electronic Privacy and Defamation Cases, Electronic Discovery, and Digital Forensics.
- 2018 - Continuing Legal Education Instructor, *Electronic Privacy Violations during Divorce: Legal and Ethical Guidelines for Family Law Practitioners*, SC Bar, Columbia SC (February 21, 2018).
- 2016 – Continuing Legal Education Instructor, *Smartphones as evidence for Personal Injury Cases*, NBI, Charleston SC (December 8, 2016).
- 2011 – 2016 Sole Practitioner Abrams Law Firm, PC. Mount Pleasant, SC 29466
- 2011 - Digital Forensics Instructor / Investigator, H-11 Digital Forensics / United States Embassy, Tirane, Albania.
- 2010 – Facilitator, Instructor, Annual In-Service Legals and CDV Training (SLED), Lowcountry Constable Association.
- 2009 – Speaker, South Carolina Association for Justice, Hilton Head, SC (August 6, 2009) Topic: Civil Discovery of E-mails after *O’Grady*
- 2009 – Digital Forensics Instructor/Investigator, H-11 Digital Forensics / United States Embassy, Mexico City, Mexico.
- 2008 – Digital Forensics Instructor/Investigator, H-11 Digital Forensics / United States Embassy, Mexico City, Mexico.
- 2008 – Faculty, SC Bar Convention – Family Law Section CLE
- 2008 – 2011 Shareholder, Abrams Millonzi Law Firm, P.C., Mount Pleasant, SC 29464
- 2007 - Presenter, “E-Discovery: Definition, FRCP Changes and Application CLE”, NBI, Charlotte, NC, December 19, 2007
- 2007 - Digital Forensics Instructor/Investigator, H-11 Digital Forensics, United States Embassy, Mexico City, Mexico
- 2007 - Presenter, “Civil to Criminal: Collaborative Computer Forensics Investigations between PIs and Law Enforcement”, GMU2007, August 9th & 10th, 2007
- 2007 - Presenter – “A South Carolina Lawyer’s Roadmap to Navigating the New Federal E-Discovery Rules,” The South Carolina Bar (CLE Division), April 13, 2007.
- 2006 - Presenter – “Typical Internet Sexual Activity and its Detection”, Family Law CLE, The South Carolina Bar (CLE Division), November 2006.

- 2006 - Instructor, "3-day Hands-on Computer Forensics Workshop", Trident Technical College, N. Charleston, SC, CLE accredited by The South Carolina Bar, January 2006.
- 2005 - Lecturer, "Computer Forensic Introduction", Trident Technical College, CLE accredited by South Carolina Bar and CEU / In-Service hours for PIs / LE by SLED.
- 2001 - Present Steve Abrams & Company, Ltd. (dba Abrams Computer Forensics)  
Licensed Private Investigator, Computer Forensics Examiner
- 1998 - 2001 Steve Abrams & Company, Ltd. Mt. Pleasant, SC, President
- 1996 - Democratic National Committee, Instructor - Southeast and Northeast Regional Schools for Congressional Campaign Managers.
- 1995 – 1999 Direct Marketers of Charleston Mt Pleasant, SC, Partner  
Co-owner of Political Database Marketing Company and full service political print shop.
- 1994 - 1995 The Software Studio Mt Pleasant, SC, Owner  
Owner of software development company that developed database applications for the Newspaper publishing industry.
- 1992-1993 Town of North Hempstead, Manhasset, NY, Deputy Commissioner of Finance
- 1986 - 1992 Digitron Telecommunications, Inc., Huntington, NY, Director of R&D
- 1984 - 1986 Computer Associates International., Islandia, NY, Senior Systems Programmer
- 1983 Contel Information Systems Division. Great Neck NY, Software Engineer  
(Developed the first Network Forensics Applications for the DoD)

### **Recent Publications**

Steven M. Abrams, Knowledge of Computer Forensics Is Becoming Essential for Attorneys in the Information Age, 75 N.Y. St. B. Assn. J. 8, 15 (Feb. 2003).

Steven M. Abrams, Knowledge of Computer Forensics, Essential for 21st Century Private Investigators, 16 PI Mag. 46, 59 (October 2003).

### **Professional Awards & Honors**

2008 – Member, SLED Ad Hoc Committee on Computer Forensics

2007 – CALI Excellence for the Future Award, Aviation Law, Charleston School of Law, Fall 2006

– CALI Excellence for the Future Award, Interviewing, Counseling & Negotiation, Charleston School of Law, Fall 2006

– CALI Excellence for the Future Award, Insurance Law, Charleston School of Law, Fall 2006

\_ Dean's List, Charleston School of Law, Fall 2006, Spring 2007.

2004 - "2004 SCALI Investigator of the Year"

2003 - Member, SLED Private Investigations Business Advisory Committee

### **Professional Associations**

Member, Institute of Electrical and Electronics Engineers - IEEE

Member, Lowcountry Constables Association - LCA

### **Bar Association Memberships**

Admitted to practice in **South Carolina, District of Columbia, and New York.**

### **Compensation**

I receive \$350 per hour, plus mileage, travel and lodging expenses, for all Computer Forensics services and for depositions and trial testimony.

### **Previous Expert Testimony**

I have completed over 1200 computer forensics investigations, the overwhelming majority of cases were settled and did not require me to testify.

South Carolina cases in which I was qualified in court as an expert are:

*Hillburn v. Hillburn*, (2001-DR-08-2354);

*Smith v. Smith*, (2001-DR-22-212);

*Natale v. Natale*, (2003-DR-10-775)

*Berda v. Berda*, (2003-DR-10-1899);

*Murphy v. Murphy* (2004-DR-10-1510) and

*Overstolz v. Fountain of Youth Wellness Centers LLC* (2003-CP-10-000761).

*Gitter v. Gitter* (2008-DR-10-2865)

*Ricigliano v. Ricigliano*, (2009-DR-18-0102)

*Edwards v. Junevicius*, (2010-DR-10-4736)

*BTM Machinery Inc. v. Michael J. Finley* (2013-CP-10-4366)

*Cherry v. Cherry* (2014-DR-10-95)

*Whitfield v. Schimpf and Sweetgrass Plastic Surgery,*

*LLC (Case No. 2017-CP-10-2758)*

I was qualified as a testifying expert on digital forensics in federal court in

*UHLIG, LLC, V JOHN ADAM SHIRLEY, (CIVIL ACTION No.. 6:08-1208-HFF)*

I have also prepared expert's reports under Federal Rule 26(a)(2)(B) for the following federal civil suits filed in the United States District Court for the District of South Carolina:

*Lumpkin v. Bennani*, (Civil Action No. 2:03-2904-23), and  
*Miller v. American LaFrance Corp.* (Civil Action No. 2:04-1668-23)  
*Microsoft v. BWC Products Inc.* (Civil Action No. 2:06-CV-2023-CWH)  
*Quala Systems, Inc, et al., v. Bulkhaul USA, Inc., et al.* (Civil Action No. 2:07-CV-00673-PMD)  
*Mainfreight v. John Marco, et al.*, (Civil Action No. 9:cv00563 JFA)

I was appointed the Court's Expert in US District Court, District of South Carolina, Rock Hill Division:

*The Travelers Home and Marine Ins. Co. v. Pope*, C/A No.: 0:10-cv-1688-JFA

I was qualified as a computer forensics expert in North Carolina courts in:  
*Hollins v. Lightfoot.*

In addition, I have been deposed in the following matters over the past ten years:

*Thomas & Assoc. v. Christopher Humphreys* (Case No. 2018-CP-10-0455)  
*Catherine Cope v. Wells Fargo Bank N.A., Century 21 Properties Plus, and Jim Bailey, individually;* (Case No.: 2018-CP-18-00112)  
*Rick Gray v. Church Mutual* (2017)  
*Calandra v. Calandra* (2004-DR-10-2675)  
*McLernon v. McLernon* (2003-DR-10-3090)  
*White v. Cassidy* (2004-DR-08-256)  
*Khoury v. Noce* (2006-CP-10-001830)  
*Quala Systems, Inc, et al., v. Bulkhaul USA, Inc., et al.* (Civil Action No. 2:07-CV-00673-PMD)  
*Mainfreight v. John Marco, et al.*, (Civil Action No. 9:cv00563 JFA)  
*Beard v. Dunn & Dixon-Hughes et al*, (Case No. 2010-CP-08-0776)  
*UHLIG, LLC, V JOHN ADAMSHIRLEY, (CIVIL ACTION No.6:08-1208-HFF)*  
*ALTMAN, ET AL. V. FIRST CITIZENS BANK AND TRUST COMPANY* (2012-CP-34-0124)

(Revised: Sept 11, 2019)





**A Cellebrite Company** †

## Terrell iPhone Digital Forensics Report

## Case Information

<b>Case Name</b>	Terrell 1
<b>Case Number</b>	
<b>Report Date</b>	2020-09-23
<b>Examiner Name</b>	Steven M Abrams, JD MS
<b>Examiner Title</b>	Terrell iPhone from Jeremy Gilbert
<b>Examiner Company</b>	Abrams Cyber Law & Forensics LLC
<b>Examiner Address</b>	PO Box 305 Sullivans Island, SC 29482
<b>Examiner Email</b>	steve@abramscyberlaw.com
<b>Examiner Phone</b>	8432161100
<b>Examiner Fax</b>	8432785107

## Contents

<b>Case Information</b>	<u>Case Information</u>
<b>Device</b>	<u>iPhone -- (Evidence ID: iPhone - 001)</u>
<b>Tag</b>	<u>Intercepted iMessage</u>
<b>Tag</b>	<u>Intercepted Message on 5/1/2019</u>
<b>Tag</b>	<u>Screenshot 4-29-19</u>

**Device: iPhone -- (Evidence ID: iPhone - 001)**

<b>Path</b>	F:\Terrell_iPhone\case\Terrell 1.BlackLight\Partitions\1FDA05C0B83B437291AC7500FF01275\1FDA05C0B83B437291 AC7500FF01275\Files\
<b>Type</b>	CellebriteArchiveEncrypted
<b>Sector Size</b>	512

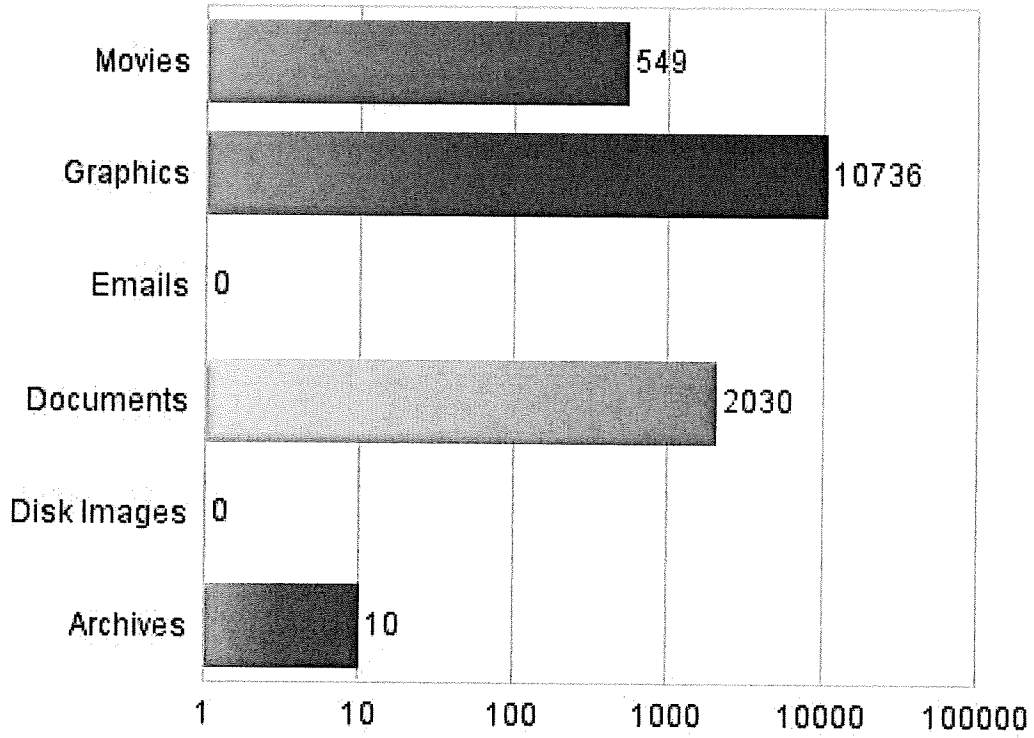
[Back to top](#)

<b>Initial BlackLight Case Version</b>	BlackLight 2020 Release 1
--	---------------------------

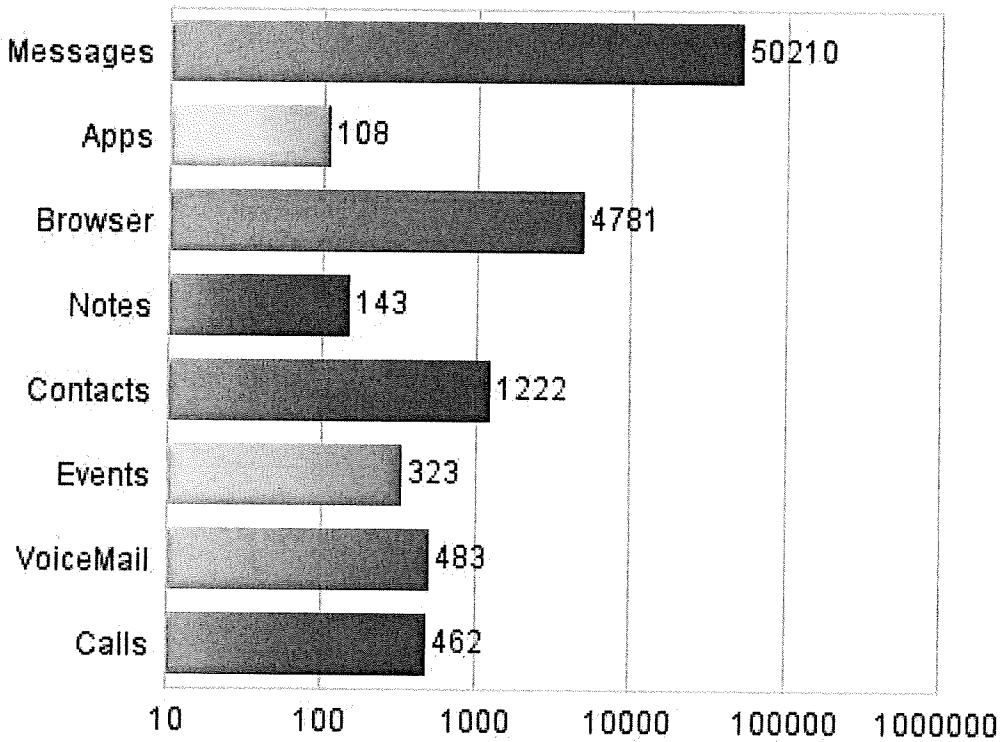
<b>Name</b>	iPhone
<b>Snapshot</b>	Not Available
<b>Snapshot Date</b>	Not Available
<b>Model Version</b>	iPhone XR
<b>Carrier</b>	Not Available
<b>Capacity</b>	Not Available
<b>Phone Number</b>	(843) 990-0292
<b>Data Available</b>	Not Available
<b>Data Used</b>	Not Available
<b>OS Version</b>	12.2
<b>Product Type</b>	iPhone11,8
<b>Model Number</b>	N841AP
<b>Firmware Version</b>	Not Available
<b>Serial Number</b>	C8PXGCARKXKW
<b>UDID</b>	00008020-000449122128002E
<b>IMEI</b>	357331090571637
<b>IMSI</b>	310410837074280
<b>ICCID</b>	89014103278370742804
<b>WiFi Address</b>	Not Available
<b>Bluetooth MAC Address</b>	Not Available
<b>Time Zone</b>	Not Available
<b>Jailbroken</b>	False
<b>Password</b>	1234

<b>Volume Name</b>	iPhone
<b>Partition Type</b>	Directory
<b>File System</b>	CellebriteArchiveEncrypted
<b>OS Version</b>	
<b>OS Install Date</b>	
<b>Identifier</b>	
<b>Root File Create Date</b>	
<b>Root File Modify Date</b>	
<b>Root File Accessed Date</b>	
<b>File Count</b>	14126
<b>Folder Count</b>	12058
<b>Sector Size</b>	
<b>Sector Count</b>	
<b>Total Size</b>	
<b>Space Used</b>	
<b>Space Available</b>	
<b>Block Sector Count</b>	
<b>Last File ID</b>	26184
<b>Write Count</b>	

**Application Artifacts**



**Device Artifacts**



## Intercepted iMessage

### Narrative

Message sent by Defendant to her sons. Copied by Husband's Agent before being read by intended Recipient.

Tag: Intercepted iMessage (1-1 of 1)

### Message

iMessage  
2019-05-01 00:04:48 (UTC) [1]  
Sender: Mama ( (843) 442-3295 )  
Participants: Mama ( (843) 442-3295 ), Sam Terrell ( (843) 329-2280 ), Self ( (843) 990-0292 )

### Notes

[1] Source Device	iPhone/iPhone
[1] Source File	<u>/mobile/Library/SMS/sms.db</u>

## Intercepted Message on 5/1/2019

### Narrative

Final two messages before iPhone was imaged,  
first one was read,  
second one was not – eg intercepted.

Tag: Intercepted Message on 5/1/2019 (1-2 of 2)

Plugin	
Source Device	iPhone/iPhone
Path	/mobile/Library/SMS/sms.db
rowid	49733
MESSAGE DATE	2019-05-01 00:04:47
DATE DELIVERED	N/A
DATE READ	2019-05-01 00:14:26
MESSAGE	Garrobo grande
CONTACT ID	+18434423295
SERVICE	iMessage
ACCOUNT	p:+18439900292
IS DELIVERED	1
IS FROM ME	0
FILENAME	~/Library/SMS/Attachments/b8/08/B0789913-6DF0-4C9F-8F41-684CCDF7C0AC/IMG_0033.jpeg
MIME TYPE	image/jpeg
TRANSFER TYPE	IMG_0033.jpeg
TOTAL BYTES	3541995
Source File	/mobile/Library/SMS/sms.db

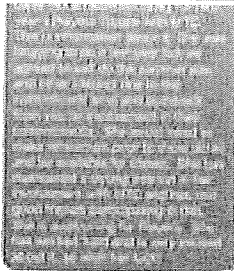
Plugin	
Source Device	iPhone/iPhone
Path	/mobile/Library/SMS/sms.db
rowid	49732
MESSAGE DATE	2019-05-01 00:04:48
DATE DELIVERED	N/A
DATE READ	N/A
CONTACT ID	+18434423295
SERVICE	iMessage
ACCOUNT	P:+18439900292
IS DELIVERED	0
IS FROM ME	0
Source File	/mobile/Library/SMS/sms.db

## Screenshot 4-29-19

### Narrative

This screenshot created prior to taking phone to Jeremy Gilbert. 4/29/19 was earliest use of phone by HT and first opportunity he had to take phone to Plaintiff's house.

Tag: Screenshot 4-29-19 (1-1 of 1)

Picture	
<b>Source Device</b>	iPhone/iPhone
<b>Name</b>	PreviewWellImage.tiff
<b>Path</b>	/mobile/Media/PhotoData/MISC/PreviewWellImage.tiff
<b>Size</b>	47070 (46.0 KB)
<b>Dimensions</b>	125 x 125
<b>BBT ID</b>	12074
<b>File System ID</b>	7452
<b>Size On Disk</b>	47070
<b>Extension</b>	tiff
<b>Content Extension</b>	TIFF
<b>Date Created</b>	2019-04-29 20:50:23 (UTC)
<b>Date Modified</b>	2019-04-29 20:50:23 (UTC)
<b>File System Offset</b>	UTC
<b>fsType</b>	CellebriteArchiveEncrypted
<b>Directory</b>	False
<b>Visible</b>	True
<b>Locked</b>	False
<b>Owner ID</b>	0
<b>Group ID</b>	0
<b>Permissions</b>	0000
<b>Entropy</b>	0.
<b>Fork Count</b>	1
<b>Hash:1:MD5</b>	DF27EF245CC50D8AB4748024C02F2121
<b>Hash Set Category</b>	
<b>Hidden</b>	false
<b>IOS Hidden Item</b>	False
<b>Skin Tone</b>	0
<b>Dimensions</b>	125 x 125
<b>Colors</b>	RGB
<b>Aspect Ratio</b>	1:1
<b>Megapixels</b>	0.015625
<b>DPI</b>	-9223372036854775808
<b>Format</b>	TIFF
<b>Extremism</b>	0.005956
<b>Thumbnail</b>	

Not published from me. You can  
didn't follow the agreement.

**Source File**

/mobile/Media/PhotoData/MISC/PreviewWellImage.tiff

[The main body of the document is a large, dark, and extremely blurry area where the text is completely illegible.]

[Small, illegible text block]

[Illegible text line]

[Illegible text line]



---

**From:** Bryan Terrell <bryan\_terrell\_mt@hotmail.com>  
**Sent:** Friday, May 10, 2019 1:25 PM  
**To:** Gilbert, Jeremy  
**Cc:** Mary Murray  
**Subject:** Items not found on phone copy

\*\*\*\* EXTERNAL EMAIL \*\*\*\*

Hi Jeremy,

While reviewing the phone PDF that you sent me last week, I have not found several text (chat) threads that were on my son's phone. Perhaps they are somewhere in the PDF, but not individually bookmarked? I know they existed, because my wife and I both viewed them on the phone, and I have screen shots of at least one of them. I sincerely hope you can help me locate these, because they are relevant to our problems.

I am looking for the following text threads:

Jo Hethcox (listed as "Jo" in the text thread)

Kay Rose (phone number 843-870-9257, possibly listed as "Kay" in the text thread)

A thread with an unknown adult male from a 512 area code (Austin, Texas)

Please let me know if you can locate this data.

Many thanks,

Bryan Terrell

**To:** Gilbert, Jeremy <[Jeremy.Gilbert@dhg.com](mailto:Jeremy.Gilbert@dhg.com)>  
**Cc:** Mary Murray <[mjmurray@lawyershmp.com](mailto:mjmurray@lawyershmp.com)>  
**Subject:** Re: Items not found on phone copy

\*\*\*\* EXTERNAL EMAIL \*\*\*\*

Hi Jeremy,

The screenshots are pictures that I took of my son's phone the same afternoon that I picked the phone up from your office. This means the conversation must have still been on the phone when I dropped it at your office.

I am alarmed that this and the other conversations were not included in the PDF file. How can this be, if we copied all chats?

Sent from my iPhone

On May 13, 2019, at 3:01 PM, Gilbert, Jeremy <[Jeremy.Gilbert@dhg.com](mailto:Jeremy.Gilbert@dhg.com)> wrote:

Thank you for the pictures. What you have are screenshots of a conversation that has been deleted. I don't have any fragments of the original conversation. I did find one additional screenshot in addition to the three you attached. They are found on the same portal site we've been using.

Please note these screenshots were taken on January 17, 2019, so the "today" in the screenshots most likely refers to January 17, 2019.

**Jeremy Gilbert, GCFE, GASF, EnCE, CPA**  
**Senior Manager | IT Advisory**  
Dixon Hughes Goodman LLP  
D 843.727.3251  
P 843.722.6443  
Incident Response Hotline: 844.696.2488 (toll-free)  
<http://dhg.com/digital-forensics>  
[jeremy.gilbert@dhg.com](mailto:jeremy.gilbert@dhg.com)  
525 E Bay St, Suite 100, Charleston, SC 29403

---

**From:** Bryan Terrell <[bryan\\_terrell\\_mt@hotmail.com](mailto:bryan_terrell_mt@hotmail.com)>  
**Sent:** Monday, May 13, 2019 14:34  
**To:** Gilbert, Jeremy <[Jeremy.Gilbert@dhg.com](mailto:Jeremy.Gilbert@dhg.com)>  
**Cc:** Mary Murray <[mjmurray@lawyershmp.com](mailto:mjmurray@lawyershmp.com)>  
**Subject:** Re: Items not found on phone copy

\*\*\*\* EXTERNAL EMAIL \*\*\*\*

Hi Jeremy, and thanks for getting back with me. Screen shots of the conversation are attached. Any help you can give would be much appreciated.

Best regards,

Bryan

On May 13, 2019, at 11:09 AM, Gilbert, Jeremy  
<[Jeremy.Gilbert@dhg.com](mailto:Jeremy.Gilbert@dhg.com)> wrote:

Bryan,  
I found the chats with Kay and a few chats with 512 numbers. I've uploaded those to the same portal site we used earlier.

I was not able to locate any chats with Jo Hethcox or even a contact named Jo Hethcox or Jo anything. The only mention of Jo Hethcox on the phone is Drew's mom sending Drew a mailing address: "Send to: St. Phillips Church, Attn: Jo Hethcox, 142 Church St., Charleston, SC 29401." Do you have a screenshot of this conversation with Jo? That could provide some search terms to use to find it.

**Jeremy Gilbert, GCFE, GASF, EnCE, CPA**  
**Senior Manager | IT Advisory**  
Dixon Hughes Goodman LLP  
D 843.727.3251  
P 843.722.6443  
Incident Response Hotline: 844.696.2488 (toll-free)  
<http://dhg.com/digital-forensics>  
[jeremy.gilbert@dhg.com](mailto:jeremy.gilbert@dhg.com)  
525 E Bay St, Suite 100, Charleston, SC 29403

**From:** Bryan Terrell <[bryan\\_terrell\\_mt@hotmail.com](mailto:bryan_terrell_mt@hotmail.com)>  
**Sent:** Friday, May 10, 2019 13:25  
**To:** Gilbert, Jeremy <[Jeremy.Gilbert@dhg.com](mailto:Jeremy.Gilbert@dhg.com)>  
**Cc:** Mary Murray <[mjmurray@lawyershmp.com](mailto:mjmurray@lawyershmp.com)>  
**Subject:** Items not found on phone copy

\*\*\*\* **EXTERNAL EMAIL** \*\*\*\*

Hi Jeremy,

While reviewing the phone PDF that you sent me last week, I have not found several text (chat) threads that were on my son's phone. Perhaps they are somewhere in the PDF, but not individually bookmarked? I know they existed, because my wife and I both viewed them on the phone, and I have screen shots of at least one of them. I sincerely hope you can help me locate these, because they are relevant to our problems.

I am looking for the following text threads:

Jo Hethcox (listed as "Jo" in the text thread)

Kay Rose (phone number 843-870-9257, possibly listed as "Kay" in the text thread)

A thread with an unknown adult male from a 512 area code (Austin, Texas)

Please let me know if you can locate this data.

Many thanks,

Bryan Terrell

---

**Confidentiality Notice:** This e-mail is intended only for the addressee named above. It contains information that is privileged, confidential or otherwise protected from use and disclosure. If you are not the intended recipient, you are hereby notified that any review, disclosure, copying, or dissemination of this transmission, or taking of any action in reliance on its contents, or other use is strictly prohibited. If you have received this transmission in error, please reply to the sender listed above immediately and permanently delete this message from your inbox. Thank you for your cooperation.

<image001.jpg><image002.jpg><image003.jpg>

---

**From:** Bryan Terrell <bryan\_terrell\_mt@hotmail.com>  
**Sent:** Monday, May 13, 2019 4:40 PM  
**To:** Gilbert, Jeremy  
**Cc:** Mary Murray  
**Subject:** Re: Items not found on phone copy

\*\*\*\* EXTERNAL EMAIL \*\*\*\*

Hi Jeremy. Thanks for the clarification. It's confusing because the original screenshots were taken on my ex-wife's phone, then sent to my son's phone in a chat, then I photographed these as attachments on my son's iPhone Xr. Ugh! So confusing!

Thanks for clearing this up!

On May 13, 2019, at 4:25 PM, Gilbert, Jeremy <[Jeremy.Gilbert@dhg.com](mailto:Jeremy.Gilbert@dhg.com)> wrote:

Bryan,

I see the source of the confusion now. The pictures you sent me are pictures of screenshots of a chat from a different phone. You're viewing them through the messages app because the screenshots are attachments to a chat, but there is no evidence of a chat with Jo on your son's phone. I can tell these screenshots were not taken using your son's iPhone Xr because of the position of UI elements in the screenshot. Most notable is the position of the clock in the screenshot. Notice it's in the center. On an iPhone Xr, the notch in the display doesn't allow for the clock to be located in the center, so it's on the left side. In these screenshots, the 1:50PM time is shown in the center of the screen, so the screenshot was taken using an iPhone 8 or older.

These screenshots are included in the big chat between Ryan and Drew. If you look at the first PDF report we sent, you'll see these screenshots on pages 4086 and 4087.

We uploaded only the chats that appeared relevant based on our conversation on May 1<sup>st</sup> to save you the effort of reviewing irrelevant messages. If you would like to review all the messages, I have created PDF reports with all Chats, all SMS, and all MMS messages. These reports are large, so it will take about an hour to finish uploading to the portal.

**Jeremy Gilbert, GCFE, GASF, EnCE, CPA**  
**Senior Manager | IT Advisory**  
Dixon Hughes Goodman LLP  
D 843.727.3251  
P 843.722.6443  
Incident Response Hotline: 844.696.2488 (toll-free)  
<http://dhg.com/digital-forensics>  
[jeremy.gilbert@dhg.com](mailto:jeremy.gilbert@dhg.com)  
525 E Bay St, Suite 100, Charleston, SC 29403

---

**From:** Bryan Terrell <bryan\_terrell\_mt@hotmail.com>  
**Sent:** Monday, May 13, 2019 15:08

---

**From:** Gilbert, Jeremy  
**Sent:** Monday, May 13, 2019 4:25 PM  
**To:** 'Bryan Terrell'  
**Cc:** 'Mary Murray'  
**Subject:** RE: Items not found on phone copy

Bryan,

I see the source of the confusion now. The pictures you sent me are pictures of screenshots of a chat from a different phone. You're viewing them through the messages app because the screenshots are attachments to a chat, but there is no evidence of a chat with Jo on your son's phone. I can tell these screenshots were not taken using your son's iPhone Xr because of the position of UI elements in the screenshot. Most notable is the position of the clock in the screenshot. Notice it's in the center. On an iPhone Xr, the notch in the display doesn't allow for the clock to be located in the center, so it's on the left side. In these screenshots, the 1:50PM time is shown in the center of the screen, so the screenshot was taken using an iPhone 8 or older.

These screenshots are included in the big chat between Ryan and Drew. If you look at the first PDF report we sent, you'll see these screenshots on pages 4086 and 4087.

We uploaded only the chats that appeared relevant based on our conversation on May 1<sup>st</sup> to save you the effort of reviewing irrelevant messages. If you would like to review all the messages, I have created PDF reports with all Chats, all SMS, and all MMS messages. These reports are large, so it will take about an hour to finish uploading to the portal.

**Jeremy Gilbert, GCFE, GASF, EnCE, CPA**  
**Senior Manager | IT Advisory**

Dixon Hughes Goodman LLP

D 843.727.3251

P 843.722.6443

Incident Response Hotline: 844.696.2488 (toll-free)

<http://dhg.com/digital-forensics>

[jeremy.gilbert@dhg.com](mailto:jeremy.gilbert@dhg.com)

525 E Bay St, Suite 100, Charleston, SC 29403

**From:** Bryan Terrell <bryan\_terrell\_mt@hotmail.com>  
**Sent:** Monday, May 13, 2019 15:08  
**To:** Gilbert, Jeremy <Jeremy.Gilbert@dhg.com>  
**Cc:** Mary Murray <mjmurray@lawyershmp.com>  
**Subject:** Re: Items not found on phone copy

**\*\*\*\* EXTERNAL EMAIL \*\*\*\***

Hi Jeremy,

The screenshots are pictures that I took of my son's phone the same afternoon that I picked the phone up from your office. This means the conversation must have still been on the phone when I dropped it at your office.

I am alarmed that this and the other conversations were not included in the PDF file. How can this be, if we copied all chats?

Sent from my iPhone

On May 13, 2019, at 3:01 PM, Gilbert, Jeremy <[Jeremy.Gilbert@dhg.com](mailto:Jeremy.Gilbert@dhg.com)> wrote:

Thank you for the pictures. What you have are screenshots of a conversation that has been deleted. I don't have any fragments of the original conversation. I did find one additional screenshot in addition to the three you attached. They are found on the same portal site we've been using.

Please note these screenshots were taken on January 17, 2019, so the "today" in the screenshots most likely refers to January 17, 2019.

**Jeremy Gilbert, GCFE, GASF, EnCE, CPA**  
**Senior Manager | IT Advisory**  
Dixon Hughes Goodman LLP  
D 843.727.3251  
P 843.722.6443  
Incident Response Hotline: 844.696.2488 (toll-free)  
<http://dhg.com/digital-forensics>  
[jeremy.gilbert@dhg.com](mailto:jeremy.gilbert@dhg.com)  
525 E Bay St, Suite 100, Charleston, SC 29403

**From:** Bryan Terrell <[bryan\\_terrell\\_mt@hotmail.com](mailto:bryan_terrell_mt@hotmail.com)>  
**Sent:** Monday, May 13, 2019 14:34  
**To:** Gilbert, Jeremy <[Jeremy.Gilbert@dhg.com](mailto:Jeremy.Gilbert@dhg.com)>  
**Cc:** Mary Murray <[mjmurray@lawyershmp.com](mailto:mjmurray@lawyershmp.com)>  
**Subject:** Re: Items not found on phone copy

\*\*\*\* **EXTERNAL EMAIL** \*\*\*\*

Hi Jeremy, and thanks for getting back with me. Screen shots of the conversation are attached. Any help you can give would be much appreciated.

Best regards,

Bryan

On May 13, 2019, at 11:09 AM, Gilbert, Jeremy <[Jeremy.Gilbert@dhg.com](mailto:Jeremy.Gilbert@dhg.com)> wrote:

Bryan,  
I found the chats with Kay and a few chats with 512 numbers. I've uploaded those to the same portal site we used earlier.

I was not able to locate any chats with Jo Hethcox or even a contact named Jo Hethcox or Jo anything. The only mention of Jo Hethcox on the phone is Drew's mom sending Drew a mailing address: "Send to: St. Phillips Church, Attn: Jo Hethcox, 142 Church St., Charleston, SC 29401." Do you have a screenshot of this conversation with Jo? That could provide some search terms to use to find it.

**Jeremy Gilbert, GCFE, GASF, EnCE, CPA**  
**Senior Manager | IT Advisory**  
Dixon Hughes Goodman LLP  
D 843.727.3251  
P 843.722.6443  
Incident Response Hotline: 844.696.2488 (toll-free)  
<http://dhg.com/digital-forensics>  
[jeremy.gilbert@dhg.com](mailto:jeremy.gilbert@dhg.com)  
525 E Bay St, Suite 100, Charleston, SC 29403

**From:** Bryan Terrell <[bryan\\_terrell\\_mt@hotmail.com](mailto:bryan_terrell_mt@hotmail.com)>  
**Sent:** Friday, May 10, 2019 13:25  
**To:** Gilbert, Jeremy <[Jeremy.Gilbert@dhg.com](mailto:Jeremy.Gilbert@dhg.com)>  
**Cc:** Mary Murray <[mjmurray@lawyershmp.com](mailto:mjmurray@lawyershmp.com)>  
**Subject:** Items not found on phone copy

**\*\*\*\* EXTERNAL EMAIL \*\*\*\***

Hi Jeremy,

While reviewing the phone PDF that you sent me last week, I have not found several text (chat) threads that were on my son's phone. Perhaps they are somewhere in the PDF, but not individually bookmarked? I know they existed, because my wife and I both viewed them on the phone, and I have screen shots of at least one of them. I sincerely hope you can help me locate these, because they are relevant to our problems.

I am looking for the following text threads:

Jo Hethcox (listed as "Jo" in the text thread)  
Kay Rose (phone number 843-870-9257, possibly listed as "Kay" in the text thread)  
A thread with an unknown adult male from a 512 area code (Austin, Texas)

Please let me know if you can locate this data.

Many thanks,

Bryan Terrell

---

**Confidentiality Notice:** This e-mail is intended only for the addressee named above. It contains information that is privileged, confidential or otherwise protected from use and disclosure. If you are not the intended recipient, you are hereby notified that any review, disclosure, copying, or dissemination of this transmission, or taking of any action in reliance on its contents, or other use is strictly prohibited. If you have received this transmission in error, please reply to the sender listed above immediately and permanently delete this message from your inbox. Thank you for your cooperation.

<image001.jpg><image002.jpg><image003.jpg>

LAW OFFICES OF  
**RICHARD G. WHITING**  
A PROFESSIONAL ASSOCIATION  
1515 LADY STREET  
POST OFFICE BOX 7877  
COLUMBIA, SOUTH CAROLINA 29202

TELEPHONE (803) 256-9067  
FACSIMILE (803) 256-0223  
dick.whiting@whitinglawsc.com

September 25, 2020

**VIA MICROSOFT ONE DRIVE AND U. S. MAIL**

The Honorable Jenny Abbot Kitchings  
South Carolina Court of Appeals  
1015 Sumter Street  
Post Office Box 11629  
Columbia, SC 29211

**RECEIVED**  
**Sep 25 2020**  
**SC Court of Appeals**

RE: Bryan R. Terrell v. Ryan E. Terrell  
Civil Action No. 2019-DR-08-1653

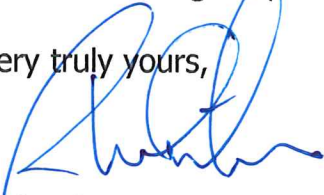
Dear Ms. Kitchings:

Enclosed please find Petitioner's Motion for Reconsideration and Amendment of Judgment or Grant Further Relief from Judgment. By copy of this correspondence via email I am also serving copies of this motion on attorney for Respondent, the Guardian ad Litem, co-attorneys for Petitioner, and the trial court. Also enclosed is a check for the filing fees for this Motion.

If anything else is needed, please do not hesitate to contact my office.

With kindest regards, I am,

Very truly yours,



Richard G. Whiting

/klh

enclosures

cc: Mary J. Murray, Esquire, Attorney for Respondent (via email)  
Maria Averill, Esquire, Guardian ad Litem (via email)  
F. P. Segars-Andrews, Esquire, Attorney for Petitioner (via email)  
Lori D. Stoney, Esquire, Attorney for Petitioner (via email)  
Berkeley County Clerk of Court (via email)

FELLOW, AMERICAN ACADEMY OF MATRIMONIAL LAWYERS

CERTIFIED FAMILY COURT MEDIATOR