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Sergeant Daniel Eckert
Mount Pleasant Police Department
Town of Mount Pleasant
Municipal Complex
100 Ann Edwards Lane
Mt. Pleasant, SC 29464

Dear Sergeant Eckert:

Based on the documentation provided to my client by the Mount Pleasant Police Department (MPPD) pursuant to Rule 5 of the SC Rules of Criminal Procedure in Case No. 2024000431, my client, Brooks Templeton, respectfully requests April Monroe be charged under S.C. Code Ann. §16-17-722 for filing a false police report. According to MPPD Incident Reports and officer sworn testimony at the Preliminary Hearing in Charleston County on July 15, 2024, Detective Cooper Upson relied on the false information provided to him by April Monroe to charge Brooks Templeton with a felony. Pursuant to S.C. Code Ann. §16-17-722(B), "A person who violates subsection (A) by falsely reporting a felony is guilty of a felony."

All information and documents referenced in this letter were produced by MPPD to my client with the exception of a publicly filed civil lawsuit and publicly available social media postings from Dallas Monroe.

On April 9, 2024, Detective Cooper Upson of the MPPD swore out an Arrest Warrant against Brooks Templeton for Assault and Battery First Degree, which is a felony. Despite the fact that his fellow officers, who were present at the scene of the alleged incident on January 12, 2024, and spoke with multiple witnesses, investigated the matter for weeks thereafter, classified the allegations as a misdemeanor Assault and Battery Second Degree, found no probable cause to arrest Mr. Templeton, and closed the case,¹ Detective Upson testified that he reopened the case months after the alleged incident and days after Mr. Templeton's mother declared her run for Congress, at the request of one individual: April Monroe.² He also testified that he *increased the charge to a felony based on the (fabricated) injuries communicated to him by April Monroe* who is not a doctor, nor is she a witness to the underlying alleged incident.³ Monroe falsely

¹ Arrest Warrant OCA 2024000431; MPPD Case No. 2024000431 Supplemental Incident Report No. 2 dated February 3, 2024, p. 6.

² Case No. 2024000431, Preliminary Hearing Transcript Dated July 15, 2024, pp. 25 & 26; MPPD Case No.: 2024000431 Supplemental Incident Report No. 6 dated April 8, 2024, p. 14.

³ MPPD Case No.: 2024000431 Supplemental Incident Report No. 6 dated April 8, 2024, p. 19; Preliminary Hearing Transcript dated July 15, 2024, p 12-15.

reported, mislead, and misinformed MPPD about the injuries to her son while knowingly withholding medical records from MPPD about which she was fully aware and that were within her control at all times relevant to this matter.⁴ April Monroe's false report to MPPD caused a felony charge against Mr. Templeton.

Interestingly, Ms. Monroe has apparently leveraged the MPPD at least once before. At all times during the investigation involving Mr. Templeton, and upon information and belief, she is currently suing another individual unrelated to this matter in civil court for money damages alleging they assaulted her son with no provocation and caused brain damage a few months before the incident of which she accuses my client.⁵ Similar to her treatment of Mr. Templeton, she also had this individual arrested for Assault and Battery by the MPPD on behalf of her son, Dallas Monroe. Upon information and belief, the gentleman was released and does not have a criminal record. The hubris with which Ms. Monroe manipulates the judicial system is reflected in her son's correspondence with a classmate and social media posts.⁶

In the matter before you, Ms. Monroe falsely reported to MPPD that her son, Dallas Monroe, was admitted to the hospital for days due to seizures as a result of an alleged altercation with multiple unnamed individuals in January 2024.⁷ Detective Upson included in his report and testified at the Preliminary Hearing that he relied upon Monroe's (false) report of injuries as his reason to increase the Assault and Battery Charge, ultimately against Mr. Templeton, from a misdemeanor to A&B First Degree – a felony.⁸ Ms. Monroe knowingly reported objectively false information to MPPD over many months and on numerous occasions directly resulting in the felony Charge according to MPPD testimony, text messages, and Incident Reports.

- Specifically, Ms. Monroe "stated that [Dallas Monroe], had seizures from the assault and was admitted into MUSC for a couple days."⁹ She also reported that Dallas was seriously harmed and needed ongoing medical follow up.¹⁰
 - According to Medical Records from the Medical University of South Carolina (MUSC Medical Records) from January 13, 2024, Dallas Monroe was *never* admitted to MUSC. Instead, Dallas visited the ER and was discharged less than 3 hours after arriving at MUSC¹¹ with the recommendation that he take Tylenol and not mix it with the alcohol in his bloodstream that exceeded the legal limit.¹²

⁴ See documents referenced in footnotes 7 through 45 below; Case No. 2024000431, Preliminary Hearing Transcript Dated July 15, 2024, p. 18.

⁵ April Monroe, as parent and natural guardian of D.M., a minor, Plaintiff v. Tobey Andrew Wagner, Jr. and Mary A. Wagner, Defendants. Charleston County Court of Common Pleas C/A: 2023CP1005062

⁶ MPPD Case No. 2024000431 Supplemental Incident Report No. 2 dated February 3, 2024, p. 5 - Social media post made within minutes of the alleged incident on January 12, 2024, at 11:26 p.m. and hours before Dallas Monroe visited the ER according to April Monroe's own review of Dallas Monroe's phone record as reported during her video interview with Officer Upson on March 22, 2024; SnapChat message sent by Dallas Monroe after Mr. Templeton was arrested.

⁷ MPPD Case No.: 2024000431 Incident Report dated January 16, 2024, p. 3.

⁸ MPPD Case No.: 2024000431 Supplemental Incident Report No. 6 dated April 8, 2024, p. 19; Preliminary Hearing Transcript dated July 15, 2024, p. 12, 28-30.

⁹ MPPD Case No.: 2024000431 Incident Report dated January 16, 2024, p. 3.

¹⁰ MPPD Case No.: 2024000431 Supplemental Incident Report No. 6 dated April 8, 2024, p. 19.

¹¹ MUSC p. 2

¹² MUSC p.18

- According to MUSC Medical Records, no additional, specialized, or acute follow up was necessary, recommended, or scheduled by the medical professionals at MUSC as a result of the alleged January incident.¹³

On March 15, 2024, Monroe sent Detective Upson a text stating, “Also, I’m not sure if u discussed and or if you’re interested in knowing at this time injuries sustained in addition to the full body seizing & multitude of CT scans, MRI imaging, x-rays ordered.”¹⁴ And on March 25th, Monroe sent another text to Detective Upson stating, “[t]he suspects violent acts caused my son to suffer severely leading to full body seizing post incident...which further medical follow up is advised.”¹⁵

- According to MUSC Medical Records for Dallas Monroe on January 13, 2024, however, there was no follow up advised, no seizures, no evidence of seizures, and the MRI completed the same night concluded that Dallas Monroe had a bump on his scalp and a “normal MRI of the brain.”¹⁶
 - These are facts Ms. Monroe was fully aware of as early as January 13, 2024, when she texted Detective Upson with false, incomplete and misleading information on March 15, 2024.
- MUSC Medical Records show that Dallas Monroe was given a FAST test, examined by ultrasound, x-ray, CT scan, MRI and the Glasgow Coma Scale on January 13, 2024.
 - Dallas Monroe had a Glasgow Coma Scale Score of 15 out of 15, which is the highest and best score possible.¹⁷
 - Dallas Monroe’s chest x-ray demonstrated *no* acute abnormality.¹⁸
 - Dallas Monroe’s CT cervical spine showed *no* acute abnormality.¹⁹
 - Dallas Monroe’s MRI of the brain showed *no* brain damage.²⁰
 - Dallas Monroe’s Ultrasound showed *no* free fluid²¹ and
 - Dallas Monroe passed the FAST test.²²
 - No broken bones, sutured cuts, brain injuries, or seizures.

April Monroe also reported to MPPD that her son was “seriously hurt and suffered head to toe seizures.”²³ At the Preliminary Hearing Detective Upson testified that *Ms. Monroe* claimed EMS identified “tonic clonic seizures” when they transported Dallas Monroe to the hospital.²⁴ However, again, Ms. Monroe gave false information. She knowingly reported provably false information to MPPD about her son’s injuries.

¹³ MUSC p. 87

¹⁴ Cellebrite Extraction Report p. 1

¹⁵ Cellebrite Extraction Report p. 3

¹⁶ MUSC pp.16-18; 22-23 and 87.

¹⁷ MUSC p. 16

¹⁸ MUSC p. 17

¹⁹ MUSC p. 17

²⁰ MUSC p. 18

²¹ MUSC p. 24

²² MUSC p. 18

²³ MPPD Case No.: 2024000431 Supplemental Incident Report No. 6 dated April 8, 2024, p. 14

²⁴ Preliminary Hearing Transcript dated July 15, 2024, p 13-14; *see also* Video interview of April Monroe by Officer Upson dated April 22, 2024 produced by MPPD.

- According to MUSC Medical Records for Dallas Monroe on January 13, 2024, it is straightforward and affirmatively stated that EMS did not identify seizures, tonic clonic seizures, or seizure-like activity.²⁵ In fact, all the medical providers who observed Dallas Monroe from beginning to end that night affirmatively noted there were no seizures or even anything that looked like a seizure.
 - According to EMS, Dallas Monroe had “no seizure-like activity and (*sic*) route to our emergency department” on January 13, 2024.²⁶
 - According to the medical providers, “Upon arrival to the emergency department, the patient does not exhibit seizure-like activity” on January 13, 2024.”²⁷
 - According to the hospital, Dallas Monroe was “not in acute distress” on the night of the alleged incident, January 13, 2024.”²⁸

April Monroe met with MPPD at least three times in person and exchanged information with MPPD at least ten times before March 11, 2024, in a repeated an ongoing effort to hold someone other than her son accountable for his actions on January 13, 2024.²⁹ The initial MPPD investigation concluded that her son, Dallas Monroe, was the “primary aggressor” in January and was not cooperative during the investigation.³⁰ In her quest to create a victim, she even lied about her son’s physical size and told police in her report that he weighed a significant 25 lbs. less than he actually did and that Mr. Templeton weighed significantly more than he does.³¹

- According to MUSC Medical Records for April Monroe’s son on January 13, 2024, Dallas Monroe weighed 169 lbs., not the 145 lbs. April Monroe reported to the police.³²

Despite the fact that *April Monroe was not at the scene of the alleged incident* and cannot bear witness to the purported altercation, she knowingly created a false narrative for police that Dallas Monroe had injuries in the *back* of the head causing seizures. “Striking my son from behind in back of skull and repeatedly striking him in back/base of skull...is incredibly dangerous as location is where spine meets the back of the skull ultimately striking their brainstem which is notorious for its harmful potential in causing irreversible injuries, spinal cord damage, and even instant death.”³³

- However, in addition to Ms. Monroe not holding any clinical medical license, the documented injuries complained of by *Dallas Monroe himself* in the hospital were all frontal complaints and none to the back of the head or neck.³⁴ In fact, no injuries to Dallas Monroe’s back were present according to MUSC Medical Records.

²⁵ Preliminary Hearing Transcript p. 13; MUSC Records pp. 16 & 23.

²⁶ MUSC p. 23

²⁷ MUSC p. 16

²⁸ MUSC p. 16

²⁹ MPPD Case No.: 2024000431 Incident Report dated January 16, 2024, p. 3; MPPD Case No.: 2024000431 Supplemental Incident Report 6 dated April 8, 2024, p. 14; Email correspondence produced by MPPD between Officer Caley and A.Monroe; Email dated February 14, 2024, also states she approached him on February 8, 2024, 100 feet from the Templeton house when he was working a private wedding.

³⁰ MPPD Case No. 2024000431 Supplemental Incident Report No. 2 dated February 3, 2024, p. 6.

³¹ MUSC p. 3; MPPD Case No.: 2024000431 Incident Report dated January 16, 2024, p. 2.

³² MUSC p. 3; MPPD Case No.: 2024000431 Incident Report dated January 16, 2024, p. 2.

³³ Email from April Monroe to Detective Cooper Upson May 28, 2024.

³⁴ MUSC Records pp. 16-18.

April Monroe knew the objective clinical records from the third-party medical providers would reveal to law enforcement that she was reporting false information about her son's injuries. As a result, she continued to refuse anyone at MPPD access to Dallas Monroe's actual medical records while she knowingly, maliciously, and falsely continued her accusations.

- On January 16, 2024, April Monroe first falsely alleged that Dallas Monroe had seizures and was admitted to MUSC for days. She was asked that day by MPPD to share additional medical information. She refused.³⁵
- Monroe again reached out on February 14, 2024, and made false claims about her son's injuries stating "aggressive acts all which put my child in the hospital causing my child to seize numerous of times."³⁶ Still, she refused MPPD access to the medical records.
- On March 13, 2024, April Monroe spoke with yet another officer at MPPD and knowingly misrepresented that her son "suffered from head-to-toe seizures," but she refused to release the actual medical records.³⁷
- Detective Upson reached out again on March 15, 2024, and asked April Monroe for access by stating, "[p]lease send me his medical records if possible or bring them to be scanned into the case file for documentation. They can be returned to you at the front desk if that is preferable."³⁸ Monroe did not respond for 10 days and then refused on March 25, 2024, to provide the records.³⁹
- Even when Detective Upson explained on March 27, 2024, that the medical records would "need to be provided to prove extent of injuries" April Monroe refused MPPD access to the records.⁴⁰
- At some point in early April 2024, Monroe texted incomplete and misleading medical information to Officer Upson from her phone and he noted in the police records, "Ms. Monroe has them (*sic*) medical records but did not want to provide them at this time...."⁴¹ She refused.
- Monroe continued adding to her false information even after Mr. Templeton was arrested, by falsely stating about the EMTs, when she told Detective Upson on April 22, 2024, that the EMTs described Dallas "to be having 'Tonic Clonic Seizures.'"⁴² The actual EMT's medical notes affirmatively state that there *was no seizure activity*.⁴³ Even still, after Brooks Templeton had been arrested on a felony based on her false report of injuries, April Monroe refused to provide the medical records.

April Monroe never released the medical records in her possession to the MPPD.

MPPD subpoenaed the medical records from MUSC after arresting Mr. Templeton at which time the department could verify that April Monroe knowingly and continuously reported false information to the MPPD.

³⁵ MPPD Case No.: 2024000431 Incident Report dated January 16, 2024, p. 3.

³⁶ Email from April Cruz Monroe to Officer Abijah Caley dated February 14, 2024.

³⁷ MPPD Case No.: 2024000431 Supplemental Incident Report No. 6 dated April 8, 2024, p. 14.

³⁸ Cellebrite Extraction Report p. 2.

³⁹ Cellebrite Extraction Report pp. 2 & 3.

⁴⁰ Cellebrite Extraction Report p. 4.

⁴¹ MPPD Case No.: 2024000431 Supplemental Incident Report No. 6 dated April 8, 2024, p. 19.

⁴² MPPD Case No.: 2024000431 Supplemental Incident Report No. 11 dated April 23, 2024, p. 25.

⁴³ MUSC Records pp. 16 & 23.

Despite her false report, April Monroe knew her son had not had seizures because she did not follow seizure protocol for a seizure patient's protection and for the protection of the public. While she was intentionally providing incomplete, misleading and false information to the police about her son's injuries, April Monroe's actions as a mother made clear she was not concerned about following seizure protocols, nor was there any protracted or acute loss or impairment, no excessive head trauma, and no lasting effects.

- Neither April nor Dallas Monroe reported any alleged seizures to the South Carolina Department of Motor Vehicles or underwent additional medical evaluations pursuant to S.C. Code Ann. § 56-1-270 (2020) or § 56-1-221 (2020) to determine whether he could legally retain his license, revoke or be denied a license, or obtain a license with restrictions pursuant to S.C. Code Ann. § 56-1-170 (2020).
- Neither April nor Dallas Monroe submitted a Form 447-CD Medical Disclosure to the South Carolina Department of Motor Vehicles as a result of any alleged seizures.
- On February 1, 2024, two weeks after April Monroe falsely reported her son was admitted to MUSC for seizures, her son was allowed to drive the family's more than \$100,000 sports fisher, post a video of it on a publicly available TikTok platform, and indicate in the comments that the boat goes 65 mph, which he appeared to be reaching.⁴⁴
- Dallas Monroe was also immediately permitted to daily drive his personal vehicle and even got a new one for his birthday the day Mr. Templeton was arrested, without family or other restrictions.
- Dallas Monroe was even permitted to travel to Argentina to hunt for several days and shoot at dozens of birds with a shotgun next to his head in contravention of concussion or seizure standards of care shortly after Mr. Templeton was arrested.

MPPD relied on the false report of April Monroe to charge Brooks Templeton with a felony. As Officer Cooper Upson documented in his report and told counsel for Mr. Templeton, MPPD charged Mr. Templeton with a felony because the "injuries sustained to the victim, especially the multiple seizures and obvious excessive head trauma support that the victim could have lasting impacts from the assault."⁴⁵ Officer Cooper Upson swore under penalty of perjury that "the victim suffered from at least four seizures that evening which required hospitalization. All injuries resulting from the defendant's actions that resulted/could have resulted in great bodily injury."⁴⁶ "Great bodily injury" is defined as bodily injury which causes a substantial risk of death or which causes serious, permanent disfigurement or protracted loss or impairment of the function of a bodily member or organ. S.C. Ann. §16-3-600(A)(1). Detective Upson also testified at the Preliminary Hearing that he relied on April Monroe's (false) recitation of the MRI results and EMT's observations to conclude that Dallas Monroe had serious head injuries and seizures to charge Mr. Templeton with a felony.⁴⁷ **According to the documented clinical expertise of the objective medical experts and numerous imaging documented in the Medical University**

⁴⁴ Dallas Monroe Tik Tok video Feb. 1, 2024. Dallas Monroe's handle is "Dallas Monroe."

⁴⁵ MPPD Case No.: 2024000431 Supplemental Incident Report No. 6 dated April 8, 2024, p. 19.

⁴⁶ Charleston County Arrest Warrant Affidavit dated April 9, 2024.

⁴⁷ Preliminary Hearing Transcript dated July 15, 2024, p 12-15.

of South Carolina records for Dallas Monroe, none of this is true and April Monroe knew it from January 13, 2024 until today.⁴⁸

On April 26, 2024, *after* Mr. Templeton was charged with a felony based on the falsely reported injuries, MPPD subpoenaed and received approximately 95 pages of medical provider notes, test results, and medical records from the Medical University of South Carolina Records Custodian regarding all interactions from the time Dallas Monroe was met by the EMT until he was discharged 3 hours later on January 13, 2024.

The medical providers and EMTs who serve their patients and this community are expert medical professionals. The objective, third party, clinical evidence makes it clear that April Monroe reported false information to the MPPD. Her presence at the hospital, verbatim recitation of cherry-picked phrases from the 95 pages that misled and furthered her false narrative, and allowance of her son's activities immediately after the alleged incident evidence that she had custody of the truth but was knowingly providing false information to law enforcement. Officer Upson specifically relied on April Monroe's false information about the seizures and brain injury to change the Charge from a misdemeanor to a felony while she purposely withheld the medical records from MPPD. As such, April Monroe's report of false information to law enforcement resulted in a felony charge against Mr. Templeton. S.C. Code §16-17-722(B) is straightforward: "A person who violates subsection (A) by falsely reporting a felony is guilty of a felony."

Not only were the objective hospital records able to exonerate Mr. Templeton from being blamed for great bodily harm that did not exist, but the judicial system exonerated him on July 15, 2024, after the officer's testimony from the Preliminary Hearing. **After hearing testimony from Detective Upson, Judge Skipper Gosnell found no probable cause to warrant the criminal felony charge of Assault and Battery in the First Degree against Brooks Templeton and dismissed it.**⁴⁹

This request to have an Arrest Warrant sworn out for April Monroe is based on the information in the medical records, Officer testimony, and police reports already in MPPD's possession which were produced to my client. This does not rely on the opinion or the bias of any lay witness. If the MPPD police reports, electronic communications from Ms. Monroe, and video recordings produced Pursuant to Rule of Criminal Procedure 5 in the initial case from MPPD to my client are accurate as to the information Ms. Monroe provided, then she lied about the injuries to Dallas Monroe the entire time she interacted with MPPD, despite having the medical information in her possession even before her first meeting with the MPPD, and should be charged with a felony. For ease of review, attached are the civil Complaint Monroe filed against another family for assault and battery alleging brain injuries a few months before this alleged incident, and the Preliminary Hearing Transcript. The remainder of the references are to

⁴⁸ Medical University of South Carolina of Medical Records for Dallas Monroe produced to MPPD.

⁴⁹ To the extent that any argument is made that a lesser charge remained until the Solicitor's Office dismissed it, the same is of no moment. Margolis v. Telech, 122 S.E.2d 417 (S.C. 1961); Green v. Montgomery, 219 F.3d 52 (2d. Cir. 2000). Monroe gave false information to MPPD and MPPD testified it relied on that ultimately false information to elevate the A&B to a felony.

MPPD's own Incident Reports, 95 pages of medical records subpoenaed by MPPD, or Dallas Monroe's publicly available social media, all of which is attached hereto.

The information contained in this letter is sufficient to lead a reasonable person to conclude that there is probable cause to arrest April Monroe pursuant to SC Code Ann. §16-17-722(B). While the next steps in this matter are solely in the discretion of MPPD, the Department may consider making Ms. Monroe pay restitution to MPPD pursuant to SC Code Ann. §16-17-722(D) to offset costs incurred in investigating the false police report. Ms. Monroe's actions also violate the common law crime of Obstruction of Justice that states "[i]t is an offense to do *any* act which prevents, obstructs, impedes, or hinders the administration of justice." *State v. Cogdell*, 257 S.E.2d 748; *see also State v. Lyles-Gray*, 492 S.E.2d 802 (S.C. Ct. App. 1997) (holding obstruction of justice is a valid criminal offense in South Carolina and does not require the defendant to accomplish it by threat or force).

I respectfully request you review your records as cited in this document and investigate any other appropriate potential evidence and hold April Monroe accountable for her actions by charging her with filing a false police report. Obstruction of justice should also be considered. Both the Mount Pleasant Police Department and my client Brooks Templeton have been victimized by her knowingly filing a false police report.

Sincerely,


Charlie Condon

