

STATE OF SOUTH CAROLINA) IN THE COURT OF COMMON PLEAS
COUNTY OF HORRY) FIFTEENTH JUDICIAL CIRCUIT
Weldon Boyd,) Case No.: 2025-CP-26-____
Plaintiff)
vs.)
Mark B. Tinsley,)
Defendant.)

TO: THE ABOVE-NAMED DEFENDANTS AND THEIR ATTORNEYS:

YOU ARE HEREBY SUMMONED and required to answer the Complaint in this action, a copy of which is hereby served on you, and to serve a copy of your Answer to the said Complaint upon the subscribers at 226 State Street, West Columbia, South Carolina 29169, within thirty (30) days after service hereof, exclusive of the day of such service, and if you fail to answer the Complaint within the time aforesaid, judgment by default will be rendered against you for the relief demanded in such Complaint.

s/ Desa Ballard
Desa Ballard (S.C. Bar No. 498)
Harvey M. Watson III (S.C. Bar No. 74053)
Haley Hubbard (S.C. Bar No. 103195)

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ATTORNEYS FOR PLAINTIFF

November 3, 2025

COURTESY OF AN ANONYMOUS FOIA
AROUND AND FIND OUT SPONSOR

STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
	)	FIFTEENTH JUDICIAL CIRCUIT
COUNTY OF HORRY	)	
	)	Case No. 2025-CP-26-_____
Weldon Boyd,	)	
	)	COMPLAINT FOR DECLARATORY
Plaintiff	)	AND OTHER EQUITABLE RELIEF
vs.	)	(Jury trial demanded on factual issues)
	)	
Mark B. Tinsley,	)	
	)	
Defendant	)	

**TINSLEY DID NOT LET THE TRUTH
GET IN THE WAY OF A GOOD STORY¹**

Plaintiff Weldon Boyd (hereafter “Boyd”) files this action seeking equitable relief, including but not limited to a declaratory judgment, finding, and determining that Defendant Mark B. Tinsley (hereafter “Tinsley”) has intentionally engaged in conduct prejudicial to the interests of justice by manufacturing, disseminating and perpetuating a false narrative through manipulative use of media outlets which has permanently harmed Boyd’s ability to obtain a fair trial in the courts of this state in any related civil or criminal matter. Tinsley has done all acts in his individual capacity and for his own purposes, and not as a lawyer to further any client matter. Tinsley’s acts have been done intentionally, and solely to generate personal publicity for himself by engaging in self-promotion. Tinsley did not engage in the acts for any tactical reasons in any client matter or to assist in furtherance of any client matter, but for his own personal purposes of establishing and/or increasing his celebrity status.

¹ The Oxford English Dictionary defines “celebrity” as “the state or fact of being well-known, widely discussed, or publicly esteemed. . . personal fame or renown as manifested in (and determined by) public interest and media attention. (2016 Ed.), https://www.oed.com/dictionary/celebrity_n?tab=meaning_and_use#1171295040. See also How To Become a Celebrity: <https://www.reddit.com/r/TheGirlSurvivalGuide/comments>. See also How To Become Famous in 9 Celebrity-Certified Steps: <https://www.backstage.com/magazine/article/how-to-become-famous-77003/>

LUNASHARK MEDIA: EMPOWERING VICTIMS' VOICES THROUGH FOIA

Tinsley's intentional misconduct has directly harmed Boyd's ability to obtain a fair trial in any related civil or criminal matter, a right guaranteed to Boyd and protected by law. Tinsley engaged in the acts which form the basis of this action for purposes of self-promotion and self-aggrandizement to establish and/or further celebrity status for himself among the masses, all of which acts that have directly and proximately harmed Boyd. Boyd expressly waives any claim of damages against Tinsley and does not seek an award of actual or punitive damages against Tinsley and seeks equitable relief only. Public policy justifies the equitable relief sought in this action.

All relief requested herein is within the equity jurisdiction of this court to award in connection with the judgment sought in this action, with legal claims expressly waived by Boyd in favor of the equitable relief sought.

Accordingly, Boyd seeks an order of this Court awarding declaratory judgment against Tinsley, following a determination by a jury of relevant facts, as follows:

- COURTESY OF AN ANONYMOUS FOIA AROUND AND FIND OUT SPONSOR
- A. Declaratory judgment that Tinsley manufactured, disseminated, and perpetuated a false narrative through manipulative use of media outlets (referred to herein as "Tinsley's media firestorm"), and that Tinsley did so intentionally and solely for personal publicity and promotion, thereby resulting in foreseeable, permanent prejudicial harm to Boyd.
 - B. Declaratory judgment that Tinsley has intentionally and wrongfully prejudiced the course of justice and such that Boyd cannot receive a fair adjudication in the courts of this state in any related matter.
 - C. An award against Tinsley for costs incurred by Boyd in pursuing the relief sought herein.

JURISDICTION

1. The allegations set forth above are incorporated herein where relevant as fully as if repeated herein verbatim
2. Plaintiff Boyd is a citizen and resident of Horry County South Carolina and was so domiciled at all times relevant to this action.
3. On information and belief, Defendant Tinsley is a citizen and resident of the County of Allendale, State of South Carolina, and Plaintiff is informed and believes he was so domiciled at all times relevant to this action.
4. On information and belief, Tinsley wants to be a celebrity and spends time and energy promoting his public profile.
5. Tinsley is a lawyer admitted to practice law in South Carolina. Tinsley is not sued in his representative capacity as a lawyer, but solely as an individual having acted for his own personal benefit and interests, not as a tactical action in litigation and not in furtherance of the interests of any client.
6. Venue in this county is appropriate pursuant to S. C. Code § 15-7-30(C) in that a substantial part of the facts which give rise to the causes of action set forth arose and have had their principal effect in Horry County.
7. This court has jurisdiction to award the requested equitable relief.

FACTUAL BACKGROUND

8. On the evening of September 9, 2023, between 5:30 p.m. and 6:00 p.m., an individual later identified as Scott Spivey (hereafter "Spivey") engaged in a road rage incident that he single-handedly initiated, whereby he stalked and assaulted Boyd and others on the public highways

of Horry County, South Carolina. On that date, Boyd was lawfully occupying a motor vehicle while accompanied by one passenger. Without provocation, Spivey engaged in multiple incidents of unlawful conduct directed at Boyd and Boyd's passenger, including reckless driving, improper traffic movements, driving under the influence of drugs and/or alcohol, pointing and presenting a firearm, malicious indifference to safety of other persons, reckless endangerment of Boyd and multiple other motorists, and a litany of wrongful and illegal acts.

9. After some time of threatening and assaulting multiple victims, Spivey began to focus his rage exclusively on Boyd and his passenger. Spivey followed Boyd's vehicle for miles then suddenly pulled in front of Boyd's vehicle and ran Boyd's vehicle off the road into the median.
10. During this time, Boyd called 911 asking for assistance, stating "Y'all need to get this guy off the road. He's aiming guns at people." (911 call @ 5:54:53 pm EDT) **Exhibit A**, attached hereto are incorporated herein verbatim pursuant to Rule 10(c), SCRC.
11. While Boyd was on the telephone with 911, Spivey turned his vehicle right onto a side street. Boyd continued to speak with the 911 operator. After turning his vehicle onto the side road, Spivey suddenly stopped his vehicle in the middle of the road, leapt from his vehicle, pointed a .45 caliber automatic pistol (hereafter "his weapon") at Boyd's vehicle (where both Boyd and his passenger remained and could not escape), and fired his weapon. Spivey's actions placed Boyd and his passenger in imminent mortal danger and fear for their lives.
12. Several eyewitnesses were consistent in their descriptions to law enforcement of Spivey firing his weapon toward Boyd's vehicle. **Exhibits B-D**, attached hereto are incorporated herein verbatim pursuant to Rule 10(c), SCRC. No other eyewitness disputed these facts.

13. Boyd remained on the line with 911 as Spivey began shooting. Boyd's 911 tape provides a real-time narration of Boyd and his passenger's efforts to retreat, with Boyd unsuccessfully attempting repeatedly to put his vehicle in reverse to escape Spivey, who was in front of his vehicle.

[Passenger]: Back up... back up.

Boyd: I'm... I can't... I can't put it I gear.

[Passenger]: Back up and put it in gear...

Boyd: Backing up. Backing up. Backing up. Hey help us please!"

14. Boyd was unable to escape before Spivey began firing his weapon.
15. While reasonably fearing for their lives and facing imminent death or serious bodily injury because of Spivey's attack, Boyd and his passenger returned fire with their own weapons in self-defense from within Boyd's vehicle. Their use of deadly force was a measure of last resort, and of necessity.
16. After Spivey received a facial wound from return fire, he re-entered his vehicle, where he reached over the center console into the back seat and continued to discharge his weapon through the back window of his vehicle. Spivey emptied the magazine in his weapon and attempted to load a second magazine into his weapon. Spivey was eventually struck and fatally wounded by return fire and died at the scene. One shot passed Spivey's body under the arm and struck Spivey's under arm/back area. Spivey's arm was still extended in a firing position when he was struck. Had his arm been in a resting position, Spivey would have been struck in the arm, but he was facing Boyd and his passenger when he was struck.
17. Prior to the conclusion of the incident, multiple other calls were placed to 911, each providing contemporaneous and consistent reports of Spivey's aggression and unlawful conduct as well

as Boyd's evasive measures, which were confirmed both by the 911 tapes and multiple eyewitness statements.

18. The first 911 call was received at 5:52 PM by a female driver who reported Spivey "waving a gun in front of me" and "waving it out the window at everybody..." She observed and reported to 911 Spivey running Boyd's vehicle off the road into the median. This caller was still on the line with 911 at the moment she reported Spivey "jumping out of the truck" and then shooting toward Boyd's vehicle.
19. Boyd's 911 call began at 5:54 PM, while Spivey was still driving recklessly and aiming his gun at Boyd and other nearby vehicles.
20. Another independent 911 call was initiated by a male driver at 5:58 PM, after conclusion of the shooting. The male caller reported "the guy in the black truck [referring to Spivey's vehicle] was trying to run the white truck [Boyd's vehicle] off the road. Like literally drove the white truck off the road" before "the guy in the black truck jumped out with a pistol."
21. In response to those multiple 911 calls received as the incident was unfolding, law enforcement arrived at the scene after the incident had concluded. Once on scene, law enforcement interviewed multiple witnesses, including the callers who had dialed 911.
22. During that initial investigation on scene, law enforcement received consistent information from the multiple eyewitnesses, none of whom were related to or known previously by either Spivey, Boyd, or Boyd's passenger. All eyewitnesses verified Spivey's aggression toward Boyd and others that continued for many miles, and also stated that Spivey's actions were the sole cause and catalyst of the events. Multiple eyewitnesses also described Boyd's

unsuccessful attempts to avoid the confrontation, confirming Boyd's own real-time narration of the events during his 911 call.

23. Law enforcement reviewed several photos taken minutes before the shooting, which showed Spivey holding a gun in his left hand outside of his vehicle while he was still driving erratically on Highway 9, confirming Boyd's own report of the same during his 911 call and reports of other eyewitnesses.
24. A female eyewitness whose vehicle was adjacent to Spivey at the time Spivey discharged his weapon witnessed Spivey shooting while standing outside his vehicle, facing toward Boyd and his passenger. She witnessed Spivey lift his weapon and fire initially, and then again, in the direction of Boyd and his passenger, at close range while they were trapped in Boyd's vehicle.
25. Eyewitnesses interviewed at the scene also confirmed to law enforcement that Boyd "was trying to get away from the black truck" by speeding up or slowing down, but "everywhere [Boyd's] truck went, that black truck would go" to harass and threaten Boyd with reckless driving. There was no dispute among the eyewitnesses as to what occurred prior to or during the shooting. All eyewitnesses rightly blamed Spivey solely for the altercation, from beginning to escalation and all the way through to its conclusion. All eyewitnesses also confirmed Boyd's attempts to avoid the altercation.
26. Boyd cooperated fully with law enforcement at the scene, despite being in shock as a result of the extended, traumatic interaction he just had suffered as the result of Spivey's assault and unlawful conduct that necessitated Boyd's defense of his life with lethal force.

27. Law enforcement on scene used the wealth of consistent information available from multiple independent eyewitnesses to make a preliminary determination that Boyd and his passenger had acted in justifiable and lawful self-defense, a conclusion that was wholly consistent with their status as victims of Spivey's reckless aggression.
28. After leaving the scene, Boyd and his passenger went to the police station as requested and stayed for many hours until law enforcement released them. Neither Boyd nor his passenger invoked their right to remain silent, but instead fully answered all questions they were asked. Both voluntarily provided law enforcement with data from their phones during their formal interviews.
29. Horry County law enforcement thereafter continued their thorough investigation into the facts and circumstances surrounding Spivey's death. Upon information and belief, Horry County law enforcement received input from other law enforcement agencies while it continued to conduct its investigation. All later acquired evidence was consistent with that acquired initially on scene, that Spivey was the sole cause and catalyst of the incident and events that concluded with Spivey's death.
30. The later acquired evidence included autopsy results, which indicated Spivey was heavily intoxicated at the time of his death, and also suffering the effects of chronic abuse of anabolic steroids. Experts confirmed that Spivey's voluntary misuse of steroids combined with his high level of alcohol intoxication had impaired his judgment to an extent that made him unfit to be on the public highways, and more apt to act in exactly the unlawful and dangerously deadly manner he displayed which proximately resulted in his death.
31. Law enforcement investigated Spivey's activity immediately prior to his unlawful conduct, which explains the intoxication indicated in the autopsy results. His bar tab reflects that

Spivey nearly five hours consuming alcohol before he got on Highway 9 and began his assault of Boyd, his passenger and others.

32. Spivey's single patron bar tab reflects that he bought seven (7) Miller Lites, eight (8) Fireballs chilled, and one plate of food as well as a tuna roll. The \$109.11 charge to Spivey's debit card to close out his tab indicates he left at 5:06 pm. Surveillance video obtained from the bar verifies Spivey spent those hours at the restaurant consuming alcohol before getting into his vehicle and beginning the assault which led to Spivey's death.
33. After appropriate, thorough, and impartial investigation that lasted seven months, Horry County law enforcement confirmed the initial on-scene conclusion, that Boyd and his passenger acted in justifiable self-defense. Consistent with that conclusion, law enforcement declined to initiate any criminal charges against Boyd or his passenger, concluding they acted in self-defense.
34. The Attorney General of the State of South Carolina conducted an investigation to determine that law enforcement's original investigation was properly done. The Attorney General also concluded in April 2024 that Boyd and his passenger acted in self-defense.
35. On or about October 3, 2025, as a direct and proximate result of Tinsley's misconduct intended to further his public reputation and bolster his own public image as described herein, including creation and perpetuation of a false public narrative regarding the Spivey incident, the Attorney General assigned a new solicitor to review "this investigation." **Exhibit E**, attached hereto and incorporated by reference verbatim pursuant to Rule 10(c), SCRCP, is a

copy of the referral issued by the Attorney General.² Upon information and belief, that new investigation continues at this time.

TINSLEY ENGAGEMENT AND CONDUCT

36. Spivey's death occurred on the evening of Saturday, September 9, 2023, and within 48 hours, Spivey's family hired legal counsel, who privately contacted law enforcement for assistance on Monday morning, September 11, 2023.
37. Notwithstanding the clear evidence that Spivey had caused his own demise as well as significant undisputed evidence of Spivey's aggression and his unilateral creation of the deadly situation that led to his death, his family eventually retained Tinsley, who filed a civil lawsuit on June 3, 2024 (hereafter "the civil lawsuit"), alleging Boyd and his passenger had acted unlawfully in protecting themselves from the vicious attack by Spivey.
38. In order to further increase his public profile, and in further acts of self-aggrandizement and self-promotion, Tinsley set about to further his celebrity and to create a knowingly false yet sensational narrative, which was perpetuated by obtaining non-public material and publicly releasing selective portions to media outlets for widespread distribution.
39. Tinsley's acts were intentional, reckless and willful, and upon information and belief, Tinsley knew his actions were wrong but engaged in the conduct nonetheless without regard to the harm it may cause to others. Tinsley's wrongful conduct as set forth herein was not in his capacity as a lawyer doing his job for a client. Tinsley's status as a lawyer created the vehicle through which Tinsley engaged in the public disclosures, self-promotion and pursuit of

² ". . . I request that you make any prosecutorial decisions and handle the prosecutions as to misconduct and include the death of Scott Spivey if you find the current investigation, including the alleged misconduct, changes the analysis of my office. . ." (see Exhibit D).

celebrity as set forth herein. Tinsley is sued as an individual, for his intentional wrongful conduct.

40. Following Tinsley's widespread publication of selective materials obtained through litigation without regard for its non-public nature, and as a direct and proximate result of the intentional acts of Tinsley in publicizing private matters for his own personal aggrandizement and pursuit of establishing celebrity for himself, a media and social media firestorm erupted.
41. The public's appetite for rooting out perceived public corruption was co-opted by Tinsley for Tinsley's own personal purposes in self-aggrandizement and seeking celebrity status for himself. Nothing Tinsley revealed through the media changed the actual facts, so Tinsley set about to manipulate the facts himself to show his media influence, his celebrity and what was perceived by the public as Tinsley's own power, in furtherance of Tinsley's self-aggrandizement.
42. The resulting media firestorm has been maintained by Tinsley and his agents acting through repeated selective release to media of non-public information. Tinsley told one individual³ that he started with one media outlet because he knew "the others [will] follow." He was correct.
43. Tinsley used the civil lawsuit to obtain significant information that was not publicly available and broadly disseminated it via multiple media outlets for the purpose of self-aggrandizement

³ This individual was the mother of Boyd's then-unborn son, whom Tinsley sought out and recruited, promising to help her with her family court litigation with Boyd in exchange for her cooperation in spreading false statements about Boyd, which he did. Tinsley exchanged text messages with this woman and said he would call her family court lawyer Brooke to assist.

and his own celebrity, notwithstanding duties owed by him as the result of the higher duties to justice owed by him to the system of justice in South Carolina.

44. Tinsley sought out media attention, through which he made public statements regarding the investigation, his own view of the facts, his stated motivation for being involved, for the purpose of stoking the media firestorm and raising his own public profile for personal reasons. Tinsley personally initiated media interest by his public disclosures and comments, after which time he repeatedly contributed significantly to the media coverage by voluntarily releasing to the media information that was not otherwise public and on information and belief, coordinated releases of additional non-public information to media by his client.
45. On information and belief, Tinsley affirmatively garnered media attention for his own self-aggrandizement, celebrity and self-promotion. It appears Tinsley is not interested in the actual facts and is instead intent on increasing his own public profile for his personal purposes by perpetuating a more salacious story than the truth reveals. On information and belief, Tinsley's goal included manipulating the facts by, *inter alia*, putting pressure on relevant officials to have Boyd charged with a crime and make the story the one Tinsley wants to tell, notwithstanding the truth, because it furthers Tinsley's goals of self-aggrandizement. It was foreseeable to Tinsley that those actions would cause and will continue to cause irreparable damages to Boyd.
46. Tinsley's initiation of the media firestorm included not only traditional media outlets but also multiple podcasters, many of whom made false statements regarding the events of September 9, 2023, largely as a result of Tinsley's manipulation of the facts in public statements and disclosures. Tinsley cooperated fully with multiple podcasters and shared "exclusive"

documentation with them, much of which he obtained through the civil lawsuit, which increased his celebrity status.

47. Tinsley had previously raised his public profile and celebrity significantly by similar actions in connection with a scandal involving Alex Murdaugh, a now-disbarred lawyer who was convicted of killing his wife and son in June 2021, which was covered insatiably by media outlets with Tinsley's active participation and full cooperation.
48. Tinsley maintains a profile page on the social media platform X (f/k/a Twitter), where he calls himself a "dragon slayer, five-year-old forensic auditor, and part time provider of comedy all the while being a Tiger on your tail." Multiple media outlets have dubbed Tinsley "Tiger Tinsley" which is a goal sought by Tinsley for his own personal purposes.
49. On information and belief, Tinsley and his agents also directly and indirectly pressured public officials to manipulate the facts of the case, lobbying for law enforcement to reopen its investigation of Boyd and asserting that criminal charges should be brought against Boyd. On information and belief, multiple public officials who have received information shared by Tinsley have pressured the Attorney General to revive a criminal investigation, demonstrating the effectiveness of Tinsley's media firestorm seeking to manipulate the facts for his own personal purposes.
50. Tinsley manipulated and prompted others (including his client) to participate in the media firestorm solely for purposes of enhancing Tinsley's own public profile and feeding his ego, not to advance his client's interests or for any other legitimate reason. Tinsley openly admitted on at least two occasions, including one time while appearing on the record before the circuit court, that the civil lawsuit was not brought to obtain compensation for his client.

51. On or about May 6, 2025, as a direct and proximate result of Tinsley's misconduct, nine South Carolina legislators, Rep. Kevin Hardee, Rep. Lucas Atkinson, Rep. Heather Ammons Crawford, Rep. Case Brittain, Rep. Jackie Haynes, Rep. Tim McGinnis, Rep. Carla Schuessler, Rep. Carl Anderson, and Rep. Val Guest signed a letter sent to Governor Henry McMaster "seeking [his] assistance in requesting the case be reopened and all new evidence considered, such as body camera footage, and phone conversations that may not have been reviewed during the initial investigation." These specific facts were among those on which Tinsley had publicly pontificated in media disclosures as he sought more celebrity status for himself.
52. On information and belief, Tinsley's own purposes for his wrongful conduct include self-aggrandizement, self-promotion and achieving celebrity and high visibility in the public eye. On further information and belief, Tinsley's efforts have nothing to do with effecting a higher or better result for his clients.
53. On information and belief, Tinsley cultivated media outlets by providing them with "exclusive" information and evidence, much of which was obtained from the civil litigation, and he also shared his own theory of why his false narrative should be accepted as truth, even though Tinsley knew it was false.

EXAMPLES OF TINSLEY'S SPECIFIC WRONGFUL ACTS

54. These examples are not intended to be an exhaustive list of all Tinsley's personal public media disclosures or manipulation, of which examples appear regularly, as recently as days prior to the filing of this action. These examples are representative of Tinsley's extensive effort and his reach as he engaged in self-aggrandizement and seeking of celebrity status.

55. Tinsley is credited in an online article updated by The Sun News on March 14, 2025 entitled “Shooting death involving North Myrtle Beach restaurant owner reopened nearly 2 years later.” The article quotes Tinsley stating they have found “considerable information” during the wrongful death lawsuit and have relayed it to authorities. Some of that includes Tinsley stating eyewitnesses to the shooting who called 911 actually did not see what happened the day Spivey was killed. The article quotes Tinsley: “It’s a very disappointing investigation... Hopefully they are going to looking at everything. We’re doing our damndest to bring accountability to this.” This was knowingly false.
56. In a Sun News article updated March 14, 2025, Tinsley is quoted as saying “I think there’s a lot of problems with the evidence.” The article states “Tinsley said it doesn’t make sense that if someone decides to chase that person and then shoot them, ‘it’s me standing my ground’ ...”. The article describes Tinsley saying that Boyd got his feelings hurt, but it “didn’t warrant chasing and shooting Scott Spivey. It’s exclusively about justice... [The family] is never going to get... Boyd doesn’t have enough money... to make up for that loss of [of Spivey].” The article appears to be an update from an earlier version of the article, posted on June 4, 2024 (the day after Tinsley filed suit against Boyd), in which the media outlet claimed to have “exclusive” 911 calls made to Horry County dispatchers, which upon information and belief had been supplied by Tinsley from discovery in the civil action.
57. Tinsley provided a photo to the Sun News for an article posted on March 14, 2025, which openly credited Tinsley as having provided the photo that accompanied a media article published on that date. Tinsley did so to promote his own celebrity and reputation among the public.

58. Tinsley was cited in a Sun News article on April 17, 2025, when he claimed there was “damning evidence which I do not believe has ever been considered”. Tinsley was further quoted to state “I think it’s going to be a hard question to answer as far as why the actual evidence was missed or ignored....” Tinsley said they have found “considerable information during the wrongful death lawsuit” and have “relayed it to authorities.” Tinsley therefore admits his efforts to manipulate the facts to suit his false narrative. Tinsley did so to promote his own celebrity and reputation among the public.
59. In a Wall Street Journal article posted online on April 17, 2025, Tinsley is cited as the source of information about the facts. The article contains a photograph of Tinsley posing for a photograph in a courtroom. The article contains several other photographs cited as having come from files of the Horry County Police Department. On information and belief, Tinsley is the source of all or part of the Horry County Police Department file materials provided to the Wall Street Journal. None of the information contained in the article had been made public. Tinsley did so to promote his own celebrity and reputation among the public.
60. In a Wall Street Journal article posted online on April 19, 2025, Tinsley’s theories of the case are discussed in detail. Tinsley spoke directly to reporters from the Wall Street Journal, sharing his theory of the civil lawsuit and discussing facts he hoped to prove. Tinsley posed for a photograph taken at his home by Wall Street Journal staff. Tinsley did so to promote his own celebrity and reputation among the public.
61. The April 19, 2025 Wall Street Journal article included links to audio and video of a deposition that was not available to the public. On information and belief, Tinsley is the source of the video deposition to the media outlet and the information regarding strategy for the litigation

and why he took the case, which were referenced in the article. Tinsley did so to promote his own celebrity and reputation among the public.

62. In a Facebook post on April 25, 2025, Tinsley published a photo of a portion of a law enforcement log entitled “Case Management History” with dated entries from Jan. 9, 2024 to February 8, 2024, and stated “they looked, they just didn’t see.” This document had been obtained by Tinsley through discovery in the pending civil action. Tinsley did so to promote his own reputation among the public.
63. In a Sun News article dated May 1, 2025, Tinsley is quoted as stating “I’d watched it. Other people watched it... It was a one in a thousand find.” The comment related to a video still located in law enforcement video by a “true crime podcaster” review of police video. The article also quoted Tinsley referencing SLED agents serving search warrants as part of a collateral investigation inferring that Tinsley had inside access to law enforcement investigations. Tinsley did so to promote his own celebrity and reputation among the public.
64. In personal Facebook posts on May 8, 2025, Tinsley published the words “Complete fabrication” in response to a post from another person. Tinsley did so to promote his own celebrity and reputation among the public.
65. On the same date, Tinsley published in a Facebook post that there was a spent cartridge under Boyd’s tire, and that it likely fell out of Boyd’s truck. Tinsley did so to promote his own celebrity and reputation among the public.
66. In response to a Facebook post made by another person on May 8, 2025, Tinsley published a comment and referred to the original poster as “some guy who doesn’t know what he’s talking

about and just repeating Boyd's spin." Tinsley did so to promote his own celebrity and reputation among the public.

67. Tinsley published a comment on Facebook on May 8, 2025, stating, "There is no witness saying [Spivey] exited the truck and discharged his weapon." Tinsley made this false statement to promote his own celebrity and reputation among the public.
68. In another Facebook statement published on May 8, 2025, Tinsley posted an excerpt from an audio recording of Boyd that was produced in discovery in the civil action. This audio recording was in Tinsley's possession solely because he had obtained it in discovery in the civil case. Tinsley did so to promote his own celebrity and reputation among the public.
69. In a Facebook post on May 9, 2025, Tinsley published a post and added his own comment, which said:

I'm told that even THIS WEEK the assistant AG – who failed to EVEN POSSESS the evidence in this case at the time she made her decision, MUCH LESS EVEN REVIEW the actual evidence that was available – has continued to dig in and scream about the 911 call of a "witness" who didn't actually see the shooting. This "witness" who says in her 911 call that she saw Scott shooting into the windshield of the shooter's truck. She says in that 911 call she could see the dust flying off the windshield from the Boyd vehicle. The fact that assistant AG refuses to acknowledge her shortcomings in this case at this point must be driven by her own ego and a refusal to acknowledge she made a mistake or mistakenly relied on what she was being told [...] Everyone who has honestly looked at the actual evidence in this case knows the AG's position is demonstrably false. Despite what the 911 caller says, NOT a single bullet went into that windshield from Scott Spivey. All the bullets shot through that windshield were shot at Scott Spivey. The assistant AG also told me that nothing that happened on Hwy 9 matters. Only what happens on Camp Swamp Road matters. [...] But, at the same time, she does say some things on Hwy 9 matter. After she says Scott was driving erratically, under the influence and waiving [sic] a gun on Hwy 9. Last time I checked, even if he committed a crime or several crimes on Hwy 9, before he was trying to "run from" the

shooters, none of those crimes carry the death penalty.” (emphasis in original).

70. In another Facebook post on May 9, 2025 Tinsley wrote “we are the Justice System. We simply have to demand it. Injustice anywhere is injustice everywhere.” Tinsley made this statement to promote his own celebrity and reputation among the public.
71. On information and belief, Tinsley appeared live by phone on a broadcast by Myrtle Beach News on April 23, 2025. While he was speaking, the screen shot identified Tinsley as “Media Savvy Attorney.” The news outlet also posted a Facebook post linking the video of the appearance, and labeled it “Mark Tinsley, Media Genius Lawyer . . .”
72. On information and belief, Tinsley participated via audio on a podcast on April 16, 2025. That appearance was publicized in advance with a teaser that labeled Tinsley as “aka Zero Dark Tinsley – the powerhouse attorney” before discussing the Spivey vs. Boyd civil suit. Tinsley appeared on the podcast to promote his own celebrity and reputation among the public.
73. On May 5, 2025, an article published online by WMBF referenced information regarding warrants to be served on a party. The article also referenced phone call recordings, and upon information and belief, Tinsley was that media outlet’s source for the recordings, which were not otherwise available to the public. Tinsley made this disclosure to increase his own celebrity and reputation among the public.
74. In an online post on May 8, 2025, WBTW media outlet posted a story that stated that Tinsley had told the news outlet that a hearing in the civil case was set for June 9, 2025. Tinsley made this disclosure to increase his own celebrity and reputation among the public.

75. According to a story posted online by WMBF News on May 9, 2025, Tinsley “released [to WMBF] a portion of what he claims is one of the seven dashcam videos that were mislabeled in HCPD’s investigation.” Tinsley did so to increase his own celebrity and reputation among the public.
76. On August 6, 2025, WMBF News published an article which said, *inter alia*, “WMBF News obtained recorded phone calls of Boyd and Strickland after the shooting through an attorney.” Upon information and belief, Tinsley was the source.
77. Tinsley has achieved his goal, with a direct and proximate result that Boyd’s ability to receive a fair trial in the courts of South Carolina has been permanently harmed. Tinsley has perverted the course of justice which has caused harm to Boyd.
78. South Carolina law requires a court to fashion an equitable remedy for Tinsley’s wrongs.

FOR A FIRST CAUSE OF ACTION
(Declaratory Judgment)

79. Each and every allegation set forth above is incorporated herein where relevant as fully as if repeated herein verbatim where relevant.
80. The declaratory judgment act, S.C. Code §15-53-10 (hereafter “the Act”), authorizes a court of this state to declare the rights of the parties, status and other legal relations whether or not further relief is or could be claimed when there is an actual case or controversy between the parties. In its equity jurisdiction, this court can fashion such equitable relief as is necessary or appropriate to properly address the wrongful conduct of Tinsley.
81. The acts of Tinsley set forth herein have perverted the course of justice making it impossible for Boyd to obtain justice in any court of this state as it relates to any matter within the scope of Tinsley’s media firestorm.

82. Tinsley manufactured, disseminated, and perpetuated a false narrative through manipulative use of media outlets, and Tinsley did so intentionally, and solely for personal publicity and promotion, foreseeably resulting in permanent prejudicial harm to Boyd.
83. Due to the acts of Tinsley, Boyd is entitled to a declaratory judgment finding that Tinsley's acts have perverted the course of justice such that Boyd is not able to receive fair treatment and adjudication in the courts of this state as to any related matter.
84. Tinsley's acts were intentional and were for his own purposes, not for the specific purpose of damaging Boyd's ability to obtain a fair trial in any court of this state, yet those acts have had that foreseeable effect, which perverts the course of justice and is actionable through the Act.
85. Declaratory judgment pursuant to the Act and as sought herein may be fashioned in such a way as to afford relief to Boyd with respect to his rights to obtain a fair adjudication in the courts of this state, and likewise resolve the controversy between Boyd and Tinsley, including the ongoing effect of Tinsley's media firestorm and campaign to raise his own public profile in an unlawful and improper manner.
86. Boyd has incurred costs in seeking and obtaining the relief sought herein, which should be assessed against Tinsley and entered as a judgment against him in this proceeding. Such costs are separate and distinct from any claim for damages that Boyd may have against Tinsley, all of which are waived, with costs appropriately awarded to Boyd against Tinsley pursuant to the Act.

PRAYER FOR RELIEF

87. Each and every allegation set forth above is repeated herein where relevant as fully as if repeated herein verbatim.

88. Boyd prays for empaneling of a jury to find and determine:

(A) Tinsley manufactured, disseminated and perpetuated a false narrative through manipulative use of media outlets and that Tinsley did so intentionally, and solely for personal publicity and promotion, foreseeably resulting in permanent prejudicial harm to Boyd.

(B) The acts of Tinsley set forth herein have perverted the course of justice such that it is impossible for Boyd to obtain justice in any court of this state as it relates to any matter within the scope of Tinsley's media firestorm.

89. Following the final determination of facts, issuing a declaratory judgment finding and adjudicating that:

(A) Tinsley manufactured, disseminated, and perpetuated a false narrative through manipulative use of media outlets and that Tinsley did so intentionally, and solely for personal publicity and promotion, foreseeably resulting in permanent prejudicial harm to Boyd'

(B) Tinsley has intentionally and wrongfully frustrated the interests of justice such that Boyd cannot receive a fair adjudication in the courts of this state in any related matter;

(C) Entry of judgment for costs against Tinsley for the costs incurred by Boyd in pursuing the relief sought herein; and

(D) Such other and further relief as is deemed just and proper through these and any amended pleading and/or determined by the court.

Respectfully submitted,

s/ Desa Ballard

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ATTORNEYS FOR PLAINTIFF

November 3, 2025

COURTESY OF
LUNASHARK MEDIA

COURTESY OF AN ANONYMOUS FOIA
AROUND AND FIND OUT SPONSOR