

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
)	
COUNTY OF GREENVILLE)	THIRTEENTH JUDICIAL CIRCUIT
)	
Juanita Joy Jackson, individually and as)	Case No. 2024-CP-23-_____
Personal Representative of the Estate of)	
Jamari Cortez Bonaparte Jackson,)	
)	
Plaintiff,)	SUMMONS
)	
v.)	
)	
Greenville County School District, Burke)	
Royster, Graysen Walles, Harold McPhail,)	
Tekoa Althea Williams, Jordan Williams,)	
SCAP 121 LLC, and John Does 1-5,)	
)	
Defendants.)	

TO THE DEFENDANTS NAMED ABOVE:

YOU ARE HEREBY SUMMONED and required to answer the **COMPLAINT** in this action, a copy of which is attached hereto and herewith served upon you, and to serve a copy of your Answer to the Complaint upon the subscriber at P.O. Box 9567, 141 Traction St., Greenville, South Carolina, 29604, within thirty (30) days after the service thereof, exclusive of the day of such service. If you fail to answer the Complaint within this thirty (30) day period, the Plaintiff will apply to the Court for the relief demanded in the Complaint and judgment will be taken against you by default.

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March 28, 2024
Greenville, SC

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
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COUNTY OF GREENVILLE)	THIRTEENTH JUDICIAL CIRCUIT
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Juanita Joy Jackson, individually and as Personal Representative of the Estate of Jamari Cortez Bonaparte Jackson,)	Case No. 2024-CP-23-_____
)	
)	
Plaintiff,)	
)	
v.)	COMPLAINT
)	(Jury Trial Demanded)
)	
Greenville County School District, Burke Royster, Graysen Walles, Harold McPhail, Tekoa Althea Williams, Jordan Williams, SCAP 121 LLC, and John Does 1-5,)	
)	
Defendants.)	

Plaintiff Juanita Jackson, individually and as personal representative of the Estate of Jamari Cortez Bonaparte Jackson, complaining of the above-named defendants, would show unto this Honorable Court as follows:

1. Matthew Cortez Bonaparte and Plaintiff Juanita Joy Jackson are the parents of minor decedent Jamari Cortez Bonaparte Jackson (“Jamari”). Plaintiff is the duly-appointed personal representative of the Estate of Jamari Cortez Bonaparte Jackson and has the authority to bring this action, which is being pursued pursuant to S.C. Code §§15-5-90 (the survival statute) and 15-51-10, *et seq.* (the wrongful death statute). The certificate of appointment as Personal Representative is attached hereto as **Exhibit A**. At all times relevant hereto Plaintiff was a citizen and resident of Greenville County, South Carolina.

2. Defendant Greenville County School District is and was at all times relevant hereto an agency, a political subdivision, and/or governmental entity organized under and existing pursuant to the laws of the State of South Carolina which operates public schools in Greenville County, South Carolina. The acts and/or omissions complained of herein which relate to

Greenville County School District were performed by employees, agents, or others acting on behalf of Greenville County School District, making Greenville County School District liable for the injuries and damages sustained by Plaintiff.

3. Defendant Burke Royster was, at all times relevant hereto, a citizen and resident of Greenville County, South Carolina and the Superintendent of Greenville County School District.

Defendant Graysen Walles was, at all times relevant hereto, a citizen and resident of Greenville County, South Carolina and was principal of Tanglewood Middle School.

4. Defendant Harold McPhail was, at all times relevant hereto, a citizen and resident of Greenville County, South Carolina and was assistant principal at Tanglewood Middle School.

5. Defendant Tekoa Althea Williams was, at all times relevant hereto, a citizen and resident of Greenville County, South Carolina.

6. Defendant Jordan Williams was, at all times relevant hereto, a citizen and resident of Greenville County, South Carolina.

7. Defendant SCAP 121, LLC is a limited liability company organized under and existing pursuant to the laws of the State of South Carolina with its principal place of business in Greenville County, South Carolina.

8. Defendants John Does 1-5 are, upon information and belief, as-yet unidentified employees, agents, or others acting on the part of Greenville County School District who worked at Tanglewood Middle School at the relevant time period associated with this matter.

9. Defendants Greenville County School District, Burke Royster, Graysen Walles, Harold McPhail, and John Does 1-5 are hereinafter collectively referred to as "GCSD".

10. This Honorable Court has jurisdiction over the matters contained herein and venue is proper.

FACTUAL ALLEGATIONS

11. The within action arises out of the shooting death of 12-year-old Jamari Jackson at Tanglewood Middle School on March 31, 2022, during a class change. Jamari was in the seventh grade at the time of his death.

12. Defendant GCSD has a documented history of concealing how dangerous its schools are. In March 2016, the *Greenville News* published an article entitled “School crime reports often contradictory; hard to come by” in which reporter Rick Bundrett detailed how “a months’ long review...found discrepancies between what local police are investigating on school grounds and what the district is reporting in its annual crime reports to the state Department of Education.” The article revealed GCSD reported no sex offenses, robberies, or kidnappings at its schools for the period reviewed, while police reports recorded 18 sexual offenses, three robberies, and one kidnapping at Greenville County Schools during the same time period. In addition, although GCSD reported 56 weapons offenses to the State Department of Education, police reports reflect at least 224 weapons offenses. Police reports of aggravated assaults and drug distribution offenses were several times more than what GCSD reported to the Department of Education.

13. By concealing the true extent of dangerous activity at its schools, GCSD attempts to avoid public accountability and scrutiny and therefore is not forced to make meaningful changes to protect students from harm.

14. GCSD is responsible for the supervision, security, and well-being of the students who attend Tanglewood Middle School. It has regularly and routinely failed to do so; as recently as last month (February 29, 2024), a Tanglewood student brought a gun to school.

15. Prior to the March 31, 2022 shooting, GCSD was aware Jamari’s killer had a propensity for physical violence and aggressiveness toward others. Upon information and belief, of the 135

school days between the start of the school year and the day Jamari was killed, Jamari's killer had been suspended from school at least 20 days for fighting, bullying, and disruptive behavior.

16. As of March 31, 2022, GCSD was aware Jamari's killer was involved in disagreements with several other students, including Jamari. Based upon its knowledge of ongoing conflicts combined with the killer's known propensity for violence, GCSD knew or should have known any disagreements involving Jamari's killer could and would intensify until he became physically violent. GCSD also knew or should have known that, because he engaged in violence even after being suspended, Jamari's killer was not deterred by suspension. Despite this knowledge, GCSD took no further action against Jamari's killer, allowing him to remain at school and permitting him to be a threat to others while at school.

17. Defendant Jordan Williams is the father of Jamari's killer. Like GCSD, he was aware of issues between his son and others, including Jamari, and was equally aware of his son's propensity for violence and aggressiveness, as well as his multiple suspensions from school and the reasons for the suspensions.

18. Jordan Williams was previously convicted of criminal domestic violence and as a result is prohibited by law from owning or possessing a firearm.

19. Despite being prohibited from owning or possessing a firearm, Defendant Jordan Williams obtained a gun from his sister, co-Defendant Tekoa Althea Williams.

20. Defendant SCAP 121 LLC owns and controls the property located at 214 Marlana Drive, where Defendant Jordan Williams lived with Jamari's killer. Upon information and belief, the agreement between SCAP 121 and Jordan Williams prohibited various activities and required tenants to have in a lawful manner at all times. Therefore, by the terms of the agreement, SCAP 121 LLC exercised control over and assumed responsibility for the proper care and keeping of

the property and otherwise assuming the obligation to enforce these terms and conditions and ensure they were followed.

21. The gun obtained by Defendant Jordan Williams through Defendant Tekoa Althea Williams was the gun used by Jamari's killer.

22. As a result of the aforementioned acts and omissions, Jamari suffered and endured physical pain, mental anguish, trauma, and death. Further, the statutory beneficiaries suffered, and continue to suffer, the following injuries:

- a. pecuniary loss;
- b. mental shock and suffering;
- c. wounded feelings;
- d. grief and sorrow;
- e. loss of companionship;
- f. loss of Jamari's experience, knowledge, and judgment; and
- g. funeral expenses.

23. The Defendants named herein are liable, jointly and severally, to Plaintiff for the roles they played in contributing to Jamari's death. Each of the Defendants named herein had the opportunity to prevent this tragedy from occurring. Each of the Defendants failed.

FOR A FIRST CAUSE OF ACTION

24. Plaintiff incorporates by reference and realleges the allegations of the prior paragraphs as if fully stated herein.

25. Defendants GCSD, Royster, Walles, McPhail, and John Does 1-5 owe students, including Jamari, various duties, including to protect, warn, and take reasonable precautions to prevent harm at the hands of others.

26. Defendants GCSD, Royster, Walles, McPhail, and John Does 1-5 breached these duties and were negligent, grossly negligent, willful and wanton in one or more of the following particulars, each of which constitutes a separate “occurrence” under the laws of the State of South Carolina and permitting separate recoveries for each instance:

- a. Failing to implement and devise programs and procedures to prevent weapons from being brought into schools;
- b. Failing to utilize available equipment to prevent weapons from being brought into schools and failing to train employees on the proper use of such equipment;
- c. Failing to properly report and document crime statistics to the Department of Education;
- d. Failing to comply with South Carolina law and regulations concerning student safety;
- e. Failing to comply with South Carolina Department of Education rules and regulations concerning student safety;
- f. Failing to exercise reasonable care for Jamari’s safety and well-being while attending school;
- g. Failing to take reasonable action to prevent a known violent individual from perpetrating additional violence;
- h. Failing to take reasonable actions to protect students from individuals who have demonstrated a history and habit of violence and aggressiveness and otherwise present a danger to other students;
- i. Failing to properly train, educate, supervise, and instruct employees on proper methods of conflict resolution, recognizing escalation of disputes, and addressing bullying;

- j. Failing to properly inform and advise the assigned SRO (School Resource Officer) of the known disputes Jamari's killer was involved at the time of the shooting, to allow the SRO to evaluate whether additional protection was needed;
 - k. Failing to properly monitor Jamari's shooter when they knew him to be violent and capable of causing others physical harm;
 - l. Failing to take other actions or to exercise that degree of care which a reasonably prudent person would have exercised under the same or similar circumstances;
 - m. Failing to create and maintain a safe school environment;
 - n. Failing to have proper security devices, programs, and procedures at Tanglewood Middle School; and
 - o. In such other particulars that will be proven during litigation and the trial of this case.
27. The injuries and damages incurred by Jamari, Plaintiff, and Jamari's heirs were directly and proximately caused by the negligence, gross negligence, recklessness, willfulness, and wantonness of GCSD as detailed hereinabove, such injuries and damages to include fear, physical pain and suffering, mental anguish, emotional distress, loss of enjoyment of life, pecuniary losses, and funeral expenses, as well as punitive damages for which Plaintiff and Jamari's estate are entitled to recovery pursuant to the laws of the state of South Carolina, in an amount to be determined by a jury at the trial of this matter.
28. Accordingly, Plaintiff is informed and believes she is entitled to a judgment against GCSD and that the statutory beneficiaries are entitled to judgment against GCSD for actual damages.

FOR A SECOND CAUSE OF ACTION
(Negligent Supervision – Jordan Williams)

29. Plaintiff incorporates by reference and realleges the allegations of the prior paragraphs as if fully stated herein.

30. At all times relevant hereto, Defendant Jordan Williams knew or should have known that his minor child, who killed Jamari, did not have the experience or knowledge to safely handle a firearm.

31. Defendant Jordan Williams knew or should have known that allowing Jamari's murderer to have unsupervised access to a firearm was extremely dangerous to the general public, especially those he would encounter during the day, and it was foreseeable that another person would be injured unless reasonable steps were taken to supervise and control him.

32. Defendant Jordan Williams owed a duty to Plaintiff and to the general public, to exercise reasonable care to control his minor child so as to:

- a. Prevent him from harming others through negligence, gross negligence, recklessness, willfulness, or wantonness; or
- b. From so conducting himself as to create an unreasonable risk of bodily harm to others.

33. Defendant Jordan Williams knew or should have known that he had the ability to control his son and knew or should have known of the necessity and opportunity for exercising such control.

34. Defendant Jordan Williams failed to perform this duty and failed to exercise control over his son by:

- a. Possessing a firearm when it was unlawful for him to do so;
- b. Failing to secure the firearm in a gun safe, which would have prevented unsupervised access to the firearm;
- c. Allowing his son to possess, carry, and use firearms with no experience or training; and

d. Obtaining from co-Defendant Tekoa Williams the firearm used to kill Jamari.

35. The injuries and damages incurred by Jamari, Plaintiff, and Jamari's heirs were directly and proximately caused by the negligence, gross negligence, recklessness, willfulness, and wantonness of Defendant Jordan Williams, such injuries and damages to include fear, physical pain and suffering, mental anguish, emotional distress, loss of enjoyment of life, pecuniary losses, and funeral expenses, as well as punitive damages for which Plaintiff and Jamari's estate are entitled to recovery pursuant to the laws of the state of South Carolina, in an amount to be determined by a jury at the trial of this matter.

36. Accordingly, Plaintiff is informed and believes she is entitled to a judgment against Jordan Williams and that the statutory beneficiaries are entitled to judgment against Jordan Williams, for both actual and punitive damages.

FOR A THIRD CAUSE OF ACTION
(Negligent Supervision – Tekoa Althea Williams)

37. Plaintiff incorporates by reference and realleges the allegations of the prior paragraphs as if fully stated herein.

38. At all times relevant hereto, Defendant Tekoa Williams knew or should have known that Jordan Williams' minor child, who killed Jamari, did not have the experience or knowledge to safely handle a firearm.

39. Defendant Tekoa Williams knew or should have known that allowing an untrained and inexperienced individual unsupervised access to a firearm was extremely dangerous to the general public, especially those he would encounter during the day, and it was foreseeable that another person would be injured unless reasonable steps were taken to supervise and control him.

40. Defendant Tekoa Williams owed a duty to Plaintiff and to the general public, to exercise reasonable care to control an individual in possession of a firearm she owns so as to:

a. Prevent him from harming others through negligence, gross negligence, recklessness, willfulness, or wantonness; or

b. From so conducting himself as to create an unreasonable risk of bodily harm to others.

41. Defendant Tekoa Williams knew or should have known that she had the ability to control Jordan Williams' son and his access to the firearm and knew or should have known of the necessity and opportunity for exercising such control.

42. Defendant Tekoa Williams failed to perform this duty and failed to exercise control by:

a. Permitting her firearm to be possessed by someone lawfully prohibited from doing so;

b. Failing to secure the firearm in a gun safe, which would have prevented unsupervised access to the firearm;

c. Allowing untrained and inexperienced individuals to possess, carry, and use her firearm; and

d. Failing to routinely perform a gun inventory check to ensure she the location of her firearm(s) was known at all times.

43. The injuries and damages incurred by Jamari, Plaintiff, and Jamari's heirs were directly and proximately caused by the negligence, gross negligence, recklessness, willfulness, and wantonness of Defendant Tekoa Williams, such injuries and damages to include fear, physical pain and suffering, mental anguish, emotional distress, loss of enjoyment of life, pecuniary losses, and funeral expenses, as well as punitive damages for which Plaintiff and Jamari's estate are entitled to recovery pursuant to the laws of the state of South Carolina, in an amount to be determined by a jury at the trial of this matter.

44. Accordingly, Plaintiff is informed and believes she is entitled to a judgment against Tekoa Williams and that the statutory beneficiaries are entitled to judgment against Tekoa Williams, for both actual and punitive damages.

FOR A FOURTH CAUSE OF ACTION
(Negligence *Per se* – Jordan Williams)

45. Plaintiff incorporates by reference and realleges the allegations of the prior paragraphs as if fully stated herein.

46. South Carolina Code of Laws §16-25-30 makes it unlawful for any person convicted of criminal domestic violence to possess a firearm within the State.

47. South Carolina Code of Laws §16-23-30 makes it unlawful for any person to deliver a firearm to a person under the age of 18, except when being used under the immediate supervision of a parent or adult instructor.

48. The aforementioned statutes are designed to protect against the type of harm which resulted from the prohibited conduct and the Plaintiff, as a member of the general public, is someone the statutes are designed to protect.

49. Defendant Jordan Williams was *per se* negligent by possessing a firearm in violation of S.C. Code §16-25-30 and/or by delivering the firearm, or allowing it to be possessed by a person under the age of 18 in violation of S.C. Code §16-23-30.

50. The injuries and damages incurred by Jamari, Plaintiff, and Jamari's heirs were directly and proximately caused by Defendant Jordan Williams' violations of the aforementioned statutes, such injuries and damages to include fear, physical pain and suffering, mental anguish, emotional distress, loss of enjoyment of life, pecuniary losses, and funeral expenses, as well as punitive damages for which Plaintiff and Jamari's estate are entitled to recovery pursuant to the

laws of the State of South Carolina, in an amount to be determined by a jury at the trial of this matter.

51. Accordingly, Plaintiff is informed and believes she is entitled to a judgment against Jordan Williams and that the statutory beneficiaries are entitled to judgment against Jordan Williams, for both actual and punitive damages.

FOR A FIFTH CAUSE OF ACTION
(Negligence *Per se* – Tekoa Williams)

52. Plaintiff incorporates by reference and realleges the allegations of the prior paragraphs as if fully stated herein.

53. South Carolina Code of Laws §16-25-30 makes it unlawful for any person convicted of criminal domestic violence to possess a firearm within the State.

54. South Carolina Code of Laws §16-23-30 makes it unlawful for any person to deliver a firearm to a person under the age of 18, except when being used under the immediate supervision of a parent or adult instructor and further makes it unlawful to deliver a firearm to any person convicted of a violent crime.

55. The aforementioned statutes are designed to protect against the type of harm which resulted from the prohibited conduct and the Plaintiff, as a member of the general public, is someone the statutes are designed to protect.

56. Defendant Tekoa Williams was *per se* negligent by possessing a firearm in violation of S.C. Code §16-25-30 and/or by delivering the firearm or allowing it to be possessed by a person under the age of 18 in violation of S.C. Code §16-23-30 and/or by delivering the firearm or allowing it to be possessed by a person convicted of a violent crime.

57. The injuries and damages incurred by Jamari, Plaintiff, and Jamari's heirs were directly and proximately caused by Defendant Tekoa Williams' violations of the aforementioned statutes,

such injuries and damages to include fear, physical pain and suffering, mental anguish, emotional distress, loss of enjoyment of life, pecuniary losses, and funeral expenses, as well as punitive damages for which Plaintiff and Jamari's estate are entitled to recovery pursuant to the laws of the State of South Carolina, in an amount to be determined by a jury at the trial of this matter.

58. Accordingly, Plaintiff is informed and believes she is entitled to a judgment against Tekoa Williams and that the statutory beneficiaries are entitled to judgment against Tekoa Williams, for both actual and punitive damages.

FOR A SIXTH CAUSE OF ACTION
(Negligent Entrustment)

59. Plaintiff incorporates by reference and realleges the allegations of the prior paragraphs as if fully stated herein.

60. At all times relevant hereto, Jamari's killer was incompetent, unfit, inexperienced, or reckless when it came to his ability to handle a firearm safely.

61. At all times relevant hereto, Defendant Tekoa Williams knew or should have known that co-Defendant Jordan Williams was incompetent, unfit, inexperienced, or reckless when it came to his ability to handle a firearm safely.

62. At all times relevant hereto, Defendants Jordan Williams and Tekoa Williams knew or should have known that Jamari's killer was incompetent, unfit, inexperienced, or reckless when it came to his ability to handle a firearm safely.

63. On or about March 31, 2022, Defendant Tekoa Williams entrusted co-Defendant Jordan Williams with a firearm, which is a dangerous instrument, and at the same time or thereafter, Defendants Jordan Williams and Tekoa Williams entrusted the minor child with a firearm a dangerous instrument.

64. Entrusting a firearm to Defendant Jordan Williams and the minor child created an appreciable risk of harm to others, including Plaintiff, Jamari, and the other students, faculty and staff at Tanglewood Middle School.

65. Entrusting a firearm to Defendant Jordan Williams was negligent, grossly negligent, willful and wanton behavior on the part of Defendant Tekoa Williams.

55. Entrusting a firearm to the minor child was negligent, grossly negligent, willful and wanton behavior on the part of Defendants Jordan Williams and Tekoa Williams.

66. The injuries and damages incurred by Jamari, Plaintiff, and Jamari's heirs were directly and proximately caused by the negligence, gross negligence, recklessness, willfulness, and wantonness of Defendants Jordan Williams and Tekoa Williams, such injuries and damages to include fear, physical pain and suffering, mental anguish, emotional distress, loss of enjoyment of life, pecuniary losses, and funeral expenses, as well as punitive damages for which Plaintiff and Jamari's estate are entitled to recovery pursuant to the laws of the state of South Carolina, in an amount to be determined by a jury at the trial of this matter.

67. Accordingly, Plaintiff is informed and believes she is entitled to a judgment against Jordan Williams and Tekoa Williams and that the statutory beneficiaries are entitled to judgment against Jordan Williams and Tekoa Williams, for both actual and punitive damages.

FOR A SEVENTH CAUSE OF ACTION
(Negligence)

68. Plaintiff incorporates by reference and realleges the allegations of the prior paragraphs as if fully stated herein.

69. Defendant SCAP 121 LLC, in its agreement with Defendant Jordan Williams, assumed various duties including duties associated with keeping the Marlana Drive property safe, secure, and free from unlawful behavior or activity.

70. Defendant SCAP 121 LLC breached the aforementioned duties and was negligent, grossly negligent, willful, wanton, and reckless in one or more of the following particulars:

- a. Failing to properly inspect the Marlana Drive property;
- b. Failing to locate and identify prohibited firearms at the Marlana Drive property;
- c. Failing to require the firearm be secured;
- d. Failing to remove and secure prohibited firearms from the Marlana Drive property;
- e. Failing to warn Plaintiff of the firearms located at the Marlana Drive property;
- f. Failing to provide a secure location for firearms to be kept; and
- g. In such other particulars as will be proven through discovery and trial of the within matter.

71. The injuries and damages incurred by Jamari, Plaintiff, and Jamari's heirs were directly and proximately caused by the negligence, gross negligence, recklessness, willfulness, and wantonness of Defendant SCAP 121 LLC, such injuries and damages to include fear, physical pain and suffering, mental anguish, emotional distress, loss of enjoyment of life, pecuniary losses, and funeral expenses, as well as punitive damages for which Plaintiff and Jamari's estate are entitled to recovery pursuant to the laws of the state of South Carolina, in an amount to be determined by a jury at the trial of this matter.

72. Accordingly, Plaintiff is informed and believes she is entitled to a judgment against SCAP 121 LLC and that the statutory beneficiaries are entitled to judgment against SCAP 121 LLC, for both actual and punitive damages.

WHEREFORE, having fully set forth her Complaint against Defendants herein, Plaintiff Juanita Jackson, individually and as personal representative of the Estate of Jamari Jackson, prays for a trial by jury and for the following:

- a. For judgment, in an amount deemed appropriate by the jury, against Defendants, jointly and severally, for all actual and punitive damages permitted to be recovered under the laws of the State of South Carolina;
- b. For the costs of this action; and
- c. For such other relief this Court deems just and proper.

Respectfully submitted,

YOUNG LAW FIRM LLC

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