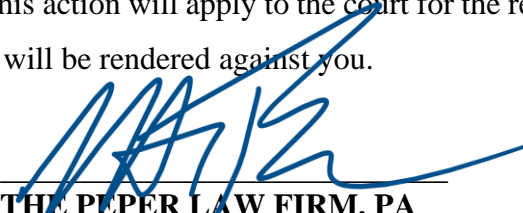


STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
)	FOR THE NINTH JUDICIAL CIRCUIT
COUNTY OF CHARLESTON)	
)	Case No. 2024-CP-10-_____
)	
C. BRANTLEY MOODY)	
)	
PLAINTIFF)	
VS.)	
)	
SAM SKARDON, Individually, and as)	SUMMONS
Chairman of the Charleston County)	
Democratic Party, and)	
CHARLESTON COUNTY)	
DEMOCRATIC PARTY)	
)	
DEFENDANTS)	
_____)	

TO THE ABOVE-NAMED DEFENDANTS:

You are hereby summoned and required to answer the complaint in this action, a copy of which is herewith served upon you, and to serve a copy of your answer on the undersigned at their office located at 548 Savannah Highway, Charleston, South Carolina 29407, within thirty (30) days after the service hereof, exclusive of the day of such service; and if you fail to answer the complaint within the time aforesaid, the Plaintiff in this action will apply to the court for the relief demanded in the complaint and judgment by default will be rendered against you.

October 15, 2024
Charleston, South Carolina



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ATTORNEYS FOR PLAINTIFF

4. Venue is proper in this court because the events giving rise to this complaint occurred in Charleston County, South Carolina, and the Defendants are based in Charleston County.

FACTUAL ALLEGATIONS

5. Plaintiff is an elected official representing residents of Charleston County District 7 on Charleston County Council.
6. Plaintiff was first elected to this office in 2016 and was re-elected in 2020.
7. Plaintiff is the Republican nominee for Charleston County Council District 7 in the upcoming general election to be held on November 5, 2024.
8. The Democratic nominee for Charleston County Council District 7 in the upcoming general election is the first cousin of Defendant Skardon.
9. On October 14, 2024, a federal holiday, Plaintiff spent the morning and early afternoon going door-to-door on his bicycle greeting residents of District 7 and handing out campaign materials.
10. After returning home at approximately 12:45pm, he remained there until leaving at approximately 3:45pm to purchase groceries from the Publix Shopping Center on Sam Rittenburg Rd.
11. He went straight to Publix, and after completing his purchase, went straight home, arriving at approximately 4:50pm, where he grilled out with his wife, and remained at home until the following morning.
12. At no point in time on October 14, 2024, did Plaintiff enter, visit, or even drive by a CCDP office.

13. On the evening of October 14, 2024, Defendant Skardon, on behalf of Defendant CCDP, issued a written statement falsely accusing Plaintiff of having “a meltdown” and “harassing” CCDP volunteers inside a CCDP office earlier that afternoon.
14. Defendants released the written statement to the media knowing it would be published to the public, to include registered voters of Charleston County District 7.
15. Defendants willfully and maliciously released this written statement containing false and defamatory statements against Plaintiff with reckless disregard for whether they were false.
16. The entirety of the false and defamatory written statement is as follows:

**GOP County Councilman Brantley Moody
has Meltdown in Charleston Democrats
Office**

On the afternoon of Monday October 14, Republican County Councilman Brantley Moody entered the Charleston County Democratic Party's office and began yelling at volunteers during a phone bank.

He falsely accused them of tampering with his yard signs, but declined to provide any proof of when asked. When he was politely asked to calm down and leave, several volunteers reported he became louder, more irate, and intimidating.

Charleston County Democratic Party Chair Sam Skardon, “We absolutely will not tolerate our volunteers being harassed by an elected official. Councilman Moody needs to apologize immediately.”

Skardon continued, “Anger and fear are at the core of Donald Trump's Republican Party, and this is another example of why no one on the MAGA ticket should be running our county government.”

County Council District 7, currently represented by Moody, is a key swing district based in West Ashley that will likely determine which party holds the majority on Charleston County Council. Moody is opposed in this year's general election by Democrat Sydney van Bulck, a former public-school teacher.

17. As intended by the Defendants, these false and defamatory statements were published to the public by local and state media outlets that same night and the following morning.

FOR A FIRST CAUSE OF ACTION
(Defamation as to all Defendants)

18. The previous paragraphs are reasserted fully as if restated herein.

19. The press release issued by Defendants contained false, defamatory statements concerning the Plaintiff.

20. The false and defamatory statements concerned Plaintiff's commission of a crime.

21. The false and defamatory statements concerned Plaintiff's fitness for his profession.

22. The false and defamatory statements concerned Plaintiff's fitness to hold office.

23. The false and defamatory statements concerned Plaintiff's honesty.

24. The false and defamatory statements concerned Plaintiff's professional integrity.

25. The false and defamatory statements concerned Plaintiff's improper conduct, behavior, or lack of qualities.

26. The false and defamatory statements constitute defamation *per se*.

27. The Defendants anticipated that the press release would be published, shared, or otherwise further disseminated by its recipients to the public.

28. As a result of Defendants' conduct, Plaintiff has suffered damages.

29. Plaintiff is entitled to a judgment for actual and punitive damages against Defendants.

FOR A SECOND CAUSE OF ACTION
(Outrage as to all Defendants)

30. Plaintiff repeats and realleges each allegation set forth in the preceding paragraphs as if fully set forth herein.

31. The Defendants intentionally and recklessly inflicted fear, anxiety, embarrassment, and severe emotional distress on the Plaintiff.
32. The Defendants' malicious conduct toward Plaintiff was extreme and outrageous, exceeding all bounds of decency tolerated by a civilized society.
33. The Defendants intentionally and recklessly engaged in conduct with reckless disregard for the truth, aiming to cause severe emotional distress to Plaintiff through their malicious actions.
34. The Plaintiff's distress was so severe that no reasonable person could be expected to endure the same.
35. As a direct and proximate result of Defendants' conduct, Plaintiff has endured severe emotional distress, including anxiety, humiliation, and mental agony, as well as other damages in an amount to be determined by the trier of fact.
36. Plaintiff is entitled to a judgment for actual and punitive damages against Defendants.


PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for judgment against the Defendants as follows:

1. For actual damages in an amount to be determined by the trier of fact, reflecting the extensive financial, emotional, and reputational harm suffered;
2. For punitive damages to penalize the Defendants' malicious conduct and deter similar future acts, as permitted by law;
3. For the costs of this action to be borne by Defendants;
4. For such other and further relief as the court deems just, equitable, and proper.

Respectfully submitted, this 15th day of October, 2024.

THE PEPPER LAW FIRM, PA



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