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February 27, 2025

VIA FACSIMILE: [REDACTED]
EMAIL: nancy@ [REDACTED] **, AND US MAIL**
Congresswoman Nancy Mace
1728 Longworth House Office Building
Washington, District of Columbia 20515

Congresswoman Nancy Mace
[REDACTED]
[REDACTED]

Congresswoman Nancy Mace
[REDACTED]
[REDACTED]

IN RE: Open Letter to Congresswoman Nancy Mace

Dear Congresswoman Mace:

Please be advised that this firm represents Brian Musgrave. Brian does not have the luxury of a bully pulpit in the form of floor of Congress to address the many accusations you leveled against him on February 10, 2025. This open letter is going to have to suffice for now, although we are prepared to take additional action as set forth below should it be made necessary. You upended Brian's life when you accused him falsely of being a rapist, a predator, and a sex trafficker. He is none of those things. Brian is a loving husband to Jen, his wife of 22 years and a loving father to his two children. For reasons we still cannot quite fathom, you chose to sweep Brian into allegations of drugs and sex crimes involving your ex-fiancé and others.

Having watched and read your address on February 10, 2025, we are struck by your conviction that something inappropriate happened to you (and perhaps to others). As it relates to Brian, however:

Reply to:
105 West Main St.
Suite D
Lexington, SC 29072
Phone: 803.256.9664
Fax: 803.256.3056
ericbland@blandrichter.com

Offices also at:
Peoples Building
Mezzanine Level
18 Broad Street
Charleston, SC 29401
Phone: 843.573.9900
Fax: 843.573.0200
ronnie@blandrichter.com
scott@blandrichter.com

- He did not rape you.
- He did not drug you.
- He did not film you.
- He did not take compromising images of you.
- He has not viewed compromising images of you.
- He did not assist anyone in perpetrating any crimes against you.

Brian's only connection with the events you described in your address is that he happens to own an interest in the beach condominium where these events allegedly took place. As you know, Brian owns the condo with his lifelong friend and your ex-fiancé, Patrick Bryant. For Brian and his family, the condo represents an investment and a place where they gather for family vacations. For Patrick, he periodically occupied the condo as a paid tenant. Brian was aware that his friend had placed a camera in plain view on top of the refrigerator in the kitchen. In fact, it would be impossible for anyone entering the condo not to see the camera. Patrick told Brian that he used the camera to monitor his minor children and to ensure that they were not trying to get into the liquor cabinet when he was not there to provide direct supervision.

- Brian did not own the camera.
- Brian did not have the password for the camera.
- Brian did not have the ability to access the camera digitally.
- Brian never viewed anything on the camera.
- Brian never recorded anything using the camera.

It is unclear from your address whether this is the camera you suspect was used to film you (and perhaps others) or whether you suspect that there were other "hidden" cameras. To be clear, Brian has never hidden any camera anywhere on the property and Brian is unaware of anyone else hiding cameras within the property.

Brian first met his friend Patrick Bryant when they were in 10th grade. They have remained friends ever since. Throughout his adult life, Brian has resided predominantly in the Fort Mill, South Carolina area, while his friend Patrick has resided primarily in and around Charleston, South Carolina. As friends, Brian and Patrick have always talked, texted, and emailed on a regular basis and have made time periodically for their paths to cross.

As you know, Brian has met you on a handful of occasions, but there was never a great deal of interaction between you. Brian, as Patrick's friend, was generally aware of the tumultuous nature of your relationship with Patrick, with the abrupt ending of the relationship and with the contentious disputes that followed as you and Patrick sought to unwind some investments that you had made in common. Brian never heard any allegations involving the filming of sex acts, sex trafficking and/or any of the other matters that you so graphically described in your address.

During the afternoon of February 10, 2025, Brian was in a Lowe's parking lot in Fort Mill, South Carolina enjoying an otherwise uneventful but pleasant day when he received a text message and later a phone call from a reporter with the Wall Street Journal. It was during this call that he

learned his name would be spoken on the floor of Congress in a matter of hours and that you would accuse him of being a rapist and a sexual predator. In the time between the call and your speech, Brian was panicked as he tried to contact as many of his friends and family members as possible to brace them for the false accusations they were about to hear. We suppose that in some sick irony, Brian experienced the same victimization that you described as he sat helplessly that evening while you displayed a poster that included his image and labeled him a “Predator” who was not safe to be in the presence of minor children. You also intentionally blurred “facts” throughout your address as you made repeated references to “they” and “them” attributing all of the conduct you described to each and every face on the poster, including Brian’s.

It is clear that you and your team sought to use the floor of Congress to insulate yourselves from liability under the protection of the speech and debate clause of the United States Constitution and/or the Westfall Act. As you were not advancing any legislative initiatives and were merely there to push a personal narrative, we question whether the protection exists. Your unwillingness to share evidence and/or to discuss these matters outside of the protection of the floor, however, are confirmatory of the strategy that you and your team sought to employ that evening and confirmatory of your belief that you were in a safe environment in which to attack Brian Musgrave. You may view the floor of Congress as a sanctuary for slander. We do not.

When Brian tried to defend himself by calling your allegations against him baseless, you took to X with a post on February 11, 2025, at 7:25 AM:

- “In Brian Musgrave’s denial he said my claims are ‘baseless’ and without a ‘shred of evidence.’ He must have missed the part of my speech where I said I ‘documented’ evidence with ‘metadata.’
- “It was also confirmed last night by SLED – there is an active investigation. So, Brian Musgrave, if there is no evidence, there would be no investigation.”
- “Hold the line.”

We can only deduce from your post that you have evidence in the form of metadata that will link Brian Musgrave to the crimes of rape and sex trafficking. If so, there are three paths forward:

1. Show us evidence in the form of metadata that links Brian Musgrave to these alleged acts, and we will cease our pursuit of this matter.
2. Retract your allegations against Brian Musgrave and issue an apology.
3. Refuse either of these options and we will bring an action to test the limits of your protection under the speech and debate clause and/or the Westfall Act.

It is important to note with regard to the prospects of a civil action for defamation that if you are successful in convincing a court that your speech (as well as your other off-floor comments) is afforded protection, your success in that regard would indicate that Brian is without remedy at law. As a result, we will seek in any future filing as an alternative form of relief that the

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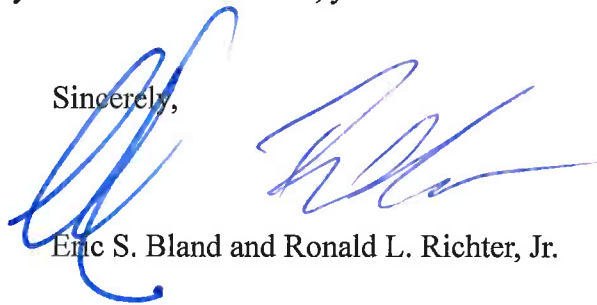
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court impose a permanent injunction against you to prevent you from continuing to defame Brian Musgrave on a going forward basis.

The damage you have inflicted upon Brian and his family is immense. Brian has no idea what transpired in the intimate relationship between yourself and Patick Bryant or anyone else for that matter. It is outrageous that you would so recklessly take these actions against him.

This is not a Rule 408 settlement offer. This is a demand for action. Should you refuse to take the steps outlined herein, this letter will be offered to a court in the future as part of a petition for the fees and costs that Brian Musgrave has been forced to incur. Please make public the evidence you have that implicates Brian Musgrave or issue your retraction and apology within ten (10) days of the date of this letter. Should you choose not to do so, you will leave us with no other recourse than to seek judicial relief.

Sincerely,

Two handwritten signatures in blue ink. The first signature is on the left, and the second is on the right. Both are cursive and stylized.

Eric S. Bland and Ronald L. Richter, Jr.

cc: client (via email)