

STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

IN COURT OF COMMON PLEAS
IN THE 9TH JUDICIAL CIRCUIT

Jane Doe,)
)
)
Plaintiff,)
)
)
v.)
)
)
Patrick Bryant, John Osborne, Eric)
Bowman, and Pommer Group LLC.)
)
Defendants.)
_____)

C/A No.: 2025-CP-10-

SUMMONS

TO THE DEFENDANTS ABOVE NAMED

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 to the Complaint to Plaintiff’s attorney, Marybeth Mullaney, at the address below, 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, Plaintiff will apply to the Court for the relief demanded in the Complaint, including the rendering of judgment by default against you.

Respectfully submitted,

s/Marybeth Mullaney
Marybeth Mullaney (S.C. Bar #6685)
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Attorney for Plaintiff

May 29, 2025
North Charleston, South Carolina

STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

IN COURT OF COMMON PLEAS
IN THE 9TH JUDICIAL CIRCUIT

Jane Doe,)	C/A No.: 2025-CP-10-
)	
)	
Plaintiff,)	COMPLAINT
)	<i>(Jury Trial Requested)</i>
v.)	
)	
Patrick Bryant, John Osborne, Eric Bowman, and Pommer Group LLC.,)	
)	
Defendants.)	
_____)	

Plaintiff Jane Doe¹ (“Plaintiff” or “Doe”), by way of this Complaint, brings the below claims against Patrick Bryant (hereinafter “Bryant”), John Osborne (hereinafter “Osborne”), and Eric Bowman (hereinafter “Bowman”) and Pommer Group LLC (“Pommer Group”), (collectively “Defendants”) through her undersigned attorney, respectfully alleges unto this Honorable Court as follows:

NATURE OF CLAIMS

1. Plaintiff brings claims against Defendants for Wrongful Intrusion into Private Affairs, Battery, Intentional Infliction of Emotional Distress, Premise Liability, Defamation, Abuse of Process, Negligence *Per Se*, Negligence, Gross Negligence, and Conspiracy.

PARTIES AND JURISDICTION

- 2. At all times relevant to this complaint, Plaintiff was a resident of Charleston County, South Carolina.
- 3. Defendant Bryant is a resident of Charleston County, South Carolina.

¹ Plaintiff is filing a motion to proceed under a pseudonym pursuant to Rule 10 of the South Carolina Rules of Civil Procedure contemporaneously with her Complaint. (Exhibit A)

4. Defendant Osborne is a resident of Charleston County, South Carolina.
5. Defendant Bowman is a resident of Charleston County, South Carolina.
6. Defendant Pommer Group LLC is a for-profit South Carolina corporation registered with the South Carolina Secretary of State and regularly conducts business in Charleston County. Bowman is the registered agent. Upon information and belief, Bowman owns and operates the company.
7. Venue is proper in this judicial circuit because the unlawful acts, which are the subject of this complaint, occurred in Charleston County.

FACTUAL ALLEGATIONS

8. On February 10, 2025, South Carolina Congresswoman Nancy Mace (hereinafter referred to as “Congresswoman Mace” or “Mace”) delivered a speech from the floor of the United States House of Representatives regarding a bill she introduced to combat voyeurism, known as the Stop Victimizers and Offenders from Yielding Explicit Unconsented Recordings Surreptitiously Act, (“Stop VOYEURS Act of 2025”) (H.R. 1203). The bill seeks to broaden the scope of federal laws against video voyeurism beyond federal lands, impose harsher penalties on offenders and create a civil right of action for victims of voyeurism, allowing them to sue perpetrators. In her speech, Congresswoman Mace said:

Last year, I had to tell a woman she’d been raped-she had no idea because she was incapacitated when it happened. I knew because I accidentally found photos and video of her assault.

I saw one of Patrick Bryant’s business associates, John Osborne, sexually assaulting her at the home of Eric Bowman. Patrick Bryant was present and he and Eric Bowman both had their phones out during the rape. I found a video recording and photos of the assault on Patrick Bryant’s phone. I would later learn these men planned her assault.

9. Plaintiff is the woman whom Congresswoman Mace was speaking about.
10. Bryant is Mace’s former fiancé and Plaintiff’s former boss.

11. Bryant, Osborne, and Bowman are wealthy entrepreneurs, close personal friends, and business associates.

12. Plaintiff is a young woman who, between 2017 and 2019, was initially employed as Bryant's personal assistant and then worked for two companies owned by Bryant.

The Sexual Assault

13. In October of 2018, Plaintiff, was 23 years old at the time and was working two jobs. She worked for one of Bryant's companies during the day and had a second job as a server to supplement her income.

14. On Thursday, October 25, 2018, at approximately 7:00 p.m., the Plaintiff met a girlfriend for drinks at the restaurant where she worked, because they offered her employee discounts and money was tight.

15. Plaintiff and her friend sat outside on the patio. Plaintiff noticed that her boss, Bryant, was at the bar drinking with Osborne and Bowman.

16. Plaintiff had been on several dates with Osborne, who was married with two kids but was separated at the time. Plaintiff knew she was not the only woman Osborne was dating.

17. Plaintiff was familiar with Bowman because she had seen him at several company parties hosted by Bryant, and she knew he owned a local sports team in Charleston.

18. Bryant, Bowman, and Osborne visited Plaintiff's table several times and bought the women drinks.

19. Around 9:00 p.m., Plaintiff's friend went home. Plaintiff, Bryant, Bowman, and Osborne went to Home Team Barbeque ("Home Team") on Sullivan's Island, where Osborne purchased drinks for Plaintiff.

20. Around 11:00 p.m., Plaintiff noticed Osborne had left her at Home Team. She texted Osborne, asking him where he was and if he was okay. Osborne responded by sending several angry and hostile texts.

21. Osborne was angry at the Plaintiff because he believed she was paying more attention to Bryant than to him. He texted, “Go fuck [Bryant] and have fun.”

22. Plaintiff was taken aback by Osborne’s texts because she felt she was paying attention to him. Moreover, Bryant was her boss, and she was not interested in him romantically, and Osborne knew that.

23. At approximately 12:15 a.m. on October 26, 2018, Plaintiff, Bryant, and Bowman went to 3024 Marshall Blvd, Sullivan’s Island, where Bowman lived with Jane Doe Witness² (hereinafter “JDW” for Jane Doe Witness) and their children from previous marriages.

24. The five-bedroom home is approximately 5000 square feet, it is across the street from the ocean, has a built-in hot tub and pool, and is owned by Pommer Group LLC, one of Bowman’s many businesses.

25. Bowman had video and audio cameras installed throughout the home, which were accessible from a cell phone.

26. JDW heard them come in. She accessed the cameras from her phone and could see and hear much of what happened. She was unable to see everything because Bowman turned the cameras off. However, JDW turned the cameras back on from her phone.

27. According to JWD, Plaintiff appeared very intoxicated and was barely able to walk or talk.

28. JDW heard Bowman and Bryant trying to coax Plaintiff into one of the empty bedrooms. However, Plaintiff went to the deck by the pool instead.

29. Plaintiff stumbled into the pool fully clothed and screamed loudly. Bowman and Bryant laughed at her and filmed her on their cell phone.

² Plaintiff uses a pseudonym at her request, as she is an alleged crime victim. On April 8, 2025, Bowman was arrested for Harassment in the 1st Degree, and those charges are pending.

30. Plaintiff then went into the house, took off her wet clothes, covered herself with throw pillows, and passed out on the couch in Bowman's living room wearing only a black bra and no underwear.

31. Bryant and Bowman called Osborne. They told him Plaintiff was passed out and that he needed to come get her. Shortly after, Osborne showed up.

32. JDW documented what she saw in writing that night in an email she used for her diary.

33. JDW emailed the diary entry to herself at 7:58 AM. Below are excerpts from her diary email:

Then [Bowman and Bryant] went to take pictures of [Plaintiff], first naked but covered with pillows, then they removed all the pillows while she was still passed out and took more photos of her totally exposed. They left her like that in the middle of the house and went back to drink in the kitchen.

When [Osborne] got there, he joined them in the kitchen. They continued talking about why you bang some girls and not others, and how they don't care who's married or not, and told [Osborne] that he needed to get [Plaintiff], dressed because they didn't want to touch her, but before that he should bang her on the couch while they watched. They decided to pour new drinks first, and [Bowman] killed the living room camera. When I turned it back on, [Bowman] and [Bryant] were sitting on chairs both taking pictures while John began kissing, fingering and performing oral sex on [Plaintiff], who was still passed out. I couldn't believe what I was seeing.

34. Bowman and Bryant took pictures on their cell phones of Plaintiff's private parts while she was unconscious and wearing a bra and no underwear.

35. Plaintiff did not consent to these pictures, nor did she have the capacity to consent when they took these pictures.

36. Osborne digitally penetrated Plaintiff's vagina and performed cunnilingus on her while Bowman and Bryant filmed it. Plaintiff was unconscious and did not consent or have the capacity to consent.

37. Bowman, Bryant, and Osborne conspired to perpetrate several criminal acts against Plaintiff, violating state and federal laws. They agreed that Osborne would perform sexual acts on Plaintiff, and Bryant and Bowman would watch him violate Plaintiff and film it.

38. The crimes that they conspired to commit included but are not limited to sexual battery which according to SC Code Ann. 16-3-651 (h) includes “sexual intercourse, cunnilingus, fellatio, anal intercourse, or any intrusion, however slight, of any part of a person's body or of any object into the genital or anal openings of another person's body.”

39. Plaintiff did not consent, nor did she have the mental capacity to consent because she was “mentally incapacitated” as defined by SC Code 16-3-651(f) and “physically helpless” as defined by SC Code 16-3-651 (g).

40. Bowman, Bryant and Osborne’s actions against Plaintiff violated Criminal Sexual Conduct in the Third Degree as set forth S.C. Code Ann. § 16-3-654(1)(b), which states:

A person is guilty of criminal sexual conduct in the third degree if the actor engages in sexual battery with the victim andthe actor knows or has reason to know that the victim is mentally defective, mentally incapacitated, or physically helpless

41. Defendants’ actions against Plaintiff also constituted Assault and Battery in the Second Degree as set forth S.C. Code Ann. § 16-3-600 (D)(1)(b) which states:

A person commits the offense of assault and battery in the second degree if the person unlawfully injures another person, or offers or attempts to injure another person with the present ability to do so, and

(b) involves nonconsensual touching of the private parts of a person, either under or above clothing, with lewd and lascivious intent;

42. Bowman, Bryant and Osborne had a lewd and lascivious intent when they perpetrated these acts on Plaintiff. These acts were perpetrated without her knowledge or consent for their own sexual gratification.

43. Bowman, and Bryant are culpable for the sexual battery perpetrated on Plaintiff under the theory of accomplice liability because they planned to commit the sexual battery and were present when it occurred.

44. At approximately 2:00 a.m., Bowman texted JDW and instructed her to come downstairs and bring clothes, as one of Bryant's employees had come over, fallen into the pool, taken off her clothes, and passed out on the couch.

45. Bowman was unaware that JDW had witnessed their criminal acts in real time on the house cameras. Bowman told JDW he didn't want to touch Plaintiff because she was naked, so she needed to dress Plaintiff in dry clothes.

46. JDW did as she was told and dressed Plaintiff. While JDW was dressing her, Plaintiff opened her eyes briefly. She looked scared and confused. After JDW dressed Plaintiff, Osborne left with Plaintiff.

Defendants' Conduct After the Sexual Assault

47. When she woke up, JDW looked for the video of the sexual assault on the house cameras, but Bowman had already deleted the video.

48. At 7:58 a.m., JDW emailed a diary entry to herself detailing what she observed. She emailed it to herself because she was fearful of Bowman and did not want him to find the email.

49. Plaintiff woke up in bed with Osborne at his residence on James Island wearing JDW's clothes. Plaintiff had little to no memory of the night. Osborne told her she was drunk, fell into the pool, and Bowman and Bryant called him to come get Plaintiff. He told her JDW gave her clothes because Plaintiff's clothes were wet.

50. The next day, Plaintiff texted the friend she met for drinks that she had blacked out and didn't remember much of the night.

51. A day after the assault, Bryant told Plaintiff he was planning on coming to the restaurant where she worked on October 28th and asked her to arrange for him to be seated in her section.

52. Plaintiff told her manager that Bryant asked to be seated in her section. Bryant sat in her section and left her a 50% tip.

53. On October 30, 2018, Plaintiff had the following text exchange with Bowman on telegram:

PLAINTIFF: "I have JDW's clothes. How can I get those back to her?"

BOWMAN: lol, wear them over?

PLAINTIFF: And then jump in the pool?

BOWMAN: Seems like some logical steps.

PLAINTIFF: I wish I could remember.

BOWMAN: Your're destructive when your smashed...was hilarious though.

PLAINTIFF: Did I wreck anything? I'm sure I was encouraged by the laughter.

BOWMAN: no worries. You are 100% fine and you seemed to be having fun so we just sat and enjoyed the show.

54. On or about November 1, 2018, Plaintiff texted Bowman and asked for his address, then left JDW's clothes on his doorstep.

55. Bowman, Bryant and Osborne concealed the sexual battery, videos and photos from Plaintiff for years. Defendants acted knowingly, intentionally and maliciously with intent to deceive and mislead Plaintiff.

56. After the assault, Plaintiff went on a few dates with Osborne and stopped seeing him in December of 2018.

57. At the office Christmas party in December 2018, Bryant and the Plaintiff took luge shots together. The party featured an open bar, DJs, photo booths, and ice luges.

58. Plaintiff has a video on her phone of the two of them simultaneously doing shots, and she has a picture from the photo booth that shows Bryant kissing her on the cheek.

59. Bryant was known to hire women in their early twenties. He regularly hosted parties and retreats for his employees that included excessive drinking.

60. Bryant often sought Plaintiff out at work parties and invited her to events where alcohol was served.

61. Plaintiff got intoxicated at the Christmas party. Bryant took her home in an Uber. Plaintiff remembers waking up in the back seat of an Uber with her head in Bryant's lap, and he was kissing her.

62. When the Uber dropped Plaintiff off at her house, Bryant followed her in and got into bed with her. Plaintiff's roommate heard Plaintiff come in, and she went into Plaintiff's room to check on her.

63. She saw Bryant lying next to Plaintiff with his arms around her. Plaintiff's roommate saw that Plaintiff was intoxicated. She recognized Bryant as Plaintiff's boss and knew he was much older than Plaintiff. She also knew that Plaintiff was not romantically interested in Bryant.

64. It appeared to Plaintiff's roommate that Bryant was attempting to have sex with Plaintiff. Plaintiff's roommate yelled at Bryant and told him he needed to leave. When Bryant didn't immediately get up to leave, she screamed, "*Get the Fuck out of our house.*" Bryant finally left.

65. In February 2019, Bryant invited Plaintiff to attend several parties with him the night of the Super Bowl.

66. In March 2019, Bryant told the Plaintiff that his date was unavailable and asked the Plaintiff to attend a Mumford and Sons concert with him. Plaintiff went with him to the concert.

Bryant's Company Profits by Committing Wage Theft - Bowman and Bryant Threaten to Publicly Embarrass Plaintiff with a "*Security Video*" of her "*Smashed*" if she Joins the Wage Lawsuit Against Him

67. When Plaintiff worked for Bryant, she struggled financially because the starting salary was only \$28,500.

68. Plaintiff and the other employees were regularly required to work sixty ("60") to seventy ("70") hours a week. They were not paid overtime compensation when they worked over 40 hours a week.

69. Plaintiff had to get a second job, waiting tables, so that she could pay her bills. She was often exhausted from working long hours for Bryant's company, as well as holding a second job.

70. In April 2019, Plaintiff asked Shawn Moffat ("Moffatt"), her manager, for a raise to \$35,000 so she would no longer have to work a second job. Moffatt refused to give a raise.

71. Since Bryant purported to be Plaintiff's friend and Plaintiff had previously been his personal assistant, Plaintiff complained to Bryant about Moffatt's refusal to give her a raise, believing that Bryant would speak to Moffatt on her behalf.

72. Since Plaintiff had previously worked as his personal assistant and Bryant knew she worked long hours, was a good employee, and was struggling financially, she expected Bryant to give Moffatt the go-ahead for her to get a raise.

73. However, Bryant did not speak with Moffatt about Plaintiff's request for a raise, nor did Bryant give Moffatt the go-ahead for a raise, even though he had the authority to do so.

74. When Plaintiff realized that Bryant was not going to intercede on her behalf and give her a raise, she resigned and moved home.

75. Several months after she resigned, Plaintiff learned that another former employee had filed a class-action lawsuit against the company, Bryant and Moffatt, alleging wage theft, seeking unpaid overtime.

76. Plaintiff joined the lawsuit because she believed she was entitled to be paid for the overtime hours she worked since Bryant, Moffatt, and the company profited at her expense as well as employees' expense, by violating labor laws.

77. On the same day that Plaintiff joined the lawsuit. Bryant sent her the below indignant messages via Telegram and Instagram, insinuating that Plaintiff betrayed him.

*I just got notice you are suing me....Is that correct?
I just found out you are suing me?
Is it true, I told [Moffatt] it absolutely wasn't?*

78. Bryant's brazen messages indicated that he was confident Plaintiff had no knowledge or indication of the crimes he perpetrated on her while she was unconscious, leading Plaintiff to believe that she might have been drugged.

79. When Plaintiff didn't respond to Bryant's texts, he had Bowman contact Plaintiff via Facebook with veiled threats to publicly embarrass her if she didn't drop out of the lawsuit.

80. Bowman told Plaintiff he had "*security footage*" of her "*smashed*" at his house, and he insinuated that the video would be used to discredit her if she didn't drop out of the lawsuit.

81. Plaintiff took this to mean that he had a video of her falling into the pool because she vaguely remembered Bryant and Bowman filming her on their phones as she was climbing out of the pool before she blacked out.

82. Plaintiff messaged Bowman that she didn't know why anyone would want a video of her drunk and falling into his pool, and she told him, "*You do what you gotta do*" and she remained in the lawsuit.

83. Several days after Bowman contacted her, Osborne randomly texted Plaintiff to ask how she was doing, even though she had not heard from him in several months.

84. Plaintiff took this to mean that Bryant instructed Osborne to contact her to persuade her to drop out of the lawsuit. Because, on information and belief, Bryant, Bowman, and Osborne were on a ski trip together at the time.

85. Plaintiff had no reason to believe at that time Bryant, Bowman and Osborne sexually assaulted her while she was unconscious and had video of the assault along with photographs of her private parts.

86. The Judge conditionally certified a class and granted summary judgment in favor of the plaintiffs against AD and Moffatt in the wage case.

87. Bryant asked the Court to dismiss him from the wage lawsuit to avoid individual liability. He claimed in sworn affidavits that he lacked operational control of the company and was only an investor; therefore, he should not be individually liable for the company's wage theft. The Judge dismissed him from the wage lawsuit.

88. The company and Moffatt later settled the case and paid the plaintiffs back wages, liquidated damages, attorneys' fees, and the Court approved the parties' settlement agreement.

89. Plaintiff enrolled in graduate school in January of 2022 and began working towards an advanced degree.

Congresswoman Mace

90. In May of 2022, Bryant got engaged to Mace. Then on October 30, 2023, a blogger contacted Mace and told her that Bryant was on a dating website called The League.

91. At first, Mace didn't believe it. But a total of three women came forward and reported seeing Bryant's dating profile. Mace confronted Bryant about infidelity and asked him to go to counseling with two of her pastors. Bryant agreed.

92. The pastors told Bryant that he needed to build trust, and to do that, he would need to give Mace access to his phone. On November 5, 2023, Bryant allowed Mace to access his phone with her thumbprint. That evening, while Bryant was sleeping, Mace checked his phone.

93. What she found on his phone was worse than anything she could have imagined. In addition to finding the video of Plaintiff being sexually assaulted while she was unconscious, she found images, photos, and videos of other women's private parts that appeared to be taken without their knowledge.

94. On December 14, 2023, Mace met with the FBI and the United States Attorney's Office, and she reported what she found on Bryant's phone. They requested that the South Carolina Law Enforcement Division ("SLED") investigate the matter. As of the filing of this

Complaint, SLED is still investigating this matter, and no charges have been filed in connection with Mace's report.

95. Mace was haunted by the video of the young woman who was sexually assaulted while unconscious. She was unsure of the woman's identity; however, she recognized the home in the video as Bowman's because she had been there on prior occasions with Bryant. Initially, Mace thought the woman in the video might be JDW.

96. In January 2024, she contacted JDW to inform her about the video she had found on Bryant's phone. JDW told her she was not the woman in the video, but she remembered what happened that night.

97. Although she was still scared of Bowman, JDW no longer lived with Bowman, so she felt safer discussing with Mace what she had seen on the cameras that night. She told Mace that she had a diary entry and screenshots she had taken from her phone.

98. Mace told her she needed to report what she saw to SLED and give them the email and screenshots. JDW later met with the SLED investigators.

99. Mace, still haunted by the video, wanted to find the young woman. JDW knew her first name but was unsure of her last name. The two women worked together to find her.

100. JDW found Plaintiff's last name on social media a few weeks later. Mace contacted someone she thought might know Plaintiff and asked if he would reach out to Plaintiff and ask her if she would be willing to talk to Mace about Bryant. He agreed.

101. He called the Plaintiff and asked if she would speak with Congresswoman Mace. He told her that Mace had called off her engagement with Bryant and wanted to talk to her about Bryant.

102. Plaintiff told him she wasn't sure what information she could possibly provide, but she was willing to talk with Mace.

103. Mace called Plaintiff on April 6, 2024. Mace asked Plaintiff what she remembered about the night she was at Bowman's house.

104. Plaintiff thought it odd that Mace was asking her about that night. She told Mace she was very intoxicated and had blacked out. She said she remembered going to Bowman's house with Bryant and falling in the pool, but she didn't remember much after that.

105. Mace told her that she had found a video on Bryant's phone of her being sexually assaulted by Osborne while she was unconscious. Mace also told Plaintiff about the Stop VOYEURS Act of 2025 and that she was working to prevent what happened to her from happening to other women.

106. Plaintiff felt her stomach drop, and her body felt numb. She was in disbelief. She couldn't believe what she was hearing. She started panicking. She couldn't process what Mace told her.

107. Plaintiff experienced immediate shock and psychological trauma. She had no prior knowledge of the assault or that such a video existed. The revelation was devastating. Plaintiff felt disoriented, violated, and betrayed.

108. The emotional impact was acute, including nausea, confusion, dissociation, and overwhelming fear. The knowledge that someone she dated did this to her and that trusted professional and interpersonal acquaintances planned and recorded this act compounded her trauma.

109. Plaintiff did not discover what the Defendants did to her until Mace told her on April 6, 2024. Plaintiff did not know or have reason to know that she had the legal claims outlined in this complaint until April 6, 2025, because she was unconscious when the Defendants violated her.

110. Plaintiff texted Mace the following day and asked if Mace would talk to her again, as she could not process what Mace had told her the day before. She and Mace spoke again the next day. Plaintiff asked Mace several questions. During the call, Plaintiff became hysterical.

111. In the months that followed, the Plaintiff met with SLED investigators. Mace called her frequently to check in and see how she was doing. Plaintiff told Mace she was struggling emotionally, and that she struggled to cope with what the Defendants did to her.

112. Although she is not certain, Plaintiff believes it was likely the Defendants drugged her because she has no memory after a certain point. Also, how else could the Defendants be certain she wouldn't wake up during the assault? Moreover, after the assault, the Defendants were confident that Plaintiff had no memory of what they did to her, which seems unlikely unless they knew she was drugged.

113. In February, Mace informed Plaintiff about a speech she planned to give in support of the legislation.

114. A few hours before Mace's speech, Osborne sent Plaintiff a message on LinkedIn asking her if she knew what was happening in Washington that night. Plaintiff's blood went cold when she saw the message. She never responded.

115. Upon information and belief, Osborne sent a similar message to JDW.

Bowman and Bryant Threaten, Intimidate, Shame, and Embarrass Plaintiff

116. On April 28, 2025, one of Bryant's lawyers sent a five-page letter to the Plaintiff, the individual who had reached out to the Plaintiff on Mace's behalf, JDW, Mace, and two former coworkers, threatening to sue.

117. Then, on May 7, 2025, Bryant carried out his threat by filing a lawsuit against Plaintiff for Breach of Contract on behalf of the company that committed wage claiming that Plaintiff violated the settlement agreement in the wage lawsuit by making disparaging comments about Bryant even though the Court granted his motion to be dismissed from that action.

118. Bryant asked the Court to grant him a restraining order precluding Plaintiff from making disparaging remarks about him, notwithstanding that the agreement does not preclude Plaintiff from making truthful statements, and the settlement agreement only pertained to the wage claims.

119. Moreover, the settlement agreement was never intended to shield Bryant from committing sexual battery or from taking photos of Plaintiff's private parts without her knowledge or consent.

120. Bryant is using his vast financial resources to intimidate the Plaintiff and discourage her from testifying against him in both criminal and civil proceedings, and is using the legal system for an improper purpose by filing a breach of contract lawsuit against the Plaintiff.

121. Bowman has attempted to silence Plaintiff by defaming her and publicly shaming and humiliating her.

122. Bowman published her first and last name on X under the username NotEricB @_ericbowman. He referred to Plaintiff as a "drunk" and insinuated she is lying, promiscuous and has a "psychological disorder."

123. Bowman posted:

Mace & [JWD] took their selfie whore videos, a drunk fall into a pool in 2018 and [JWD's] infidelity throughout the years (more on that later) and turned it into a House floor scandal.

124. Bowman has maliciously shamed and embarrassed Plaintiff and destroyed her reputation. He posted, "[Plaintiff] was drunk, laughing, tripped over a chair, and fell in. It was hilarious - at the time." "Is there a psychological disorder for this?"

125. Bowman also posted a 4-second video on X that he took of Plaintiff, soaking wet, climbing out of his pool. Bowman also provided the video to the Daily Mail, who published the video with Plaintiff's face blurred.

126. Bowman provided the Daily Mail with the Plaintiff's full name and cell phone number, along with several photographs of the Plaintiff and videos of the Plaintiff climbing out of the pool. To harass, shame, and intimidate Plaintiff.

127. Bowman and Bryant's actions violate SC Code Ann. § 16-3-730, which makes it a misdemeanor to publish or "cause to be published" the name of an alleged victim of criminal sexual assault.

128. While The Daily Mail did not publish Plaintiff's name, they did publish pictures of Plaintiff that blurred her face and published Bowman's statements in an article.

129. Additionally, Bowman published her name on X, a platform that is publicly available and has received thousands of views.

130. Plaintiff contacted X and asked them to remove her name from the posts because she is a victim of sexual assault, and they refused.

131. Plaintiff's counsel also sent X's Legal Department a certified letter requesting that her name be removed, and to date, X continues to refuse to remove her name.

132. The Daily Mail video shows Bowman sitting on a chaise lounge by his pool with what appears to be a liquor drink between his legs, filming Plaintiff. Bowman's video shows Bryant standing by the pool with his cell phone out, also filming Plaintiff as she attempts to climb out of the pool.

133. The article also contains a close-up photo of Plaintiff's face that Bryant took of Plaintiff climbing out of the pool. Therefore, Bryant either gave the photograph to the Daily Mail himself or provided the photo to Bowman and instructed him to give it to The Daily Mail.

134. Bryant and Bowman were acting with malicious intent by providing the Daily Mail with close-up photographs of Plaintiff climbing out of the pool to publicly humiliate, shame, and intimidate her.

135. Bowman and Bryant sent the video and pictures of Plaintiff to the Daily Mail to embarrass and discredit her. The video demonstrates that both men were intent on filming Plaintiff on their cell phones and viewed her as an object for their amusement.

136. Ever since Bowman revealed the plaintiff's identity on X, she has received calls and texts from reporters at CNN and The Daily Mail, asking her to comment on the allegations.

137. These calls have disrupted her life and caused her anxiety. Plaintiff is afraid to answer her phone and is scared that reporters will show up at her home or place of work.

Plaintiff's Emotional Distress

138. As a result of what Defendants did to her, Plaintiff has experienced severe emotional distress. She suffers from panic attacks, crying spells, and anger outbursts.

139. Plaintiff had to take time off work to prioritize her mental health and seek therapeutic support. The emotional fallout has been ongoing, impacting both her personal and professional life.

140. Plaintiff becomes frightened and anxious every time she sees a man holding a cell phone to take a picture.

141. One day, when she was getting out of the water at the beach, she noticed a man holding up his phone; she thought he was taking a picture or video of her. In that moment, Plaintiff experienced an intense emotional and physiological reaction, including rage, fear, and a visceral sense of violation, driven by the fear that she was being photographed or recorded without her consent.

142. Plaintiff has nightmares and frequently wakes up screaming. On various occasions, friends have told Plaintiff they heard her scream in her sleep. On a work trip, a co-worker in a hotel room across the hall texted her to see if she was ok after hearing her screams through the hallway.

143. Plaintiff frequently experiences hypervigilance in both public and private spaces, scanning for hidden cameras or men with their phones out. She finds herself scanning for hidden cameras or recording devices everywhere she goes. She struggles to interact with males at her job. Plaintiff could not finish her thesis in graduate school and had to ask for an extension, and is in counseling.

144. Defendants' actions against Plaintiff were willful, wanton, and done in reckless disregard of her rights. The Defendants' conscious failure to exercise due care constitutes willfulness; therefore, Plaintiff is entitled to punitive damages.

145. Plaintiff also seeks damages for severe emotional distress she has suffered and continues to suffer due to the Defendants' actions.

FOR A FIRST CAUSE OF ACTION
WRONGFUL INTRUSION INTO PRIVATE AFFAIRS
(DEFENDANTS BRYANT, BOWMAN, OSBORNE)

146. Plaintiff incorporates all allegations above into this cause of action.

147. Bryant, Bowman and Osborne intentionally used cameras to record Plaintiff's private parts that she expected to free from exposure.

148. Defendants wrongfully intruded into Plaintiff's personal space by taking these pictures and videos without her consent or knowledge.

149. Defendants' actions were unauthorized, unwanted, and overly invasive.

150. Defendants' intrusion would cause mental distress and injury to a reasonable person in like circumstances as Plaintiff.

151. As a result of Defendants' wrongful instruction, Plaintiff has suffered shame, embarrassment, and extreme emotional distress.

SECOND CAUSE OF ACTION
BATTERY
(DEFENDANTS BRYANT, BOWMAN, OSBORNE)

152. Plaintiff incorporates all allegations above into this cause of action.

153. Defendants willfully, wantonly, and recklessly inflicted forcible contact on Plaintiff without her permission.

154. As a result of Defendants' actions, Plaintiff has suffered mental distress.

155. The conduct and actions of Defendants constituted an intentional and offensive touching of Plaintiff to which Plaintiff did not consent.

THIRD CAUSE OF ACTION
(INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS)
(DEFENDANTS BRYANT, BOWMAN, OSBORNE)

156. Plaintiff incorporates all the allegations above into this complaint.

157. Defendants Bryant, Bowman and Osborne engaged in conduct that they were certain, or substantially certain, would cause Plaintiff to suffer severe emotional distress.

158. Bryant, Bowman and Osborne's conduct was so extreme and outrageous that it exceeded all bounds of decency.

159. Bryant, Bowman and Osborne's conduct caused Plaintiff to suffer severe emotional distress.

160. The emotional distress suffered by Plaintiff was severe so that no reasonable person could be expected to endure it.

FOURTH CAUSE OF ACTION
PREMISES LIABILITY
(DEFENDANTS BOWMAN, POMMER GROUP LLC)

161. Plaintiff incorporates all allegations above into this cause of action.

162. Bowman invited Plaintiff into his residence at 3024 Marshall Blvd, Sullivan's Island in the early morning hours of October 26, 2018.

163. Bowman lived in the residence and had control over it, as did Pommer Group LLC.

164. The residence is owned, occupied, and maintained by Defendants Bowman and Pommer Group LLC.

165. Defendants Bowman and Pommer Group LLC owed Plaintiff a duty of care to discover risks and take safety precautions within the areas of invitation.

166. Defendants Bowman and Pommer Group LLC had the duty to protect Plaintiff from foreseeable crimes, including a duty to protect her from criminal acts of third parties.

167. Defendants Bowman and Pommer Group LLC had actual and constructive knowledge that Bryant and Osborne presented a danger to Plaintiff.

168. Defendants Bowman had actual and constructive knowledge that Bryant engaged in criminal acts on other women, including taking pictures of women's private parts without their knowledge or consent.

169. It was foreseeable to Bowman and Pommer Group LLC that Bryant would commit unlawful acts against Plaintiff.

170. At all relevant times hereto, Defendants Bowman and Pommer Group LLC owed a duty of care to Plaintiff to take appropriate measures to frustrate Bryant and Osborne unlawful and immoral acts against Plaintiff on the property.

171. Bowman and Pommer Group LLC acted negligently and/or recklessly by failing to take action to stop third parties from engaging in unlawful acts against Plaintiff while she was unconscious in his home.

172. Defendants Bowman and Pommer Group LLC breached their duty of care to Plaintiff through their acts and/or omissions, which collectively, jointly, and severally constituted negligence and was a direct and proximate cause of Plaintiff's injuries.

173. Defendants Bowman and Pommer Group showed a willful and wanton disregard for the safety and privacy of Plaintiff.

FIFTH CAUSE OF ACTION
DEFAMATION
(DEFENDANTS BOWMAN AND BRYANT)

174. Plaintiff incorporates all allegations above into this cause of action.

175. Defendants published written and verbal statements to The Daily Mail and on X to impeach Plaintiff's honesty, integrity, virtue, and reputation, and expose her to public hatred, contempt, and ridicule.

176. Defendants Bowman and Bryant published statements and pictures on X and to the Daily Mail insinuating that Plaintiff was a drunk, unchaste, a liar, and damaged her professional reputation.

177. Defendants Bowman and Bryant's statements were plain in meaning and constituted defamation *per se* because they insinuated Plaintiff is unchaste and committed crimes of moral turpitude by lying about being a crime victim.

178. Plaintiff was not a public official or limited-purpose public figure at the time of publication and had no more access to channels of effective communication than any ordinary private person.

179. Plaintiff did not voluntarily assume a role of special prominence in the controversy; rather, she was thrust into controversy against her will because she was a victim of sexual assault and cooperated with law enforcement.

180. Defendants Bowman and Bryant were influenced by ill will to willfully and wantonly injure Plaintiff to discredit her to avoid criminal prosecution and civil liability.

181. Defendants Bowman and Bryant knew their statements about Plaintiff were false because they orchestrated a sexual assault on her while she was unconscious and filmed it for their own voyeuristic gratification.

182. Defendants Bowman and Bryant acted with reckless disregard for the truthfulness of their statements about Plaintiff.

183. Defendants Bowman and Bryant were not acting in good faith, nor did they have proper motives when they made these statements.

184. As a result of Defendants Bowman and Bryant's statements, Plaintiff has suffered embarrassment, humiliation, and mental anguish and seeks damages.

SIXTH CAUSE OF ACTION
(ABUSE OF PROCESS)
(DEFENDANT BRYANT)

185. Plaintiff incorporates all allegations above into this cause of action.

186. Bryant abused the legal process by filing a frivolous lawsuit on an unrelated matter against Plaintiff to harass, intimidate, and silence her from reporting what he did to her.

187. Bryant's sole purpose for filing the lawsuit was to silence Plaintiff and prevent her from telling the truth about what he did to her and avoid criminal and civil liability for his unlawful acts against Plaintiff.

188. Bryant used the court system for a purpose it was not intended for, and to gain an objective that is not a legitimate use of the process.

189. Bryant's sole purpose in filing the lawsuit is to silence Plaintiff from reporting and speaking about the unlawful acts he perpetrated against her, to avoid criminal and civil liability.

SEVENTH CAUSE OF ACTION
CONSPIRACY
(DEFENDANTS BRYANT, BOWMAN AND OSBORNE)

190. Plaintiff incorporates all allegations above into this cause of action.

191. Bryant, Bowman and Osborne planned to perpetrate several unlawful acts against Plaintiff and to inflict harm on her. They agreed to commit an unlawful act by unlawful means.

192. Bryant, Bowman and Osborne plotted to sexually assault Plaintiff while she was unconscious and to take photographs of her private parts and film the assault without her knowledge or consent.

193. Bryant, Bowman, and Osborne committed overt acts in furtherance of their agreement.

194. Plaintiff was damaged due to their agreement to commit these unlawful acts.

EIGHTH, NINTH, AND TENETH CAUSE OF ACTION
NEGLIGENCE/NEGLIGENCE *PER SE*/GROSS NEGLIGENCE
(ALL DEFENDANTS)

195. Plaintiff incorporates all allegations above into this cause of action.

196. Defendants conduct constitutes negligent *per se* because they owed Plaintiff a duty of care arising from a numerous federal and state statutes, including but not limited to S.C. Code Ann. § 16-3-654(1)(b), § 16-3-654(1)(b), § 16-3-600 (D)(1)(b) and § 16-3-730.

197. The above statutes, as well as other state and federal statute criminal statutes, created a duty owed to Plaintiff and the Defendants breached that duty.

198. The essential purpose of these statutes is to protect people who are mentally incapacitated and/or physically helpless from sexual battery. As well as protecting victims of sexual assault from potential harm and further trauma associated with having their names publicly exposed.

199. Plaintiff was a person the statute was intended to protect because she was mentally incapacitated and physically helpless when the Defendants inflicted harm on her and she is an alleged sexual assault victim.

200. Defendants' violation of these statutes proximately caused Plaintiff's injury. Defendants had a duty of care to protect the Plaintiff from the risk of harm by their actions.

201. Defendants undertook a duty to protect Plaintiff from the risk of harm when they undertook a duty to care for her when she was intoxicated and unconscious.

202. Instead of using the amount of care one would ordinarily use under the circumstances. They violated her sexually and took pictures of her private parts.

203. Defendants knew Plaintiff was intoxicated because they served her alcohol and engaged in conduct that was likely and foreseeable to cause her to be extremely intoxicated.

204. Defendants Bryant, Bowman, and Osborne departed from the recognized and generally accepted standard of care, causing injury to the Plaintiff.

205. As a result of Defendants' departure from the standard of care, Plaintiff suffered and continues to suffer injury and emotional distress.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff, seeks judgment against the Defendants as follows:

- A. Declaratory Judgment in favor of Plaintiff for all causes of action brought against Defendants in this matter;
- B. Injunctive relief requiring Defendants to refrain from defaming Plaintiff or revealing her identity on social media or to any media outlet;
- C. Award against Defendants for Plaintiff's emotional distress;
- D. Award against Defendants for Plaintiff's compensatory damages;
- E. Award against Defendants for the damage they caused to her reputation;
- F. Award against the Defendants for punitive damages;
- G. An award of the reasonable attorneys' fees and costs incurred by Plaintiff and;
- H. All applicable damages available for Plaintiff pursuant to the causes of action brought by Plaintiff; and`
- I. All such further relief as the Court deems just and equitable.

Respectfully submitted,

s/Marybeth Mullaney
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ATTORNEY FOR PLAINTIFF

May 29, 2025
North Charleston, South Carolina