

STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

GLT2, LLC,

Petitioner,

vs.

JANE DOE and JOHN DOE,

Respondents,

IN THE COURT OF COMMON PLEAS
FOR THE NINTH JUDICIAL CIRCUIT

CASE NO.: 2025-CP-10-00981

**GLT2, LLC'S MEMORANDUM IN
OPPOSITION TO PROPOSED
INTERVENOR NANCY R. MACE'S
AND JANE DOE'S MOTION TO
INTERVENE**

To: Robert J. Wyndham, Esq., attorney for Nancy R. Mace, and Marybeth Mullaney, Esq., attorney for Jane Doe.

NOW COMES Petitioner GLT2, LLC, and submit this Memorandum in Opposition to Intervenor Nancy R. Mace's and Jane Doe's Motion to Intervene.

INTRODUCTION & SUMMARY OF FACTS

Plaintiff Opposes the Proposed Intervenors' Mace and Doe's Motions to Intervene and any requests for Sanctions, but has independently elected to dismiss the pre-trial discovery Petition. Petitioner has filed a Notice of Withdrawal of Petition, in accordance herewith, which is the primary relief requested, and which renders moot arguments by proposed Intervenors. In addition to intervention and sanctions being procedurally improper, Mace and Doe come to the Court with unclean hands.

- Mace is attempting to use her alleged Congressional Immunity as both a sword and a shield. She publicizes that she is the key witness to have seen information that damns Bryant, but has not provided the information she claims to have seen. Mace is attacking and trying Bryant in the media and in the court of public opinion, accusing Bryant of alleged rape, sexual abuse, and/or the alleged recording of rape and sexual abuse, without providing sufficient information about the identities of the alleged Doe claimants or the details of each such alleged act. Mace is using her bully pulpit to leverage

South Carolina public officials into arresting Bryant, and attempting to delegitimize public officials and institutions, by threatening to sue the public officials and have the Federal government, “take over” the State of South Carolina, for not taking criminal action against Bryant, which upon information and belief would benefit the Defendant civil cases.

- Jane Doe Intervenor, on the other hand, is publicly filing claims that rely on the media bias Mace is creating in her favor, is filing Court documents that proffer Mace’s credibility and motives as a core part of Doe’s claim, all the while admitting to third-parties that Doe called her lawyers, before the filing of the Doe Complaint, and told them Doe believed, “Nancy’s making all this up”, “This is literally a lie”, that Doe doesn’t trust Mace, and that Mace is using Doe for political gain. Then Doe’s lawyers file a Complaint against Bryant, relying on Mace as a core/key witness.

Neither proposed intervenors Mace, nor Jane Doe, are proper intervenors in this matter. SCRCRCP Rule 24 only anticipates allowing an intervenor in a matter where the “disposition of an action”, would impair an interest of the proposed intervenor. Since there is no dispositive finding of fact or legal issue to be decided in the Petition, which is now being dismissed, the motion to intervene under SCRCRCP Rule 24 is now “moot.” Moreover, Mace is clearly not a potential Doe claimant and cannot articulate any genuine interest to support intervention. For her part, Jane Doe has now filed her own lawsuit pending (filed May 29, 2025), and has that action within which she might address her alleged concerns. In this new Doe suit, Doe names the Plaintiff Petitioner, GLT2, LLC. GLT2, LLC, has filed an answer through separate counsel, and has acknowledged that GLT2, LLC, is single member LLC owned by Bryant.

Petitioner’s legitimate intent in filing the Petition was to gather facts under oath and to document sworn testimony of a potential witness Wesley Donehue, regarding the credibility of Mace’s very public claims that she is the key witness¹ in a number of

¹ Mace has made multiple declarations publicly that she is the “Key Witness” in multiple Jane Doe sexual assault cases, including in her floor speech, See Ex. A; Nancy Mace Floor Speech, and see also Ex. B, NY Post, Rep. Nancy Mace accuses ‘depraved’ ex fiancé, biz partners of sexual abuse against herself, a

forthcoming Doe lawsuits. Mace has unilaterally and publicly raised her own credibility as a key issue in these forthcoming suits, since Mace claims to have viewed certain evidentiary videos and, without offering any evidence but her own representations, characterizing the videos as showing Bryant and other men engaging in rape, sexual assault, and/or the filming of rape and sexual assault of the alleged Jane Doe witnesses. Mace has likewise admitted to being the source of, if not the sole source, of information that these putative Doe claimants are relying upon in their pending civil actions. Donehue provided testimony, under oath, as set forth in the transcript, that calls into question Mace's reliability as the sole witness to characterize and describe the content of the alleged videos.

The problem facing Petitioner at the commencement of the instant matter was one deliberately created by Mace herself. Mace publicly claimed at great length that there were "dozens" of Doe claimants coming forward, but did not identify them, and did not set forth specific facts in each instance. At the time of the filing of the Petition, the names of specific Doe claimants who would come forward and file what specific claim, or upon what specific set of facts or actual evidence (apart from Mace's narratives) the alleged Doe claimants would rely to file a claim was simply unknown. All that was known for certain was that Mace was publicly alleging in the media that Mace had informed potential Doe claimants about the alleged videos, and that the Doe claimants would be coming forward against Bryant. IN so doing, Mace publicly placed her own credibility as the relator of the contents of the alleged videos at the center of the potential Doe witnesses' claims.

dozen women, in explosive speech, Feb. 10, 2025, which Mace re-posted on multiple of her social media platforms.

Prior to the Donehue deposition occurring on April 28, 2025, counsel for Plaintiff conferred with counsel for Donehue, and both believed in good faith that a resolution had been reached regarding the need for the Petition hearing to go forward, and for an Order to be rendered. Plaintiff's agreement with Donehue's counsel was that upon the receipt of a subpoena, Donehue would comply and appear for the deposition without the necessity of a Petition hearing and Court Order compelling Donehue to attend. Petitioner's good faith belief and understanding was that the lack of a Court Order meant that the Donehue deposition could move forward, but was tantamount to a fact-finding affidavit under oath, i.e. a sworn statement under oath, not subjected to cross-examination. The basis of the undersigned's good faith belief is contained in SCRCP 27 (a) (4), which specifies that taking a deposition in compliance with Rule 27 is relevant to the evidentiary issue of whether the Court will allow the deposition to be used in accordance with SCRCP 32.

On or about May 29, 2025, a Jane Doe Defendant filed suit against Plaintiff. Now that this newly identified Jane Doe has filed suit against Plaintiff in a separate action, it is highly likely that Donehue's deposition will likely be noticed in that action, Donahue will be cross-examined, and any remaining concerns of the proposed intervenors will be moot and resolved. For these reasons, the Plaintiff respectfully requests the Court to deny Proposed Intervenors' Motions to Intervene and Request Sanctions and to Dismiss the Current Action with Prejudice.

ARGUMENT

I. PROPOSED INTERVENORS MACE AND DOE'S MOTIONS TO INTERVENE SHOULD BE DENIED, BOTH AS OF RIGHT AND PERMISSIVELY.

Pursuant to SCRCP 24, a proposed intervenor may be allowed to intervene, either as a matter of right, or permissively. There are apparently no South Carolina cases on point concerning the attempt to intervene into a Petition for Pre-trial Discovery.

A. Neither Mace Nor the New Jane Doe Is Entitled to Intervention As a Matter of Right Since There Is No Disposition of a Pre-Suit Discovery Petition That Will Impair or Impede Proposed Intervenors Rights Under SCRCP 24 a (2).

Neither Mace nor Doe have standing to intervene under SCRCP 24 a (2), since there is no disposition of their rights or interests related to property or a transaction, which is the subject of the action. South Carolina Rule of Civil Procedure 24 provides for an Intervention of Right where, “[u]pon timely application, anyone shall be permitted to intervene in an action. . . when the applicant claims an interest relating to property or transaction which is the subject of the action and is situated that the disposition of the action made as a practical matter impair or impede his ability to protect that interest, unless the applicants interest is adequately represented by existing parties.” S.C. R. Civ. P. 24(a). Additionally, South Carolina Rule of Civil Procedure 24 provides for Permissive Intervention “[u]pon timely application, anyone shall be permitted to intervene in an action . . . when an applicant’s claim or defense in the main action have a question of law or fact in common.” S.C. R. Civ. P. 24(b).

Plaintiff has agreed to withdraw the Petition, and will file the appropriate Notice of Withdrawal of Petition simultaneously herewith. As such, Plaintiff’s intent will be in line with the proposed intervenor’s request to dismiss the action, and the Court should dismiss the action and deny intervenor’s motions as the most judicially efficient resolution.

SCRCP 24 is meant to promote **judicial economy**. See Berkeley Electric, 302 S.C. at 189, 394 S.E.2d at 714.

B. Neither Mace Nor Jane Doe Have Standing to Permissively Intervene, Since Neither Can Establish a Question of Law or Fact That Affects Them That Will Be Decided In the Pre-Trial Discovery Action.

If a party is not permitted to intervene as a right, an intervention may be permitted when the applicant's claim or defense and the main action have a question of law or fact in common. See *Kiawah Resort Associates*, L.P. 421 S.C. 538 at 552 (quoting S.C. R. Civ. P. 24(b)). **The burden is on the party seeking to intervene to establish that the claim and the main actions have a question of law and fact in common with the underlying action.** See *Ex parte Builders Mutual Insurance Company*, 431 S.C. at 101. They must also provide proof that their intervention will not "unduly" delay or prejudice the adjudication of the rights of the existing parties. *Id.* (holding that finding a permissive right of intervention would unnecessarily complicate the action by altering the burden of proof and possibly delaying the trial). In the case at bar, allowing an intervention would actually delay this Petition, since the most immediate and effective course of disposition is Petitioner's Notice of Withdrawal.

There are no questions of fact or law to be decided in a pre-trial discovery petition, such that either Mace or Doe can meet the burden of establishing that they have an interest in a question of law or fact, in common with the underlying Petition action, which will never have a final determination under these facts.

GLT2's Notice of Withdrawal of the Petition aligns with the intervenors' request for dismissal, rendering their motions to intervene moot and promoting judicial economy. See *Kiawah Resort Associates*, L.P., 421 S.C. 538, 552, 808 S.E.2d 525, 532 (2017) (Rule 24

intervention should avoid unnecessary complications). Jane Doe's pending lawsuit (Doe v. Bryant, 2025-CP-10-03124) provides a forum for her to address her interests, and Mace's claimed interest as a witness is adequately protected therein, eliminating the need for intervention in this proceeding.

C. Responses Specific to Mace's Motion and Arguments.

1. Mace Is Not A Real Party In Interest Concerning the Petition, Since Mace Has Identified Herself as a Key Witness.

Mace has made multiple references and allusions to the fact that she is a witness.

See, Ex. A, Floor Speech. Because of the statements made by Mace, Petitioner reasonably assumed that Mace would be a witness in any criminal or civil case arising out of the accusations and treated her as such when filing the Petition. See, Ex. A, Floor Speech: "This is what I found, **this is what I saw**, and this is what I accidentally uncovered. As you should know by now, I carry receipts. I documented some of what I uncovered, to include metadata. I found some of the victims. I found some of the witnesses. I found more than enough probable cause and then some." ." (Id.)(emphasis added.)

Mace has also indicated that she will be a key witness in the lawsuits filed by the many alleged 'victims' she has spoken with outside of the floor speech. See, Ex. C; Posts on X Referencing Being a Witness, & Ex. D; Motion to Intervene Press Release on Mace's Website. In a press release on her own website, Mace refers to herself in this very Motion as a "key witness" . See, Ex. D; Motion to Intervene Press Release on Mace's Website. Additionally, Mace has posted multiple times on her social media accounts that she is a

“key witness.” See, Ex. C; Posts on X. See also Ex. E²; PDB Podcast, June 19, 2025, at 1:17:51, “I’m the key witness because I found all of this stuff” in addition to Mace further threatening to sue Scarlett Wilson, as a key witness, in connection to this investigation into Bryant”.

2. The Suits and Claims that Bryant Sought to Defend Against, Were Those Potential Claims Brought By Then Unknown Doe Claimants, Not Mace.

On February 11, 2025, the day following her speech, Mace published the following to her X account:

- “Since my speech last night, so many calls and texts from women in our district, and men and women who may have information.” See, Ex. F; Nancy Mace’s Posts on X About Unknown Claimants.
- “When I say this is just the “tip of the iceberg” this might be an understatement. The calls and texts coming in are offering valuable information and helping to identify more possible victims- it is overwhelming.” See, Ex. F.
- “Phones have been ringing off the hook all day and night and right now as I type this. People are stepping out of the shadows to share information and help victims. More potential victims are coming forward also.” See, Ex. F.

The above posts on X are just an example of the numerous public statements made by Mace leading up to and after GLT2, LLC (hereinafter “GLT2”) filed a Petition to Authorize Depositions and Discovery Before Action (hereinafter the “Petition”). The representations made by Mace sent a clear message: multiple potential Doe claimants were about to come forward with allegations against Petitioner. But without additional information, Petitioner was unaware of how to identify or locate these potential claimants, or what facts to specify their claims would be about.

² Petitioner has filed the unofficial transcript of the podcast in lieu of the recording as Exhibit E until the Court can advise the Petitioner how to file or submit the audio recording with the Court.

3. Mace Believes She Has Immunity Under Speech and Debate Clause and the Westfall Act, and, Thus, Believes She Cannot Be A Defendant, and, Thus, Believes She Cannot Be a Real Party In Interest.

Mace implausibly suggests in her Motion that she should be allowed to intervene since she claims to be the Jane Doe in this Petition. These claims are implausible since Mace also publicly claims that all of the false publications she has made against Bryant and the other men (i.e. that the men are rapists, sexual abusers, video record rape and sexual abuse) are all claims protected by the Speech and Debate Clause and the Westfall Act, and, according to Mace, she is immune from the same. Mace can't have it both ways. In order to successfully argue that she is the Jane Doe in this Petition, she must concede that she is, either not protected by the Constitution's Speech and Debate Clause, and the Westfall Act, for each and every one of her false publications alleging that Bryant raped, sexually abused, and/or illicitly video-taped sexual abuse, such that she is not immune for each of those publications. If Mace claims immunity for her allegations, then she must also be estopped from claiming she has standing to intervene as Jane Doe as a real party in interest and potential defendant.

4. Mace's Concerns About Her Reputation From Media Publicity Are Disingenuous, As She Has Voluntarily Placed Her Credibility and Motives At The Center of Public Debate.

Mace's concerns about reputational harm from the Donehue deposition are overstated, due to her public statements have already placed the core issue of her credibility and motives as a key witness in the public domain. For example, Mace's February 10, 2025, House floor speech (Ex. A), X posts (Ex. C), and press release (Ex. D) identify her as a "key witness" in potential Doe lawsuits, inviting public scrutiny of her communications. These statements necessitated GLT2's Rule 27 petition to investigate potential claimants, as Mace's allegations about "dozens" of women (Ex. F) provided no

specific identities or claims. As a public official, Mace has a reduced expectation of privacy regarding her public actions, particularly when using her congressional platform to discuss these matters. See *Hutchinson v. Proxmire*, 443 U.S. 111, 134-35 (1979).

If Mace, a public official, were truly concerned with her reputation, Mace would not have so publicly placed herself and her congressional office in the middle of the investigation of Bryant and/or into the alleged claims of the dozens of putative Doe claimants. Mace has attempted to try the Plaintiff, on behalf of the potential Doe claimants, and in the court of public opinion, and she is using her position as a public official to crack down on viewpoints, opinions, and witnesses, whose views do not align with her own, or with the representations she so publicly makes.

Mace's media theatrics cast further doubt on her credibility, in that it appears she is attacking other public officials to further her own future election goals, and to leverage elected officials into punishing her perceived enemies, like Bryant. Mace has publicly accused the Attorney General Alan Wilson and the Solicitor Scarlett Wilson of corruption in connection with the investigation into Bryant and the other men, and has asked the United States Federal Government to "take over" the State of South Carolina in order to apparently use her Congressional position to force South Carolina elected leadership to charge Mr. Bryant with a crime. See also Ex. E; PDB Podcast, June 19, 2025, where Mace publicly threatens Solicitor Wilson in relation to this very matter with Bryant:

I just want you to do your job, follow the law, and put people in jail who've broken it. And you just can't. She doesn't want to prosecute rape cases. And there's a history of that in her office. She doesn't believe the witnesses. And she's got a political bias against me. Unfortunately, I'm the key witness in all this stuff. But she's got a political bias against me. And Scarlett Wilson, I hope you're listening, I believe you can be sued. I don't believe you can be protected by qualified immunity because of the way you have inserted yourself into this investigation and have obstructed the investigation", Ex. E at 1:17:36 - 1:18:01.

Later in the same podcast, Mace claims she has taken formal action to ask the Federal Government to “take over” the State of South Carolina’s sovereignty, presumably by military force, insinuating that she, as an elected federal official, can compel the prosecution of Bryant, in this same matter that she is also the “key witness” in.

I need the feds to come in and take over our state. (1:08:49) Because what happens is, you know, we have a legislature filled of lawyers. (1:08:53) They elect the judges. (1:08:54) And then the lawyer legislators and other lawyers, they fund the campaigns for the Attorney General. (1:09:00) They fund the campaigns for the solicitors. (1:09:02) In fact, the solicitor working on a case that I am a key witness in right now, her last big fundraiser was headlined by the attorney for two predators who are being investigated by law enforcement. (1:09:12) Evidence has been leaked to these guys, you know, and so the system is just so corrupt. (1:09:17) There's I don't think anything going. (1:09:18) You can't go back. (1:09:19). I need the feds to come in and take over the state. (1:09:22) That's what needs to happen.

I'm going to be begging the feds. (1:20:51) I'm working on it. (1:20:52) It's a really long letter. (1:20:53) It's taken a while. (1:20:54) But somebody's got to take over the state and make right what's been so wrong in South Carolina. See Ex. E.

In addition to Mace repeatedly making outlandish media claims designed to unduly pressure elected officials, these allegations are a blatant violation of both South Carolina’s state sovereignty rights and the principles of federalism, both of which are long-held traditions in an independent South Carolina. See Ex. E; PDB Podcast.

D. Specific Responses to Jane Doe Arguments.

1. Doe's Intervention Precluded by Prior Action Pending.

Jane Doe’s Motion to Intervene is barred by the prior action pending doctrine under SCRC Rule 12(b)(8), as her lawsuit filed on May 29, 2025 (Doe v. Bryant, GLT2, LLC, et al., 2025-CP-10-03124), names GLT2 and addresses substantially similar claims to those raised in her Motion to Intervene (Ex. H). South Carolina courts dismiss actions when another case involves the same parties and claims. See Capital City Ins. Co. v. BP Staff, Inc., 382 S.C. 92, 105, 674 S.E.2d 524, 531 (Ct. App. 2009). In South Carolina,

dismissal under Rule 12(b)(8) may be proper when there is (1) another action pending, (2) between the same parties, (3) for the same claim." *Capital City Ins, Co. v. BP Staff, Inc.*, 382 S.C. 92, 105, 674 S.E.2d 524, 531 (Ct. App. 2009). This rule is interpreted "narrowly such that the claim must be precisely or substantially the same in both proceedings in order for the drastic remedy of dismissal to be appropriate under Rule 12(b)(8)." *Id.*

Doe's complaint filed in May 2025 confirms Petitioner's prior assumption that Mace is the primary relator to any alleged Doe of any allegations of rape, sexual assault, or recording of rape or sexual assault (Ex. H, para. 92-96). This disclosure in the Doe Complaint came months after GLT2 filed the petition on February 10, 2025, supporting GLT2's lack of knowledge about her identity at the time. Doe's pending lawsuit provides a forum to address her interests, rendering intervention redundant and contrary to judicial economy. See *Kiawah Resort Associates, L.P.*, 421 S.C. 538, 552, 808 S.E.2d 525, 532 (2017).

Jane Doe filed an Amended Complaint on June 10, 2025, naming Petitioner and alleging substantially the same claims that are contained in this instant Motion. See Ex. H; Amended Complaint of Jane Doe vs. Bryant, GLT2, LLC, et al. 2025-CP-10-03124. The original Jane Doe complaint was filed on May 29, 2025. Upon information and belief, the same Jane Doe filed the current Motion to Intervene after the above Complaints, on June 26, 2025. Thus, Jane Doe's Motion to Intervene should be barred under the doctrine of Prior Action Pending.

2. Jane Doe Intervenor Admits That Mace's Credibility Is a Core Issue In the Case that Prior Pending Action that Doe Has Filed.

Upon information and belief, Jane Doe Intervenor is the same Jane Doe in Jane Doe vs. Bryant, GLT2, LLC, et al. 2025-CP-10-03124. After Donehue gave his deposition in this matter involving John Doe and Jane Doe, which occurred on April 28, 2025, the first Doe claimant publicly filed suit against Mr. Bryant on May 29, 2025, identifying herself as one of the dozens of Doe claimants Mace had been contacting and publicly identifying, without naming them. The May 29, 2025, Doe Complaint sets forth that Mace was a key witness in her case. See Ex. H; Doe v. Bryant, et. al., 2025CP1003124, para 10, citing Mace's House Floor Speech "*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*". The Doe Complaint is full of allegations and assertions taken from the first-person, subjective perspective of Mace, thus, making it clear that Doe is working closely with Mace, and, thus, Doe is in position to adequately represent and protect the interests of Mace. SCRCMP allows the Court to deny a motion for interventions when, "the applicants interest is adequately represented by existing parties." S.C. R. Civ. P. 24(a)

Additionally, in Jane Doe's complaint, Mace is the sole person acknowledged as the source of the allegations found within the complaint. See Ex. H; Doe v. Bryant, et. al., 2025-CP-10-03124, para 92- 96, "*Mace told her [Jane Doe] that she [Mace] had found a video on Bryant's phone of her being sexually assaulted...She [Jane Doe] had no prior knowledge of the assault or that such a video existed.... Plaintiff did not know or have reason to know that she had the legal claims outlined in this complaint until April 6 [date Jane Doe was contacted by Mace]....*".

However, an affidavit ADW gathered from Erin Gunther in a related case illustrates broader issues with Doe's reliance on Mace. Assignment Desk Works brought a complaint for breach of contract, violation of a non-disparagement provision against a former ADW employee/defendant. See Complaint in ADW v. Doe³ 2025-CP-10-02671. In a Motion to Dismiss filed by the former ADW employee/defendant, the ADW employee/defendant acknowledged having claims against Bryant that appear to align with those claims brought in Doe v. Bryant, et. al., 2025-CP-10-03124. While Petitioner cannot confirm that former ADW employee/defendant in 2025-CP-10-02671 is the same person as the Plaintiff Doe in 2025-CP-10-03124., and as the Doe Intervenor in this case, Petitioner will treat them as the same person for the purpose of this brief, due in large part to what appears to be the same counsel making appearances for Doe and former ADW employee.

The Gunther affidavit, states that a former ADW employee, who may or may not be Jane Doe, expressed doubts to her lawyer about Mace's credibility, alleging that Mace was "making this all up" for political gain (Ex. N, Gunther Affidavit). The Gunther affidavit underscores the necessity of the Donehue deposition to investigate Mace's credibility as a key witness, supporting GLT2's good faith effort to prepare for potential claims. This inconsistency undermines Doe's equitable claim to intervene or seek sanctions, as Doe's reliance on Mace appears conflicted.

Fact-finding and documenting witnesses under oath is key to Parties being able to perform reasonable fact-finding research to determine the credibility of key witnesses. Eric Bowman, a business associate of Bryant's, and a one-time friend of Mace's produced

³ Doe is named in this Complaint but out of respect, Petitioner will refer to her as Jane Doe.

an affidavit, in connection with Mace's pending suit against him. See Ex. I; Bowman Affidavit, May 28, 2025. The Bowman affidavit states that, on or about November 24, 2023, Mace was begging Bowman for incriminating data or evidence against Bryant, saying, "She begged me to provide such data and said she was building a case against him to ruin him [Bryant]". Obtaining the Donehue sworn testimony allowed other witnesses to compare reliable information and truthfully attest to further information, in order to prepare for the current pending actions. Thus, neither Mace nor Doe are prejudiced, since the credibility of Mace as a key witness will clearly be a central evidentiary matter in any current or future Doe suit filed.

3. Jane Doe Intervenor Substantiates That Plaintiff Did Not Know the Identity of the Potential Jane Doe Claimants When the Petition Was Filed.

At the time GLT2, LLC filed the Petition to Authorize Depositions and Discovery Before Action on February 10, 2025, it had no knowledge of the specific identities of potential claimants, including the former ADW employee/defendant/Doe in the lawsuit filed on May 29, 2025 (Jane Doe v. Bryant, GLT2, LLC, et al., 2025-CP-10-03124). Proposed Intervenor Nancy Mace's public statements, including her February 10, 2025, House floor speech (Ex. A) and X posts on February 11, 2025 (Ex. F), alleged that "dozens" of women were preparing to file lawsuits against Petitioner's sole member, Patrick Bryant, without providing names, specific allegations, or factual details. For example, Mace stated, "Phones have been ringing off the hook... People are stepping out of the shadows to share information and help victims" (Ex. F). Faced with this uncertainty, GLT2 used "Jane Doe" and "John Doe" placeholders in the petition, as permitted under SCRCP Rule 27(a)(1) when adverse parties' identities are unknown. The filing of Jane Doe's lawsuit, over three months after the Petition, confirms that GLT2 could

not have known Doe's identity or specific claims at the time of filing, as the specifics of Doe's identities and the specifics of the particulars of her legal action against Bryant were unknown and the details unanticipated.

Jane Doe further solidifies that Petitioner did not know who the parties were at the time the Petition was filed in her motion to intervene. In this motion, Jane Doe's counsel states the following: "Ms. Doe and Mace could be the expected defendants; however, according to the Petition, the expected defendants are residents of Charleston County, and neither Ms. Doe nor Mace is a resident of Charleston County." See, Ex. J; Proposed Intervenor Jane Doe's Proposed Intervenor's Motion to Expedite Hearing on Her Motion to Intervene, Motion to Dismiss, and Request for Sanctions. Given that Jane Doe later filed suit against the Petitioner, it is clear that the Petitioner was unaware of exactly who the potential Doe claimants would be.

Mace's concerns about reputational harm from the Donehue deposition are overstated, as her public statements have already placed her credibility as a key witness in the public domain. For example, Mace's February 10, 2025, House floor speech (Ex. A), X posts (Ex. C), and press release (Ex. D) identify her as a "key witness" in potential Doe lawsuits, inviting public scrutiny of her communications. These statements necessitated GLT2's Rule 27 petition to investigate potential claimants, as Mace's allegations about "dozens" of women (Ex. F) provided no specific identities or claims. As a public official, Mace has a reduced expectation of privacy regarding her public actions, particularly when using her congressional platform to discuss these matters. See *Hutchinson v. Proxmire*, 443 U.S. 111, 134-35 (1979).

II. MOTION TO IMPOSE SANCTIONS SHOULD BE DENIED.

A. Sanctions Are Moot As the Petition Is Withdrawn, and the Proposed Intervenors Are Not Prejudiced, Since a Deposition of Donehue Under Cross-Examination May Be Taken In The Prior Action Pending Lawsuits Filed by Mace and Doe.

Now that Jane Doe has identified herself as a claimant, Petitioner is willing to dismiss the current petition for discovery. The purpose of this petition was to preserve evidence and attempt to identify potential adverse parties. See, Ex. K; GLT2, LLC, Petition to Authorize Depositions and Discovery Before Action. This is no longer necessary now that Jane Doe has identified herself by serving the Petitioner with a complaint, and the Petitioner can obtain discovery through the discovery process in that suit.

GLT2's counsel did not disseminate the uncertified Donehue deposition transcript to the media, and the intervenors provide no evidence linking GLT2 to the leak. The claimed reputational harm is speculative, and Mace's own public statements, including her X posts (Ex. C) and press release (Ex. D), already placed her credibility and communications in the public domain, reducing her expectation of privacy. Any harm from the leak aligns with Mace's self-initiated media exposure, not GLT2's actions.

To the extent that Doe relies so heavily on Mace as her key witness in the Complaint filed against Bryant, the fact that Doe Intervenor has published to third-parties and her own counsel that, "Nancy is making all this up". Clearly, Doe anticipates that Mace will be deposed as a "key witness" in any one of these Prior Pending matters, and then, certainly, any identified witnesses concerning Mace's credibility and motives, like Donehue, will be deposed in those cases as well.

B. There Is No Prejudice, and Proposed Intervenors Come to the Court With Unclean Hands.

The determination of whether attorney's fees should be awarded under Rule 11 or under the Act is treated as one in equity. *In re Beard*, 359 S.C. 351, 357, 597 S.E.2d 835, 838 (Ct. App. 2004), cited by *Southeastern Site Prep, LLC v. Atl. Coast Builders & Contrs., LLC*, 394 S.C. 97, 104. Any party, or potential party, will be able to take the deposition of Donehue, under cross-examination, and the trial court in those cases will be able to decide to what extent any prior sworn testimony or statements of Donehue may be used, therefore, there is no prejudice to either party. Further, it would be inequitable to award any attorneys fees or sanctions to either proposed intervenor, since the Parties requesting them have acted inequitably and have created the very situation of which they complain.

1. *It Would Be Inequitable to Reward Mace For Using Her Congressional Position As Both a Sword and a Shield Against Bryant.*

First, Mace is using her Congressional position as both a sword and a shield against Petitioner. Mace has very publicly used her position in Congress to garner media attention, appointing herself as the key witness in the allegations against Bryant and his business partners. For months, Mace has been using her public office to try a case against Bryant and his business partners in the media, and in the court of public opinion, yet has done so simply alluding to dozens of unidentified alleged victims, vaguely referencing unspecified crimes that are being investigated by SLED, publicly leveraging her political clout to attempt to manipulate state officials to take action against Bryant, and/or to set the public officials up to delegitimize them in the media, if they disagree.

As a result of Mace's public statements, SLED has inserted into the public that Bryant is under investigation by SLED, a fact that SLED only admitted when confronted by the Media after Mace's House Floor Speech. Mace has been utilizing her bully pulpit

to publicly pressure SLED, Attorney General Alan Wilson, and Charleston County Solicitor of the Ninth Circuit Scarlett Wilson, into arresting Patrick Bryant. The undersigned has personally heard interviews and statements by Mace:

- Calling Alan Wilson and Scarlett Wilson corrupt in regards to the investigation of Bryant;
- Threatening to sue Scarlett Wilson in connection with the investigation into Bryant; and
- Threatening to cause the Federal Government to “take over” the State of South Carolina, in the context of the investigation into Bryant.

See Ex. E; PDB Podcast, June 19, 2025. Mace trying Mr. Bryant in the media, and in the court of public opinion, attempting to leverage public officials to do Mace’s bidding, and alternatively attempting to delegitimize South Carolina’s government institutions and elected officials if they failed to take the various actions against that Makes demands is an inequitable abuse of her office and power.

In using her position as a sword, Mace has intentionally and publicly made her own credibility and motives, as the key witness, a core issue of any case brought forward by a Doe claimant. This also means that Mace has made her role in prosecuting the case to the media, via her congressional seat, an equally relevant and public issue, such that she has no real expectation of privacy. As an elected public official, Mace has almost no expectation of privacy regarding the details of her interactions with congressional staff (Donehue). However, when Mace intentionally uses her congressional office to prosecute Petitioner in the media as a predator, she lost any remote expectation of privacy as to her interactions and communications with congressional staff, who are paid for with tax-payer dollars and/or with political donations, particularly when Mace and Donehue have been

public battling each other in social media for months. See Doe Motion to Intervene, ppg. 8-9, Twitter posts between Donehue and Mace.

However, after using her congressional position as a sword, Mace then immediately uses that same congressional position as a shield, claiming she is immune from any civil recourse by the Speech and Debate Clause of the Constitution and the Westfall Act. See Ex. M, July 11, 2025, Post and Courier, *Can US Rep Nancy Mace be shielded from a defamation suit? A judge will have to decide*, quoting government court filings on behalf of Mace as saying, "Even if the Congresswoman and Doe Defendants had an additional motive in delivering the speech, releasing the speech to the press, hanging the poster near her Congressional office, giving a media interview, or posting on social media about the speech, that does not take the alleged conduct outside the scope of their employment under South Carolina law", the filing states.

Mace will not admit on the record in this proceeding that her communications and interactions with Donehue about Bryant and the alleged recordings she discovered were so "personal, that they were not part of the course and scope her role with Congress, since doing so would be an admission that she does not have civil immunity. "Finally, "[w]here the conduct of the servant is unprovoked, highly unusual, and quite outrageous," courts tend to hold "that this in itself is sufficient to indicate that the motive was a purely personal one" and the conduct outside the scope of employment." See *Sawyer v. Humphries*, 322 Md. 247, 257, 587 A.2d 467, 471 (1991).

Simply put, Mace cannot, in equity have it both ways. Mace's claims that she was a potential Doe defendant in the Petition is dubious and disingenuous, running counter to her public positions. It is inequitable for Mace to claim that she is the envisioned Doe

Defendant and, thus, she should be collaterally estopped from claiming the same in this Motion to Intervene. The allegations, statements or admissions contained in a pleading are conclusive as against the pleader and a party cannot subsequently take a position contradictory of, or inconsistent with, his pleadings and the facts which are admitted by the pleadings are taken as true against the pleader for the purpose of the action." Postal v. Mann, 308 S.C. 385, 387 (Ct. App. 1992). "Parties are judicially bound by their pleadings unless withdrawn, altered, or stricken by amendment or otherwise". Id.

2. *It Is Inequitable To Reward Jane Doe For Filing Motions That Feign Outrage At Donehue Testimony Regarding Mace Credibility, When Doe Admitted Mace Is a Liar, And Admitted That Doe Told Her Lawyers, Mace is "Making This All Up".*

Second, Jane Doe Intervenor is inequitably using Mace's credibility and congressional office as a sword and a shield. It is unclear if Jane Doe Intervenor, Jane Doe Claimant, and the ADW former employee who disparaged Bryant and ADW are the same person, but if she is the same person, then she is inequitably riding the coat tails of Mace's prosecution of Bryant in the media and inequitably proffering Mace's credibility as a crucial part of Doe's case. Simultaneously, and disingenuously, Doe is telling third-parties and her own lawyers that Doe thinks Mace is a liar and that, "Nancy's Making This All Up". Yet, despite this knowledge of Doe's belief about Mace's credibility, Doe's lawyers filed suit against Bryant, ADW, and GLT2, LLC, and filed this Motion, proffering Mace's credibility and attacking Petitioners for documenting witness testimony that conflicts with Doe's own true admitted beliefs.

GLT2, LLC and ADW have overlapping counsel in Saxton & Stump, in cases 2025-CP-10-02671 and 2025-CP-10-03124. Fact-finding in the ADW case that Saxton & Stump has filed against the former ADW employee/defendant (2025-CP-10-02671) has resulted

in an affidavit, signed on May 9, 2025, by ADW employee Erin Gunther, who had a conversation with the former ADW employee/defendant in the ADW case. See Ex. N, Affidavit of Erin Gunther from ADW case.⁴ According to Gunther's affidavit, The former ADW employee/defendant, who may be this Jane Doe, makes allegations against Bryant in her Motion to Dismiss in 2025-CP-10-02671 that are substantially similar to those in the *Doe v. Bryant, ADW, GLT2, LLC* case 2025-CP-10-03124, concerning alleged video evidence of an alleged sexual assault against Doe, that Mace told Doe about. Therefore, while Petitioner does not know if Doe and former ADW employee/defendant are the same, Petitioner will, for purposes of this Memo, assume they are the same person.

Specifically, in the Gunther Affidavit, See Ex. N, Doe/former ADW employee/defendant admits she has never seen the alleged video, stating, "I haven't seen the video" and "Nancy doesn't have it, she [Mace] just told me what she saw." This places Mace's credibility about the contents and context of the alleged video into direct issue. Doe then told Gunther, "I don't know what to believe or who to trust . . . I called my lawyer last week and told them, 'Nancy's making all this up. This is literally a lie so she can get in some political position". See Ex. N, Affidavit of Erin Gunther from ADW case.

Assuming the former ADW employee/defendant is the same person as Doe Intervenor, which is still unknown by the undersigned, this underscores the difficulty of how Mace and Doe's own unclean hands hamper Mr. Bryant's defense and the job of his counsel. Specifically, Jane Doe has filed a suit which clearly makes Nancy Mace the central key witness in the case. The Doe Complaint contains so many subjective

⁴ To the extent that Jane Doe Intervenor has not confirmed that she is the same person as the former ADW employee in the ADW suit, the Gunther Affidavit gathered in the ADW suit, and which will likely be exchanged in discovery in that suit, and referenced as Ex. N to this Memorandum, has been redacted heavily for filing herewith.

allegations by Mace, that it appears Mace cowrote the Complaint with Doe. Yet, if the affidavit of Gunther is to be believed, and if the former ADW employee/defendant is the same person as Jane Doe Intervenor, then Doe, herself, has expressed to her own lawyer that Mace, a key witness, is "making all this up" and that "This is literally a lie so she [Mace] can get in some political position". See Ex. N, Gunther Affidavit. Yet, despite knowing this, Doe is working with Mace to attack Bryant publicly in the media, all the while leveraging Mace's credibility in Doe's own Court filings.

More importantly, the Court addresses the issue of sanctions and attorneys fees in equity. If Gunther is to be believed, and if the former ADW employee/defendant is the same person as Jane Doe, and if that lawyer is the same lawyer representing Doe Intervenor in this action and in the Jane Doe civil suit, then Jane Doe and her lawyer's outrage in their pleadings and motions is feigned and dubious and would clearly place both Mace and Doe in an inequitable position to attempt to intervene into this Petition and to seek sanctions, hereunder.

C. Conferring With Counsel, Under Rule 11 Would Have Been Futile, Since Mace Could Not Be Jane Doe, And Since the Identity and The Specific Allegations of Jane Doe Defendants, Had Not Been Disclosed, Making It Impossible to Plead Specific Enough Facts to Even Appoint Counsel for Doe.

The Court does not abuse its discretion to refuse sanctions for failure to consult with counsel, if the attempt at consultation would be futile. Rule 11 requires "all motions filed shall contain an affirmation that the movant's counsel prior to filing the motion has communicated, orally or in writing, with opposing counsel and has attempted in good faith to resolve the matter . . . unless the movant's counsel certifies that consultation would serve no useful purpose, or could not be timely held." The penalty for noncompliance is

to strike the motion unless the attorney promptly amends the document to comply with the rule. *Jackson v. Speed*, 326 S.C. 289, 310.

In Mace's Motion to Intervene, opposing counsel seems to have taken the position that the filing of the Petition was merely a pretext to elicit deposition testimony without this Court's approval and that "Petitioner was fully aware of the individuals and subject matter he intended to probe." See, Ex. L; Mace's Motion to Intervene. Opposing Counsel also alleges that: "[r]ather than identifying her [Mace] or any other interested individuals as parties to the proceeding, however, GLT2 concealed the true nature of the dispute by naming only "John Doe" and "Jane Doe" as putative defendants." See, Ex. L; Mace's Motion to Intervene.

As set forth in detail above, Mace does not actually believe that she can be a putative Defendant, since she claims immunity under the Speech and Debate Clause of the Constitution and the Westfall Act, and therefore, must be collaterally estopped from claiming otherwise. Moreover, at the time of the filing of the Petition, Doe claimant's counsel was relying on Mace to prosecute Bryant in the media and the court of public opinion, without having to disclose her identity and/or any specific facts about her claim, all the while doubting Mace's own credibility to her lawyers – lawyers who then later file pleadings with the Court proffering Mace's credibility, despite actual knowledge from their client otherwise.

Thus conferring with counsel under Rule 11, even Court-appointed counsel, would have been futile, since so little was known at the time of filing the Petition, about the identity of which Doe was a claimant, or about the substance of those claims. Petitioner, did however, confer with Donehue's counsel, and attempted to gather facts which could

have been used to amend the Petition, had Jane Doe complainant not filed suit, rendering the Petition moot.

D. Petitioner Used the Best of Knowledge and Belief That There Is Good Ground To Support The Petition, At The Time It Was Filed, And That Imperfections In the Petition Could Be Cured by an Amended Petition, Prior to a Rule 27 Hearing, In Order For Depositions to Later Satisfy Rule 32.

"The signature of an attorney . . . constitutes a certificate by him that he has read the pleading, motion or other paper; that *to the best of his knowledge, information and belief there is good ground to support it*; and that it is not interposed for delay." (emphasis added). *Kilcawley v. Kilcawley*, 312 S.C. 425, 427. Counsel for Petitioner has submitted an affidavit submitting that Petitioner had good grounds for believing that Mace's self-publicized role as a key witness in unidentified Doe cases, based upon non-specific allegations of rape, sexual abuse, and filming of rape and sexual abuse, and how the lack of specific information available about the identity of potential Doe claimants, and/or the specifics of those claims, placed Petitioner in an impossible position, where counsel made the best use of the rules that were available. See Affidavit of Brewer.

Petitioner had a good faith belief that full compliance with SCRCP Rule 27⁵, i.e. obtaining the deposition after hearing by the Court on the Petition, would simply go to whether the deposition could be used under SCRCP 32 (a), as per the plain language of SCRCP Rule 27 (4). Nothing SCRCP 27 prohibits counsel for Petitioner and counsel for deponent to reach an agreement for the witness to give sworn testimony without Court Order. While there are no current cases on point addressing this issue, the State of Texas does have a somewhat similar rule for pre-suit depositions, called Rule 202 depositions.

⁵ In fact, had Donehue originally consented to sit for a deposition, Plaintiff could have obtained his sworn testimony without filing of a Petition.

See 47 Tex. Prac. Discovery Practice Sec. 16:7 states that trial courts may restrict the use of 202 depositions in subsequent actions to protect a person not served with notice of a deposition from a claim of unfair prejudice, which is consistent with Petitioner's interpretation of SCRCP 27.

Mr. Donehue was represented by counsel. Mr. Donehue's counsel clearly understood that a hearing and a Court Order had not been obtained, and yet Mr. Donehue showed up to give his testimony regardless. The testimony given under oath by Mr. Donehue is no different than an affidavit given under penalty of perjury. The defects in the deposition testimony claimed by the proposed intervenors goes to the admissibility of the Donehue deposition in any subsequent action, not to the ability of Donehue to give a sworn statement under oath.

Given the lack of information known to Petitioner at the time of filing, Petitioner's counsel knew, to the best of his knowledge, that there were good grounds for filing the Petition, and attempting to gather enough information to potentially amend the pleading. Counsel for Donehue believed that Rule 27 did not prohibit the issuance of a subpoena, and that, if counsel for Donehue was willing to agree to accept and comply with an issued subpoena, was willing to have his testimony preserved in the form of a deposition, without the need for a Notice of Deposition perfected by a Court Order, which in the undersigned counsel's good faith belief, rendered the deposition equivalent to an affidavit, and subject to being challenged for use in any future proceeding under SCRCP 32. See Affidavit of Brewer.

Subsequent to the filing of the Petition, the other civil litigation that was filed over an approximately one month period, around May, 2025, which in and/or itself informed

Petitioner about known information and changed the landscape of the need to amend the Petition at all, due to other vehicles for discovery. In connection to litigation with Nancy Mace, Bowman produced an affidavit that questioned Mace's credibility and motives. See Ex. I, Bowman Affidavit. The ADW suit versus former ADW employee/defendant Doe, produced another affidavit establishing that Doe herself does not believe Mace and that Doe personally believes, "Nancy's Making all this up". See Ex. N Gunther Affidavit. And Doe filed a separate civil action against Bryant and others confirming that Doe is relying on Mace for the content of any alleged recordings taken by Bryant.

E. Filing of the Petition Has Caused No Delay, and, Thus, No Prejudice to the Court or to Any Proposed Intervenor.

A trial court may impose sanctions on a party, a party's attorney, or both for filing a pleading, motion, or other paper to cause delay or when no good grounds exist to support the filing. See Runyon, 322 S.C. at 19, 471 S.E.2d at 162, *Ex parte Bon Secours St. Francis Xavier Hosp. Inc.*, 393 S.C. 590, 597-598. In the cited case, sanctions were awarded when the disputed action cost the Court, Parties, and Attorneys actual out of pocket expenses, in a case where opposing counsel represented parties actually in the case, in a case actually set for trial. Here, there are no such concerns. None of the proposed intervenors are in this case, the current date for the hearing on this matter was the date of Petition hearing, and Petitioner is filing a Notice of Withdrawal of the Petition, which is the relief sought. Withdrawal of the Petition is actually the most efficient resolution and the proposed intervention, actually seeks to delay the disposition of the Petition.

CONCLUSION

For the reasons set forth in this brief and in oral argument, the Plaintiff requests this Court grant its Notice of Withdrawal of the Petition and Deny the Motions for Intervention and Sanctions.

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July 14 , 2025
Charleston, South Carolina

TITLE

Iron Sharpens Iron

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INTRO

Mr. Speaker I rise today ready to call out the cowards who think they can prey on women and get away with it.

Today I'm going scorched earth.

So, let the bridges I burn light our way forward.

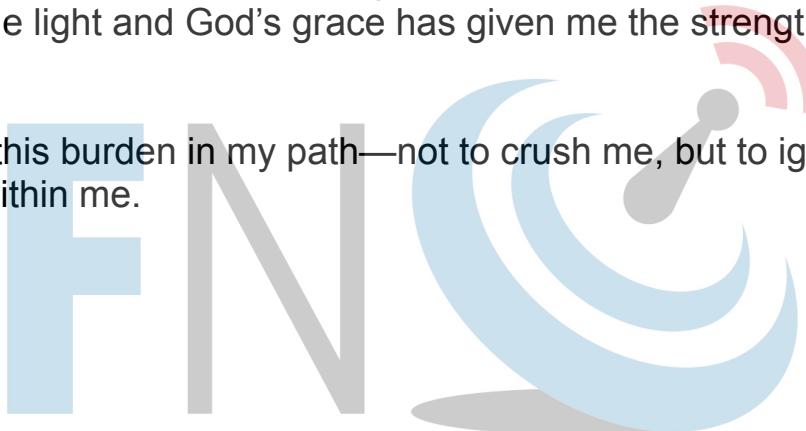
As in many areas, God's word has given me wisdom. God's love has shown me the light and God's grace has given me the strength to be here today.

God placed this burden in my path—not to crush me, but to ignite something within me.

A purpose.

A calling.

A responsibility.



And Courage, which I'm using today.

My purpose is to make sure these women will never be forgotten, and the men who hurt them will never be allowed to get away with it or hide again.

God uses Imperfect people to carry out his perfect plans. I ask God to fill me up, to be his vessel. To use me for His purpose in this moment.

I ask for His protection as I expose the devil's hand today.

[ANECDOTE Jeremiah 6:16]

[MLK ANECDOTE]

BIBLE

I am going to place my hand on this Bible. I swear to tell the truth, the whole truth and nothing but the truth, so help me God.

Today I am going to free myself from the monster who broke me.

Today I will free other women who fell prey to the same man.

Today I will free other women further from a group of men who committed the most evil acts against them.

I want every woman and girl to know, you have a friend and a sister in me.

And I will fight like hell for you!

PREDATORS

We must never tolerate abusers masquerading as men of character.

Abuse doesn't discriminate.

Abuse doesn't care if you're a Republican or a Democrat.

Abuse doesn't care who you are, or where you come from, how strong you are or what title you hold.

I'm living proof - even as a member of Congress - I found myself face-to-face with the darkest corners of humanity.

You really think you know someone, until you don't.

In November 2023, I accidentally uncovered some of the most heinous crimes against women imaginable—rape, nonconsensual photos and videos of women and underage girls, and the premeditated, calculated, exploitation of innocent women and girls in my district.

Today you will hear about the depraved men behind these gutless, evil acts.

These men didn't just harm their victims; they recorded their depravity as if it were a badge of honor.

When I uncovered evidence of rape, illegal filming of women, illegal photographing of women, and sex trafficking, I didn't just see victims—I saw a system which failed to protect them.

I saw criminals who thought they could get away with it because no one had the guts to call them out or hold them accountable.

I will burn this system to the ground if I have to.

These men aren't just criminals—they're predators.

These predators are not untouchable.

These predators are not invisible.

These predators are not invincible.

And today, their names will be tied to their crimes and their cowardice, FOREVER.

SAY THEIR NAMES

Let me say their names for the record, in alphabetical order:

1. Eric Bowman of Sullivan's Island, South Carolina
2. Patrick Bryant of Isle of Palms and Mt. Pleasant, South Carolina also goes by Brendan Patrick Bryant
3. Brian Musgrave of Fort Mill, and Isle of Palms, South Carolina
4. John Osborne of Charleston, South Carolina

I would never allow any woman or underage girl anywhere near any of you.

SEX TRAFFICKERS

When you and your business partners incapacitate women, it's against the law.

When you and your business partners sexually assault women, it's called rape.

If you film women naked without their knowledge, permission or consent, it's called voyeurism and it is illegal.

When you and your business partners pay each other, and you're sexually abusing women, you are by definition a sex trafficker.

Witness intimidation is also illegal.

ONE WAY TICKET TO HELL

To Eric Bowman, Patrick Bryant, Brian Musgrave, and John Osborne this is your pilot speaking.

You've booked yourself a one-way ticket to hell. Nonstop. No connections.

So I, and ALL of your victims, can watch you rot for an eternity.

Today is Justice.

THE LEAST OF MY WORRIES

Truth has a way of rising, no matter how deeply you try to bury it.

On the night of October 30, 2023 I received a text message with screenshots showing my then fiance, Patrick Bryant, active on a dating app.

In South Carolina, politics is a bloodsport. I thought this was your usual run-of-the-mill political game. I thought this was a joke.

After more women came forward, I realized this was not for laughs.

When I confronted Patrick Bryant 4 days later on November 3rd, the first thing he did was put his phone in his safe, **just like this one**, and lock it.

Soon after, I learned the dating app was the least of my worries.

LEGAL ACCESS TO PATRICK BRYANT PHONE

Two days later Patrick Bryant put my thumbprint on his phone and gave me the four digit code to his safe.

The night I was given legal access to his phone, I opened it for the first time, and what I discovered shook me to my core.

I saw a video of a woman who was incapacitated and she was being raped.

I found some photos of what appeared to be a teenager undressed, in the kind of underwear a child would wear. To me, her facial expression looked nervous.

I saw a video of another woman who was naked, clearly on a hidden camera, unaware she was being filmed.

She was slender. She had long brown hair.

I turned up the volume to hear if there was audio.

I heard my voice.

I zoomed in on the video.

The woman was me.

I was in shock. I didn't believe it. I couldn't believe it.

I was horrified.

I was humiliated.

I was violated.



This monster stole my body from me. Without my knowledge, without my permission, and without my consent.

This hidden camera was located at a property Patrick Bryant owns with one of his business partners named Brian Musgrave.

Here is a similar camera, [bought on Amazon](#).

I found an app where the files of at least one hidden camera were stored. I discovered there were 10,633 videos on this one device.

Let me repeat, just one camera I found had 10,633 videos on it.

I found more photos, this time of female employees, wives of male employees, girlfriends and other women who very clearly didn't know their private parts were being filmed or photographed.

I found file after file. Patrick Bryant had upskirt photos of one particular victim, the wife of a male employee who is also one of his closest friends. He took upskirt photos of his employee's wife for at least 8 straight years. He even took upskirt photographs of her on their family vacations.

I found about a dozen photos in Patrick Bryant's trash bin of underage girls he deleted in the hours after giving me access to his phone. I recognized three of the underage girls were daughters of business partners, some in bikinis.

One of these jarring photos was of an underage girl fully clothed, her legs spread open, unaware she was being photographed. Patrick Bryant took this photo with his cell phone from his penis area.

In my accidental discovery, I found multiple devices used to record women without their knowledge. And that's before I get to what I uncovered with Patrick Bryant and his business partners.

The weekend I was given access to Patrick Bryant's phone, he got a second mobile device.

I documented it.

Patrick Bryant couldn't transfer all these files off his device fast enough. I discovered terabytes of data were transferred off his cell phone and on to another device.

I documented it.

Patrick Bryant would soon replace his cell phone with a new one.

I documented that too.

None of this is conjecture. This is not an allegation. These are the facts. In black and white. Without exaggeration or without any flourishes. This is what I found, this is what I saw and this is what I accidentally uncovered.

As you should know by now, I carry receipts. I documented some of what I uncovered, to include metadata. I found some of the victims. I found some witnesses. I found more than enough probable cause and then some.

FLEEING HOME

Exactly 7 days later, I was under extreme duress. I found more photos and more videos. On my last night with Patrick Bryant, he physically assaulted me.

On the morning of November 13, 2023 I fled my home and went into hiding. It would be the first of four moves I would make over the course of a year.

I still have the mark Patrick Bryant made on me. Rather than see this mark as a scar, I see this scar as the mark of a free woman; free from a monster.

I will wear this mark the rest of my life as a badge of honor.

Friends who took me in, and took care of me, thank you.

RAPE

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 both 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.

It was premeditated.

There were also children in the home at the time of the rape.

But that's not the only rape I uncovered at Eric Bowman's home. In a second video, Patrick Bryant can be seen breaking into a room, pants undone, ready to rape a different, incapacitated woman.

Eric Bowman filmed it.

VODKA SODA

When I informed my children we were urgently fleeing our home as if our lives depended on it, my children asked if Patrick Bryant ever raped me.

Let me say this again... The first question my underage children asked was if Patrick Bryant ever raped me.

Out of the mouths of babes.

In searching for victims over the course of the last year, I met other women who were raped or sexually assaulted by some of these men; the other assaults I uncovered span over a decade.

In talking to the victims, there is a clear pattern of behavior.

One night in 2022. I found myself at a property owned by Patrick Bryant and Brian Musgrave on Isle of Palms, South Carolina.

Business partners Patrick Bryant and Eric Bowman were there.

I was served two small vodka sodas. Like this small glass here.

A short time later, I blacked out.

The only memories I have from that evening are images flashing in and out of the dark, images flashing in and out of the night.

I have never blacked out in my life.

But I know who has.

The women I saw raped on those tapes and other women I would meet or speak to months after uncovering these videos.

The stories from these women were all too familiar. Now I know why.

HANDCUFFS

I learned first-hand about the weaponization of government because I met it head on. I fought in silence and it was one of the hardest things I've ever had to do.

During the last year, as I turned everything over to law enforcement I was told I, as a victim, would be investigated.

Investigated for what?

During the last year, more than once, I was told I could be arrested if I moved forward.

Arrested for what?

These types of threats are also a way to intimidate victims. Instilling fear so victims hide in the shadows, so victims don't come forward, so victims don't file complaints - so there is no investigation.

I was also told my domestic violence incident wouldn't be investigated.

When I see a problem, I will do anything I can to fix it.

I brought handcuffs with me today.

If anyone would like to arrest me for standing up for women - here are my wrists.

Take me to jail.

I am 100% guilty for finding, and bringing forward evidence of rape, voyeurism, drugging women, incapacitating women, domestic violence, sex trafficking and probably a whole lot more.

I am 100% guilty of advocating for justice despite best efforts to silence me.

CLOSING

WILL WE EVER KNOW?

I have many unanswered questions for South Carolina's Attorney General Alan Wilson.

Were any children endangered?

Did any children witness rape?

Were any underage girls inappropriately touched or molested?

Are there still underage children in the home where rapes occurred?

How many recordings were taken of women on all these devices by all these men? Will these women ever know?

Were the recordings I saw of myself and ALL these women sold on the dark web? How many are there? Who has seen them? Where are they today? Will we ever know?

Did anyone film me when I was incapacitated and being raped? Will I ever know?

How many women were raped by these men? Will we ever know?

Who are all the victims of all these men? And will THEY ever know?

SOUTH CAROLINA ATTORNEY GENERAL ALAN WILSON

There is a silent battle raging every day. It is not a problem confined to one race, one religion, or one socioeconomic class.

It's not someone else's problem - it is our problem.

We must face domestic violence, sexual assault, rape and sex trafficking with courage, with clarity, and with compassion.

We must also face it with hard core justice.

There is no room for those who think their strength lies in intimidating or harming others. True strength lies in honor, respect, and the truth.

Real men are protectors, not predators.

South Carolina's chief law enforcement officer, Attorney General Alan Wilson, stated two weeks ago tonight in a visit to Beaufort, South Carolina that he will "allow his record to speak for itself."

Attorney General Alan Wilson, be careful what you wish for - your record speaks loud and clear.

Women who come forward are treated like criminals under your leadership, in your system, and on your watch.

Attorney General Alan Wilson, you know there were deliberate delays to investigate. 228 days of delay actually. That's 7 months, 2 weeks and 4 days of delay.

Once again, today, you are kicking this can down the road, like you always do. More days, more weeks, more delay.

What are you waiting for?

Did South Carolina's Attorney General contact the Department of Social Services when the state was told about a rape that occurred with children in the home? No, he did not.

Did South Carolina's Attorney General have any of these predators indicted after being provided clear cut and dry evidence including video, photos and witnesses? No he has not.

When the attorney of a victim asked to speak to Attorney General Alan Wilson directly, he told the attorney not to send him any information or documents.

Did the state accept the additional, potential physical and other evidence from me when I stumbled across potentially additional information later last year? No they did not.

In your system, Attorney General Alan Wilson, women who come forward are threatened to be investigated, like I was.

In your system, women who come forward are threatened with arrest, like I was.

While the law is explicit in protecting victims, in your system, Attorney General Alan Wilson, your office doesn't follow the law. I waited 320 days before receiving a victim's rights advocate and only because I was persistent.

That's right. I wasn't given a victim's rights advocate for 10 months, 2 weeks and 6 days.

So let me remind you, Mr. Attorney General, you have ONE JOB, and it is to enforce the law!

[VICTIMS RIGHTS LAWS SOUTH CAROLINA - ENTER INTO THE RECORD]

Being neutral on any wrongdoing or crime means you're siding with the abuser and the criminal.

South Carolina Attorney General Alan Wilson - you are not a real man because real men protect women.

I have no respect for anyone who treats victims the way you do.

I will stand up and stand in the way of any one who allows harm and abuse, and you're one of them.

You've had 15 years to protect women and children, and to reduce sex trafficking in South Carolina, and to throw rapists and pedophiles in jail, and you spectacularly failed to do so.

You've turned a blind eye to women and girls all across our state. I don't have the luxury of looking away.

My outrage over your broken system and my passion to call it out and fix it isn't political.

This is personal.

FORGIVENESS DOES NOT FORFEIT JUSTICE

To those concerned about false accusations - Yes, fake victims exist, and they do real harm.

But the existence of a few frauds cannot be an excuse to ignore the desperate cries of many who suffer in silence.

Justice demands discernment—not denial.

This isn't a story about bitter ex-girlfriends or consensual sex tapes, there are plenty of those. I don't care what two consenting adults agree to do.

This is a story about predators who hunt women for sport.

The daughter of Ethel Lance, a victim of the 2015 Mother Emanuel shooting, said to her mom's killer, "I forgive you." If she can do it, I can too. Ethel thank you for being a beacon of forgiveness.

But also - the Bible reminds us forgiveness does not forfeit justice. And today, we are getting justice.

Romans 12:19

"Beloved, never avenge yourselves, but leave it to the wrath of God, for it is written, 'Vengeance is mine, I will repay, says the Lord'".

As a woman of faith, I draw strength from the teachings of Jesus Christ. Christ confronted injustice wherever He found it.

I will not stand by silently while abuse is excused, while it is hidden and while it is ignored. I will fight to protect victims, I will fight to hold abusers accountable, and I will fight to ensure every woman and child has the safety and security they deserve.

As Gisele Pelicot said, "Shame must change sides." Today, I no longer live in the shadows. I no longer live in shame. I live in the light. Thank you Gisele, for being fearless, fighting for your justice.

JK Rowling - watching your resilience speaking out for women and girls kept me pushing forward on days when I didn't think I had anything left.

There are an untold number of groups working around the clock to support women, I thank you too.

ANGUISH INTO ACTION

I've spent countless hours working on legislation to protect women and girls since this deeply traumatic event. I want to thank my staff, who've worked incredibly hard to deliver.

Women have rights.

We have the right to privacy.

We have the right not to be raped.

We have the right not to be taped.

We have the right to be safe and secure.

There's more work to be done yet, but to my staff, my team, you are a very special part of making history for women and girls everywhere:

1. My bill The Sue VOYEURS Act creates a civil right of action for victims of voyeurism.
2. The Stop VOYEURS Act expands the very narrow criminal prohibition against video voyeurism at the federal level.
3. H.R.7567 addresses deep fakes.
4. The Violence Against Women by Illegal Aliens Act would deport sex offenders, pedophiles and murderers here illegally.
5. The Safe Shelters Act prohibits sex offenders from entering or using the services of emergency shelters.
6. The Rape Shield Enhancement Act to protect the privacy of rape victims.
7. My bill the Stop the Invasion of Women's Spaces Act defunds any entity who allows an individual to use a single-sex facility that does not correspond to their biological sex.
8. The Protecting Women's Private Spaces Act prohibits people from using single-sex facilities on Federal property other than those corresponding to their biological sex.
9. The Prison Rape Prevention Act requires inmates to be housed based on biological sex.

10. The VANISH Act addresses revenge porn.
11. H.R.8180 increases the civil penalty for revenge porn in Violence Against Women Act from \$150k to \$500k.
12. H.Res.1579 prohibits Members, officers, and employees of the US House from using single-sex facilities other than those corresponding to their biological sex.

But it's not just federal law that needs changing. State laws too. For example SC Code of Laws 16-17-470.

If you would like to work on legislation with me, my door is open. Please reach out to us mace.house.gov/women.

WHY

Some will ask, why am I speaking out? Why am I doing this?

I was horrified about what I uncovered and cannot stand silent and do nothing about it. Being quiet when I see wrongdoing isn't in my DNA.

The probability these predators are continuing their crimes against women right now, as I speak, is very high.

I am sounding the alarm on predators who are still roaming the streets of South Carolina and the state's chief law enforcement officer, Attorney General Alan Wilson, knows it.

You don't wake up one day and decide the first crime ever in your life is to coldly, casually and callously plan a rape and film it with your children at home. These men have been doing this for years and who knows what else.

To the men watching, their next victim could be YOUR daughter or YOUR wife. To the women watching, their next victim could be YOU.

I feel duty-bound to protect these women and girls with every ounce of my being.

I don't have the luxury of letting go until there is justice.

Do I trust South Carolina's Attorney General to bring these women justice? No, I do not.

If Alan Wilson won't do his job or fulfill his duties as South Carolina's Attorney General, I will do it for him. I am determined to help every single victim.

For too long, women have been told speaking out against abuse is unbecoming, that it diminishes our dignity.

But silence is what diminishes us. And strength comes from shining a light on the darkness.

This is an incredibly difficult task. I have been attacked for standing up for women, for our dignity, for our safety and for our rights.

Just a few weeks ago, I was physically assaulted by a pro-trans man for it too.

I'll take all of the arrows and all of the attacks, if it means I'm taking these attacks for you.

I am doing this today because we can't delay justice any longer. Justice victims like myself, need to move forward.

I have lived in fear. I have lived in pain. I have lived in agony.

But after today, I will live free.

VICTIM OUTREACH

If you are a woman who has visited the home of Eric Bowman on Sullivan's Island, South Carolina,

Or if you are a woman who has visited properties owned by Patrick Bryant and Brian Musgrave, on Isle of Palms, South Carolina,

Or if you are a female employee of Patrick Bryant,

Or if you are the wife of any man who works for him at any of his companies,

Or if you are an underage girl anywhere near Patrick Bryant,

Or if you've been anywhere near Patrick Bryant or Eric Bowman, their cell phones or any recording device or camera,

Or if you believe you may have been drugged or incapacitated, raped, filmed or photographed without your knowledge, permission or consent by one or more of these men,

Or if you believe you may be a victim of the crimes I have described today, we have set up a hotline at **843.212.7048**

You can call or text.

PTSD

Like so many women, I've suffered tremendous consequences to my physical health.

I've been diagnosed with Post Traumatic Stress Disorder (PTSD). I live looking over my shoulder. I endure sleepless nights. I have a form of vertigo from PTSD-related nightmares. And the adverse health issues I've had still linger 14 months after this deeply traumatic event.

I hit rock bottom last year - but as phoenix rose from the ashes - I too am coming back to life.

My breakdown was my breakthrough.

My devastation was my deliverance.

And my God was my grace.

I want to thank my children, and my family, for being there when I needed it the most.

Mom is here tonight.

I want to thank the Medical University of South Carolina for having one of the best sexual abuse trauma centers in the country.

You saved my life and countless others.

To the women behind the scenes who shared their horror stories, and who now lurk in the shadows out of real, terrifying fear about coming forward, I want to thank you too, for your quiet courage.

You know who you are and you INSPIRED me to keep going.

Today, I'm standing here not just as a Member of Congress, but as a woman, and as a SURVIVOR, fighting as hard as I can, for other SURVIVORS.

I am going to put this pin on, my staff made it for me tonight. It says in bold letters SURVIVOR.

I will be the loudest voice for those forced to stay silent.

Living through my trauma and helping other women through theirs - all of us victims of crimes we didn't know had been committed - until now.

Our bodies violated in ways none of us could comprehend.

Today is about justice, and the belief we should do better for every woman and girl.

BUSINESSES

To anyone doing business with these men, know who you are doing business with.

Some of the properties where these crimes took place are listed on certain short term rental sites like AirBnB, VRBO and others and managed by local property management companies for short term rentals. I bring this up because there may have been hidden cameras at these properties when short term renters were renting them.

Some of the companies these predators are involved with have had or are trying to get or currently have contracts with federal, state and local governments.

The government should not do business with rapists or sex traffickers or voyeurs.

IRON SHARPENS IRON

Women and some victims present in the Gallery tonight and to the victims watching, thank you. My heart bleeds for you. I will be there for you always.

Had I never found out I was a victim, I would never have known to dig deep to find other victims. And these crimes would never have seen the light of day.

Today I stand defiant - my fist in the air - to say as loudly and as boldly as I can: I have the courage and I have the strength to take on the challenges of this moment.

To the naysayers living in my past, I want you to know "I don't live there anymore [sweetheart]. I sold the whole [fucking] building."

Your lies will never break me.

Genesis 19:26

"But Lot's wife looked back, and she became a pillar of salt." - fleeing Sodom and Gomorrah.

Today I am free. Today I am moving forward. And today I am never looking back.

Let us leave a legacy our children can be proud of - a legacy of courage, a legacy of compassion, and a legacy of unyielding justice.

To the victims of these predators:

I pray for your protection.

I pray for your courage.

I pray for your resilience.

Victims can still have victory.

[ANECDOTE Ecclesiastes 4:9-10, 3 strands of rope not easily broken]

Women - You have the bravery necessary, the courage required, and the voice needed in times like these to hold those accountable for their horrific abuses against you.

Proverbs 27:17 says, "Iron sharpens iron."

I want to thank The Citadel for being the iron that sharpened me in my younger days.

Ladies, find your death goddess and use it.

Say: No more.

Fight back.

When you feel defeated, fight harder.

And when you need nourishment, seek God's wisdom.

Your wound is my wound.
Your pain is my pain.
Your fear is my fear.

Know I am standing on the battlefield with you.
Know I am standing in the trenches with you.
Know I am standing in your fight with you.
Know I will be your iron.

May God bless the women who fell victim to the abuse of these monsters.
May God bless the great state of South Carolina.
May God bless the United States of America.

In my most humble voice, Mr. Speaker, I yield back.

###

nypost.com

Rep. Nancy Mace accuses 'depraved' ex-fiancé, biz partners of sexual abuse against herself, a dozen women in explosive speech

Josh Christenson, Victor Nava

9–11 minutes

[Rep. Nancy Mace](#) accused her ex-fiancé and three business partners of committing “depraved” sexual crimes against herself and a dozen other women — including underage girls — in explosive remarks in the House of Representatives on Monday.

The [South Carolina Republican pol](#) said she came forward with the shocking allegations of rape, voyeurism and other sexual abuse after uncovering a trove of more than 10,000 videos and other photographic evidence contained on the phone of her [former husband-to-be Patrick Bryant](#).

“I accidentally uncovered some of the most heinous crimes against women imaginable — we are talking about rape, nonconsensual photos, nonconsensual videos of women and underage girls, and the premeditated, calculated exploitation of women and girls in my district,” Mace said in her House floor speech.





Rep. Nancy Mace accused her ex-fiancé and his business partner of committing “depraved” sexual crimes against her and a dozen other women. Jim Bourg

“Today you will hear about the depraved men behind these gutless, evil acts,” she added. “These men didn’t just harm their victims; they recorded their depravity as if it were a badge of honor.”

The digital files Mace claims she discovered in November 2023 included nonconsensual images of “female employees, wives of male employees, girlfriends and other women who very clearly didn’t know their private parts were being filmed or photographed,” the congresswoman said, along with “upskirt photos” of at least one underage girl who was the daughter of a business associate.

“Last year, I had to tell a woman that she’d been raped, and she didn’t even know it,” Mace said, telling lawmakers that she discovered a video of Bryant and one of his business associates allegedly recording another business associate sexually assaulting an “incapacitated” woman.

"She had no idea because she was incapacitated at the time of the rape," Mace said. "I knew she was raped because I accidentally found the video of her being raped."

"The two of them, the three of them business partners, the two of them had their phones out just like this. Filming her as she was being raped. And she was completely laid out. There was no movement. There was no life. I couldn't even tell if this young woman was alive."



Mace made the accusations against Patrick Bryant and others during a speech on the House floor. @RepNancyMace/X

Mace, who presented no evidence during her remarks, is shielded from potential criminal prosecution and civil lawsuits by the Constitution's speech and debate clause, which provides lawmakers with immunity for "acts taken within the legislative sphere."

The congresswoman claims she told the state attorney general's office that there were children present on the property where the woman was allegedly raped but that state social workers were not notified.

Mace also alleged that one of Bryant's business associates had "tried to

EXHIBIT B

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intimidate" her from bringing the evidence to light — and that South Carolina Attorney General Alan Wilson failed to probe the act as witness intimidation despite apparently opening an investigation into the sex crime allegations.



Mace accused South Carolina AG Alan Wilson of slow-walking the investigation into her ex and his business partners. AP

Bryant denied Mace's allegations in a statement to [the New York Times](#).

"I categorically deny these allegations," he said. "I take this matter seriously and will cooperate fully with any necessary legal processes to clear my name."

The congresswoman said it took Wilson's office seven months from the time she first came forward with the allegations and evidence for an investigation to be opened.

With some female victims apparently listening in the House gallery, Mace went on to recount how stumbling upon her ex-fiancé on a dating

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app in October 2023 prompted Bryant to allow her access to his phone, where she was horrified to find a video of herself “undressed” and “unaware she was being filmed.”



Mace holding the handcuffs and safe that she says are among the evidence in her allegations. Jim Bourg

“I turned up the volume to hear if there was audio. I heard my voice. I zoomed in on the video. The woman was me,” Mace revealed. “My entire body paralyzed, and I couldn’t move.”

After making the terrifying discovery, she claimed that Bryant “physically assaulted” her and she was forced out of her home and “into hiding” the

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following month, moving in with friends and changing addresses at least four times in a single year.

"I still have the mark Patrick Bryant made on me. Rather than see this mark as a scar, I see this scar as the mark of a free woman; free from a monster," Mace also said, disclosing that she had since been diagnosed with post-traumatic stress disorder.

"This isn't a story about bitter ex-girlfriends ... or consensual sex tapes, there are plenty of those. I don't care what two consenting adults agree to do. That is the definition of freedom. This is a story about predators who hunt women for sport."



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Mace claims she discovered a video of Bryant participating in a sexual assault among thousands of disturbing images on his phone. Instagram / Nancy Mace

Throughout the speech, Mace alleged that Wilson deliberately stalled his investigation into the sex crimes and was part of “a system which failed to protect” female victims.

“If anyone would like to arrest me for standing up for women — here are my wrists. Arrest me. Take me to jail,” she threatened. “I am 100% guilty for turning over evidence of peeping Toms, of turning over evidence of rape, of turning over evidence of voyeurism, of turning over evidence of sex trafficking and who knows, probably a whole heck of a lot more and more crimes I don’t have time to get into tonight.”

“South Carolina Attorney General Alan Wilson — you are not a real man because real men, real men protect women,” she said with scorn.

Wilson’s office described Mace’s statements regarding the conduct of the South Carolina attorney general as “categorically false” and “politically motivated.”





Mace said some of the sex crimes were against underage girls. Jim Bourg

“Ms. Mace either does not understand or is purposefully mischaracterizing the role of the Attorney General. At this time, our office has not received any reports or requests for assistance from any law enforcement or prosecution agencies regarding these matters.

Additionally, the Attorney General and members of his office have had no role and no knowledge of these allegations until her public statements,” read a statement from the South Carolina AG’s office.

“Congresswoman Mace and the Attorney General have been at multiple events together over the last six months. She also has the Attorney General’s personal cellphone number. Not once has she approached or reached out to him regarding any of her concerns,” the statement continued.

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The AG’s office noted that it would be up to local law enforcement agencies to investigate potential evidence of a crime.

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State police opened an investigation into Patrick Bryant on Dec. 14, 2023, according to the South Carolina Law Enforcement Division.

“Since that date SLED has conducted multiple interviews, served multiple search warrants, and has a well-documented case file that will be available for release upon the conclusion of the case,” the group said in a statement.



Mace accused Wilson of being part of “a system which failed to protect” female victims. Jim Bourg

“This active and ongoing investigation is complex and has involved multiple lawyers. Once the investigation is completed, it will be sent to a prosecutor for review.”

Bryant and two of his alleged business partners whom Mace referenced, John Osborne and Eric Bowman, did not respond to The Post’s requests for comment.

Brian Musgrave, who Mace claims owned properties with Bryant with

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hidden cameras installed in them, called the allegations “baseless.”

“Nancy Mace’s statement tonight is a dangerous mix of falsehoods and baseless accusations, recklessly leveled at four individuals without a shred of evidence,” he told The Post.

“Her continued pattern of making inflammatory claims without proof is not only reckless but a blatant attempt to weaponize the legal system for political and personal gain,” Musgrave added.

Mace, 47, cited at least a dozen pieces of legislation she had authored to crack down on sex offenders and shield women from abuse — including her Sue VOYEURS Act, which allows for the prosecution of those who take nonconsensual sex videos of others.

“I’m sounding the alarm on predators who are still roaming the streets of South Carolina, and our chief law enforcement officer, Attorney General Alan Wilson, knows it,” the Republican pol said.

“None of this is conjecture. These are not allegations. These are facts. It is documented,” Mace said of her claims.

**Nancy Mace**

@NancyMace



This is false. The first thing I did was go to the authorities. I am also the key witness in an investigation. This is your typical weaponization of the justice system. These guys created a shell company who filed a fake lawsuit with fake defendants so they could do a fake deposition and not get sued... that's all this is... interestingly in the fake process they confirmed I was assaulted by Patrick Bryant by witnessing the bruising on my body, confirmed I was terrified due to the traumatizing events. I don't think this is the political hit they want it to be... so we move on.

11:25 AM · May 23, 2025 · 517 Views

**Nancy Mace**

@NancyMace



This is false. I'm the key witness in an investigation. Just the usual weaponization of the justice system to go after enemies.

They created a fake company to file a fake lawsuit with fake defendants. No cross examination. All done in secret.

Just so they can't be sued for defamation.

10:31 AM · May 23, 2025 · 554 Views



Rep. Nancy Mace
@RepNancyMace

...

Witness intimidation is real, and it is illegal.

Hold the line.

Last edited 10:57 PM · Feb 27, 2025 · 66.5K Views



Congresswoman Nancy Mace Files Motion To Intervene And Dismiss GLT2, LLC (Patrick Bryant's) Fake "Lawsuit" And Requests Expedited Hearing

June 11, 2025 / [Press Release](#)

Mace Will Expose Wesley Donehue's Flagrant Dishonesty and Judicial Abuse of Process to Harm a Criminal Investigation Where She is Key Witness for Victims

CHARLESTON, S.C. — Today Congresswoman Nancy Mace filed a motion in Charleston County demanding expeditious intervention, case dismissal, and sanctions against GLT 2, LLC, a shell corporation formed by Patrick Bryant and his attorneys of Brewer Law Firm, LLC. Mace alleges, through GLT 2, LLC, Bryant filed a fictitious lawsuit to target, defame, and intimidate her as a key witness in a sexual assault investigation.

The motion, submitted June 10, 2025, calls for an expedited hearing in the Court of Common Pleas to address GLT 2's "deliberate abuse of the judicial process," including the illegal issuance of subpoenas, unauthorized depositions, and a coordinated media smear campaign using false statements aimed at discrediting Congresswoman Mace as a key witness in a criminal investigation.

"GLT 2 is not a real company. It's a fictitious business created with one purpose: to intimidate, attack, and silence a witness cooperating in an active criminal investigation," said Mace. "This is not just unethical, it's illegal."

BACKGROUND: FAKE COMPANY, FAKE LAWSUIT, REAL RETALIATION

GLT 2 was incorporated on February 20, 2025, just ten days after Mace delivered a floor speech in Congress detailing disturbing evidence of a sexual assault she discovered on Bryant's phone and supporting legislation to protect victims.

One day later, on February 21, 2025, the company filed a "Petition to Authorize Depositions and Discovery Before Action" naming only "John Doe" and "Jane Doe" as defendants, despite targeting Mace as the sole subject of its efforts. The company, then only 24 hours old, claimed to have already suffered reputational harm and needed pre-suit discovery to investigate tortious acts.

GLT 2 never named Mace in the petition, never served her, and never received court approval to begin discovery. Despite this, it subpoenaed political consultant Wesley Donehue for a deposition, during which he made demonstrably false and defamatory claims about Mace, which were then leaked to the media. The motion notes that Donehue's deposition centered exclusively on Mace's communications, yet Mace had no opportunity to object, be present, or even be informed of the proceeding.

LEGAL VIOLATIONS AND REQUEST FOR SANCTIONS

Mace asserts that GLT 2 and its counsel violated multiple provisions of South Carolina Rule of Civil Procedure 27 by failing to name expected adverse parties, failing to notify her, and proceeding with unauthorized discovery. The motion also cites Rule 11 violations, arguing that GLT 2's filings were not made in good faith and that its attorneys acted in willful defiance of court procedure.

"They filed a fake petition to buy time, conducted an unauthorized deposition behind closed doors, then leaked those lies to the press. This was not a lawsuit - it was a smear campaign disguised as legal process," said Mace.

The motion respectfully demands:

1. Immediate/Expedited intervention by Congresswoman Mace as a party whose rights were directly violated;
2. Full dismissal of GLT 2's Petition due to failure to comply with procedural requirements;
3. Sanctions against GLT 2 and its attorneys for knowingly abusing the legal system.

WHAT'S NEXT

Mace is urging the Charleston County Court for Mace is urging the Charleston County Court to set an emergency hearing date immediately to prevent further abuse of the judicial process. She remains a key cooperating witness in an active investigation by the South Carolina Law Enforcement Division (SLED), which began in December 2023 after Mace reported evidence she discovered on Bryant's phone.

"This is an open-and-shut case of fraud, among other things," said Mace. "GLT 2 and its operators must be held accountable, not just for what they've done to a key witness, but for what they've tried to do to the rule of law in South Carolina."

###

Issues: Women & Victim's Rights**Washington, DC Office**

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Washington, DC 20515
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710 Boundary Street
Beaufort, SC 29902
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Daniel Island Office

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PBD Podcast transcript from June 19, 2025

Mace Charleston Comments from version with new speaker labels (gpt):

[Vinny] (1:02:49) Our policies regarding COVID were designed to protect individuals.

[Nancy Mace] (1:02:54) We were seeing you guys censored Harvard educated doctors, Stanford educated doctors, doctors that are educated in the best places in the world.

(1:03:03) And you silenced those voices. (1:03:06) Did the US government ever contact you or anyone at Twitter to pressure Twitter to moderate or censor certain tweets? (1:03:13) Yes or no? (1:03:14) We received legal demands to remove content from the platform from the US government and governments all around the world. (1:03:20) Thank God for Matt Taibbi. (1:03:22) Thank God for Elon Musk for allowing to show us the world that Twitter was basically a subsidiary of the FBI.

[Patrick] (1:03:30) So when are you running for governor?

[Nancy Mace] (1:03:33) I have to make the decision. (1:03:36) Yeah, I can't say I'm a candidate because then I have to declare. (1:03:39) So we're thinking about it. (1:03:40) And I'm dead serious about it. (1:03:42) I just, you know, we're a red state and it's supposed to be law and order and conservative, but it's not. (1:03:50) I mean, I just found a couple of weeks ago, Clemson University had 15 genders on a form on their website. (1:03:55) I did a video on X. (1:03:57) I called the president of the college. (1:03:58) Three hours later, they took it down. (1:04:00) I've had two other colleges have the same sort of thing. (1:04:02) This gender bending ideology is everywhere. (1:04:05) States have funded it and allowed this woke DEI tranny stuff to happen. (1:04:11) We had a sanctuary sheriff in South Carolina for the last four years, and she wasn't working with ICE. (1:04:16) And I found out she was letting hundreds of illegals out on the streets who are murderers, rapists and pedophiles. (1:04:20) No one who was in statewide office said a damn thing. (1:04:23) They could have impeached her and then the voters could have elected a new one. (1:04:27) But I just said, you know, this is we don't have law and order. (1:04:31) And there's a lot of corruption. (1:04:32) And I've been through the system as a survivor, and I see all the corruption between our solicitors, the lawyers that fund the solicitors campaigns, the corruption with our AG. (1:04:41) Our AG had a case that he prosecuted with 1900 photos that this pedophile had, convicted pedophile of toddlers as young as three being raped by animals. (1:04:52) He had six indictments. (1:04:53) Our attorney general, Alan Wilson, put him down to one and his sentence. (1:04:58) Guess what? (1:04:58) I guess how many days he

served in jail. (1:05:00) Anybody want to guess? (1:05:01) Zero. (1:05:02) Two years. (1:05:03) How many days did he serve in jail? (1:05:05) Less than a week. (1:05:06) One. (1:05:07) One day. (1:05:08) We have 353 murder cases in Charleston County in South Carolina. (1:05:13) We've got a case.

[Tom] (1:05:14) Are you serious about this? (1:05:15) It's not the ones that are sitting. (1:05:16) What is the name of this?

[Nancy Mace] (1:05:17) I read about this. (1:05:18) They're idle murder cases. (1:05:19) One county in a rural county in South Carolina is Sumter, kind of near Charlotte upstate. (1:05:25) They have 60 cases. (1:05:27) Again, there's a case in Myrtle Beach that the Wall Street Journal has covered. (1:05:30) Scott Spivey, his name. (1:05:31) I just met with the family and Loris on Tuesday. (1:05:34) He was shot. (1:05:34) They shot at him. (1:05:35) They chased him down the road nine miles. (1:05:37) They shot him 17 times as he was facing away, got killed by a shot in the back. (1:05:43) The AG wouldn't prosecute. (1:05:45) Governor wouldn't do anything. (1:05:46) Solicitor buried the head in sand. (1:05:48) Come to find out with the tapes later, the shooter knew the guy was terrified, admitted he chased him down the road. (1:05:56) No prosecution. (1:05:57) I'm actually trying to talk to the feds to get them to come in, not just in cases that I'm working on, but the entire state. (1:06:05) How does this happen? (1:06:06) We have more pedophiles out on the streets than we have in jail. (1:06:10) Murderers are out running free. (1:06:11) Rapists running wild. (1:06:13) Try to get a rapist convicted in my state. (1:06:15) You can't. (1:06:16) And so it's just, I want, if I, if I do it, I'm going to be the drop the hammer law and order Trump in high heels. (1:06:22) I'm coming for you. (1:06:23) And if you're a pedophile, you ain't voting for me. (1:06:25) You're voting for the pedophile protector. (1:06:27) Attorney General Alan Wilson, like I'm going to come for the criminals. (1:06:30) I'm going to make sure our state is safe. (1:06:33) Florida has done a great job under Governor DeSantis. (1:06:36) Trump's doing a phenomenal job. (1:06:37) And I want to bring his America first.

[Patrick] (1:06:39) How is McMaster doing?

[Nancy Mace] (1:06:41) This has happened. (1:06:43) I like him personally. (1:06:44) He's a Republican governor. (1:06:46) But this has happened while he's been in office. (1:06:48) And I'm a fighter. (1:06:49) And I just, I would never allow like a daughter going to college to allow men to share dormitories and showers with him. (1:06:56) I mean, that's just the kind of thing that's been going on in South Carolina. (1:06:58) And everyone is just buried their heads in the sand. (1:07:01) And that is not America first. (1:07:03) That is not part of the Trump doctrine. (1:07:05) Is he fighting it? (1:07:06) Is he talking to you guys? (1:07:07) Is he coming and saying, what do we do? (1:07:08) No, no. (1:07:09) And I, and I love him personally. (1:07:11) He's a great guy. (1:07:12) Great family, nothing. (1:07:14) Neither is

my Lieutenant Governor. (1:07:15) My Attorney General, nothing. (1:07:17) They're doing nothing about any of this. (1:07:18) And I'm the one who's exposing it. (1:07:20) The pedophile I mentioned, Donald Grush, just got arrested for the second time. (1:07:24) He violated, I think, a sex registry thing or something. (1:07:28) But the only reason he got re-arrested is because I've been talking about it on air. (1:07:31) And so it's like, I'm not even governor yet. (1:07:34) And I have forced these universities to stop, you know, putting trainees on their gender forms, on their applications for college. (1:07:41) I've stopped one university from promoting cross-dressing on their website. (1:07:45) You know, I have exposed what's going on, you know, in our justice system or in justice system. (1:07:51) And I, I don't even hold state office. (1:07:53) So that just says to me, I'm the only one screaming about it, that we need new leadership who's going to- What's this, Rob?

[Tom] (1:08:01) What's this? (1:08:02) This was from two days ago. (1:08:04) This was about the Attorney General that was mentioned earlier, Alan Wilson.

[Nancy Mace] (1:08:08) So can we look into Alan Wilson? (1:08:09) Can you go a little bit deeper? (1:08:10) Can you go to his profile? (1:08:11) I just want to see what his background is. (1:08:13) So Alan Wilson, a member of South Carolina National Guard, 51st annual South Carolina member of the Republican Party. (1:08:19) So this guy's a Republican. (1:08:20) Wilson has litigated, blocked same-sex marriage in Valentine, Affordable Care Act challenge. (1:08:25) Wilson was born, boom, boom, boom. (1:08:27) Go a little bit to the right to see what we see. (1:08:28) He's an EPO baby. (1:08:29) He's the son of Congressman Joe Wilson. (1:08:33) He's been in office for 16 years. (1:08:35) And this shit's been going on with him as Attorney General. (1:08:38) He likes to put out the press release, hey, we arrested this pedophile, but he will not put out the press release of what the conviction was if they get convicted at all. (1:08:45) That's how bad it is. (1:08:46) I need the feds to come in and take over our state. (1:08:49) Because what happens is, you know, we have a legislature filled of lawyers. (1:08:53) They elect the judges. (1:08:54) And then the lawyer legislators and other lawyers, they fund the campaigns for the Attorney General. (1:09:00) They fund the campaigns for the solicitors. (1:09:02) In fact, the solicitor working on a case that I am a key witness in right now, her last big fundraiser was headlined by the attorney for two predators who are being investigated by law enforcement. (1:09:12) Evidence has been leaked to these guys, you know, and so the system is just so corrupt. (1:09:17) There's I don't think anything going. (1:09:18) You can't go back. (1:09:19) I need the feds to come in and take over the state. (1:09:22) That's what needs to happen.

[Patrick] (1:09:23) You just made an incredible case was why the people of South Carolina need a different governor.

[Tom] (1:09:29) Yes.

[Nancy Mace] (1:09:29) And there was a leak on the 17th two days ago that Alan Wilson's rally and formal announcement will be on Monday, the 23rd coming up on Monday.

(1:09:37) He is announcing he's had exploratory going going for a while. (1:09:40) OK, so he's in and he's in with money. (1:09:43) Monday, the 23rd coming up, says when will the people of South Carolina hear from you about exploratory committee or definitive announcement?

[Tom] (1:09:50) I don't do just me.

[Nancy Mace] (1:09:52) Yeah, I don't do exploratory. (1:09:53) Once I'm in, I'm all in 100 percent. (1:09:55) They're just all in. (1:09:56) I don't like the idea of exploratory. (1:09:58) I am still in session in D.C. I'm still talking to family. (1:10:01) I'm getting around the state, listening to people and hearing where they are. (1:10:04) I'm not in a rush. (1:10:05) Every poll that's out there, I'm ahead in every poll, which is not where you want to be when you're starting out running one or two and you want to be two or three strong. (1:10:13) But I know that if I decide to do it, my sense is the people are going to be with me. (1:10:17) I had a town hall last night. (1:10:19) Democrats will tell you I never have town halls. (1:10:21) We had a town hall last night. (1:10:22) We had three hundred three or three hundred people, at least RSVP last night for this thing in kind of a remote part of Mount Pleasant, South Carolina. (1:10:32) Everywhere we go, hundreds of people show up. (1:10:34) They don't have that. (1:10:35) And I'm just making sure that I get my ducks in the row with my family. (1:10:38) I've got two kids. (1:10:40) I've got parents to think of. (1:10:42) And I'm spending some time with my children over the next couple of weeks. (1:10:44) And we'll decide by the end of summer. (1:10:47) So I want to make sure when I if I do it, I do it the right way. (1:10:51) I run my own races. (1:10:52) I don't play by anyone's playbook. (1:10:54) I don't care that he's announcing on Monday. (1:10:56) I think it's a terrible time. (1:10:57) He leaked that he was announcing two days ago on the 10 year anniversary of Mother Emanuel, where nine black church members were murdered while they were reading scripture. (1:11:06) So I just the timing of it, tone deafness. (1:11:09) I'm not in a rush because he's not going to win. (1:11:10) But him getting in might force me to run because he cannot be governor. (1:11:14) I think you indirectly announce your run, which is we'll take it as an indirect announcement. (1:11:18) When I run, it was an indirect announcement that was made.

[Patrick] (1:11:20) But here's a question for you. (1:11:22) When you're as tough and strong and calling out and talking shit like you are, they're going to come after you.

[Tom] (1:11:29) They are.

[Nancy Mace] (1:11:30) OK, so what methods have they already taken to come after you and target you? (1:11:33) Oh, they leak stories. (1:11:35) They use, quote, anonymous sources. (1:11:37) They try to get you investigated by the ethics committee. (1:11:39) They make things up. (1:11:41) In fact, I can't tell you how many times I've talked to reporter. (1:11:44) OK, they're accusing you of doing this. (1:11:47) And I was seven anonymous sources and they're all disgruntled former employees because I fire people. (1:11:51) I'm like Trump. (1:11:52) If I don't think you're doing a good job or you're unethical, you're gone. (1:11:55) And so what we don't have the paperwork, we don't have a recording. (1:11:58) We don't have a text. (1:11:59) We don't have a receipts. (1:12:02) They just said you did this. (1:12:03) I'm like, well, show me the receipt. (1:12:04) There was even a guy and I'm getting ready to file a lawsuit on this today or tomorrow or by Monday who lied in a deposition to say I blackmailed somebody. (1:12:16) And I literally have all the receipts. (1:12:18) I'm like, no, we didn't meet when you said we meet met. (1:12:21) No, that trip didn't happen the way you said it did. (1:12:24) Nope. (1:12:24) I didn't wait to withhold evidence from law enforcement for a year. (1:12:28) And no, I didn't. (1:12:29) I didn't blackmail anybody. (1:12:30) In fact, the guy that's alleging blackmail actually allegedly attempted to blackmail me last year. (1:12:37) Politics in South Carolina is a very dirty business. (1:12:41) So these guys will do fake depositions with fake subpoenas. (1:12:45) In fact, this lawsuit, they filed a fake fictitious company to file a fictitious lawsuit with fictitious defendants knowing they were targeting me and then had a guy lie under oath and subpoenaed a subpoena that the judge never even approved and violated my civil rights. (1:13:01) But like, I'm like, I literally have to sue them now, all of them. (1:13:04) And I'm doing that today or tomorrow to say, here are the receipts, buddy. (1:13:08) And here's where you lied. (1:13:10) But in South Carolina, if you perjure yourself, do you think that they go after you for perjury? (1:13:14) For not going after pedophiles that are having three year olds have sex with animals? (1:13:17) It's like, what the hell are we talking? (1:13:18) So it's going to be in public and all that. (1:13:21) But like, that's why, like, I fight back and I'm like, I'm suing people who need to be sued, and I'm holding them accountable. (1:13:26) And I will talk about it in the most public place possible to hold people accountable, because it might be the only justice and the only truth that I get, which is why I am a fighter. (1:13:36) Like, I don't, I don't wilt. (1:13:38) I don't flee. (1:13:39) I also have post-traumatic stress disorder, which is why sometimes I go off in those videos, because I feel like, you know, when you're being attacked with PTSD, you either fight or you flee. (1:13:51) And I sure as hell and getting out of there alive. (1:13:53) I'm the only one coming out alive. (1:13:54) So I fight back. (1:13:55) So that's what I'm doing. (1:13:56) What is the story that says the day Nancy Mae shows nude photos of herself in house hearing, as she says she was recorded without consent? (1:14:05) Yeah, I did it in May, May 20th of this year. (1:14:09) So about a year and a half ago, I uncovered some things that

were very disturbing, including videos of me being recorded without my knowledge, without my permission, without my consent. (1:14:17) I also identified other women that were recorded on this camera without their knowledge, without their permission, without their consent. (1:14:24) And today at a year and a half later, since I came forward to law enforcement with all this evidence, including metadata, photos, some video and other evidence, no one's been arrested. (1:14:36) And if that can happen to a member of Congress and nobody lifts a finger, because this is against the law. (1:14:42) What is this? (1:14:43) This is a hearing. (1:14:44) I had an oversight about surveillance in private spaces, and that's my body. (1:14:48) You can see the silhouette. (1:14:49) It's I mean, it's pretty tame. (1:14:51) It's the silhouette. (1:14:52) You can tell that it's me and my long hair and everything. (1:14:55) But today, a year and a half later, no one's been arrested. (1:14:59) And to have to say, as a woman, we want to be believed. (1:15:03) We want people who've violated us. (1:15:05) When this happens to you, and there were lots of videos and photos, I can't unsee what I've seen. (1:15:09) When this happens to you, it feels like you're physically being raped. (1:15:12) I have post-traumatic stress disorder of what I saw of myself that I had no idea was recorded. (1:15:18) And it's humiliating. (1:15:19) And I don't know. (1:15:20) Was this sold on the dark web? (1:15:22) Was this going to be used to blackmail me in the future? (1:15:25) I have no idea why this individual did this to me. (1:15:28) And he did this for years. (1:15:30) And I undercover.

[Patrick] (1:15:31) Who is the individual? (1:15:31) Did you find out? (1:15:58) Is your ex-fiance a conservative? (1:15:59) Or is he? (1:16:00) I'm assuming he's a conservative.

[Nancy Mace] (1:15:32) My former fiance, someone I was engaged to, someone I trusted. (1:15:35) I gave him my life savings. (1:15:36) I owned property with him. (1:15:38) I found evidence going back a decade of upskirt photos. (1:15:43) And I showed some of those in this hearing. (1:15:45) And so, you know, I'm a key witness in an investigation. (1:15:48) I'm a key witness in a now a civil suit. (1:15:50) One of the victims was allegedly sexually assaulted. (1:15:53) It was filmed. (1:15:54) And I found it on his phone. (1:15:56) And so I just. (1:16:02) I don't know what he is. (1:16:03) I mean, I'm not going to comment on him. (1:16:04) The only reason I'm saying that is because to see if it's something that the opposition is using, because they're going to come after you. (1:16:11) You're loud. (1:16:12) You're loud. (1:16:13) You're nonstop loud. (1:16:14) And it's not like you're coming in like, hey, let me kind of relax and get to know everybody. (1:16:19) Like, no, I'm here. (1:16:20) Boom. (1:16:20) You're full of shit. (1:16:21) You're full of shit. (1:16:22) I'm not going to do this. (1:16:23) Tranny, tranny, tranny. (1:16:24) Hey, what is it?

[Tom] (1:16:26) Always.

[Nancy Mace] (1:16:26) But the solicitor is very good friends with one of his attorneys who's representing two of the four people that I talked about in my floor speech in February. (1:16:34) But, you know, I have evidence. (1:16:36) I have knowledge of our solicitor obstructing justice for me and other women who are victims, either rape victims, allegedly, or victims of voyeurism in this thing. (1:16:48) There's been evidence that's been leaked, and I believe it was the solicitor that leaked evidence to people who shouldn't have had it. (1:16:54) And the solicitor, Scarlett Wilson is her name, her last big fundraiser last year before her reelection was headlined by attorney Jerry Theos. (1:17:07) Jerry Theos is the attorney for two of the four predators who are being investigated today. (1:17:13) I have the invitation. (1:17:15) I haven't made it public yet, but he reps my ex and one of his business partners in these cases. (1:17:21) And so they're leaking stuff and leaking information, I believe. (1:17:25) And I believe she's the one doing it. (1:17:28) And so it's it's just this corrupted system. (1:17:32) And he should not. (1:17:33) I mean, I just. (1:17:35) Women just deserve justice. (1:17:36) I just want you to do your job, follow the law and put people in jail who've broken it. (1:17:40) And you just can't. (1:17:42) She doesn't want to prosecute rape cases. (1:17:43) And there's a history of that in her office. (1:17:46) She doesn't believe the victims. (1:17:48) She's got a political bias against me. (1:17:51) Unfortunately, I'm the key witness because I found all this stuff. (1:17:54) But she's got political bias against me. (1:17:56) And I believe I believe that we can puncture the seal of qualified immunity. (1:18:01) And Scarlett Wilson, I hope you're listening. (1:18:04) I believe you can be sued. (1:18:06) I don't believe you can be protected by qualified immunity because of the way that you have inserted yourself into this investigation and have obstructed the investigation. (1:18:18) And if you get your shit together and do the right thing, there can be a different conversation. (1:18:22) But right now, that's what it looks like. (1:18:23) Wow. (1:18:24) Scarlett A. (1:18:25) Wilson. (1:18:26) Oh, yeah, she's. (1:18:27) Oh, and Jerry Theos, the attorney for these guys in this investigation. (1:18:32) How do you spell the last name? (1:18:33) T-H-E-O-S. (1:18:34) He was the attorney for the pedophile I mentioned, Donald Grash earlier. (1:18:38) It's just this nasty, corrupt. (1:18:40) Everyone's scratching everybody's back. (1:18:41) Nobody wants to go to trial. (1:18:43) There are no trials. (1:18:44) You know, you just plead down to the least common, least worst indictment, the easiest thing to indict on. (1:18:50) Nobody serves jail time. (1:18:52) Everybody gets rich. (1:18:53) Either with your campaign or your law firm, with your clients who you're defending who aren't going to jail. (1:18:58) Are you are you planning on at any time to slow down and not take the approach that you're taking now? (1:19:03) OK, then this is going to continue. (1:19:04) Yeah, this is going to continue as long as you know it. (1:19:07) And, you know. (1:19:07) Oh, and they're coming after me. (1:19:09) Let me tell you, I mean, if you're willing to file a fictitious company to file a fictitious lawsuit and have someone lie under oath, what else are you willing to do? (1:19:18) But, you know, I have a

great legal team. (1:19:21) I have great staff. (1:19:22) I have a great platform. (1:19:24) And all I'm going to do is tell the truth and the people can decide. (1:19:28) But what I will tell you, because I've come forward as a victim, as a key witness in this thing, I'm learning about other cases like Scott Spivey's case. (1:19:36) The family came to me, you know, they're these families are begging for help because there needs to be a trial in that in that murder case. (1:19:44) There are there was a kid that was just run over with a car by someone who was mentally ill in Sullivan's Island, South Carolina. (1:19:51) And the family's not being informed by their victim's rights advocate in South Carolina. (1:19:56) But when the hearings are for this guy, in my case, I didn't get a victim's rights advocate for 11 months. (1:20:01) And guess what? (1:20:01) I had to go through the attorney general's office who denies he knew anything about it. (1:20:06) I got my victim's rights advocate through his office and one of the rape victims didn't get her victim's rights advocate until the day of my speech, like an hour before my speech. (1:20:16) So it's just, you know, and I've got I've got people all over the state. (1:20:19) Hey, this case happened, this murder, this rape, this pedophile. (1:20:23) I went to law enforcement. (1:20:25) Nothing happened. (1:20:26) And when I I was also physically assaulted on my way out, I have bruises all over the left side of my body. (1:20:31) And I showed it to law enforcement and was told point blank, we're not going to investigate it. (1:20:35) Like if that's happening to me as a as a prominent member of the community, then what's happening to the little black girl in North Charleston when she comes forward? (1:20:44) You know, victims are treated like criminals. (1:20:46) Criminals are treated like victims. (1:20:48) And that's what's going on. (1:20:49) I'm going to be begging the feds. (1:20:51) I'm working on it. (1:20:52) It's a really long letter. (1:20:53) It's taken a while. (1:20:54) But somebody's got to take over the state and make right what's been so wrong in South Carolina.

[Patrick] (1:20:59) Sounds like the state's about to get a new governor. (1:21:01) That's what it sounds like. (1:21:02) I hope like hell there. (1:21:03) Well, let's see. (1:21:03) Let's see what's going to happen. (1:21:04) She's going to make the announcement here soon. (1:21:06) All right.

Exhibit F

 **Rep. Nancy Mace**   @RepNancyMace

 843.212.7048 

Since my speech last night, so many calls and texts from women in our district, who may be victims, and men and women who may have information. Keep the calls and texts coming. We will keep your information private and confidential.

 843.212.7048 

How's the investigation progressing? What crimes were alleged?

12:02 PM · Feb 11, 2025 · 102.7K Views

 216  1.6K  7.6K  64 

 **Rep. Nancy Mace**   @RepNancyMace

When I say this is just the “tip of the iceberg” this might be an understatement.

The calls and texts coming in are offering valuable information and helping to identify more possible victims - it is overwhelming.

We will keep your information confidential. Call or text us at 843.212.7048

You, us, we, together, are doing the Lord’s work to protect women and girls. 

 **Eric Bowman**
Sullivans Island, SC

 **John Osborne**
Charleston, SC

 **Brian**





H.R.8027 - Sue VOYEURS Act **H.R. 10290** - Stop the Invasion of Women's Spaces Act

H.R.7778 - Stop VOYEURS Act **H.R.10186** - Protecting Women's Private Spaces Act

H.R.7567 - Stop deep fakes **H.R.10497** - Prison Rape Prevention Act

H.R.7909/HR30 - Violence Against Women by Illegal Aliens **H.R.8387** - VANISH Act

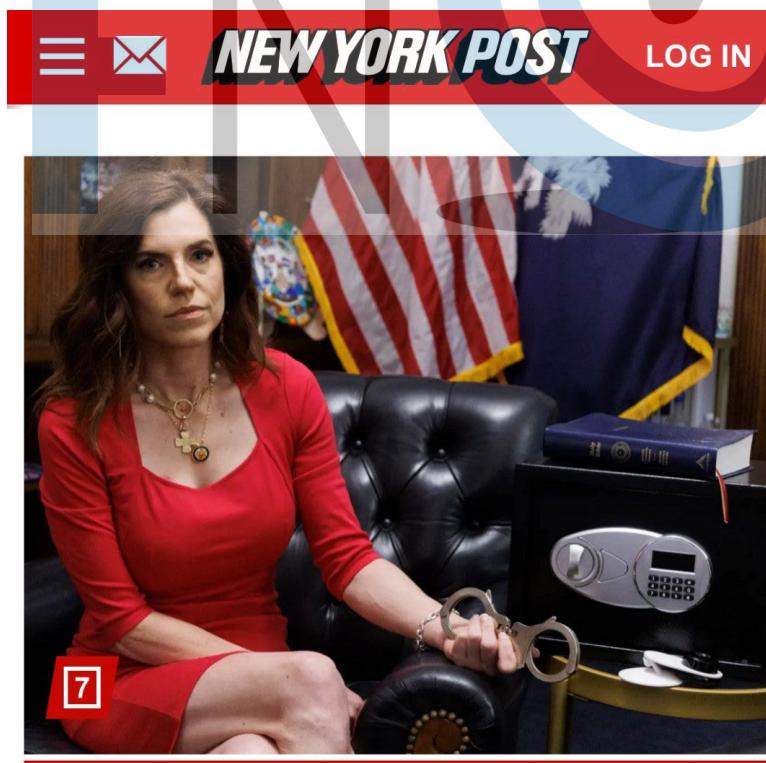
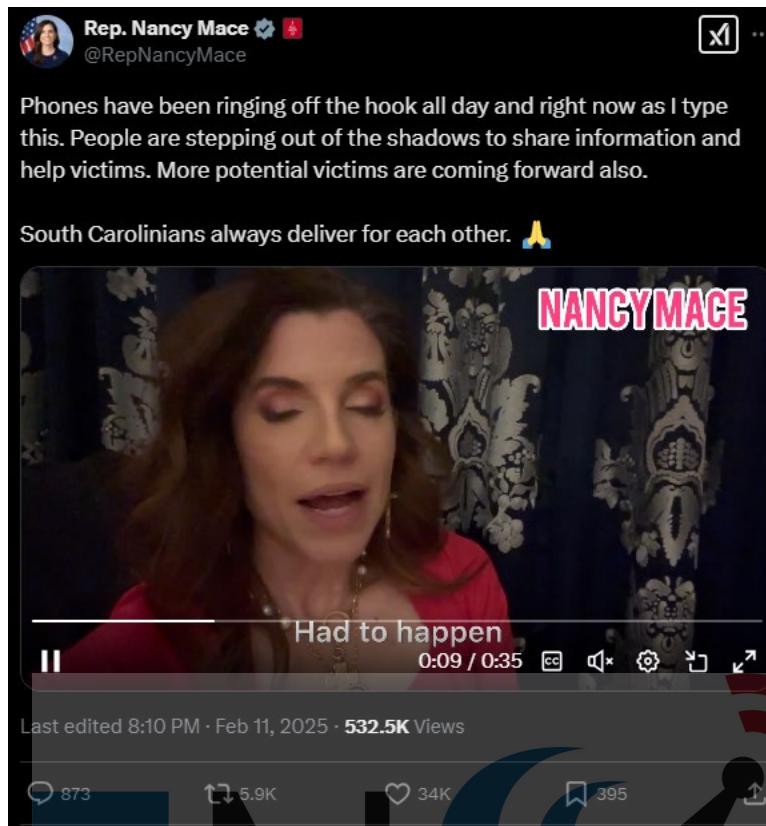
H.R.10398 - Safe Shelters Act **H.R.8180** - Stop revenge porn

H.R.10094 - Rape Shield Enhancement Act **H.Res.1579** - Bathroom Bill

What evidence is gathered? What legal actions planned?

1:34 PM · Feb 11, 2025 · 159.4K Views

 353  2.9K  9.3K  172 



Rep. Nancy Mace accused her ex-fiancé and his business partner of committing “depraved” sexual crimes against her and a dozen other women.

[Speaker 1] Let me just Set some context here. I want to run the clip and then we will have representative Nancy Mace yesterday representative Nancy Mace Dropped some private footage as part of I believe it was it it was congressional testimony to push for passing some anti-voyeurism legislation exhibit one

[Video]

Behind me is a screenshot from one of the videos I found of myself the yellow circle this Naked silhouette is my naked body.

I didn't know that I had been filmed.

I Didn't give my consent I didn't give my permission and this particular video that Patrick Bryant recorded of on of me on his secret camera He saved for over three years Without my knowledge.

I didn't pick this fight. I don't even want to be here today and discuss this

[Speaker 1] (24:30 - 28:26)

Please welcome to the program representative from South Carolina, Nancy Mace And you can follow her on X and I say her in the biological sense rep Nancy Mace Representative Mace. Thank you for being here

[Mace]

and Thank you for having me and bringing attention to this very important issue for women and girls all across the country Well, okay.

[Speaker 1]

I have some follow-up question. Could you the floor is yours explain to people who may not be familiar with this What is this important issue and what are you looking to achieve?

[Mace]

We're talking about peeping Tom's and voyeurism voyeurism being those individuals who film other people in Compromising positions intimate nude that sort of thing and I shared some examples of upskirt shots nude imagery and videos yesterday in my hearing because I Myself have just recently been through this over the last year and a half and uncovering all these videos I found I Identified some other potential victims other potential women and it's had devastating consequences for them And I've I've learned so much about federal law and also state law You know Democrats tout the violence against women act as being this Holy grail for victims like women of this kind of situation. It actually does nothing for them and so I've drafted a couple pieces of legislation like the Sue voyeurs act that Creates a civil right of action or a civil tort for those who've been victims of voyeurism or peeping Tom's Because there is no civil right of action at the federal level and then also it's not criminal to do this at the federal level under title 18 it's only criminal in certain maritime jurisdictions think cruises or Tribal lands and under state law state law in South Carolina is much weaker that like the screenshot I just you just showed of that clip of my Silhouette naked silhouette on the screen there first offense is a misdemeanor in a \$500 fine in South Carolina which is it's appalling that it's that little and it's It's

disgusting. It should be far worse. The penalty should be far higher than that

[Speaker 1]

Can I ask you has anyone been charged with misdemeanors or fines in South Carolina where this took place?

[Mace]

Not in this particular case yet because there's still an ongoing Investigation and that's part of some of the victims Frustration is that this thing has gone on for more than a year and a half these people are walking free But also in the last couple months, you know in working with these victims I'm uncovering all kinds of cases that are not getting the justice They deserve in the county where this crime these potential wrong this potential crime crimes took place There are over 350 cases of murder an attempted murder that are on the docket for probably close to the last decade and haven't been tried we have Pedophiles that are walking free.

I've shown some cases of those. We've got a guy in this same County Who had 1900 images of kids as young as three being raped by animals and adults and the guy got one day served in jail was time Served he's on the streets of South Carolina walking free. We have there's a murder case up the road where a guy was chasing some other man nine miles down the road and Shot him 15 times in the back and hasn't been no trial So what I've learned in this experience over the last year and a half is there's so much of a broken system And sometimes the lawyers involved sometimes it's judges solicitors attorney generals, etc We have a really broken criminal and justice system in this country

[Speaker 1]

Well, okay So I want to get to and of course I know that you've faced some criticism for this and I want to give you a Chance to to respond to those Obviously in this case, I would imagine since you presented that video you have this video and you've turned it over There would be that would be significant evidence and it would be kind of surprising if nothing is being done about that because you that in tandem with some of the Well, I guess I'd say claims or the statements that you made yesterday Are really serious and I want people to see those so that they know what it is that was stated

[Video] (28:26 - 28:55)

starting on November 5th 2023 I discovered my former fiance Patrick Bryant had filmed women without their knowledge Without their permission and without their consent.

He's able to rape other women Film them. This is one of Their rape victims that I discussed in my February 10th floor speech as You can tell she's on the couch and she's unconscious Passed out blacked out.

I think she was roofied We don't know we never will know and the tape of her being assaulted By the business partner of Patrick Bryant, John Osborne This rape tape was saved For years Patrick Bryant allegedly raped at least three women.

[Speaker 1]

And obviously is a very specific name and very specific crimes claims, right Raping at least, you know, three women drugging roofing I also heard the word underage there One of the criticisms is that you are relying on congressional immunity where you make these Accusations right as opposed to in a court of law or especially in the post me to era What do you say to those those people that that's the only place you've made these claims definitively

[Mace]

Well, it will not be the only place I make these claims. I don't even consider these allegations I mean to me this is a fact this is what I witnessed what I saw what I stand by and I stand by every word both of my February 10th floor speech and What I stated yesterday in my hearing I will have a chance and an opportunity to say this under oath in a court of law hopefully sooner than later and I won't get into too many details, but that's already in motion and You know I dare these these folks to these predators to to sue me because I am very much look forward to discovery and the depositions that will come along with it and

[Speaker 1]

Well, one of them is, right. One of one of the men in question is suing you ?

[Mace]

Yes, there was already one case and that falls into the speech and debate clause or the Westfall Act is the way that I interpret The Constitution, but I will absolutely have an opportunity and everything I've stated publicly. I have also stated to investigators Privately and so I've sat down with investigators. I believe three times in the last year and a half And then of course in my speaking with other potential victims I have uncovered more potential wrongdoing more potential victims more potential information that validates my experience and the experiences of other women and so it's also for me the reason I did the floor speech and the reason I did this hearing is because I've learned how, How much failure there is in the system at the federal level?

Which is where I as a member of Congress have a say whether it's the Violence Against Women Act whether it's men and women's spaces I am vehemently opposed to men being in women's bathrooms showers locker rooms and part of that that vehement like Anger that I have about men being in private spaces is because of the experience That I just went through this trauma a year and a half ago when I uncovered all these things You can imagine my shock and awe to discover.

Holy shit. This this guy this monster Had videos of me undressed and he saved them for over three years. I had no idea I didn't have any knowledge of it.

I didn't give my permission there was no consent and then the fact that he saved these videos of me for over three years was really terrifying and I sometimes I feel hopeless and then I meet

and talk to all these other potential victims.

[Speaker 1]

I do have two questions Sorry, just I just want to are any of those other victims pressing charges Are they going through the court process and to be clear you are standing by the claim that Patrick Bryan raped three women and some were roofied and underage

[Speaker 1]

Well, that's the assumption in some of the cases though So with some of the women it seems a lot like roofing and I said yesterday I believed one of them and actually probably more based on women that I've spoken to now Some of the women who are victims are too afraid to come forward and I'm gonna be their voice Others have come forward and I encouraged women yesterday who think or believe they may be a victim Within this group of individuals to call the state law enforcement division And then or we have a tip line with our office that we will provide their information Confidentially to the appropriate law enforcement officials but like if I went to law enforcement and falsely reported a crime that is a crime and You know is something I have never done and would never do but I've sat down with them three times I'll sit down with them again if I have to and then I will testify under oath to the same exact statements I made both in the hearing and in the floor speech and I expect to be able to do that I expect I will have an opportunity to do that

[Speaker 1]

Right is it sometimes a complication because I know this being on air all the time where if you are planning on pressing charges and going Through that process speaking publicly in a separate form can be a problem Since this investigation has been going on since 2023 and I wanted to ask so you're saying women have come forward against these specific men There so there are other women who are who are claiming to be victims and pressing charges, correct?

[Mace]

Yes, multiple women.

[Speaker 1]

Okay, and there's our roofied raped or any underage or is it?

[Mace]

I would say the allegations are all of the above Including, you know potential CSAM or child sexual abuse material that allegation.

I've not been able to verify that but that is an allegation That a few folks have come forward with and you know time will tell I think one of our frustration My frustration,

[Speaker 1]

but was it on the tape because you implied that there was underage sexual abuse in the tapes

[Mace]

Not yesterday, I didn't say anything about CSAM yesterday,

[Speaker 1]

okay, but in your Speech...

[Mace]

Since my floor speech there are some people who have come forward about potential CSAM with one of the individuals mentioned in that speech

[Speaker 1]

Let me ask I want to ask this did this man or these men?

I think there's four or five men right who are included in and I don't know...

[Mace]

It is four. And then five Various locations at different locations. it's complex because they're different people different locations different victims Different potential wrongdoing and crimes. It's a complicated. It's a complicated case,

[Speaker 1]

but there are no charges or convictions yet

[Mace]

None yet that's part of the frustration like I went to authorities in December of 2023 and if you you saw the whole hearing and saw my Introduction to me.

It's very cut-and-dry It's black and white like the the threshold for probable cause is So very low and if you add on top of it, I brought witness a witness forward witnesses I brought victims forward I brought footage forward with metadata date and timestamps file names folders of where these things were saved The devices where they were saved, you know, most investigations when you have someone come for you just have some hearsay You just have hey, I saw this. I did a lot more than that I literally delivered on a silver platter here is Evidence that you you can use right now to go make the arrest and they haven't done it yet And you know, that's why you know, I'm so passionate about this

[Speaker 1]

why do you think they haven't because that that is not normal in these cases I mean, especially after me to where we have men who were accused and you know You have to bow. I have a son and I have a daughter and I'm very worried about her with predators But I'm equally worried about him being falsely accused.

Yeah, we've seen men be railroaded and turns out they didn't do anything So if there's all of this evidence, why do you think there have been no charges? No convictions and it doesn't seem like there's there's going to be any time soon

[Mace]

Well, I think that sled confirmed this week that they were gonna provide whatever their investigative file is over to the solicitor at some point But this is the problem with South Carolina. It is a completely corrupt system so one of the attorneys for example of one of the predators in this case headlined a fundraiser for the solicitor who's who's Taken this case by hand hand handling it herself So her last fundraiser before her reelection last year was headlined by one of the attorneys for one of these men or one or more Of these men.

It's this the the conflict of interest is massive The Attorney General who should be championing this case is going to run for governor I might run for governor. So, you know when you have these conflicts of interest, there's a there's a political bias I believe, Underneath and then when you look at all the cases of rape or assault of women domestic violence in South Carolina I've talked to so many women who've gone to law enforcement or gone to the authorities for these kinds of cases And then they just tell you well, there's nothing we can do for you

[Speaker 1]

And I hear that over and I know you're running I know you mentioned the AG and that was a thing, right?

That was a little bit of a controversy because you said he was dragging his feet and I do know that he said hey I hadn't heard anything about this until the public statements and you have his cell phone number You've gone to a lot of events. Did you since you have access to him personally? Did you bring this up to him personally before the public testimony?

[Mace]

One of my one of my attorneys brought it up to him at an event. But here's the thing. My speech was in February it's now almost June and Instead of saying hey, you're right.

This is such an egregious case instead of saying, you know, let's get justice for these victims Let's change our state laws in South Carolina because they're so weak for women instead. He's attacked me as a as a victim He's attacked me for coming forward.

[Speaker 1]

Well, you kind of attacked him first I mean, I just want to say I want to be because this is a very complicated issue You did say he was dragging his feet and that almost makes him seem like he's aiding and abetting rape Systemically if I was I probably wouldn't be thrilled about that either.

I go. That's not true I only saw it when you're out there publicly on C-SPAN

[Mace]

Oh, yeah, he is letting pedophiles walk free and that's a fact and I've been putting that information out there as well

[Speaker 1]

That's fine. He's not attacking you right?

You're not a bit. You're both attacking each other I think that's that's important because we need to be better on the right than doing the victim thing either him or you

[Mace]

Yeah, no, I know I hear you and I hear that loud and clear from folks But here's the thing I waited 11 months to get a victim's rights advocate in my case 11 months and you know How I got the victim's rights have I get I got it through his office So I knew he was well aware There's no way with this hope high profiles and individual as I am and as an elected official There's no way in October of last year when I got my victim's rights advocate through his office But he had no idea I mean either either you're incompetent or You're ignorant and that's the only you know, that's the only answer there.

[Speaker 1]

Yeah Well, I mean it could also be you know AG's this is not really their job obviously to go forward like from the base level I would need to come from the police department first So I think maybe maybe there's a miscommunication there where maybe he didn't know And then maybe he felt attacked and then he kind of came back at you So, you know, I hate to see that kind of infighting especially over something as serious as you know underage rape Accusations and I really don't want this to get muddied When truth is paramount in all of us and I know that you were running against him Potentially people talk about this as governor Let me ask you this when you kick because I wouldn't know about this unless you came forward Sounds to me like you're saying this is to raise awareness because the justice system has not been very just Did this did mr. Bryant at any point threatened to use this disseminate this material? Did he give it out to anyone else?

[Speaker 1]

I Don't know. I hope we find that out. want to shed light on that because I have no idea where this material when I you know So I just don't have those answers and that's again another frustration. I have Knowing this person carried this around for years. What did he do with it?

Why did he have it? Why did he save it? Why did he catalog it?

Why did he store it? And what was he going to use it for or what had he used it for but also the experience has informed me Legislatively on all these bills whether it's about rape kits I'm filing

a bill this week that would prohibit rapists from suing their rape victims

[Speaker 1]

Wait, hang on a second can they sue if it's a false allegation because I think we need to have an equal punishment for

[Mace]

I think that's Fair and I have a son like you I have a son and I have a daughter my fears are the same my fears for My daughter the same are your fears for your daughter my fears for my son are the same as your fears for your son I've had to have very frank conversations with my son about About false allegations because that is a problem in there and the women that come forward and make false claims do a great disservice to real victims when they come after or come later because women aren't believed generally and so You know, that's tough. And so that has to be you have to tamp down

[Speaker 1]

Well, I was like and that sounds like covert women are very much believed I mean we have example after example in the me too. The problem was a proliferation

[Mace]

Democrats don't believe women.

[Speaker 1]

So no, no, no. No, no, that's the opposite. Aziz Azaria had a bad date for crying out loud.

I mean you look at guy like Chris Hardwick. He's a Democrat I was in defending people going. Well, this is not the same as rape He went over to his hotel room at 2 in the morning There are plenty of sex out there in mattress girl The guy at Columbia never got to graduate go to graduation and it turns out she was sexually assaulting him So I would disagree with that premise that women are not...

[Mace] (41:11 - 41:14)

She hould face jail time women that do that

[Speaker 1] (41:15 - 44:52)

Yes, but the problem the problem I have with the premise is that right now in today's society women are often believed and there's the court of public opinion that often takes a priority over the actual courts Which is why I think you can understand as you said if you have a son people being Skeptical here if this man didn't go out and disseminate it Is it possible because it looked I will tell you this when I look at it It looks exactly like the security camera that I have in my living room Is it a security camera that Existed in the house that you knew was there or you both knew were there and then it stores Automatically to the cloud because that would be the same of every sort of ring camera as it were

[Mace]

Well, I found the brand of the camera and provided that information the serial number and the screenshots that I showed yesterday I provide all that evidence over to law enforcement again. These are questions that I have I don't know if it was on the cloud one would presume because a lot of them are in the cloud I don't know how long they save it like as soon as I found out about this, you know I reached out to the camera company to find out when it's deleted Does it stay on the cloud because oftentimes once it's deleted it's gone and that was that was hard to hear too so a lot of my questions can't be answered until I see what the investigation turns up because I'm not an investigator.

I'm not a detective I'm just this person who accidentally found these files and was like what the hell and I identified some of the women and Some of the victims I talked to clearly didn't know they were being recorded whether they saw the camera or not and They were told they were not being recorded and then let's just say let's just say quote It is a security camera and was used for security But there were no security cameras on the outside of that property Which is odd you'd think if you had security cameras, you'd have cameras all over the place inside outside wherever and that wasn't the case and And so even if it was a security camera Why would you just save the naked videos of women? Why would you just why would you save only the naked videos of women and nothing else?

[Speaker 1]

Like it's just it's it's only the videos of naked women of these crimes were what was saved.

Nothing else ?

[Mace]

That's what I saw. I didn't see any security camera footage I saw footage of women who were naked lots of it video after video after video and I was able to identify Several women on that camera and other cameras I found up to four recording potentially for recording devices and And this stuff that I found spanned almost a decade long before I ever met my former fiance This was years in the making before I ever knew him But I was able to identify several victims and I provided all that information, of course along.

[Speaker 1]

What was the brand of camera?

[Mace]

It was an Arlo brand camera. You can see that on the screenshot. I believe one of the screenshots I had yesterday that particular device at one point had ten thousand six hundred thirty three videos on it based on the screenshot

[Speaker 1]

But they're not Usually hidden cameras Arlo's like there's one of the brands that they set up I mean, especially when I had new well, my children were very young.

I had these cameras out there in case, you know, something happens

[Mace]

Oh, it's a security camera.

[Speaker 1]

Okay I don't know, you know that doesn't scream security camera to me. That's if there are only videos of naked women Yes, that's certainly we're not that's basically a modern-day pair of binoculars But if that's not the I mean again, I know many people most people here who have some of us have Arlo's I was going to you said this is this footage goes back ten years.

[Mace]

I have footage going back It was at the time when I found it a roughly eight years of upskirt photos of women's genital areas Photography images videos I saw almost a decade worth of stuff

[Speaker 1]

How did you get this by the way since you had this before an investigation? How did how did you come upon this footage?

[Mace] (44:52 - 44:58)

We went to couples counseling and the couples counseling said hey, you know to rebuild trust in your relationship

You need to give her access to your phone so you put my thumbprint on his phones my biometrics were on there and I was allowed to go on his phone at any time and That's when I accidentally uncovered all I just wasn't I wasn't expecting that Wasn't something I was looking for wasn't expecting it It was a real shock to the system and when I found it I took you know, a couple screenshots and I handed everything over to law enforcement again This isn't it's my not my job to be investigator or detective It is law enforcement's job to do that and I hope and pray that they're doing an extensive Investigation and that justice is brought for all these victims and that at the same time we reshape federal and state law to do better

[Speaker 1]

If so, you're going through couples therapy and he gave you the passcode or the biometric unlocking mechanism to his phone While you guys are I assume, you know in some somewhat dire straits and and didn't delete Non-consensual footage on the phone that you had access to

[Mace] (45:53 - 46:00)

He definitely was transferring footage and I showed a screenshot yesterday of files that were

being transferred off his device

He got a second device. I said yesterday like I saw a second device at our Wi-Fi like that same day It was the tiramisu operating system a couple weeks later. He would replace his Android s22 with an Android s23 and There's some indication and data indicating that he may have been transferring terabytes of data terabytes and terabytes and terabytes of data Which would indicate lots and lots of photos and videos thousands of files potentially.

[Speaker 1]

Okay. Wow. Yeah, that's terabytes That's that's a lot especially if you're going back eight years where it's pre HD That's many many hours, but you did get this while you two are still in a relationship is when you found the footage

[Mace]

Yeah I mean I got the hell out as soon as I found out about it Took me about a week.

I wanted to just get all my ducks in a row I had children, you know I've had a tumor that month as well and I didn't have surgery and so I had all these things going on and took me About I don't know a week to ten days to make sure I had all my things in order to be able to leave

[Speaker 1]

Okay, glad Let me ask you this How do you balance because he just said you had a son and I don't know if Gerald you had a question that you wanted To ask but how do you balance like you just said being concerned for a son and a daughter? Due process obviously post me too, which was spearheaded by by Democrats where it was a witch hunt and obviously protecting Victims of actual, you know of actual rape and sexual abuse

[Mace]

How do I balance that

[Speaker 1]

yeah with this legislation How do we balance those things because you know, I disagree with the premise that women are not believed So for example that legislation that legislation that you proposed would it still permit or would it?

Allow I should say Victims of false accusations of rape to sue their accuser or have equal criminal penalties Like how do we balance this out because it's false allegations.

[Mace]

It has to do with real Real crimes and convictions. It doesn't have to do with false Allegations number one number two when I talk about my sue voyeurs act that that is creating a civil Tort at the federal level when we when Democrats did the violence against women act there was no civil Right of action women couldn't sue federally Civilly over being filmed in this way They will

be able to do that with the sue voyeurs act with the stop voyeurs act We expand the federal prohibition against voyeurism So you can only it's only illegal federally to film women in this manner in certain maritime jurisdictions or tribal lands And so this would expand that very narrow definition to make it a crime under title 18 of the federal US Code of Laws For voyeurism and so those two specific things are what I've done federally I've also worked with state lawmakers to draft a bill to Strengthen South Carolina state law because it's a misdemeanor and a \$500 fine on first offense That particular bill would make it a felony and make the financial penalties Significantly higher because we want to deter these people as much as we can On the very first offense and then it gets worse from there and so I've been working with state lawmakers and then of course I have my own legislation at the federal level based on the Experiences I uncovered with all of these women

[Speaker 1]

Sure, and I know that I know I appreciate you giving us your time Gerald I know you have a question. I know and by the way you everyone out there You can follow her and send her your questions at rep Nancy mace on X. Yes, Gerald

[Speaker 2]

Yeah, so again, thanks, and we're all on the same page here like bury the pedophiles under the jail You know like these guys should be getting long prison sentences if if what we're claiming is is true I think the question that I had for you is I've had a theory about this that I'm really worried about we've seen people tried in the media before I'm not saying that's what you're By the way, I just want to set this up because you're somebody who's experiencing this and I think your opinion would be very valid I am of the mindset that to balance this out and make sure that justice is served and people aren't Taken like Brett Kavanaugh taken through the media basically just to smear his name, right? We shouldn't be making names public and accusations this, this dire I mean, these are these are very serious accusations that somebody has been raped and some people's privacy has been violated at the very least Yeah, there's there's a lot of very serious allegations here until a legal process has gone Gone through and I wonder what your opinion is on that because I understand that there are problems Potentially with that because we want to hold people accountable Sometimes the justice system doesn't do us justice essentially or takes so long to do justice that justice is really delayed and that's kind of denied But at the same time haven't we seen so many people's lives ruined you cannot unring the bell It doesn't matter how many times you go out and tell people that Johnny Depp didn't do what Amber Heard said He's still not working.

He's still not getting that time back He's still not getting the contracts back for Trevor Bauer You're still not having Brett Kavanaugh's kids not think that hey did something happen with my dad where he was drunk and raped somebody So shouldn't there be some more protections here to make sure that everybody is protected in the system And it doesn't swing one way or the other with allegations being made in public that are very specific when cases haven't been tried yet

[Mace]

Well, I think that you know in this particular instance I am exposing what is completely shattered and broken and corrupt in South Carolina's court system and justice system If I had not spoken up this there would be no investigation and in fact one of the Rape victims didn't get her victims rights advocate until the day of my speech on February 10th six months later After she came forward

[Speaker 2]

and that's appalling and I agree and I'm pardon me for interrupting But could that also have been done without saying names is my question and it's a genuine question

[Speaker 1]

I just want to clarify. It hasn't there been an ongoing you just said police investigation since 2023 So that would be before your statements, right?

But she didn't get the advocate until six months this other person, but I mean for yourself

[Mace]

Yeah, they're different things have come forward at different times of the investigation now Remember, I didn't know who all the women were right at right Like yeah, I had to go find some of them and identify them I did that because because our law enforcement state law enforcement wasn't doing that six months into the quote investigation, to my knowledge they hadn't contacted any victims.

[Speaker 1]

Yeah Yeah, I mean so but what about your but for you what why do you for you because you made your claims, right? You can't some victims may not like you said want to come forward but yours that's been open since 2023 Before you came out and stated his name publicly like let's say because this is the question people have and I know that and I Appreciate you allowing us to be fair There could be a universe in which Nancy Mace and this mr. Bryant had a very ugly falling out You got these while you were together and then used it against him and the investigation reveals that there is actually no crime Like if that happens, should he be able to sue you?

[Mace]

Well, hey, I it doesn't really Matt. Let's just say there was a very nasty breakup Let's just say it was the worst in the world. That doesn't negate That I was filmed without my knowledge without my permission without my consent and those videos were saved for years And that is that is not That's not okay.

Not by any standard. And so it didn't really matter, you know that part of it but I add on top of that I find all these other potential victims and all this potential other wrongdoing and To see really nothing happening and only because of the public attention is the investigation moving

forward I don't expect honestly I expect very little out of this because that is very typical of South Carolina and the and the justice system I mean, there's a case in Myrtle Beach where the guy was chased nine miles down the road shot 15 times in the back... No charges and when you know now the feds are stepping in I am going to ask the feds to step in on this and provide some oversight because there's been I believe obstruction of justice by the solicitor and other issues that underscore the political bias and the unfair way that Some of the victims have been treated some of us feel like we've been treated like criminals and the criminals treated like victims And that's not the way the system is supposed to work like victims have rights They're supposed to be protected their identity is supposed to be protected The witness intimidation is not supposed to be allowed by law and they The solicitor will not prosecute for witness intimidation and there have been numerous examples of it over the last couple of months And so when you see the system break down in the way that it has this is the only recourse we have

[Speaker 2]

You're right that has to be that hat like that is that is unconscionable that that stuff is still out there And I 100% agree, but I want to laser in on the point. I agree with you more attention has to be brought to this That's that public pressure good Make sure this stuff gets changed Did his name have to be used to accomplish that because it's a bell that cannot be unrun you may be 100% right in this case, but what about some of the other cases we've seen in the past and yet future?

Where maybe a name gets dropped in public and people drag them through the the social media Hellscape that happens after that in the media hellscape you can't unring that bell Did his name have to be used for you to be able to make this point?

[Mace]

A hundred percent, the hellscape these... women went through the hellscape

[Speaker 2]

I agree with the women that but we're all on that same page represent I'm trying to be very fair.

I'm a hundred percent like bury these guys under the jails like like well the guys who actually commit rape Yes, the guy who's committing rape and disseminating these pictures are the worst of the worst We would kick their ass if they were in front of us all of us agree on that But you do understand the jeopardy we have where people's lives are being ruined by this How do we balance that when public accusations include people's names? While an investigation is going on is there a better way for us to accomplish all of it to keep women safe?

But also to make sure that men are not just gonna with no recourse like I sue the lady who accused Trevor Bauer But you're not gonna get any money from her. She's just gonna declare bank Contract like that happens a lot and I want to make sure that neither one of these things happen that the rape doesn't happen that the Voyeurism doesn't happen and that the men's names if they don't have to be used and I don't see a reason why they do yet Maybe there is

one well

[Speaker 1] Sorry, why did the name specifically because you said they revealed your identity and again I didn't know about this until you started speaking about it So if they did that that's horrible and that would be the answer, but why did the name have to be used?

[Mace]

I believe that there is a present danger Particularly at some of the locations I mentioned in my speech where underage children are I wanted to be sure that families and parents that that I don't know that the general public knew that there are certain locations that I would not advise your child to go to because of some of what was being filmed or Allegedly or being done at those locations with cameras it to me as a mom I didn't have a choice and And as I went through the process of the last year and a half and I learned about all these other allegations and potential Wrongdoing from parents who are aware of things being filmed about with underage children Potentially, you know all of that to me.

[Speaker 2]

This is in the house?

[Speaker 1]

At one of the properties I mentioned in the speech and so for me This is like this was like an immediate clear and present danger to my constituents. Not only just to women potentially underage girls as well and Like, you know, I felt like I was doing my civic duty to protect my constituents and then on top of that I'm obviously doing the legislation working with state lawmakers. I've got dozens of federal bills too.

But like this was an immediate Holy shit. Oh my god There are kids over at this property things are being allegedly filmed at this property including potentially really bad things That to me was like we don't have time

[Speaker 1]

What really bad things though because I would imagine if if children are any property right near there Isn't it? You have security camera footage to make sure that everything is is kosher What really is this about child rape at the these properties?

[Mace] (57:40 - 57:40)

Not child rape I haven't said that.

[Mace] (57:42 - 58:04)

I would say things I would qualify as a CSAM potentially and that and like

[Speaker 2]

again these guys from mr. Bryant Yeah deserve deserve every ounce of punishment that we can get but that moment was in 2023 when you found that information, right? But that is that that is

the holy shit moment

[Mace] (58:04 - 1:04:01)

Well, yeah, but I've over the course of last year and a half talking to potential victims I've learned so much more and I'm informed by other potential wrongdoing and crimes But then even since my February speech, I've had parents come forward

With some claims and they're really damning and you know Kids are at risk as long as these certain individuals at least one Individual that I spoke about in my speech if he's still free Kids are in danger and they should not be at that location And so just you know for me, it was like I didn't have a choice This is clear and present danger.

I want to protect kids. I want to protect women This is what I have to do and I stand by every word. I said in my floor speech I stand by every word I said in my hearing yesterday This this can't this can't go on and I'm gonna run through I'll run through a brick wall if I have to but to protect Constituents and to protect kids and protect women across South Carolina all across the country really. I stand by everything.

[Speaker 1]

Well, I hope that and thank you for clearing some of that up. I hope that justice is served It looks like it's gonna go through this process and with that amount of evidence It would seem like there will be some people put in in prison for life Representative Nancy Mace, we appreciate you taking the time I know it must be very difficult and thank you for giving the floor to people who are giving you some some tough questions Appreciate it.

[Mace]

Yeah, I appreciate the tough questions I like the kaliloqui.

So thank you. All right. Thank you very much representative Nancy Mace everybody all right.

STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

IN COURT OF COMMON PLEAS
IN THE NINTH JUDICIAL CIRCUIT

) C/A No.: 2025-CP-10-03124
Jane Doe,)
Plaintiff,)
v.)
Patrick Bryant, John Osborne, Eric)
Bowman, and Pommer Group LLC.)
Assignment Desk Works LLC., and)
GLT2, LLC.,)
Defendants.)

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
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(843) 588-5587
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Attorney for Plaintiff

June 10, 2025
North Charleston, South Carolina

STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

IN COURT OF COMMON PLEAS
IN THE 9TH JUDICIAL CIRCUIT

) C/A No.: 2025-CP-10-03124
Jane Doe,)
Plaintiff,) **FIRST AMENDED COMPLAINT**
v.) *(Jury Trial Requested)*
Patrick Bryant, John Osborne, Eric)
Bowman, and Pommer Group LLC.,)
Assignment Desk Works LLC., and)
GLT2, LLC.,)
Defendants.)

Plaintiff Jane Doe¹ (“Plaintiff” or “Doe”), by way of this Complaint, brings the below claims against Patrick Bryant, John Osborne and Eric Bowman, Pommer Group LLC, Assignment Desk Works LLC and GLT2 LLC, (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.

¹ Plaintiff filed a motion to proceed under a pseudonym pursuant to Rule 10 of the South Carolina Rules of Civil Procedure contemporaneously with her complaint on May 29, 2025.

3. Defendant Patrick Bryant (hereinafter “Bryant”) is a resident of Charleston County, South Carolina.

4. Defendant John Osborne (hereinafter “Osborne”) is a resident of Charleston County, South Carolina.

5. Defendant Eric Bowman (hereinafter “Bowman”) is a resident of Charleston County, South Carolina.

6. Defendant Pommer Group LLC (“Pommer Group”) is a for-profit South Carolina South Carolina Limited Liability Company 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 is the principal member.

7. Defendant Assignment Desk Works LLC (hereinafter “ADW”) is a for-profit South Carolina Limited Liability Company registered with the South Carolina Secretary of State and regularly conducts business in Charleston County. Upon information and belief, Bryant is the principal member.

8. Defendant GLT2 LLC (hereinafter “GLT2”) is a for-profit South Carolina Limited Liability Company registered with the South Carolina Secretary of State and regularly conducts business in Charleston County. Upon information and belief, Bryant is the principal member.

9. Venue is proper in this judicial circuit because the unlawful acts, which are the subject of this complaint, occurred in Charleston County.

FACTUAL ALLEGATIONS

10. 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 Victimizer and Offenders from Yielding Explicit Unconsented Recordings Surreptitiously Act, (“Stop VOYEURS Act of 2024 and 2025”) (H.R. 7778 and 1203) The bill

seeks to broaden the scope of federal laws against video voyeurism beyond federal lands, impose harsher penalties on offenders. Another bill filed in 2024 and again in 2025 (H.R. 8027 and H.R. 1204 respectively), the SUE Voyeurs Act creates 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.

11. Plaintiff is the woman whom Congresswoman Mace was speaking about.
12. Bryant is Mace's former fiancé and Plaintiff's former boss.
13. Bryant, Osborne, and Bowman are wealthy entrepreneurs, close personal friends, and business associates.

14. Plaintiff is a young woman who, between 2017 and 2019, was initially employed as Bryant's personal assistant and then worked for Go To Team Incorporated, and ADW, which are owned by Bryant.

The Sexual Assault

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

16. 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.

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

18. 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.

19. 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.

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

21. 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.

22. 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.

23. 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."

24. 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.

25. 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.

26. 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.

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.

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

28. 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.

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

30. 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.

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

32. 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.

33. 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.

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

35. JDW emailed the diary entry to herself at 7:58 a.m. 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.

36. 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.

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

38. 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.

39. 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.

40. The crimes that they conspired to commit included but are not limited to sexual battery as defined by SC Code Ann. 16-3-651 (h).

41. 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).

42. 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).

43. 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) (b)

44. 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.

45. 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.

46. 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.

47. 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 battery

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 on December 19, 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. Plaintiff took an Uber home from the party at approximately 12:35 a.m. Bryant joined her in the 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. Plaintiff asked Bryant and Shawn Moffatt the Managing Partner of ADW for a raise so she would no longer have to work two jobs. When they refused, Plaintiff resigned.

ADW is sued for failing to pay overtime. Bowman and Bryant threaten Plaintiff for joining the wage lawsuit

67. Several months after she resigned, Plaintiff learned that another former employee had filed a class-action lawsuit against AWD, Bryant and Moffatt for failing to pay overtime.

68. 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.

69. 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?

70. 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.

71. 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.

72. 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.

73. 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.

74. 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.

75. 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.

76. 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.

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

78. 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 class action.

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

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

Congresswoman Mace

81. 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.

82. 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.

83. 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.

84. 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.

85. 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.

86. 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.

87. 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.

88. 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.

89. 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.

90. 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.

91. JDW found Plaintiff's last name on social media a few weeks later. Mace called Plaintiff on April 6, 2024.

92. 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 the Sue VOYEURS Act and that she was working to prevent what happened to her from happening to other women.

93. 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.

94. 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.

95. 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.

96. 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, 2024, because she was unconscious when the Defendants violated her.

97. 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.

98. 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.

99. Although she is not certain, Plaintiff believes it is possible 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.

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

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

Bryant, and ADW use the legal process to threaten Plaintiff with civil liability for cooperating with law enforcement in the sexual assault case

102. On April 28, 2025, ADW sent letters to Plaintiff, Mace, JWD, and the other plaintiffs in the class action lawsuit advising them to preserve their communications and threatening to sue them for making disparaging comments about Bryant.

103. On May 7, 2025, Bryant and ADW filed a lawsuit against the Plaintiff for Breach of Contract in Charleston County Court of Common Pleas, claiming that the Plaintiff had violated the settlement agreement in the wage lawsuit by making disparaging comments about Bryant.

104. Bryant and ADW lawsuit seek civil damages and a restraining order precluding Plaintiff from making disparaging remarks about him,

105. Plaintiff only made truthful statements to SLED about Bryant in the ongoing criminal investigation.

106. On May 21, 2025, Bryant and ADW's attorney served Plaintiff with Request for Production and Interrogatories seeking information and documents related to the sexual assault she reported to SLED that are the subject of an ongoing criminal investigation.

107. Bryant and ADW filed the breach of contract lawsuit for an improper purpose to threaten Plaintiff with civil liability if she cooperates with law enforcement in the sexual assault case.

108. The settlement agreement only pertained to Plaintiff's wage claim against Moffatt and ADW, and it was not intended to shield Bryant from sexually assaulting Plaintiff when she was unconscious.

109. Bryant and AWD filed the breach of contract lawsuit against Plaintiff for an improper purpose; namely, to intimidate her from testifying against Bryant in criminal and civil proceedings related to the sexual assault.

Bryant creates GLT2 LLC to use the legal process for an improper purpose and shield himself from personal liability

110. Bryant formed the shell company GLT2 LLC (“GLT2”) to conduct depositions for an improper purpose, namely, to disseminate false information and discredit the Plaintiff’s witnesses, thereby interfering with her right to have a fair and impartial jury in future criminal and civil proceedings.

111. GLT2 is the alter ego of Bryant and was formed to shield Bryant from personal liability.

112. According to paperwork filed with SC Secretary of State, GLT2 was formed on February 20, 2025, ten days after Mace’s speech. Bryant is a member of the company.

113. Then, one day later, on February 21, 2025, the Brewer Law firm, GLT2 filed a deficient “Petition to Authorize Depositions and Discovery Before an ~~Action~~” (“The Petition”), 2025-CP-10-00981, in the Charleston County Court of Common Pleas naming John and Jane Doe as Defendants.

114. The action violates SCRCMP 11 because the grounds to support the Petition are false and not made in good faith.

115. The Petition claims GLT2 needs to conduct discovery before filing a lawsuit “*to determine the individuals involved in committing tortious acts against the Petitioner, including but not limited to publishing statements intended to cause damage to Plaintiff’s business.*”

116. However, at the time it filed the Petition, GLT2 had only been in business for one day. Thus, it would be virtually impossible for individuals to publish statements harming the business in a twenty-four-hour period, as The Petition claims.

117. Moreover, GLT2’s petition did not comply with FRCP 27, which only allows parties to conduct depositions before an action is filed if the petition meets the requirements set forth in the rule. The Petition failed to comply with FRCP 27 in the following manner:

- a. SCRCMP 27 (a)(1) requires that the petition be verified by the petitioner under penalty of perjury. GLT2’s petition was not verified.

- b. SCRCP 27 (a)(1)(4) requires the petitioner to state the names or a description of the persons it expects will be adverse parties and their addresses so far as known. GLT2's Petition does not contain the names or a description of the expected adverse parties.
- c. SCRCP 27 (a)(1)(5) requires the petitioner to state the names or a description of the persons to be examined and the substance of the testimony which he expects to elicit from each person. GLT2's Petition does not contain the names or a description of the person(s) it is seeking to depose.
- d. SCRCP 27 (a)(2) requires the petitioner to serve a notice on the expected adverse party of the time and date that the Court will hear the petition at least 20 days before the date of hearing. Since GLT2 did not name or describe the expected adverse party, they likely did not serve the expected adverse party with notice of the Petition.

118. As of the date of this filing, GLT2's Petition has not been heard by any Court.

GLT2 continued the action twice.

119. Even though the Court did not grant its Petition, GLT2 served a subpoena on Wesley Donehue and deposed him on April 28, 2025. ("Donehue") GLT2 did not have the authority to issue a subpoena or conduct this deposition.

Donehue made false and defamatory statements about Mace throughout his deposition that prejudice Plaintiff's civil and criminal claims against Bryant.

120. GLT2 released the transcript of Donehue's deposition. Donehue made false and defamatory statements about Mace that prejudiced Plaintiff.

121. Donehue is a longtime friend and business associate of Bryant's. Donehue, Bryant and Osborne are members of The Harbor Entrepreneur Center and Forum.

122. Donehue is a former political consultant for Mace. The two had a falling out and ended their business relationship on or about August 8, 2024.

123. Donehue testified that between November of 2023 and August 8, 2024, Mace had not reported what she found on Bryant's phone to law enforcement because she planned to use the images to blackmail Bryant into giving her the two houses they owned together.

124. This is false. Mace reported it in November and met with law enforcement in December 2023, providing them with the pictures and images she had found on Bryant's phone.

125. Donehue testified that Mace asked him to blackmail Bryant. He claims that Mace asked him to tell Bryant that she would not report him to law enforcement unless Bryant agreed to give her the two houses they owned together.

126. This is also false because Mace had met with SLED well before she talked to Donehue; therefore, she could not have asked Donehue to blackmail Bryant, because Bryant was already under investigation at the time.

127. Donehue testified that one of the reasons he fired Mace as a client on August 8, 2024 was that she had asked him to blackmail Bryant.

128. This is false because Mace and Bryant settled the dispute over the property they owned together at mediation on May 28, 2024, so she would not have asked Donehue to blackmail Bryant.

129. Moreover, emails reveal the real reason that Donehue fired Mace as a client is that she wanted access to her Google Analytics, and Donehue didn't want to give her access to her own data.

130. Donehue, not Mace, is the one engaged in blackmail. In December of 2024, Donehue sent Mace hostile and threatening text messages when she had a public dispute with Trey Gowdy, one of Donahue's clients. Donehue texted Mace "And let me be very clear with you. You do not want to pick a fight with me..."

131. Bryant took the unauthorized deposition of Donehue so he could publicly disseminate false information that would prejudice Plaintiff's claims and her ability to have a fair and impartial proceeding.

Bowman and Bryant defamed Plaintiff on social media and to the Daily Mail

132. Bowman and Bryant attempted to silence Plaintiff by defaming her and publicly shaming and humiliating her on social media and in a Daily Mail article.

133. 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*.”

134. 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.

135. 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?”

136. 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, which published it with Plaintiff’s face blurred.

137. Bowman provided the video to the Daily Mail along with Plaintiff’s full name and cell phone number, to harass, shame, and intimidate her into not pursuing a criminal case or civil proceedings.

138. 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.

139. 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.

140. Bowman and Bryant knew SLED was investigating the matter and that Plaintiff was an alleged sexual assault victim when they published her name on X and provided it to the Daily Mail.

141. 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.

142. Bryant and Bowman were acting with malicious intent by providing the Daily Mail with close-up photographs and videos of Plaintiff when she was intoxicated to defame her character.

143. 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.

144. 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

145. 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.

146. 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.

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

148. 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.

149. 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.

150. 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.

151. 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.

152. 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)

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

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

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

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

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

158. 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)

159. Plaintiff incorporates all allegations above into this cause of action.
160. Defendants willfully, wantonly, and recklessly inflicted forcible contact on Plaintiff without her permission.
161. As a result of Defendants' actions, Plaintiff has suffered mental distress.
162. 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 INFILCTION OF EMOTIONAL DISTRESS)
(DEFENDANTS BRYANT, BOWMAN, OSBORNE)

163. Plaintiff incorporates all the allegations above into this complaint.
164. Defendants Bryant, Bowman and Osborne engaged in conduct that they were certain, or substantially certain, would cause Plaintiff to suffer severe emotional distress.
165. Bryant, Bowman and Osborne's conduct was so extreme and outrageous that it exceeded all bounds of decency.
166. Bryant, Bowman and Osborne's conduct caused Plaintiff to suffer severe emotional distress.
167. 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)

168. Plaintiff incorporates all allegations above into this cause of action.
169. Bowman invited Plaintiff into his residence at 3024 Marshall Blvd, Sullivan's Island in the early morning hours of October 26, 2018.
170. Bowman lived in the residence and had control over it, as did Pommer Group LLC.

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

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

173. 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.

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

175. 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.

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

177. 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.

178. 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.

179. 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.

180. 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)

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

182. 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.

183. 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.

184. 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.

185. 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.

186. 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.

187. 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.

188. 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.

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

190. As a result of Defendants Bowman and Bryant's statements, Plaintiff has suffered embarrassment, humiliation, and mental anguish and seeks damages to be determined at trial.

SIXTH CAUSE OF ACTION
(ABUSE OF PROCESS)
(DEFENDANTS BRYANT, BOWMAN, GLT2, AWD)

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

192. Bryant and ADW abused the legal process by filing a frivolous lawsuit against Plaintiff for breach of contract on an unrelated matter to harass, intimidate, and silence her from reporting what he did to her in an attempt to avoid criminal prosecution and civil liability.

193. GLT2, Bryant and Bowman abused the legal process by filing a Petition to Authorize Depositions and Discovery before an Action for an improper purpose.

194. GLT2, Bryant, and Bowman conducted unauthorized discovery and released it to the media to prejudice Plaintiff in civil and criminal proceedings and interfere with her right to have a fair and impartial jury.

195. ADW, Bowman, Bryant's and GLT2's sole purpose for filing the lawsuit and conducting unauthorized discovery was to scare and intimidate Plaintiff in effort to avoid criminal and civil liability for their unlawful acts and to create bias against Plaintiff and her witnesses at trial.

196. ADW, Bowman, Bryant and GLT2 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.

197. 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, OSBORNE, ADW, GLT2)

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

199. 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.

200. Bryant, Bowman, and Osborne plotted to sexually assault Plaintiff while she was unconscious and film the assault without her knowledge or consent.

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

202. Bryant, Bowman, ADW, and GLT2 conspired to use the legal process for an improper purpose by filing a frivolous lawsuit and conducting unauthorized discovery to gain an unfair advantage to prejudice Plaintiff in civil and criminal proceedings.

203. Plaintiff was damaged due to their agreements to commit these unlawful acts.

EIGHTH, NINITH, AND TENETH CAUSE OF ACTION

NEGLIGENCE/NEGLIGENCE *PER SE*/GROSS NEGLIGENCE

(DEFENDANTS BOWMAN, BRYANT, OSBORNE, POMMER GROUP)

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

205. 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.

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

207. Plaintiff was a person the statutes were 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.

208. 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.

209. 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.

210. 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.

211. 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.

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

213. 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
Marybeth Mullaney (S.C. Bar #6685)
MULLANEY LAW

4900 O'Hear Ave Suite 100 & 200
North Charleston, South Carolina 29405
(843) 588-5587 Phone
marybeth@mullaneylaw.net

ATTORNEY FOR PLAINTIFF

June 10, 2025
North Charleston, South Carolina



AFFIDAVIT OF ERIC BOWMAN

STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

I, Eric Bowman, being duly sworn, do hereby state and affirm as follows:

1. My name is Eric Bowman. I am over the age of 18 and competent to testify to the matters set forth in this affidavit. I reside in Charleston County, South Carolina.
2. I make this statement voluntarily and based on my own personal knowledge regarding events and interactions involving Congresswoman Nancy Mace between September 7th, 2023, and November 24, 2023.
3. On or about September 7th, 2023, in the middle of the day, Nancy Mace messaged me via Signal and then placed a voice call through the same platform. During that conversation, she asked if I knew someone who could hack into a phone. I responded that I did, but noted it would be very expensive.
4. In the same conversation, she asked if I could hire a private investigator to watch Patrick Bryant's condo while she was in Washington, D.C. I told her I could handle that.
5. Later that same day, around 5:00 or 6:00 p.m., she sent another message via Signal stating that I should not proceed with anything and that she had already "taken care of it."
6. I have had past communications with Nancy Mace through the Signal messaging application. On or about October 31, 2023, she updated the settings within our Signal conversation to change the disappearing message time to one day.
7. This action was notable, as it occurred shortly before a series of possible disturbing interactions and events involving Ms. Mace. I know it reflected an intent to prevent a record of further communications from being retained.
8. On or about Nov 12th, 2023, in the middle of the day, Nancy Mace messaged me via Signal and asked again about a private investigator and I was too busy to deal with anything but said I'd take care of whatever she needed.
9. On November 24, 2023, I received an incoming voice call from Nancy Mace on Signal at approximately 10:41 a.m. This call occurred during a period of heightened tension related to the dissolution of her relationship with Patrick Bryant. She was begging me to tell her what incriminating data or evidence on any business deals gone wrong that I had on Patrick and if I would be willing to testify against him. I told her that I had plenty of data, but I do not want to get involved in any disputes publicly. She begged me to provide such data and said she was building a case against him to ruin him.
10. While I will not detail the specific content of our prior Signal conversations in this affidavit, I am prepared to attest under oath that her conduct during this period, including use of encrypted and disappearing communication, is consistent with behavior intended to conceal or obscure digital interactions.
11. Based on subsequent sworn testimony by others, including Wesley Donahue, I believe the communications I received and the timing of Ms. Mace's Signal activity align with her broader efforts to obtain data from Mr. Bryant's devices and to use that information in personal legal and reputational disputes.
12. Ms. Mace deleted the Signal thread containing our conversation afterwards. I have retained a screenshot of a partial Signal communication record showing the date she updated the disappearing message setting and the date and time of her incoming call. This screenshot is attached hereto as Exhibit A.
13. The entire discussion was personal and was unrelated to her congressional role. I was frequently the go to person who would fix any personal issues that came up in her life whether it was needing a golf cart fixed, advice on kids logistics or questions about how to get edible marijuana. In these matters and at no time during the conversations referenced, was any legislation or congressional matters discussed.

14. Even as I provide this affidavit, I remain concerned about potential consequences given her position and influence including her current lawsuit against me for my previous whistleblower mentions of her behavior.

15. I make this affidavit voluntarily for use in pending and prospective civil actions arising from Representative Mace's statements.

16. I affirm that the foregoing is true and correct to the best of my knowledge.

FURTHER AFFIANT SAYETH NAUGHT.

Eric Bowman, Affiant

Sworn to and subscribed before me this

28th day of May, 2025.

Notary Public for South Carolina

My Commission Expires: 7-17-2034

Dustin Ham



STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
COUNTY OF CHARLESTON)	FOR THE NINTH JUDICIAL CIRCUIT
)	
)	CASE NO.: 2025-CP-10-00981
GLT2, LLC,)	
)	
Expected Plaintiff,)	
vs.)	
)	
JANE DOE, and JOHN DOE)	
)	
Expected Defendants.)	
)	

**PROPOSED INTERVENOR'S MOTION TO EXPEDITE HEARING ON HER MOTION
TO INTERVENE, MOTION TO DISMISS, AND REQUEST FOR SANCTIONS**

Proposed Intervenor, Jane Doe (“Ms. Doe”), a sexual assault victim, requests to proceed under a pseudonym pursuant to SCRCP 10. She incorporates the motion she filed in her pending civil action *Doe v. Bryant*, No. 2025CP1003124 (S.C. Ct. Com. Pl. May 29, 2025) (Exhibit A – Motion SCRCP 10). Ms. Doe hereby moves, under Rule 24 of the SCRCP to intervene in Expected Plaintiff GLT2 LLC’s (“GTL2”) Petition to Authorize Depositions and Discovery Before an Action (“Petition”) and simultaneously moves to dismiss the Petition. An expedited hearing is necessary to prevent GTL2 from conducting additional unauthorized depositions and using the pendency of its Petition to conduct additional unauthorized discovery.

The Court should dismiss the Petition and award sanctions because GLT2 and its attorneys the Brewer Law Firm (“BLF”) engaged in the following willful misconduct: (1) even though this Court had not granted its Petition they issued a subpoena and deposed a witness¹ without any legal authority to do so; (2) mislead the Court about the purpose for filing this action; (3) failed to comply with SCRCP 27(a)(1) which sets forth the requirements to depose a witness before filing

¹ Ms. Doe is aware of one witness, Wesley Donehue (“Donehue”) that GTL2 deposed; however, she believes there are likely other witnesses that they have deposed or intend to depose.

an action; (4) failed to notice and serve the expected adverse parties as required by SCRCP 27(a)(2); (5) failed to notify the Court that expected Defendants John and Joe Doe were unrepresented so the Court could appoint Counsel as required by CP 27(a)(2); (6) continued this action to ensure that it could depose the witness even if the Court denied its Petition; (7) leaked² the transcript of the deposition, which they knew contained false information about Ms.

Doe's claims to FITS News and other media outlets. (Exhibit B-Wesley Donehue Transcript)

Ms. Doe asks this Honorable Court for an Order permitting her to intervene in this action and for Order simultaneously dismissing this Petition. Lastly, Ms. Doe requests that this Court order appropriate sanctions against GLT2/Bryant and BLF for their willful misconduct and reckless disregard of Ms. Doe's due process rights including but not limited to the right to a fair and impartial jury, and the right to confront the witnesses against her. For the reasons set forth below, this Honorable Court should grant the requested relief.

I. FACTUAL ALLEGATIONS

Ms. Doe filed a civil lawsuit against the men who sexually assaulted her and their related companies 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. (*Doe v. Bryant* 2025CP1003124). Ms. Doe is a cooperating witness in an ongoing SLED investigation into Patrick Bryant ("Bryant"), who is one of Ms. Doe's alleged assailants and her former employer. Bryant is a member of the recently formed GTL2 and is the company's alter ego. ("GTL2/Bryant") (Exhibit C, GLT2's Articles of Incorp) GTL2/Bryant and BLF filed this Petition to depose witnesses and to question them about Ms. Doe's sexual assault

² BLF was the only parties to the deposition, other than the deposed witness, and his counsel. The deposed witness did not request a copy of the transcript. (Exhibit B p. 80) Therefore, the transcript had to be leaked by Bryant and/or the BLF.

without identifying or providing notice to the expected adverse parties so that it could disseminate false information to the media that prejudices Ms. Doe in future civil and criminal proceedings. Ms. Doe seeks to intervene to protect her interests.

The allegations in the Amended Complaint are that on October 26, 2018, Ms. Doe, who was only twenty-three years old at the time, went out drinking with Bryant, John Osborne (“Osborne”) and Eric Bowman. (“Bowman”) She was casually dating Osborne at the time. Ms. Doe got very intoxicated and passed out at Bowman’s home. While she was unconscious Bowman and Bryant took pictures of her private parts, and Osborne sexually assaulted her while Bowman and Bryant filmed it on their cell phones. Unbeknownst to them, Jane Doe Witness³ (“JDW”), who was living with Bowman, was home and saw the assault in real time on video cameras that were installed throughout the home and were accessible from a cell phone. JDW took screenshots of the assault and chronicled what she saw in an email that she sent to herself. JDW didn’t report it initially because she was fearful of Bowman. JDW has now come forward and is cooperating with SLED.

In November of 2023, Congresswoman Nancy Mace (“Mace”), who was engaged to Bryant at the time, found the video of Ms. Doe being sexually assaulted on Bryant’s phone along with numerous other images, photos, and videos of women’s private parts that appeared to be taken without their knowledge. **Mace took screenshots of some of the images and videos using her phone, so Bryant would not be alerted and delete the images before law enforcement could obtain them. She then reported Bryant to the FBI and the United States Attorney’s Office on December 14, 2023, who turned the matter over to SLED for investigation. Ms. Mace**

³ This witness has asked not to be identified; therefore, she will be referred to as Jane Doe, witness. Bowman, Bryant/GLT2, and Osborne know her identity.

provided SLED with all the pictures and images she had taken from Bryant's phone. As of the date of this filing, the matter is still under investigation. Mace learned Ms. Doe's identity and contacted her on April 6, 2024. Mace told her about the video she uncovered on Bryant's phone. Since learning of the assault, Ms. Doe has been suffering from severe emotional distress, including panic attacks, crying spells, and nightmares. Ms. Doe has had to take time off work and seek help from mental health professionals.

Bryant formed GTL2 on February 20, 2025, ten days after Mace delivered a speech on the floor of the US House of Representatives about pending legislation to combat voyeurism and about finding the video of Ms. Doe's sexual assault on Bryant's phone. Mace also named Bowman and Osborne in connection with the assault. Ten days after Mace's speech Bryant formed GTL2. (Exhibit C) Then, just one day later, on February 21, 2025, GLT2/Bryant and BLF filed this Petition seeking to take depositions before an action, even though it did not meet the legal requirements of Rule 27.

GLT2/Bryant and BLF claims the purpose of the Petition is "*to determine the individuals involved in committing tortious acts against the Petitioner, including but not limited to publishing statements intended to cause damage to Plaintiff's business.*" (Petition ¶.) However, GLT2 had only been in business for one day, making its purported reason for filing this Petition not credible because it would be virtually impossible to publish statements harming GLT2's business in such a short time frame. Notably, in the transcript, BLF and/or Bryant leaked to the media, BLF did not ask the deponent a single question about GTL2 or any tortious statements they claim were published damaging GTL2's business reputation. (Exhibit B) Thus lending further support that GLT2/Bryant and BLF misrepresented its purpose for filing this Petition to the Court.

In addition to misleading the Court about its purpose for filing the action, GLT2/Bryant and BLF failed to comply with Rule 27 of SCRCRCP, which allows parties to depose witnesses before an action is filed in certain circumstances. None of those circumstances were met in this case. GLT2/Bryant and BLF failed to present any facts to the Court explaining why it was presently unable to file an action, as Rule 27(a)(1) requires. *See e.g.* Rule 27, SCRCRCP. GLT2/Bryant and BLF also failed to file a verified petition with the name or a description of the expected adverse party, as well as their addresses, which is a required element. *Id.* GLT2/Bryant and BLF also failed to state the facts that they seek to establish through the proposed testimony, as well as the reasons for seeking to perpetuate it, which is required. *Id.* GLT2/Bryant failed to specify the proposed testimony and the names of the deponents, as required by the rule. *Id.* GLT2/Bryant's Petition failed to comply with any of the above requirements.

Rule 27(a)(2) also requires the petitioner to serve and notice the expected adverse party, so they have the opportunity to appear before the court and be heard about whether the court should grant the petition. *See.* SCRCRCP 27 (a)(2). GLT2/Bryant and BLF failed to identify the Expected Defendants, John and Jane Doe, and failed to serve them. Ms. Doe is unaware of who the expected defendants are. Ms. Doe and Mace could be the expected defendants; however, according to the Petition, the expected defendants are residents of Charleston County, and neither Ms. Doe nor Mace is a resident of Charleston County. (Petition ¶ 5) Ms. Doe believes it is also possible that the expected defendants are fictitious, and that GLT2/Bryant and BLF brought this action against fictitious parties so the witnesses they were seeking to depose would not be subject to cross-examination. Whether the Expected Defendants John and Jane Doe, are Mace, Doe, other individuals, or are fictitious, one thing is certain, they are prejudiced by GLT2/Bryant and BLF's

failure to notice and serve them so they could participate in the deposition and cross-examine the deponent.

The Petition was initially set to be heard by this Court on April 3, 2025. GTL2/Bryant and BLF continued this action to ensure that it could depose Donehue even if the Court denied its Petition. The same day, it continued the case, BLF served the deponent, Wesley Donehue (“Donehue”), with a “subpoena.” Donehue testified that he received a “subpoena” on April 3, 2025, to be deposed on April 28, 2025. (Exhibit B, Tr. p. 7) Thus, regardless of whether the Court authorized it, BLF intended to depose Donehue. Moreover, BLF served Donehue with a “subpoena” even though they had no legal authority to issue a subpoena because the Court had not granted its Petition.

GTL2/Bryant and BLF also continued the Petition so that the Court would not have the opportunity to appoint counsel for Expected John and Jane Doe Defendants, thus ensuring that Donehue would not be subject to cross-examination. Rule 27(a)(2) states that if the petitioner is unable to serve the expected adverse party, the petitioner must notify the court, so the Court can appoint an attorney for the expected adverse party to cross-examine the deponent. *Id.* GTL2/Bryant and BLF failed to notify the Court that the Expected John and Jane Doe Defendants were unrepresented, so the Court could appoint an attorney to cross-examine the deponent. Rather than advise the Court that the Expected John and Jane Doe Defendants were unrepresented as they were legally required to do under Rule 27(a)(2), BLF continued the case so they could depose Donehue before the Court could appoint counsel. Thus, ensuring that Expected John and Jane Doe Defendants would not be able to cross-examine Donehue and would be prejudiced.

This Petition was then set to be heard again on June 4, 2025. However, GLT2/Bryant and BLF requested yet another continuance. The Order of Continuance, which was drafted by GLT2's Counsel for the Court, states, "**[t]here are no opposing counsel in this matter and the Petitioner is currently finalizing discovery.**" *GLT2, LLC v. Doe*, No. 2025-CP-10-00981 (S.C. Ct. Com. Pl. June 3, 2025). **This is a clear admission that GLT2/Bryant and BLF were engaging in discovery even though this Court had not authorized them to do so, and that they failed to notice and serve the Expected Defendants, John and Jane Doe, or advise the Court that the adverse parties was unrepresented, so the Court could appoint counsel.** The language in the order also implies that it was BLF, and GLT2/Bryant's intent to "finalize" discovery while the expected adverse party was unrepresented, so the Expected Defendants John and Jane Doe would not have the opportunity to participate in the discovery. The language in order is extremely concerning because it indicates that BLF and GLT2/Bryant have deposed other witnesses in secret. Ms. Doe only learned of Donehue's deposition because BLF and GLT2/Bryant leaked the transcript to the media. Given the questions that BLF asked Donehue during his deposition, it is abundantly clear that GLT2/Bryant and BLF intend to use the testimony they obtained from Donehue against Ms. Doe in other proceedings. Ms. Doe is gravely concerned about what other testimony GLT2/Bryant and BLF have unlawfully obtained that they intend to use against her in future proceedings. Ms. Doe requests that this Court order them to turn over all the unauthorized discovery they conducted and preclude them from using this testimony in any proceedings related to Ms. Doe.

The leaked transcript reveals that BLF and GLT2/Bryant's true purpose in filing this Petition is to disseminate false and malicious information about Mace, a key witness in Ms. Doe's case. BLF's defense strategy is to attack Mace's credibility and create a false narrative by deposing

her detractors and leaking the testimony to the public so that jurors will have a preconceived notion to find in Bryant, Bowman, and Osborne's favor. BLF admitted as much in a letter to Mace's attorney on October 17, 2024. (Exhibit D -BLF Letter) In the letter, BLF⁴ bragged that he intended to discredit Mace by deposing witnesses who were "begging for a deposition [sic] subpoena to tell all" about her. (Exhibit D-BLF letter) Donehue's name was at the top of his list in his letter. *Id.* To this end, Ms. Doe believes that BLF has deposed other individuals listed in the letter and has not disclosed this to Ms. Doe or the Expected John and Jane Defendants in this matter.

BLF and GLT2/Bryant deposed Donehue, who has been friends with Bryant and Osborne for over a decade and is a harsh critic of Mace's, on April 28, 2025. (Exhibit B Tr. p 13, 46) Donehue is a former campaign consultant for Mace's. He ended their business relationship on August 8, 2024. (Ex B Tr p.47,48). It is well known that Donehue has a grudge against Mace stemming from a heated public exchange she had with US Representative Trey Gowdy, who is a client of Donehue's. Since then, Donehue has made false, and malicious attacks on Mace's character on social media. For instance, on December 20, 2024, Donehue posted the following on X:

I fired Nancy Mace as client a few months back because I'm a political consultant and not a babysitter, a sex therapist or a doctor who can prescribe fixes for chemical imbalances. I don't have time for her constant egotistical bullshit and drama in my life.

It's seems that I hurt Nancy's feelings. Can't wait for her to throw that victim card down again. It's her only play. A pitiful embarrassment to the South Carolina Lowcountry.

In March of 2025, not long before BLF and GTL2/Bryant sought to depose him, he posted:

This is literally what Nancy Mace does every day. She's always the victim of some attack, most of which she completely made up in that chemically imbalanced brain of hers. Total trash. Total nut job.

⁴ The BLF was representing Bowman in the letter it sent to Mace's attorney on October 17, 2024.

In April, just before his deposition, he posted the following about Mace:

A constant victim mindset is for losers. She's a loser. Always has been. Always will be. Total loser.

Donehue has demonstrated a deep-seated hatred of Mace, as well as a bias towards victims and women in general. In 2019, he stepped down from his company, Frothy Beer Brewing, for posting the following comments on Twitter and Facebook, reacting to Alabama's recent abortion ban: "We need more women running for office," Donehue wrote. "Until then, men will and should control legislative bodies." <https://charlestoncitypaper.com/2019/05/20/wesley-donehue-to-leave-frothy-beard-brewing-co-after-backlash-over-social-media-posts/> On September 24, 2024, he posted on X, "*Nikki Haley played the victim card to the highest levels of politics. She still has a pocket full of those cards*". In March of 2025, he posted on X "*Strong people don't need to play the victim*".

Donehue claimed that he didn't want to testify against Mace and was only doing so because he was served with a "subpoena". (Ex B Tr p.77) His claim is not believable considering his countless X posts where he has made a sport out of posting false and malicious statements about Mace's character. He and his lawyer knew or should have known that BLF had no legal authority to issue a subpoena, as there was no pending lawsuit and the Court had not granted GLT2's Petition. Moreover, Donehue and his Counsel should have known the deposition was unlawful because there was no opposing counsel present. It is more believable that Donehue became unhinged when Mace attacked Gowdy and was a willing participant in BLF and GLT2/Bryant's efforts to poison the well.

BLF questioned Donehue extensively about Ms. Doe's claims and his relationship with Mace. At no time did BLF question Donehue about tortious acts against GLT2, as his law firm

claimed in the Petition to the Court. **BLF and/or GLT2/Bryant leaked Donehue's transcript, knowing that Donehue lied.** Donehue testified:

And what I know is that she believed-- and she did believe -- that Patrick cheated on her and had pictures of women without their consent; and she sat on that information for well over a year, did not wanna contact authorities, and asked me to blackmail Patrick Bryant. (Exhibit B, Tr p.76)

Contrary to Donehue's claim, Mace did not sit on the information for well over a year to blackmail Bryant. BLF and GTL2 know that Donehue lied because SLED spokesperson Renee Wunderlich ("Wunderlich") confirmed to multiple media outlets that they opened an investigation regarding allegations of assault, harassment, and voyeurism on Dec. 14, 2023, and that Bryant is the subject of the SLED investigation. Wunderlich released the following statement: "Since [Dec. 14, 2023] SLED has conducted multiple interviews, served multiple search warrants, and has a well-documented case file that will be available for release upon the conclusion of the case." <https://www.live5news.com/2025/02/11/sled-confirms-assault-voyeurism-investigation-after-mace-speech/> Upon information and belief, Bryant and BLF also know that Donehue lied because they were likely served with search warrants by SLED and were fully aware that Mace did not wait a year to report Bryant as Donehue claimed.

BLF and GLT2/Bryant leaked the transcript to the media, knowing that it contained false information to sway public perception against Mace and gain a tactical advantage by creating a false narrative before Ms. Doe's trial even begins. **We know this is Bryant's purpose in filing this action because after he or BIF leaked the transcript, Bryant re-posted the testimony that he knew to be false on Facebook.** (Exhibit E-Bryant FB post) Ms. Doe has been irreparably harmed by the release of the leaked transcript. The false information is out there, and the bell cannot be unrung. Because there was no opposing counsel and Donehue was not cross-examined,

there is a public perception that his testimony was true and unrefuted, because he was under oath.

The leaked transcript made headlines throughout the state like the following in the Post Courier:

“Under oath, former Nancy Mace strategist says SC congresswoman asked him to ‘blackmail’ her ex”

https://www.postandcourier.com/politics/mace-consultant-donehue-deposition/article_7af949ca-fc5e-4824-8672-b5afab045b10.html

and “*Bombshell Deposition: Nancy Mace’s Former Strategist Unloads Wesley Donehue deposed about sex, lies and (alleged) blackmail...*” <https://www.fitsnews.com/2025/05/21/bombshell-deposition-nancy-maces-former-strategist-unloads/>

After they leaked the transcript Bryant gave the following statement to News 2 about Ms. Doe’s civil lawsuit, “This lawsuit is yet another media stunt in Nancy Mace’s long-running vendetta and blackmail campaign against me”. Additionally, Osborne’s attorney gave the following statement to News 2. “I want to point to the deposition of Wes Donehue. It is very telling.” <https://www.counton2.com/news/local-news/woman-sues-three-charleston-area-businessman-over-alleged-2018-rape/>

Additionally, Wes Donehue is publicly referring people to the deposition transcript <https://www.facebook.com/share/v/1AincdJ5dv/?mibextid=wwXIfr>
(See 17:14 minute mark)

The released transcript is extremely prejudicial because Donehue was not cross-examined by Ms. Doe, Mace or Expected Defendants John and Doe. Since Donehue knew he would not be subject to cross-examination at the deposition, he was able to lie with impunity because there was no one to confront him. For instance, Donehue testified that Mace showed him a picture of Ms. Doe passed out on the couch, and she had a blanket over her, and you could not tell she was naked. (Exhibit A Tr. p. 45) Thus, trying to make it appear that his friend Bryant took an innocuous picture of Doe while she was passed out, when nothing is further from the truth. There is no blanket in the picture, and it clearly shows Ms. Doe passed out wearing no underwear and a black bra. Had Ms.

Doe been able to cross-examine Donehue, she could have introduced the picture into evidence and established that Donehue is misrepresenting the picture to help his friends avoid liability.

Donehue also testified that one of the reasons he fired Mace as a client on August 8, 2024, was because she asked him to blackmail Bryant. (Exhibit B Tr. 35). Had Ms. Doe been able to cross-examine Donehue, she could have introduced emails he exchanged with Mace, indicating otherwise. The emails clearly state that Donehue fired Mace as a client because she requested access to her Google Analytics, and rather than granting her access, he terminated her. Moreover, his text messages to Mace don't support his claim that he fired Mace because she asked him to blackmail Bryant. On November 22, 2024, he texted, "*Yeah, we parted ways after I did everything I could for you because you let some child talk down to me and my staff, and you refused to talk to me about it.*" Donehue never claimed that Mace asked him to blackmail Bryant until after December 20, 2024, when she had a heated exchange with Gowdy, Donehue's client.

Donehue's claim that Mace asked him to blackmail Bryant is ironic because, according to the test messages, Donehue was the one blackmailing Mace. On December 20, 2024, he texted Mace, "**You do not want to pick a fight with me,**" then he texted Mace a laundry list of the things he claimed to possess that he could use to blackmail her such as embarrassing videos, texts, and Signal messages—implying he would release them if Mace acted in a way he disapproved of. Yet nowhere in this list of things he claims to have on Mace does he claim that she asked him to blackmail Bryant. However, neither Ms. Doe nor Expected Defendants John and Jane Doe were able to confront Donehue with his prior inconsistent statements at his deposition because they were not provided notice of the Petition or Donehue's deposition. BLF and GTL2/Bryant only leaked the transcript because Donehue was not subject to cross-examination. Leaking any transcript to the media before a case is heard is egregious but leaking a transcript where the adverse parties

were not informed of the proceedings or allowed to cross-exam the witness is unconscionable especially when the purpose for doing it is to get away with raping a young woman.

It is unclear whether it was BLF or Bryant who leaked the transcript to FITS News, but it had to be one of them, as Donehue and his attorney did not request the transcript. (Exhibit B Tr. p. 80). Not only was it improper and unethical for them to leak the transcript, but it also violated state law. It is a misdemeanor to publish or “cause to be published” the name of an alleged victim of criminal sexual assault. See. SC Code Ann. § 16-3-730. Although FITS redacted Ms. Doe’s name before publishing the transcript, they received the transcript unredacted. Therefore BLF and GTLT2/Bryant’s intent in leaking the transcript was not just to disseminate false information so Bryant, Osborne and Bowman would not be found liable for their action, but it was also meant to publicly shame, embarrass and intimidate Ms. Doe so she would be less likely to cooperate in the criminal investigation or seek to hold them civilly responsible for what they did to her. Ms. Doe is seeking to preserve her privacy given that this matter is sensitive and highly personal, and she is suffering from emotional distress.

BLF and Bryant’s intentional and willful misconduct violated Ms. Doe’s fundamental rights, which include the right to fair treatment under the law, the right to a fair hearing, the right to counsel, and the right to confront one’s accusers. BLF and Bryant also knowingly and intentionally violated the authority of this court and the rules of civil procedure. They have irreparably harmed a sexual assault victim who is seeking justice and accountability. This Court should allow her to intervene, dismiss this action, and order appropriate sanctions.

ARGUMENT

II. MS. DOE MEETS THE LIBERAL STANDARD TO INTERVENE AS A RIGHT AND PERMISSIVE INTERVENTION.

The South Carolina Supreme Court interprets Rule 24 broadly, permitting liberal intervention when an applicant's claims have common questions of law or fact. *Ex Parte: DeBordieu Colony Cnty. Ass'n, Inc.*, 442 S.C. 285, 290, 898 S.E.2d 179, 181-82 (Ct. App. 2024). Rule 24 of the SCRCP, like the federal rule, provides for two types of intervention: Intervention as Right and Permissible Intervention. Ms. Doe satisfies the requirements for intervention under either subsection of Rule 24. Rule 24(a)(2) requires a court to grant intervention:

[W]hen the applicant claims an interest relating to the property or transaction which is the subject of the action and he [or she] is so situated that the disposition of the action may as a practical matter impair or impede his [or her] ability to protect that interest, unless the applicant's interest is adequately represented by existing parties.

Rule 24(a)(2) SCRCP. Thus, to intervene as a right, a movant must show: (1) a timely application; (2) an interest in the subject matter of the underlying action; (3) that a denial of the motion for leave to intervene would impair or impede the movant's ability to protect its interest; and (4) that the movant's interest is not adequately represented by the existing parties to the litigation. *Houston Gen. Ins. Co. v. Moore*, 193 F.3d 838, 839 (4th Cir. 1999).

Ms. Doe easily satisfies all the requirements to intervene as a right. First, this application is timely because the Court hasn't heard GLT2's petition. Second, Ms. Doe has an interest in the action because she has a pending lawsuit against GLT2 and Bryant that involves the same set of facts and involves common questions of law. Ms. Doe has an interest as a sexual assault victim because she is cooperating with SLED in a criminal investigation involving Bryant. Third, the denial of this motion would substantially impair and impede Ms. Doe's ability to protect her interests in future proceedings. Ms. Doe would be impaired in her civil case as well as any criminal action in which she was a victim if she were not privy to the testimony that Bryant/GTL2 elicit from witnesses regarding the facts of her case and their defense. Lastly, since BLF and

Bryant/GTL2 violated the SCRCRCP and failed to identify, serve, and notice the Expected Defendants John and Jane Doe, there is no one to protect or represent Ms. Doe's interests.

Ms. Doe meets the standard for "Intervention as a Right", accordingly, this Court should grant her motion. However, even if the Court disagrees, she should still be permitted to intervene because Ms. Doe more than meets the less restrictive standard of "Permissive Intervention." To warrant intervention under Rule 24(b) an applicant is only required to show they have a claim or defense involving a question of law or fact in common with the main action. *Trustgard Ins. Co. v. Full Logistics, Inc.*, 442 S.C. 485, 513, 900 S.E.2d 448, 463 (Ct. App. 2023). Here, Ms. Doe's lawsuit is premised on the same set of facts that GLT2's counsel questioned Donehue about. Moreover, the Petition overlaps with Ms. Doe's claims against Bryant and GLT2 in her civil action. Thus, permissive intervention is warranted.

This Court should permit Ms. Doe to intervene to cross-examine deponents and uncover the full extent of the unauthorized discovery that GTL2/Bryant and BLF conducted in this case, so she can protect her interest in further proceedings.

III. THE COURT SHOULD GRANT MS. DOE'S MOTION TO DISMISS THIS PETITION BECAUSE THE EXPECTED PLAINTIFF FAILED TO COMPLY WITH SCRCRCP 27 AND ENGAGED IN MISCONDUCT

The Court should dismiss GLT2's Petition because: (1) it failed to comply with any of the requirements of Rule 27 of the SCRCRCP; (2) it misled the Court about the purpose of its Petition; (3) engaged in unauthorized discovery that was not sanctioned by the Court.

1) GTL2 FAILED TO COMPLY WITH RULE 27

According to the Note section to Rule 27 of SCRCRCP, a verified petition must establish that the petitioner expects to be a party but is currently unable to do so. Rule 27, SCRCRCP *see Note*. There are not many state cases on Rule 27; however, there are numerous federal cases applying

Fed. R. Civ. P. 27. Because Rule 27 of SCRCF is drawn from Fed. R. Civ. P. 27 with minor modifications, the federal cases on Rule 27 are analogous. *See*. Rule 27, SCRCF *see* Note. The Fourth Circuit has stated that "Rule 27 properly applies only in that special category of cases where it is necessary to prevent testimony from being lost." *In re Application of Deiulemar Compagnia Di Navigazione v. M/V Allegra*, 198 F.3d 473, 484 (4th Cir. 1999). This includes the testimony of a witness who is elderly or seriously ill, may flee, or may become unavailable due to relocation or other geographic constraints before a suit can be filed. *Qi Qin v. Deslongchamps*, 31 F.4th 576, 581 (7th Cir. 2022).

A petitioner must demonstrate an immediate need to perpetuate testimony. *Babb v. Isom*, No. 2:23-03218-RMG-MHC, 2024 U.S. Dist. LEXIS 108651, at *3 (D.S.C. May 7, 2024) A Rule 27 petition "is not a substitute for broad discovery, nor is it designed as a means of ascertaining facts for drafting a complaint." "Deiulemar", 198 F.3d at 485. GTL2's petition is not verified. Nor has GTL2 asserted any facts to indicate that the testimony they are seeking is at risk of becoming unavailable. Because GTL2 has failed to demonstrate any need, much less an immediate need, to perpetuate testimony before filing an action the Court should dismiss the Petition.

GLT2's fails to comply with Rule 27(a)(1) which states:

- (1) **Petition.** A person who desires to perpetuate his own testimony or that of another person regarding any matter that may be cognizable in any court of the State may file a verified petition in the court in the Circuit of the residence of any expected adverse party. The petition shall be entitled in the name of the petitioner and shall show: 1. that the petitioner expects to be a party to an action cognizable in a court of the State but is presently unable to bring it or cause it to be brought; 2. the subject matter of the expected action and his interest therein; 3. the facts which he desires to establish by the proposed testimony and his reasons for desiring to perpetuate it; 4. the names or a description of the persons he expects will be adverse parties and their addresses so far as known; and 5. the names or a description of the persons to be examined and the substance of the testimony which he expects to elicit from each, and shall ask for an order authorizing the petitioner to take the depositions of

the persons to be examined named in the petition, for the purpose of perpetuating their testimony. *See* SCRCP 27(a)(1).*(emphasis added)*

GLT2's Petition failed to comply with SCRCP 27 (a)(1) in the following ways:

- SCRCP 27 (a)(1) required the petitioner to state why it is presently unable to bring an action. **GLT2 failed to state why it is unable to bring the action.**
- SCRCP 27 (a)(1) requires that the petition be verified by the petitioner under penalty of perjury. **GLT2's petition is NOT verified.**
- SCRCP 27 (a)(4) requires the petitioner to state the names or a description of the persons it expects will be adverse parties and their addresses so far as known. **GLT2's Petition does not contain the names or a description of the expected adverse parties.**
- SCRCP 27 (a)(5) requires the petitioner to state the names or a description of the persons to be examined and the substance of the testimony which he expects to elicit from each person. **GLT2's Petition does not contain the names or a description of the person(s) it is seeking to depose, nor does it state the testimony it expects to elicit.**

GLT2 also failed to comply with the Notice and Service requirements of Rule 27(a)(2), which state:

(2) **Notice and Service.** The petitioner shall thereafter serve a notice upon each person named in the petition as an expected adverse party, together with a copy of the petition, stating that the petitioner will apply to the court, at a time and place named therein, for the order described in the petition. At least 20 days before the date of hearing the notice shall be served either within or without the circuit or state in the manner provided in Rule 4(d) for service of summons; but if such service cannot with due diligence be made upon any expected adverse party named in the petition, the court may make such order as is just for service by publication or otherwise, and shall appoint, for persons not served in the manner provided in Rule 4(d), an attorney who shall represent them, and, in case they are not otherwise represented, shall cross-examine the deponent. *See* SCRCP 27(a)(2).

GLT2's Petition failed to comply with SCRCR 27 (a)(2) in the following ways:

- SCRCR 27 (a)(2) requires the petitioner to serve a notice on the expected adverse party of the time and date that the Court will hear the petition at least 20 days before the date of hearing. Since GLT2 did not name or describe the expected adverse party, and they did not serve the expected adverse party with notice of the Petition.
- GLT2 failed to notify the Court that the expected adverse party was not served or represented by Counsel, so the Court could appoint an attorney to cross-examine the deponent on behalf of the expected adverse party's interest.

2) GLT2 MISLED THE COURT ABOUT THE PURPOSE OF ITS PETITION

The Court should dismiss this action because GLT2 misled the Court about its reasons for filing this action. In its Petition GLT2 claims it intends to depose witnesses about published statements against GLT2 that cause damage to its business. Yet the company was formed only one day before this action was filed; therefore, it would be nearly impossible to publish statements that harmed its business in such a short period. Additionally, Donehue was never questioned about GLT2, which is the purported reason for filing the Petition.

3) GLT2 ENGAGED IN DISCOVERY THAT WAS NOT AUTHORIZED BY THE COURT

The Court should dismiss this action because GLT2 was not legally authorized to depose witnesses or issue subpoenas. They were required to wait until the Court ruled on their Petition before proceeding with depositions. They disregarded the authority of this Court and proceeded as if the Court had granted their motion. The Court did not grant GLT2's Petition. GLT2's counsel issued a "subpoena" and conducted at least one deposition of a witness without judicial authority to do so. GLT2's counsel deposed a witness in direct violation of the SCRCR and the authority

of this Court. Consequently, GLT2's Petition should be denied, and the Court should grant sanctions for the reasons set forth below.

IV. BECAUSE GLT2 INTENTIONALLY ACTED WITH CALLOUS DISREGARD FOR MS. DOE'S RIGHTS, MISLEAD THE COURT, VIOLATED SCRCP, SANCTIONS ARE WARRANTED TO PROTECT MS. DOE'S INTEREST IN FUTURE PROCEEDINGS

Sanctions are warranted against the parties and their attorneys because they both engaged in intentional conduct with gross indifference to Ms. Doe's rights. They misled the Court about their purpose for filing the Petition and intentionally violated SCRCP by conducting unauthorized discovery. The parties' and attorneys' purported reason for filing the Petition is false. They had no legitimate reason to believe that individuals had engaged in tortious acts related to GLT2's business.

Under Rule 11(a), SCRCP, a party and/or the party's attorney can be sanctioned for filing "a pleading, motion, or other paper to cause delay or when no good grounds exist to support the filing." Rule 11, SCRCP; *Runyon v. Wright*, 322 S.C. 15, 19, 471 S.E.2d 160, 162 (1996). (emphasis added). "While Rule 11 is evaluated by a subjective standard, the rule still may be violated with a filing that is so patently without merit that no reasonable attorney could have a good faith belief in its propriety." *Ex parte Bon Secours-St. Francis Xavier Hosp., Inc.*, 393 S.C. 590, 598, 713 S.E.2d 624, 628 (2011). The parties and their attorneys purposefully misled the Court when they filed the Petition and when they requested continuances to complete unauthorized discovery in violation of Rule 27.

The Petition was filed in bad faith and for an improper purpose. Bryant created a corporate entity to hide behind it and avoid liability. BLF filed a Petition with the court, claiming that they intended to depose witnesses and question them about tortious acts regarding GLT2's business,

when in fact they intended to conduct discovery on Ms. Doe's allegations against Bryant and disseminate false information to exert undue influence in future proceedings and violate Ms. Doe's rights to a fair and impartial jury. The parties and their attorneys filed this Petition and publicly disseminated false information in callous disregard of Ms. Doe's rights. The leaked transcript prejudices the fairness of Ms. Doe's trial, compromises the integrity of the judicial process, and harms her in future proceedings. Attorneys are bound by ethical rules of conduct, which includes avoiding actions that could prejudice a case. Leaking information, they know to be false to the media is a violation of these rules.

The court has the authority to sanction a party or counsel who publishes false statements of fact concerning litigation before the court, *Atkins v. Va. DOT ("VDOT")*, Civil Action No. 1:13cv00057, 2015 U.S. Dist. LEXIS 16578, at *14 (W.D. Va. Feb. 11, 2015). Courts have broad discretion in imposing sanctions when a party intentionally violates discovery procedures. *Parr v. Gaines*, 309 S.C. 477, 479, 424 S.E.2d 515, 517 (Ct. App. 1992) Including excluding evidence as a sanction for not complying with discovery procedures. *See. McGaha v. Mosley*, 283 S.C. 268, 322 S.E.2d 461 (Ct. App. 1984). The parties and their attorneys acted in bad faith and intentionally and purposefully engaged in misconduct with callous disregard for Ms. Doe's rights. Therefore, this Court should publicly sanction both the attorneys and parties by: (1) dismissing this action; (2) ordering them to pay Ms. Doe's attorneys' fees; (3) prohibiting them from calling Donehue as a witness in Ms. Doe's civil case; and (4) requiring them to turn over all the unauthorized discovery to Ms. Doe's counsel.

CONCLUSION

Ms. Doe respectfully asks this Honorable Court for an Order granting her leave to intervene in this action, for an Order dismissing the GLT2's Petition, and for an Order imposing appropriate

sanctions so that Ms. Doe's rights are protected in future proceedings.

Respectfully submitted,

s/Marybeth Mullaney
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ATTORNEY FOR MS.DOE

June 24, 2025
North Charleston, South Carolina



STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON
GLT2, LLC,

Plaintiff,
vs.
JANE DOE and JOHN DOE,
Defendants.

IN THE COURT OF COMMON PLEAS
FOR THE NINTH JUDICIAL CIRCUIT

CASE NO.: 2025-CP-10-_____

**PETITION TO AUTHORIZE
DEPOSITIONS AND DISCOVERY
BEFORE ACTION**

COMES NOW the Petitioner by and through its undersigned attorney, and would respectfully show this Honorable Court as follows:

1. Plaintiff, GLT2, LLC, (hereinafter "GLT2"), is a corporation organized and existing under the laws of the State of South Carolina, and headquartered in Charleston County, SC.
2. On information and belief, proposed defendant Jane Doe is an individual citizen and resident of the County of Charleston, South Carolina, and is subject to the jurisdiction of this Court for the purposes of this action.
3. On information and belief, proposed defendant John Doe is an individual citizen and resident of the County of Charleston, South Carolina, and is subject to the jurisdiction of this Court for the purposes of this action.
4. This Honorable Court has jurisdiction over the parties and the subject matters alleged hereinafter.
5. On information and belief, Jane Doe and John Doe are residents residing in Charleston County, South Carolina, and the underlying events giving rise to this action occurred in Charleston County, South Carolina, such that venue is proper in Charleston County.

6. The purpose of this action is to perpetuate investigative discovery (i.e. depositions and discovery subpoenas) in order to determine the individuals involved in committing tortious acts against the Petitioner, including but not limited to publishing statements intended to cause damage to Plaintiff's business.
7. Petitioner expects to be a party to an action cognizable in the court of this State but is presently unable to bring it or cause it to be brought and needs to be able to collect evidence regarding the statements in question, such as to be able to identify the specific claims to be brought and the specific parties to be named as witnesses.
8. Petitioner is informed and believes this Court can allow it to perpetuate discovery by deposition testimony and discovery subpoenas.
9. Petitioner is informed and believes that deposition and/or discovery subpoenas to Jane Doe and John Doe are necessary to perpetuate testimony and to sufficiently determine the individuals involved in committing tortious acts against Petitioner.
10. Once that information is obtained and reviewed, only then will Petitioner be able to determine the nature, if any, of civil relief available to the Petitioner.

Respectfully submitted,

BREWER LAW FIRM, LLC

/s/ Amanda F. Davis

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Attorney for Petitioner

February 21, 2024
Charleston, South Carolina

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
COUNTY OF CHARLESTON)	FOR THE NINTH JUDICIAL CIRCUIT
)	
)	CASE NO.: 2025-CP-10-00981
GLT2, LLC,)	
)	
)	
Petitioner,)	
vs.)	
)	MOTION TO INTERVENE, MOTION
JANE DOE and JOHN DOE)	TO DISMISS PETITION AND AWARD
)	SANCTIONS
)	
Respondents.)	
)	

Proposed Intervenor, Nancy R. Mace (“Proposed Intervenor” or “Ms. Mace”), through undersigned counsel, hereby moves, under Rule 24(a) of the South Carolina Rules of Civil Procedure to intervene as of right in this action, or, in the alternative, for permissive intervention under Rule 24(b) of the South of the South Carolina Rules of Civil Procedure. Proposed Intervenor simultaneously moves to dismiss the GLT2, LLC’s Petition to Authorize Depositions and Discovery Before Action for failing to comply with Rule 27(a) of the South Carolina Rules of Civil Procedure. In addition, the Proposed Intervenor requests this Court order appropriate sanctions for the willful violations of the procedural safeguards established by the South Carolina Rules of Civil Procedure set forth below. Based on the irreparable harm already suffered by Ms. Mace through the leaking of unauthorized discovery and the immediacy of further irreparable harm to the Proposed Intervener’s interests should GLT2, LLC continue engaging in the conduct below described herein, Proposed Intervener respectfully requests an expedited hearing on this matter.

BACKGROUND AND FACTUAL ALLEGATIONS

On February 10, 2025, Ms. Mace (Congresswoman Mace) delivered a speech from the floor of the United States House of Representatives regarding twelve legislative bills, including

the 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). In her speech, Ms. Mace identified four men, including her ex-fiancé, Patrick Bryant, of being involved in or aware of sexual assaults and other calculated acts aimed at the exploitation of women and minor girls.

Mere days later, the Petitioner, GLT2, LLC, (hereinafter “GLT2” or “Petitioner”) was formed on or about February 20, 2025, according to records on file with the South Carolina Secretary of State. *See* South Carolina Sec’y of State, Business Filings for GLT2, LLC (Feb. 20, 2025) (attached as Exhibit A). Mr. Bryant is a member of GLT2. Just one day later, GLT2 filed the instant Petition to Authorize Depositions and Discovery Before Action (hereinafter “the Petition”). Pet. to Authorize Depositions & Disc. Before Action, *GLT2, LLC v. Doe*, No. 2025-CP-10-00981 (S.C. Ct. Com. Pl. Feb. 21, 2025).

The Petition represents that the purpose of this action is to “perpetuate investigative discovery (i.e., depositions and subpoenas) in order to determine the individuals involved in committing tortious acts against the Petitioner, including, but not limited to publishing statements intended to cause damage to [Petitioner’s] business.” *Id.* ¶ 6. It further claims that GLT2 “is informed and believes deposition and/or discovery subpoenas to Jane Doe and John Doe are necessary to perpetrate testimony and to sufficiently determine individuals involved in committing tortious acts against” the recently formed LLC, in order to preserve evidence and identify responsible parties. *Id.* ¶ 9. Yet, given that GLT2 had been in existence for a mere 24 hours at the time it filed the Petition, it strains credulity to suggest that any actionable harm—much less damage requiring urgent discovery—could have occurred against the LLC in that brief

window. The timeline simply does not support the notion that Petitioner had a functioning business capable of being harmed within a single day of its existence.

A hearing on the Petition was originally scheduled for April 3, 2025. But, before the hearing, GLT2 requested a continuance to facilitate a potential resolution of the matter. The request was granted, and the hearing was rescheduled for June 4, 2025. Order for Continuance, *GLT2, LLC v. Doe*, No. 2025-CP-10-00981 (S.C. Ct. Com. Pl. Apr. 1, 2025). At the time of the continuance request, GLT2 *still* had not identified any adverse party nor had any attorney made an appearance on behalf of any such adverse party.

In late May 2025, a purported copy of a deposition taken of Mr. Wesley Donehue as part of this specific proceeding was leaked to members of the press and widely reported. Ms. Mace disputes the authenticity of the document and the veracity of the representations contained therein. Proposed Intervenor does not possess a certified copy of the transcript itself¹ and, because Petitioner apparently, in a brazen manner, undertook unauthorized discovery without identifying the Proposed Intervenor as a likely adverse party, neither Proposed Intervenor nor counsel were present at Mr. Donehue's purported deposition and had no opportunity to object to questions posed nor question Mr. Donehue directly.

Nevertheless, the leaked—noncertified—deposition transcript reflects that Petitioner subpoenaed Mr. Donehue to appear at a deposition on April 28, 2025. Mr. Donehue complied with the subpoena, but made it quite clear he had no interest in voluntarily providing such information. Counsel for Petitioner, Barret Brewer, Esq., of Brewer Law Firm, LLC, deposed Mr. Donehue. Almost immediately, Mr. Brewer made it abundantly clear that the entire purpose of

¹ The deposition transcript was purportedly prepared by Clark Bolen, Inc. However, the copy intentionally released to the media lacks certification by the Court Reporter identified as having acted as stenographer for the deposition.

the deposition was to obtain Mr. Donehue's testimony concerning the Proposed Intervenor.² But, when this deposition took place, *no* order had been issued by the Court *granting* the Petition *or* authorizing Petitioner to conduct such discovery. In fact, the hearing for the Petition had been recently continued to June *at Petitioner's request*. In other words, all available documents and information point to the inescapable conclusion that Petitioner willfully proceeded to issue unauthorized subpoenas and take unauthorized discovery.

More alarmingly, less than two weeks after the uncertified deposition transcript was apparently prepared, it was intentionally leaked to the media. The list of parties who had access to this transcript is limited to the individuals listed in the transcript.

As noted previously, the hearing on the Petition was re-scheduled on June 4, 2025, following GLT2's motion for a continuance. Once again, mere days before the hearing was to be held, GLT2 requested another continuance, because “[t]here are no opposing counsel in this matter and the Petitioner is currently finalizing discovery.” Order of Continuance, *GLT2, LLC v. Doe*, No. 2025-CP-10-00981 (S.C. Ct. Com. Pl. June 3, 2025). The undeniable import of Petitioner's representations to this Court is that it has *continued* to engage in unauthorized discovery and intends to simply voluntarily dismiss the Petition as soon as it has completed taking discovery—without ever receiving the Court's approval.

² See Exhibit B, Deposition of Wesley Donehue at 4:7-11 (Apr. 28, 2025) (“Mr. Donehue, thank you for being here with us today. My name is Barrett Brewer, and I am here on behalf of GLT2, LLC, to take a deposition regarding information you might have in terms of your relationship, communications, conversations with Nancy Mace.”) During the deposition, Mr. Donehue acknowledged that he appeared solely because he had been subpoenaed, and that the threat of legal compulsion—not voluntary cooperation—was the reason for his participation. *See id.* at 7:6-9 (“Q: ... can you confirm this is the subpoena that you received that led to your deposition here today? A: Yes, Sir.”); *see also id.* at 35:16-19 (“[t]he second thing is, which is the reason I am being subpoenaed and wouldn't provide a statement to you guys, is I didn't wanna to get sucked into this any further....”).

MOTION TO INTERVENE SHOULD BE GRANTED

South Carolina Rule of Civil Procedure 24 provides for an Intervention of Right where, “[u]pon timely application, anyone shall be permitted to intervene in an action. . .when the applicant claims an interest relating to property or transaction which is the subject of the action and is situated that the disposition of the action made as a practical matter impair or impede his ability to protect that interest, unless the applicants interest is adequately represented by existing parties.” S.C. R. Civ. P. 24(a). Additionally, South Carolina Rule of Civil Procedure 24 provides for Permissive Intervention “[u]pon timely application, anyone shall be permitted to intervene in an action . . . when an applicant’s claim or defense in the main action have a question of law or fact in common.” S.C. R. Civ. P. 24(b).

The Proposed Intervenor satisfies the requirements for intervention under either subsection of Rule 24. The deposition conducted by Petitioner’s counsel directly concerned her communications, relationships, and conversations. *See* Ex. B, Deposition of Wesley Donehue at 4:8-11 (“My name is Barrett Brewer, and I am here on behalf of GLT2, LLC, to take a deposition regarding information you might have in terms of your relationship, communication, conversations with Nancy Mace.”). Ms. Mace was the central subject of the discovery, and counsel for the Petitioner was fully aware of the individuals and subject matter he intended to probe.

Moreover, there are no respondents or adverse parties in the Petition proceeding, meaning there is no one present to protect or represent Ms. Mace’s interests. Although the Court has not granted the Petition, Petitioner and his counsel have nonetheless issued subpoenas and conducted depositions. These actions were taken prior to the rescheduled hearing on June 4, 2025, and, based upon all available information, appear to have been executed without judicial

authorization, in contravention of South Carolina law and the South Carolina Rules of Civil Procedure.

As a practical matter, these unauthorized proceedings vitiate Ms. Mace's ability to protect her rights and interests. Her private communications have been targeted through compelled testimony, without notice or opportunity for her to object or participate. Accordingly, it is beyond dispute that she has a direct and legally cognizable interest in the subject matter of this proceeding. Under Rule 24(a), intervention of right is appropriate where the disposition of an action may impair or impede the proposed intervenor's ability to protect such an interest. *See* S.C. R. Civ. P. 24(a). The record amply supports that standard.

Alternatively, permissive intervention under Rule 24(b) is also warranted, as the factual and legal questions raised by the Petition directly overlap with those affecting Ms. Mace. Given the absence of any party to represent her interests and the clear targeting of her communications, intervention is both procedurally proper and necessary to ensure fairness. *See* S.C. R. Civ. P. 24(b).

For these reasons, the Motion to Intervene should be granted.

MOTION TO DISMISS PETITION SHOULD BE GRANTED

Although this court never granted the Petition, GLT2 and its counsel have issued subpoenas and conducted at least one purported deposition of which the Proposed Intervenor is aware. Rule 27 of the South Carolina Rules of Civil Procedure provides that “[a] person who desires to perpetuate his own testimony or that of another person regarding any matter that may be cognizable in any court of the State may file a verified petition in the court in the Circuit of the residence of any expected adverse party.” S.C. R. Civ. P. 27(a)(1). The rule requires that the petition must show “[t]he names or a description of the persons he expects will be adverse parties

and their addresses so far as known.” *Id.* What is more, Rule 27 also requires that “[t]he petitioner shall thereafter serve a notice upon each person named in the petition as an expected adverse party together with a copy of the petition, stating that the petitioner will apply to the court, at a time and place named therein, for the other described in the petition.” S.C. R. Civ. P. 27(a)(2)

It is evident from the Petition itself that GLT2 failed to comply with Rule 27. Specifically, GLT2 did not provide notice to Ms. Mace as required by Rule 27(a)(1). Given the obvious nature of the alleged Donehue deposition, the Petitioner and its counsel clearly expected that Ms. Mace would be an adverse party. Rather than identifying her or any other interested individuals as parties to the proceeding, however, GLT2 concealed the true nature of the dispute by naming only “John Doe” and “Jane Doe” as putative defendants. In doing so, the Petitioner effectively shielded itself behind pseudonyms and adopted a posture of willful blindness, deliberately avoiding service or notice to those it intended to examine and later litigate against in clear violation of Rule 27. The Petitioner failed to comply with Rule 27 and further circumvented the judicial process by issuing at least one subpoena—and subsequently scheduling and taking the deposition of a witness—without first obtaining the Court’s approval of the Petition. These actions were taken in direct violation of the South Carolina Rules of Civil Procedure. Accordingly, the Petition should be denied, and for the reasons set forth below, sanctions are warranted.

MOTION TO IMPOSE SANCTIONS SHOULD BE GRANTED

Finally, this Court should order sanctions for the willful violation of the South Carolina Rules of Civil Procedure. In particular, Rule 11(a) places specific responsibilities on the attorney signing any pleading. As the Note to the Rule elucidates, the attorney “who signs a pleading” has

the “duty of good faith in preparing the pleading” and the “lawyer may be disciplined if he violates this duty.” Note, Rule 11, SCRCP; *see also Kovach v. Whitley*, 437 S.C. 261, 264, 878 S.E.2d 863, 865 n.3 (2022) (quoting Note, Rule 11, SCRCP) (“explaining that the signature requirement ‘represents a substantial forward step in *lawyer* responsibility,’ as it ‘places *on the lawyer who signs a pleading* the duty of good faith in preparing the pleading’”) (emphasis in original); *In re Beard*, 359 S.C. 351, 360, 597 S.E.2d 835, 839 n.4 (App. Ct. 2004) (citation omitted) (explaining that appellant’s attempts to “frame[] the issue as one of ‘good faith’ or ‘bad faith’” are irrelevant because “Rule 11 has been interpreted to include actions done in bad faith”); *Runyon v. Wright*, 322 S.C. 15, 19, 471 S.E.2d 160, 162 (1996) (“The party and/or attorney may also be sanctioned [under Rule 11] for filing a pleading, motion, or other paper in bad faith ...”) (citation omitted).

Petitioner failed to comply with Rule 27(a)(1) and (2) of the South Carolina Rules of Civil Procedure by deliberately omitting Ms. Mace as an expected adverse party despite seeking pre-litigation discovery directly concerning her and failing to provide notice and service of process. Moreover, while Petitioner and counsel were fully aware that a hearing was scheduled in early April to determine whether the Petitioner could proceed with a deposition, they moved for a continuance of that hearing. After the hearing was continued at their request, they unlawfully issued a subpoena to a witness and ultimately took the deposition of that witness.

The Petition, which was signed by Attorney Amanda F. Davis, a member of Brewer Law Firm, asserts that Petitioner expects to be a party to an action but is unable to bring it without collecting evidence regarding the tortious statements in question. GLT2 was formed only one day prior to filing the instant Petition. In that Petition, Attorney Davis and her client made statements to the Court that simply had no reasonable basis. The deposition testimony cited herein clearly

demonstrates that counsel was fully aware of the identity of the individual they intended to depose, as well as the individual they likely anticipated bringing a cause of action against. By signing the Petition, issuing a subpoena, and conducting a deposition—all without authorization from this Court—Petitioner’s counsel knowingly violated the South Carolina Rules of Civil Procedure. This conduct was willful and improper, and it warrants the imposition of appropriate sanctions by the Court under Rule 11.

CONCLUSION

Pursuant to Rule 27 of the South Carolina Rules of Civil Procedure, the proposed Intervenor’s Motion to Intervene should be granted under Rule 24, as the record—including the unlawful issuance of a subpoena and improper deposition—makes clear that Ms. Mace is so situated that the disposition of this action may, as a practical matter, impair or impede her ability to protect her interests.

Additionally, the Petition should be dismissed due to its egregious failures to comply with South Carolina Rule of Civil Procedure 27. The Petition fails to establish that the Petitioner expects to be a party to an action but is presently unable to bring it or cause it to be brought, as required by Rule. It also fails to set forth the specific facts the Petitioner seeks to preserve through testimony, or to provide any valid reason for seeking to perpetuate such testimony. Moreover, the Petition does not identify—by name or by adequate description—the individuals expected to be adverse parties, nor does it provide their addresses, despite the Petitioner and his counsel clearly knowing that Ms. Mace is likely to be such a party. The Petition also omits the names or sufficient descriptions of the persons to be deposed, the substance of the testimony sought from each, and any coherent request for an order authorizing the taking of those depositions for the purpose of preserving testimony.

Finally, sanctions are warranted in light of the Petitioner's deliberate disregard for the procedural safeguards established by the South Carolina Rules of Civil Procedure. The execution of the Petition, issuance of the subpoena, and taking of the deposition without prior authorization from this Court constitute a clear and willful violation of those rules. This conduct reflects a knowing circumvention of the judicial process and warrants the imposition of appropriate sanctions by the Court.

WHEREFORE, given the foregoing, the Proposed Intervenor prays that her Motion to Intervene and Motion to Dismiss and Award Sanctions be granted.

Respectfully submitted,



Attorneys for Nancy R. Mace/Jane Doe

June 10, 2025

Rule 11(a) Counsel Certification

Rule 11(a) of the South Carolina Rules of Civil Procedure generally requires counsel to confer in good faith with opposing counsel before filing a motion, except in certain specified circumstances. One such exception applies to motions to dismiss, for which no duty to confer exists. See Rule 11(a) (“There is no duty of consultation on motions to dismiss.”). Additionally, Rule 11 does not require a meet-and-confer where such efforts “would serve no useful purpose.” In the undersigned counsel’s professional judgment, consultation here would not be productive. As detailed above, the Petitioner filed this action without a proper basis, failed to identify the Proposed Intervenor as a likely adverse party despite her being the target of the pre-litigation discovery, and thereafter issued subpoenas and conducted depositions without Court approval or the Petition being granted. Further, in a recent motion for continuance, the Petitioner acknowledged that it is continuing unauthorized discovery, stated that it has nearly completed that discovery, and implied an intent to voluntarily dismiss the Petition once that effort is complete.

s/Mary Grace W. Maybank
Mary Grace Maybank (SC BAR #105552)

EXHIBIT A



Filing Date: 02/20/2025

STATE OF SOUTH CAROLINA
SECRETARY OF STATE

ARTICLES OF ORGANIZATION
Limited Liability Company – Domestic

The undersigned delivers the following articles of organization to form a South Carolina limited liability company pursuant to S.C. Code of Laws Section 33-44-202 and Section 33-44-203.

1. The name of the limited liability company (Company ending must be included in name*)

GLT2 LLC

*Note: The name of the limited liability company must contain one of the following endings: "limited liability company" or "limited company" or the abbreviation "L.L.C.", "LLC", "L.C.", "LC", or "Ltd. Co."

2. The address of the initial designated office of the limited liability company in South Carolina is
1000 Johnnie Dodds Blvd Ste 103-144

(Street Address)

Mt Pleasant, South Carolina 29464

(City, State, Zip Code)

3. The initial agent for service of process is

Dustin Ham

(Name)

(Signature of Agent)

And the street address in South Carolina for this initial agent for service of process is:
1000 Johnnie Dodds Blvd Ste 103-144

(Street Address)

Mt Pleasant

(City)

South Carolina

29464

(Zip Code)

4. List the name and address of each organizer. Only one organizer is required, but you may have more than one.

(a)

Dustin Ham

(Name)

1000 Johnnie Dodds Blvd Ste 103-144

(Street Address)

Mt Pleasant, South Carolina 29464

(City, State, Zip Code)

GLT2 LLC

Name of Limited Liability Company

(b)

(Name)

(Street Address)

(City, State, Zip Code)

5. Check this box only if the company is to be a term company. If the company is a term company, provide the term specified. _____
6. Check this box only if management of the limited liability company is vested in a manager or managers. If this company is to be managed by managers, include the name and address of each initial manager.

(a)

(Name)

(Street Address)

(City, State, Zip Code)

(b)

(Name)

(Street Address)

(City, State, Zip Code)

7. Check this box only if one or more of the members of the company are to be liable for its debts and obligations under Section 33-44-303(c). If one or more members are so liable, specify which members, and for which debts, obligations or liabilities such members are liable in their capacity as members. This provision is optional and does not have to be completed.

8. Unless a delayed effective date is specified, these articles will be effective when endorsed for filing by the Secretary of State. Specify any delayed effective date and time _____.

GLT2 LLC

Name of Limited Liability Company

9. Any other provisions not consistent with law which the organizers determine to include, including any provisions that are required or are permitted to be set forth in the limited liability company operating agreement may be included on a separate attachment. Please make reference to this section if you include a separate attachment.

10. Each organizer listed under number 4 must sign.

Dustin Ham: (Electronically Signed)

Signature of Organizer

Date: 02/20/2025

Signature of Organizer

Date: _____



South Carolina Secretary of State Mark Hammond

Business Entities Online

File, Search, and Retrieve Documents Electronically

Exhibit L

Transaction Profile

[View Entity Profile](#)

Entity Name: GLT2 LLC

Transaction Information

Transaction ID: 1834552

TPE Order Id: 166629734

Transaction Date: 2/20/2025 4:38:10 PM

Transaction Status: Closed

Payment Status: Payment Complete

Transaction Origin: Internet

Payment Method: Card

Receipt Delivery Method: Email

Transaction Processed By: Kelly Sisk

Documents for Download

Filing Type

Certified Documents: [Download](#)

Articles of Organization: [Download](#)

Certificate: [Download](#)

Pricing Summary

Item	Price
Articles of Organization	\$110.00
Service Fee* SC.GOV	\$15.00
Certificate	\$10.00
Service Fee* SC.GOV	\$4.00
Certified Documents for Articles of Organization	\$4.00
Service Fee* SC.GOV	\$2.50
Total Cost	\$145.50

Contact Information

Name: Dustin Ham

Email: accounting@gototeam.com

Phone: 864-561-6694

Address: 665 Johnnie Dodds Blvd Ste 201

Mount Pleasant, SC 29464

STATE OF SOUTH CAROLINA
SECRETARY OF STATE

NOTICE OF CHANGE OF (1) DESIGNATED OFFICE, (2) AGENT FOR SERVICE OF
PROCESS, OR (3) ADDRESS OF AGENT
LIMITED LIABILITY COMPANY – DOMESTIC AND FOREIGN

Pursuant to the 1976 S.C. Code of Laws, as amended, §33-44-109, the limited liability company submits the following statement of change.

1. The name of the limited liability company is:

GLT2 LLC

2. The limited liability company is (check either "a" or "b", whichever is applicable):

a. A South Carolina limited liability company.
 b. A foreign limited liability company authorized to transact business in South Carolina.

3. a. The South Carolina street address of the current designated office for the limited liability company is:
6650 Rivers Ave. STE 100

(Street Address)

Charleston, South Carolina 29406

(City, State, Zip Code)

b. The name of the company's current agent for service of process is:

Dustin Ham

(Name)

c. The South Carolina street address of the current registered agent's office is:
1000 Johnnie Dodds Blvd Ste 103-144

(Street Address)

Mt Pleasant, South Carolina 29464

(City, State, Zip Code)

4. Check and complete all boxes (a-c) that apply.

a. The company is changing the address of its designated office.

The new South Carolina address of the designated office of the limited liability company is:

(Street Address)

(City, State, Zip Code)

GLT2 LLC

Name of Limited Liability Company

b. The company is changing its agent for service of process.

The name of the company's new agent for service of process is:

Northwest Registered Agent LLC

(Name)

I hereby consent to the appointment as registered agent.

Taylor Newman: (Electronically Signed)

(Agent's Signature)

c. The company is changing the street address of the agent for service of process.

The new South Carolina street address of the registered agent's office is:
6650 Rivers Ave. STE 100

(Street Address)

Charleston, South Carolina 29406

(City, State, Zip Code)

5. Unless otherwise specified, these articles are effective when endorsed for filing by the Secretary of State. Specify the time and date of any delayed effective date

(Date)

Date: 05/30/2025

Signed as Authorized Signature: Brendan Bryant: (Electronically Signed)

(Signature)

Brendan Bryant

(Print Name)

Capacity/Position of Person Signing (You must check one box.)

Manager Member Organizer
 Fiduciary Attorney-in-Fact

South Carolina Secretary of State Mark Hammond

Business Entities Online

File, Search, and Retrieve Documents Electronically

Transaction Profile

[View Entity Profile](#)

Entity Name: GLT2 LLC

Transaction Information

Transaction ID: 1914888

TPE Order Id: 169630114

Transaction Date: 5/30/2025 10:28:56 AM

Transaction Status: Closed

Payment Status: Payment Complete

Transaction Origin: Internet

Payment Method: Card

Receipt Delivery Method: Email

Transaction Processed By: Fallon Hawkins

Documents for Download

Filing Type

Notice of Change of Designated Office, Agent or Address of Registered Agent: [Download](#)

Pricing Summary

Item	Price
Notice of Change of Designated Office, Agent or Address of Registered Agent	\$10.00
Service Fee* SC.GOV	\$5.00
Total Cost	\$15.00

Contact Information

Name: Filings Team

Email: eastern@northwestregisteredagent.com

Phone: 509-768-2249

Address: 6650 Rivers Ave, STE 100
Charleston, SC 29406

South Carolina Secretary of State Mark Hammond

Business Entities Online

File, Search, and Retrieve Documents Electronically

GLT2 LLC

Corporate Information

[Hide this entity?](#)

Entity Id: 01484116

Important Dates

Effective Date: 02/20/2025

Entity Type: Limited Liability Company

Expiration Date: N/A

Status: Good Standing

Term End Date: N/A

Domestic/Foreign: Domestic

Dissolved Date: N/A

Incorporated State: South Carolina

Registered Agent

[Hide this agent?](#)

Agent: Northwest Registered Agent LLC

Address: 6650 Rivers Ave. STE 100
Charleston, South Carolina 29406



Notes

Official Documents On File

[Lock this filing information](#)

File ID	Filing Type	Filing Date	Microfilm ID	Transaction	Update
250530-1103084	Notice of Change of Designated Office, Agent or Address of Registered Agent	05/30/2025	N/A	View	LOCKED
250221-1025121	Articles of Organization	02/20/2025	N/A	View	LOCKED

EXHIBIT B



Deposition of Wesley Donehue

1 (1 - 4)

1 STATE OF SOUTH CAROLINA) Page 1
 2 COUNTY OF CHARLESTON) IN THE COURT OF COMMON PLEAS
 3) THE NINTH JUDICIAL CIRCUIT
 4 GLT2, LLC,) CASE NO: 2025-CP-10-00981
 5 Plaintiff,)
 6 vs.)
 7)
 8 JANE DOE and JOHN DOE,)
 9 Defendants.)
 10 _____)

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24	
25	

1 A P P E A R A N C E S:

2 BREWER LAW FIRM
 3 By: BARRETT BREWER, Esq. (via Zoom)
 4 510 Mill Street, Suite 2B
 5 Mount Pleasant, South Carolina 29464
 6 (843) 779-7408
 7 barrett@brewerlawfirmsc.com
 8 amanda@brewerlawfirmsc.com
 9 nichelle@brewerlawfirmsc.com
 10 For the Plaintiff

11 COPELAND STAIR VALZ & LOVELL
 12 By: DOUG MACKELCAN, Esq. (via Zoom)
 13 40 Calhoun Street, Suite 400
 14 Charleston, South Carolina 29401
 15 (843) 226-8228
 16 dmackelcan@csvl.law
 17 For the Deponent

Page 2

Page 4

1 WESLEY DONEHUE,
 2 being first duly sworn by LORI WEBBER, a Notary Public
 3 within and for the State of South Carolina, was examined
 4 and testified on his oath as follows:

5 EXAMINATION

6 BY MR. BREWER:

7 Q Mr. Donehue, thank you for being here with us
 8 today. My name is Barrett Brewer, and I am here on behalf
 9 of GLT, LLC, to take a deposition regarding information
 10 you might have in terms of your relationship,
 11 communications, conversations with Nancy Mace.

12 Let me start from the beginning. Could you
 13 please state your full name for the record?

14 A John Wesley Donehue; and I go by my nickname,
 15 Wesley.

16 Q All right.

17 And are you a Charleston County resident?

18 A No, sir; I'm a Dorchester County resident.

19 Q Gotcha.

20 Let me get some background from you real quick.

21 Where'd you go to college at?

22 A University of South Carolina.

23 Q Okay.

24 And what is your current occupation and is it
 25 relevant to anything you did at USC?

Deposition of Wesley Donehue

2 (5 - 8)

1 A I am an entrepreneur and political consultant.
 2 Q I understand that you have or are a member of
 3 or have ownership in four different companies related to
 4 your political consulting?

5 A Yes. But it's more than that. I mean, for
 6 matters of this, Push Digital Group has four public
 7 companies, but it also has a few other subsidiary
 8 companies used for various things.

9 Q Gotcha.

10 A I actually have no idea how many companies I
 11 own, if you wanna know the truth, but it's more than four.

12 Q Gotcha.

13 So of the companies that you own that are
 14 relevant to our inquiry regarding Nancy Mace, her
 15 campaign, or anything to do with her congressional office,
 16 that would be Push, Drive, and Campaign Solutions?

17 A It would be. But I will tell you, Drive Public
 18 Affairs did a rebrand about a year, year and a half ago.
 19 So anything related could've been under a former company
 20 name called Push Advocacy. No; actually, it would've been
 21 Laurens Group. I'm sorry; it would've been called Laurens
 22 Group.

23 Q Are these all South Carolina entities?

24 A They are not. I have a partner based out of
 25 Dallas, Texas. I believe they're all Texas entities, if

Page 5

1 BY MR. BREWER:
 2 Q Okay.
 3 In coming to discuss your involvement with
 4 Ms. Mace professionally, individually, or through any of
 5 these entities, we sent you a subpoena on April 3rd, 2025.
 6 And I've got a picture of that up on the screen. Can you
 7 confirm this is the subpoena that you received that led to
 8 your deposition here today?

9 A Yes, sir.

10 Q Of course, you are represented by counsel here,
 11 which is Mr. MacKelcan; is that correct?

12 A Yes, sir.

13 Q All right.

14 One of the things we asked is that you bring
 15 with you any notes, reports, basically, documentation that
 16 you thought might be relevant to the deposition today.
 17 Did you produce any type of documentation, communications,
 18 texts, et cetera, that you need to produce to us today or
 19 that you might've produced to Mr. MacKelcan that we need
 20 to see?

21 A I did not.

22 Q Okay.

(Discussion held off the record.)

24 BY MR. BREWER:

25 Q So I've shown you Exhibit A, which is the

Page 6

1 I'm not mistaken.

2 Q Okay.

3 So to the extent I'm using the appropriate
 4 name, when we talk about Push, what's the appropriate
 5 corporate name for Push?

6 A So there's Push Digital Group.

7 Q Your umbrella.

8 A The umbrella accompany. And there are four
 9 main companies under that: Push Digital, which is a
 10 advertising and content development company; Campaign
 11 Solutions is a fundraising company; Drive Public Affairs,
 12 formerly known as Laurens Group, is a corporate
 13 communication company that also handles congressional
 14 franking; (inaudible).

15 THE STENOGRAPHIC REPORTER: I'm sorry;
 16 what was the last one?

17 THE WITNESS: Drive Public Affairs,
 18 previously known as Laurens Group.

19 THE STENOGRAPHIC REPORTER: Okay; I got
 20 that one.

21 THE WITNESS: And the fourth group is
 22 Right Country Lists. We call it RCL, but I don't think it
 23 has anything to do with this. I don't think it ever did
 24 any business with the campaign or the congressional
 25 office.

Page 8

1 subpoena. And obviously, sometimes we send subpoenas that
 2 have requests because I don't know what you have and what
 3 you don't have. So I guess one thing that I'd like to ask
 4 right now is if you didn't bring any documents with you,
 5 I'd like to know what might exist out in the world; right?
 6 And also, this is gonna be part of our communication for
 7 the next hour or so because you had communications with
 8 Ms. Mace. You could've had those in your capacity
 9 personally or individually.

10 A Yes.

11 Q You could've had those communications through
 12 any one of your multiple entities wearing that hat, if you
 13 will; right?

14 A Yes.

15 Q And that might control whether or not what
 16 records you may or may not have or what company may or may
 17 not have, so I just need to figure out what we're
 18 discussing and what the world of potential things that
 19 exist might be.

20 So did you ever have -- if you communicated
 21 with Ms. Mace, did you communicate with her by social
 22 media apps or direct messaging apps or anything like that?

23 A Yes. Most of my communications with Nancy were
 24 either on the phone or through Signal. There were very
 25 few actual text messages; and anything e-mail would've

Deposition of Wesley Donehue

9 (33 - 36)

ELECTRONICALLY FILED - 2025 Jun 14 5:34 PM - CHARLESTON - COMMON PLEAS - CASE#2025CP11000981

Page 33
 1 where she was living, and I said "I don't know." And then
 2 we started talking -- he asked how she was doing and was
 3 concerned about her. I remember that. And then we were
 4 mostly just sitting out on the deck talking about
 5 business.

6 Q When you met with Patrick, did it -- go ahead.
 7 A No; that's okay.

8 Q When you met with Patrick at this time, March
 9 27th of 2024, I'm assuming from your testimony so far that
 10 it seemed to you that Patrick was legitimately concerned
 11 about Nancy, whereas Nancy was not legitimately concerned
 12 for the well-being of Patrick.

13 A As -- yes; I guess that would be a good
 14 summary. But I mean, as much as I can tell if someone's
 15 concerned about someone else. I mean, he was asking about
 16 her; and she had a very different tone, I guess is the
 17 best way to say it.

18 Q Well -- and I guess a better way for me to ask
 19 that question is: March 27th, 2024, was Patrick
 20 expressing in any way ill will towards Nancy or the intent
 21 to harm her or to in any way cause damage, discomfort, or
 22 negativity towards her, I guess?

23 A Not at all. But -- I know, Doug, I'm not
 24 supposed to -- I wanna be very clear here so we can have
 25 some -- because it's not a question as -- Nancy was an

Page 34
 1 emotional wreck at this time. She took the breakup
 2 extremely hard. And I believe that Nancy believed the
 3 things that she was saying.

4 Q Okay.

5 A If they were true or not; and I don't know if
 6 they were true or not. And she believed it. She was
 7 losing a lot of weight, she was getting what she called
 8 stress tattoos. She was -- just because she wasn't saying
 9 things like "How is Patrick?", she was emotionally
 10 distraught at this point in the year. And in my view, her
 11 emotional stability was crumbling. So I don't wanna make
 12 it seem like she was just this machine that didn't care
 13 about anything. She very much cared. But it was coming
 14 across as erratic and unstable. Does that make sense? I
 15 wanna -- don't get mad at me, Doug. I'm kidding. But she
 16 did care, and that's the only way I can say that. That
 17 make sense?

18 Q Yes.

19 MR. BREWER: Madam court reporter, let's
 20 go off the record for a second.

21 (Discussion held off the record.)

22 BY MR. BREWER:

23 Q So Wes, you were telling me a minute ago that
 24 this line of interaction with Nancy where she asked you to
 25 go and essentially blackmail Patrick for her own personal

Page 35
 1 objectives regarding the house, that that ultimately led
 2 to your dissociating from her campaign; and then you went
 3 into some other stories about how she was emotionally
 4 unstable or mentally unstable, whichever phrase you used.
 5 So let me pick up there.

6 How did this series of communications starting
 7 with "I found things on Patrick's phone" lead to talking
 8 about houses, her seeming to be unstable, how did all that
 9 relate to your comments about what led to be dissociating
 10 from the campaign?

11 A I would say I left the campaign for three
 12 primary reasons. The first is that -- I'll say four
 13 things. The first being that I felt uncomfortable with
 14 the things that Nancy was asking me to do, and I didn't
 15 want to get in any legal trouble. That was the first
 16 thing. The second thing is, which is the reason I'm being
 17 subpoenaed and wouldn't provide a statement to you guys,
 18 is I didn't wanna get sucked into this any further because
 19 I saw what was coming. I ~~saw~~ that devolving into
 20 something pretty bad. And being that I was Patrick's
 21 friend, Nancy's friend, I saw that I was gonna get caught
 22 in the middle; and I didn't want to be there, because I
 23 have a business and family, too, and this was gonna get
 24 ugly. The third reason is because of my own -- to be
 25 honest with you, my own anxiety and stress levels. Her

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 1 erratic behavior was causing problems in my own personal
 2 life in that the constant phone calls, the constant
 3 yelling, the erratic behavior was just too much. And the
 4 fourth reason is she started tweeting and doing things on
 5 the internet that I thought was unprofessional and people
 6 were blaming me because I was her digital guy, and I
 7 didn't want to be associated with what I found to be a
 8 level of unprofessionalism on the internet.

9 Q Okay.

10 A So I cut ties with her.

11 Q Okay.

12 The first thing you mentioned that I wanna
 13 kinda go down the road on is she was asking you to do
 14 things that made you feel uncomfortable. We've discussed
 15 her sharing the photos on Patrick's phone with you and
 16 asking you to go blackmail him over the properties. Were
 17 there other things she was asking you to do that made you
 18 feel uncomfortable?

19 A No; I mean, it was primarily that. And you
 20 used the word "blackmail." That was actually a word I was
 21 using, too, internally when I was talking to people in my
 22 company or talking to my wife and literally said, you
 23 know, "Like she's asking me to blackmail someone." You
 24 know, asking me do something that I thought was illegal.
 25 And I'm no -- I'm no jurist. I have the -- I don't know

Exhibit M

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https://www.postandcourier.com/politics/mace-defamation-defense-filing-government/article_aa276e2b-83ao-4760-8c54-9627a65159a1.html

Can US Rep. Nancy Mace be shielded from a defamation suit? A judge will have to decide.

BY CAITLIN BYRD CBYRD@POSTANDCOURIER.COM

JUL 11, 2025



U.S. Rep. Nancy Mace, R-Charleston, arrives before President Donald Trump speaks during the congressional picnic on the South Lawn of the White House, Thursday, June 12, 2025, in Washington.

ALEX BRANDON/AP PHOTO

U.S. Rep. Nancy Mace should be shielded from a defamation lawsuit, the state's top federal attorney argues, contending the South Carolina Republican was simply doing her job when she repeatedly accused a Fort Mill man of being a sexual predator.

U.S. Attorney for South Carolina Bryan Stirling made the assertion in a July 11 court filing, saying the statements Mace is being sued over — including accusations she later

Exhibit M

repeated in social media posts viewed by millions — were all part of her duties as an elected official.

That means, Stirling said, Mace and her staff shouldn't be the ones on the hook in the defamation and libel lawsuit brought by one of the four men the congresswoman accused of rape, sex trafficking and other sex crimes.

Instead, the federal government is asking to be substituted as the defendant in the case, replacing Mace. And if that happens, Stirling outlined, the government will ask for the case to be dismissed.

It will be up to U.S. District Judge Richard Gergel to decide whether the government can take Mace's place in a case that could carry broader implications by testing the limits of congressional immunity.

Mace's office declined to comment, instead directing the newspaper to contact Matthew Berry, the House general counsel.

Mace has stated she is both a victim and a witness to acts by the four men she has accused of sexual assault and of multiple instances of photographing women without their knowledge. All of the men have denied the accusations.

Brian Musgrave, a Fort Mill resident, filed the original lawsuit against Mace and her team in March, about a month after she accused him and three other men — including her former fiancé — of engaging in a range of sexual misconduct in a stunning 53-minute address on the House floor.

That speech took place in a space likely protected from legal action under the Constitution's "speech or debate" clause.

Musgrave is represented by South Carolina attorneys Eric Bland, Ronnie Richter and Scott Mongillo.

Traditionally, the chamber has served as a protected forum for lawmakers to speak

Exhibit M

freely. But in his original 37-page complaint, Musgrave accused Mace of pushing past that boundary, claiming she defamed and libeled him when she labeled him a sexual predator before she ever stepped foot on the House floor and long after she left the chamber.

The allegations leveled by Mace were delivered along multiple fronts, including in her floor address, in her subsequent messaging on social media and in a poster Mace displayed outside her congressional office in the Longworth building on Capitol Hill. The poster featured Musgrave and three others with their photos and names beneath the word "predators."

The civil suit contends both Mace and her team "destroyed the lives of Brian Musgrave and his family."

But in the new court filings, government attorneys argue that a key question isn't whether Mace did something wrong, but whether the type of action she took is the kind of thing she's generally expected to do as part of her job as an elected officer.

Courts have ruled that when members of Congress make public statements about issues that matter to the public, those statements are considered part of their official job duties, they argue.

Eric Bland, one of Musgrave's attorneys, was unimpressed by the government's legal argument when he spoke to The Post and Courier after reading the new filings.

"That's what they waited all four months to come up with?" he said, noting that this case raises an issue that should concern every American.

"What happens if a politician sets their sights on you? How much can they wreck your lives?" Bland said. "Obviously they can wreck it a lot by what they say on the House floor, and she can do that. But are we just going to let them then go off the House floor, drive their car back to South Carolina and start tweeting up a storm to wreck your life, too? And then just say that's part of the legislative purpose of being a House member? It's ridiculous. That is not what our framers intended."

Exhibit M

Bland predicted that a key issue will be whether Mace was "using the guise of legislation" as a cover for pursuing her personal motivations against her ex-fiancé, and to further her own political career back home as she weighs a bid for governor.

Bland said his client has only been singled out by Mace for one reason: Musgrave is best friends with Mace's ex.

In the new court filings, government attorneys argue that even if Mace and her staff had other motives for their actions, their conduct still falls within the scope of official duties.

"Even if the Congresswoman and Doe Defendants had an additional motive in delivering the speech, releasing the speech to the press, hanging the poster near her Congressional office, giving a media interview, or posting on social media about the speech, that does not take the alleged conduct outside the scope of their employment under South Carolina law," the filing states.

Bland pushed back on the assertion.

"Just because the government calls her an employee doesn't make it so. I can call something a duck, and I can scream it's a duck until I'm blue in the face. But the truth is that's a goose," he said, adding, "Show us the receipts, Nancy. We're waiting."

A hearing to determine the matter will be held at a future date.

Reach Caitlin Byrd at 843-998-5404 and follow her on X @MaryCaitlinByrd.

CAITLIN BYRD

SENIOR POLITICS REPORTER

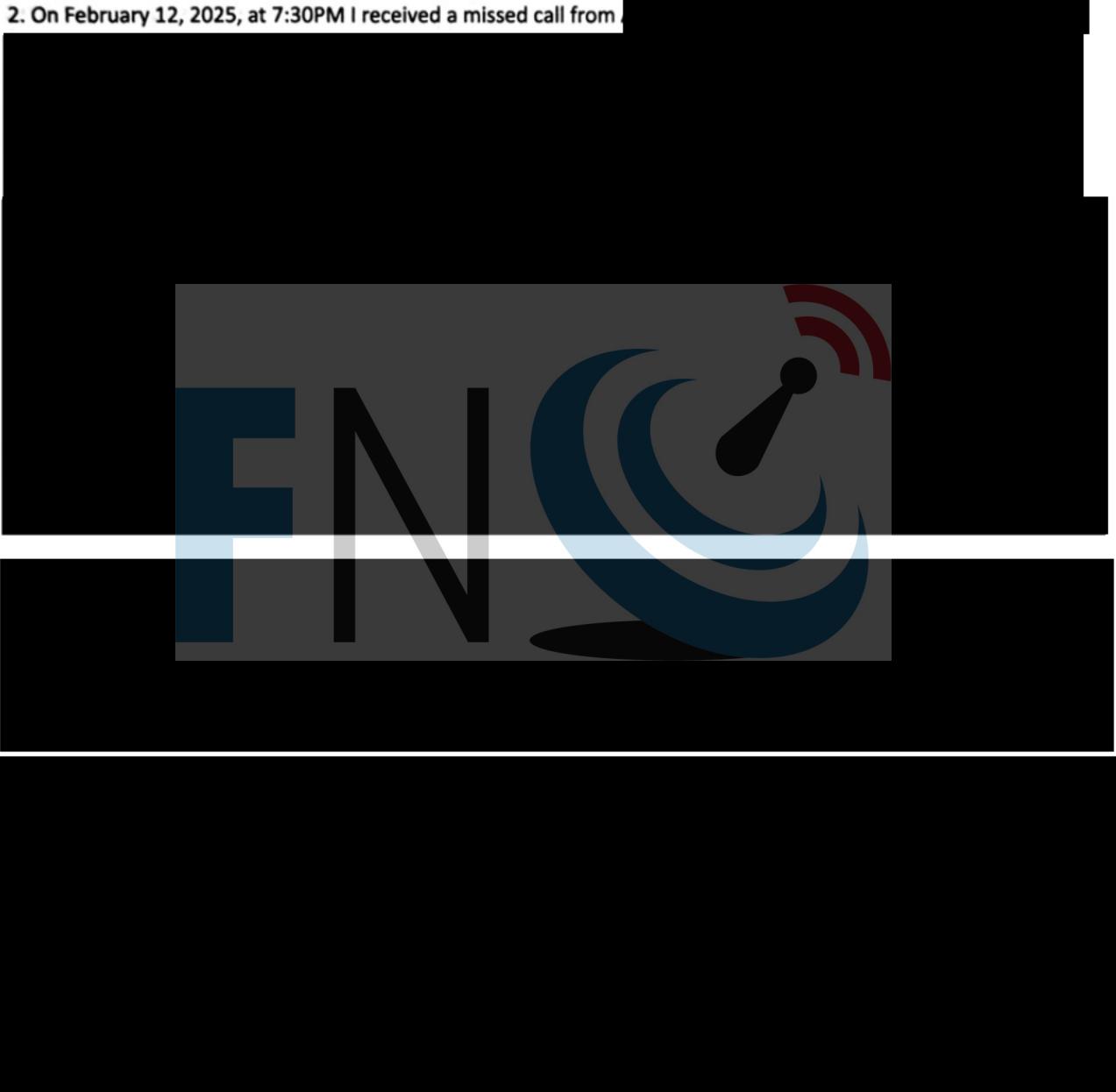
Caitlin Byrd is the senior politics reporter at The Post and Courier. An award-winning journalist, Byrd previously worked as an enterprise reporter for The State newspaper, where she covered the Charleston region and South Carolina politics. Raised in eastern North Carolina, she has called South Carolina home since 2016.

AFFIDAVIT OF ERIN GUNTHER
STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

I, Erin Gunther, being duly sworn, do hereby state and affirm as follows:

1. My name is Erin Gunther. I am over the age of 18 and competent to testify to the matters set forth in this affidavit. I reside in Charleston, South Carolina.

2. On February 12, 2025, at 7:30PM I received a missed call from [REDACTED]



6. [REDACTED] said she woke up at [REDACTED] house the next morning and only learned of the alleged sexual assault years later when Nancy Mace contacted her in April 2024 and told her about it. She said, "I didn't even know what happened to me until I found out it happened to me," and "Nancy told me I was sexually assaulted."

7. She admitted she had not seen the alleged video, stating: "I haven't seen the video," and "Nancy doesn't have it—she just told me what she saw."



16.. She stated of Nancy Mace's House floor speech, "It's not bullshit, there's so much evidence of it." But then commented, "Nancy has her own way of telling stories... Like, it's a theatrical sort of thing." She repeatedly insisted these claims were true, despite openly acknowledging the source of her story was Nancy Mace and that she could not independently verify it. At one point, [REDACTED] said, "I don't know what to believe or who to trust." She further admitted, "I called my lawyer last week and told them Nancy's making this all up. This is literally a lie so she can get in some political position."



24. I made this affidavit voluntarily and to the best of my recollection. I was not coerced or promised anything in exchange for this statement.

FURTHER AFFIANT SAYETH NAUGHT.

Erin S. Gunther

Erin S. Gunther

Sworn to and subscribed before me
this 9th day of May, 2025.

Erin S. Gunther

Notary Public for South Carolina

My Commission Expires: 6-19-28

FN

