

STATE OF SOUTH CAROLINA

COUNTY OF CHS

Eric Bowman

Plaintiff,

vs.

Melissa Britton

Defendant.

IN THE COURT OF COMMON PLEAS
JUDICIAL CIRCUIT

CASE NO.: 2025-CP- 10 - 4343

MOTION AND ORDER INFORMATION
FORM AND COVERSHEET

Plaintiff's Attorney: _____, Bar No. <u>PROSC</u> Address: <u>116 Wall St. ericbowmonkids@gmail.com</u> Phone: _____ Fax _____ E-mail: _____ Other: _____		Defendant's Attorney: _____, Bar No. _____ Address: _____ Phone: _____ Fax _____ E-mail: _____ Other: _____	
<input type="checkbox"/> MOTION HEARING REQUESTED (attach written motion and complete SECTIONS I and III) <input type="checkbox"/> FORM MOTION, NO HEARING REQUESTED (complete SECTIONS II and III) <input type="checkbox"/> PROPOSED ORDER/CONSENT ORDER (complete SECTIONS II and III)			
SECTION I: Hearing Information			
Nature of Motion: _____ Estimated Time Needed: _____		Court Reporter Needed: <input type="checkbox"/> YES/ <input type="checkbox"/> NO	
SECTION II: Motion/Order Type			
<input type="checkbox"/> Written motion attached <input type="checkbox"/> Form Motion/Order I hereby move for relief or action by the court as set forth in the attached proposed order.			
Signature of Attorney for <input type="checkbox"/> Plaintiff / <input type="checkbox"/> Defendant		Date submitted	
SECTION III: Motion Fee			
<input type="checkbox"/> PAID - AMOUNT: \$ _____ <input type="checkbox"/> EXEMPT: (check reason) <input type="checkbox"/> Rule to Show Cause in Child or Spousal Support <input type="checkbox"/> Domestic Abuse or Abuse and Neglect <input type="checkbox"/> Indigent Status <input type="checkbox"/> State Agency v. Indigent Party <input type="checkbox"/> Sexually Violent Predator Act <input type="checkbox"/> Post-Conviction Relief <input type="checkbox"/> Motion for Stay in Bankruptcy <input type="checkbox"/> Motion for Publication <input type="checkbox"/> Motion for Execution (Rule 69, SCRCP) <input type="checkbox"/> Proposed order submitted at request of the court; or, reduced to writing from motion made in open court per judge's instructions Name of Court Reporter: _____ <input type="checkbox"/> Other: _____			
JUDGE'S SECTION			
<input type="checkbox"/> Motion Fee to be paid upon filing of the attached order. <input type="checkbox"/> Other: _____		JUDGE CODE _____ Date: _____	
CLERK'S VERIFICATION			
Collected by: _____ Date Filed: _____ <input type="checkbox"/> MOTION FEE COLLECTED: \$ _____ <input type="checkbox"/> CONTESTED - AMOUNT DUE: \$ _____			

STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON
STATE OF SOUTH CAROLINA

IN THE COURT OF COMMON PLEAS
IN THE NINTH JUDICIAL CIRCUIT

Eric Bowman,)
Plaintiff,) **Case No. 2025-CP-10- 4343**
v.) **EMERGENCY MOTION FOR TEMPORARY**
Melissa Britton, individually and in her) **RESTRAINING ORDER (TRO)**
capacity as Trustee of the Pommer Group,)
LLC Qualified Personal Residence Trust,)
Defendant.)
_____)

2025 AUG -4 PM 1:30
CLERK OF COURT

NOW COMES Plaintiff, **Eric Bernard Bowman**, pursuant to **Rule 65 of the South Carolina Rules of Civil Procedure**, and respectfully moves this Honorable Court to issue an immediate **Temporary Restraining Order (TRO)** against Defendant **Melissa Britton**, both in her individual capacity and in her fiduciary role as trustee, to preserve the status quo and prevent irreparable harm to trust-held property and beneficiaries pending a hearing on the **Complaint for Removal of Trustee and Appointment of Successor**.

I. PROCEDURAL CONTEXT

1. This Motion is filed in conjunction with Plaintiff's Complaint seeking removal of Melissa Britton as trustee of the Pommer Group, LLC Qualified Personal Residence Trust (the "Trust") pursuant to **S.C. Code Ann. § 62-7-706**.
2. The Trust is the sole member and legal owner of **Pommer Group, LLC**, which in turn holds real estate intended for the long-term use and benefit of Plaintiff's minor daughters — the sole named beneficiaries of the Trust.
3. The subject real property is residential in nature and forms part of the family estate; it cannot be replaced or restored once lost through judgment, foreclosure, or judicial sale.

4. Defendant's continuing inaction and conflict of interest place the Trust corpus in jeopardy, create structural deadlock, and warrant emergency equitable intervention by this Court.
5. This Motion is filed ex parte pursuant to Rule 65(b), SCRCF, due to the existing no-contact order issued by Charleston County General Sessions Court (Warrant Numbers: 2025A1011100011; 2025A101110012, dated 15 April 2025), which prohibits direct communication between Plaintiff and Defendant. Immediate relief is necessary to prevent irreparable harm to the Trust's assets, as detailed below, and Plaintiff certifies that efforts to provide notice are impracticable under these circumstances.

II. RELIEF REQUESTED

Plaintiff requests a Temporary Restraining Order enjoining Defendant Melissa Britton from:

- Taking any action that purports to bind or represent **Pommer Group, LLC** in any civil or legal capacity;
- Failing or refusing to engage qualified legal counsel to respond to the Complaint in *Jane Doe v. Pommer Group, LLC*, Case No. 2025-CP-10-03124;
- Allowing the LLC to be exposed to **default judgment** or other adverse outcomes due to inaction or abandonment;
- Transferring, pledging, concealing, or otherwise encumbering **any real or personal property** held by Pommer Group, LLC or the Trust pending further order of this Court.

III. LEGAL AND EQUITABLE GROUNDS

This Motion is based on the following legal grounds and factual averments, which establish Plaintiff's right to temporary injunctive relief:

A. Rule 65 SCRCF Standard

Under Rule 65, a temporary restraining order may be issued where (1) there is a likelihood of success on the merits, (2) there is a threat of irreparable harm, (3) the balance of equities favors the movant, and (4) no adequate remedy at law exists.

B. Likelihood of Success on the Merits

Plaintiff has filed a detailed Verified Complaint demonstrating that:

- Defendant has failed to engage legal counsel to defend Pommer Group, LLC in *Jane Doe v. Pommer Group, LLC* (Case No. 2025-CP-10-03124), despite repeated deadlines, risking default judgment.
- Defendant's status as the sole fact witness ("JDW") in the *Jane Doe* case creates a disqualifying conflict of interest, as her testimony may prejudice the LLC's defense, violating her duty of loyalty under S.C. Code Ann. § 62-7-802.
- Defendant has demonstrated unfitness by neglecting to communicate with Plaintiff or Trust beneficiaries regarding critical Trust matters, breaching her duty of prudent administration under S.C. Code Ann. § 62-7-804. These actions and omissions justify her removal as trustee and the appointment of a successor to protect the Trust's assets and beneficiaries.

C. Threat of Irreparable Harm

Defendant's refusal to engage counsel or defend Pommer Group, LLC:

- Exposes the LLC to imminent default judgment which could result in monetary damages or liens against the Trust's primary asset—a residential property located on Sullivans Island, SC.
- Jeopardizes the Trust's sole asset, a single-family which serves as the primary residence for Plaintiff's minor daughters, the Trust's sole beneficiaries.
- Risks permanent loss through foreclosure, judicial sale, or encumbrance, as this property is uniquely suited to the beneficiaries' needs and cannot be replaced due to its location, size, and familial significance.
- Cannot be remedied through monetary damages, as the loss of the family home would cause emotional and financial devastation to the minor beneficiaries.

D. No Adequate Remedy at Law

Plaintiff is barred from communicating with Defendant due to a no-contact order issued by Charleston County General Sessions Court (Warrant Numbers: 2025A1011100011; 2025A101110012, dated 15 April 2025), which prohibits all direct contact. Plaintiff, as a non-trustee, lacks standing to intervene in the LLC's defense while Defendant remains trustee. Absent immediate injunctive relief, the Trust's assets face imminent loss, with no legal mechanism to compel Defendant's action before the *Jane Doe* case deadline.

E. Balance of Equities Favors Plaintiff

The requested TRO imposes no undue hardship on Defendant, as it merely requires her to refrain from actions that harm the Trust and to fulfill her existing fiduciary duty to defend the LLC. In contrast, denying the TRO risks catastrophic loss to the minor beneficiaries, who

rely on the Trust's residential property for their housing and financial security. Equity strongly favors preserving the Trust's assets for the benefit of vulnerable minors over allowing Defendant's inaction to jeopardize their interests.

F. Public Interest

Granting the TRO serves the public interest by preserving the integrity of irrevocable trusts, preventing trustees from acting with divided loyalties, and safeguarding real property held for the benefit of minor children, consistent with South Carolina's strong policy of protecting vulnerable dependents under S.C. Code Ann. § 62-7-401 et seq.

IV. NATURE AND SCOPE OF INJUNCTION REQUESTED

Plaintiff does not seek to disrupt ordinary administration of the Trust, but rather to prevent the Trustee from failing to act where she is legally obligated to do so — and to stop her from actively harming the Trust by refusing to resign or delegate fiduciary authority while in conflict.

Plaintiff respectfully requests that the TRO remain in place until the Court has ruled on the pending **Complaint for Removal of Trustee and Appointment of Successor** or until further order of the Court.

V. PRAYER FOR RELIEF

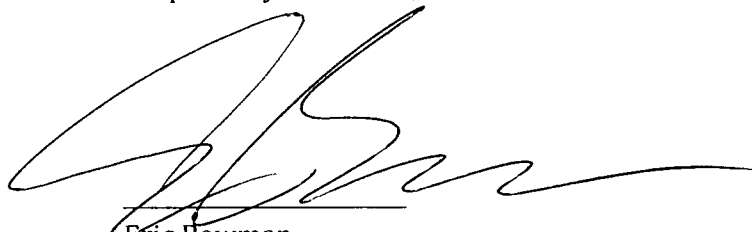
WHEREFORE, Plaintiff respectfully requests that the Court:

1. Issue a **Temporary Restraining Order** immediately enjoining Defendant from acting for, or failing to act on behalf of, Pommer Group, LLC;
2. Prevent any default judgment or legal injury to the Trust's assets caused by Defendant's nonfeasance;
3. Prohibit any transfer or encumbrance of Trust or LLC property;
4. Preserve the status quo pending hearing on a motion for preliminary injunction and final resolution of the Complaint for Removal;
5. Grant any such other relief as the Court deems just and proper in equity.
6. Schedule an expedited hearing on Plaintiff's motion for a preliminary injunction to address the removal of Defendant as trustee and prevent further harm to the Trust.

VI. Certification of Good Faith

Pursuant to Rule 65(b), SCRPC, Plaintiff certifies that efforts to provide notice to Defendant are impracticable due to the no-contact order issued by the Charleston County General Sessions Court, which prohibits all communication between Plaintiff and Defendant. The imminent risk of default judgment in *Jane Doe v. Pommer Group, LLC* and the potential loss of Trust assets necessitate immediate ex parte relief to prevent irreparable harm.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Eric Bowman', is written over a horizontal line.

Eric Bowman
Pro Se Plaintiff

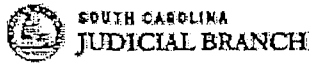
11 eWall Street

Mount Pleasant, SC 29464

(843) 693-8720

ericbowman.kids@gmail.com

Dated: August 4, 2025



STATE OF SOUTH CAROLINA
COUNTY OF Charleston

Eric Bowman
Plaintiff(s)

v.

Melissa Bitter
Defendant(s)

Submitted By: Eric Bowman
Address: 116 Wall Street
W.P. 294611

IN THE COURT OF COMMON PLEAS

Civil Action Coversheet

Case No. 2025 CP10 04343

SC Bar Number: _____
Telephone #: _____
Fax #: _____
Other: _____
Email: _____

NOTE: The coversheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for the use of the Clerk of Court for the purpose of docketing cases that are NOT E-Filed. It must be filled out completely, signed, and dated. A copy of this coversheet must be served on the defendant(s) along with the Summons and Complaint. **This form is NOT required to be filed in E-Filed Cases.**

DOCKETING INFORMATION (*Check all that apply*)

**If Action is Judgment/Settlement do not complete*

- ☐ **JURY TRIAL** demanded in complaint.
- ☐ **NON-JURY TRIAL** demanded in complaint.
- ☐ This case is subject to **ARBITRATION** pursuant to the Court Annexed Alternative Dispute Resolution Rules.
- ☐ This case is subject to **MEDIATION** pursuant to the Court Annexed Alternative Dispute Resolution Rules.
- ☐ This case is exempt from ADR. (Certificate Attached)

Note: Frivolous civil proceedings may be subject to sanctions pursuant to SCRCF, Rule 11, and the South Carolina Frivolous Civil Proceedings Sanctions Act, S.C. Code Ann. §15-36-10 et. seq.

Submitting Party Signature: [Signature]
Date: 8/14/25



Nature of Action (Check one box below)

Contracts

- ☐ Constructions (100)
- ☐ Debt Collection (110)
- ☐ General (130)
- ☐ Breach of Contract (140)
- ☐ Fraud/Bad Faith (150)
- ☐ Failure to Deliver/Warranty (160)
- ☐ Employment Discrim (170)
- ☐ Employment (180)
- ☒ Other (199)

Torts- Professional
Malpractice

- ☐ Dental Malpractice (200)
- ☐ Legal Malpractice (210)
- ☐ Medical Malpractice (220)
- ☐ Notice of Intent Case #
- ☐ Notice File. Med Mal (230)
- ☐ Other (299)

Torts- Personal Injury

- ☐ Conversion (310)
- ☐ Motor Vehicle Accident (320)
- ☐ Premises Liability (330)
- ☐ Products Liability (340)
- ☐ Personal Injury (350)
- ☐ Wrongful Death (360)
- ☐ Assault/Battery (370)
- ☐ Slander/Libel (380)
- ☐ Other (399)

Inmate Petitions

- ☐ PCR (500)
- ☐ Mandamus (520)
- ☐ Habeas Corpus (530)
- ☐ Other (599)

Real Property

- ☐ Claim & Delivery (400)
- ☐ Condemnation (410)
- ☐ Foreclosure (420)
- ☐ Mechanic's Lien (430)
- ☐ Partition (440)
- ☐ Possession (450)
- ☐ Building Code Violation (460)
- ☐ Other (499)

Judgments/Settlements

- ☐ Death Settlement (700)
- ☐ Foreign Judgment (710)
- ☐ Magistrate's Judgment (720)
- ☐ Minor Settlement (730)
- ☐ Transcript Judgment (740)
- ☐ Lis Pendens (750)
- ☐ Transfer of Structured Settlement Application Payment Rights (760)
- ☐ Confession of Judgment (770)
- ☐ Petition for Workers Compensation Settlement Approval (780)
- ☐ Incapacitated Adult Settlement (790)
- ☒ Other (799)

Administrative Law/Relief

- ☐ Reinstate Driver's License (800)
- ☐ Judicial Review (810)
- ☐ Relief (820)
- ☐ Permanent Injunction (830)
- ☐ Forfeiture- Petition (840)
- ☐ Forfeiture- Consent Order (850)
- ☐ Other (899)

Special/Complex/Other

- ☐ Environmental (600)
- ☐ Automobile Arb. (610)
- ☐ Medical (620)
- ☐ Pharmaceuticals (630)
- ☐ Unfair Trade Practices (640)
- ☐ Out of State Depositions (650)
- ☐ Motion to Quash Subpoena in an Out of County Action (660)
- ☐ Pre-Suit Discovery (670)
- ☐ Permanent Restraining Order (680)
- ☐ Interpleader (690)
- ☐ Other (699)

Appeals

- ☐ Arbitration (900)
- ☐ Magistrate- Civil (910)
- ☐ Magistrate- Criminal (920)
- ☐ Municipal (930)
- ☐ Probate Court (940)
- ☐ SCDOT (950)
- ☐ Worker's Comp (960)
- ☐ Zoning Board (970)
- ☐ Public Service Comm. (990)
- ☐ Employment Service Comm. (991)
- ☐ Other (999)

STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

IN THE COURT OF COMMON PLEAS
IN THE NINTH JUDICIAL CIRCUIT

Eric Bowman,)
Plaintiff,)
v.)
Melissa Britton, individually and in her)
capacity as Trustee of the Pommer Group,)
LLC Qualified Personal Residence Trust,)
Defendant.)
_____)

Case No. 2025-CP-10- 04343

SUMMONS

(18)

2025 AUG -4 PM 1:20

TO THE DEFENDANTS ABOVE NAMED

YOU ARE HEREBY SUMMONED and required to answer the Complaint in this action, a copy of which is attached hereto and herewith served upon you, and to serve a copy of your Answer to said Complaint upon the subscriber at the address below, either by U.S. mail or email, pursuant to Rule 5, South Carolina Rules of Civil Procedure.

Eric Bowman
11 eWall Street
Mount Pleasant, SC 29464
ericbowman.kids@gmail.com

WITHIN THIRTY (30) DAYS after service hereof, exclusive of the day of such service. If you fail to answer the Complaint within the time aforesaid, judgment by default may be rendered against you for the relief demanded in the Complaint.

4 August 2025
Charleston County, South Carolina

Respectfully submitted,



Eric Bowman
Pro Se Plaintiff

11 eWall Street

Mount Pleasant, SC 29464

(843) 693-8720

ericbowman.kids@gmail.com

Dated: August 4, 2025

FITSNEWS

STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

IN THE COURT OF COMMON PLEAS
IN THE NINTH JUDICIAL CIRCUIT

Eric Bowman,)
Plaintiff,)
v.)
Melissa Britton, individually and in her)
capacity as Trustee of the Pommer Group,)
LLC Qualified Personal Residence Trust,)
Defendant.)
_____)

Case No. 2025-CP-10- **04343**

COMPLAINT

COMPLAINT FOR REMOVAL OF TRUSTEE AND APPOINTMENT OF SUCCESSOR

COMES NOW Plaintiff, **Eric Bernard Bowman**, by way of Verified Complaint, and respectfully alleges:

I. JURISDICTION AND VENUE

1. Plaintiff is a resident of Charleston County, South Carolina, and the father of the **sole beneficiaries** of the Pommer Group, LLC Qualified Personal Residence Trust ("the Trust").
2. Defendant **Melissa Britton** is Plaintiff's estranged spouse and the current acting trustee of the Trust. She resides or may be served in Charleston County.
3. This Court has jurisdiction pursuant to **S.C. Code Ann. §§ 62-7-201, 62-7-706, and 62-7-704**, and venue is proper in Charleston County pursuant to **§ 62-7-204** and **§ 15-7-30**, as the Trust is administered and the subject property is located in Charleston County.

II. BACKGROUND FACTS

4. The Trust is an irrevocable South Carolina trust formed to own and manage **100% of Pommer Group, LLC**, a company whose sole asset is real estate used for residential purposes.
 5. The Trust's purpose is to hold and preserve the property for the long-term housing and financial benefit of Plaintiff's minor daughters, who are the sole named beneficiaries.
 6. Plaintiff was previously the initial trustee of the Trust until **September 2017**, at which time Defendant Melissa Britton assumed the role of sole trustee.
 7. Since that time, Defendant has exercised exclusive control over the Trust and the LLC. This includes control over real property at **3024 Marshall Blvd, Sullivan's Island, SC**, where Plaintiff currently resides with his minor children — the **sole beneficiaries of the Trust**.
 8. Defendant's control has been documented through public and contractual acts, including a May 20, 2021 USA Patriot Act Notice, to open a financial account for Pommer Group, LLC (see Exhibit A: Patriot Act Notice) where she signed as trustee.
 9. USA Patriot Act Notice (Exhibit A), and *Jane Doe v. Pommer Group, LLC* Complaint (Exhibit B) to support the allegations herein. Additional relevant documents will be provided upon discovery, if necessary.
-

III. GROUNDS FOR REMOVAL

10. Plaintiff alleges grounds for **removal of Defendant as trustee** under **S.C. Code Ann. § 62-7-706(b)**, including:
 11. **Breach of fiduciary duty** by refusing to defend Pommer Group, LLC in *Jane Doe v. Pommer Group, LLC* (Case No. 2025-CP-10-03124, filed June 1, 2025), risking default judgment and liens against the Trust's sole asset (see Exhibit B: *Jane Doe* Complaint). This inaction violates her duty to administer the Trust in good faith and in the beneficiaries' interests under S.C. Code Ann. § 62-7-801. See *Moore v. Moore*, 414 S.C. 1, 776 S.E.2d 900 (Ct. App. 2015) (trustee's failure to act prudently to protect trust assets constitutes grounds for removal).
 12. **Unfitness and unwillingness** to serve, due to an irreconcilable **conflict of interest** as she is the sole fact witness ("JDW") for the plaintiff in *Jane Doe v. Pommer Group, LLC* (Case No. 2025-CP-10-03124, filed June 1, 2025). Her testimony may prejudice the LLC's defense, violating her duty of loyalty under S.C. Code Ann. § 62-7-802. See *Ex parte Dibble*, 279 S.C. 592, 310 S.E.2d 440 (Ct. App. 1983) (trustee's conflict of interest impairing impartiality warrants removal);

13. **Failure to act prudently**, in violation of **§ 62-7-804**, by refusing to hire counsel for the LLC or take any action to preserve trust assets, exposing the property to foreclosure or judicial sale, directly harming the minor beneficiaries. See **Moore v. Moore**, 414 S.C. 1, 776 S.E.2d 900 (Ct. App. 2015) (trustee's failure to act prudently to protect trust assets constitutes grounds for removal).
 14. **Persistent failure and Administrative Deadlock**: Defendant's persistent failure to administer the Trust effectively, coupled with an administrative deadlock caused by the no-contact order, results in imminent risk of default judgment in **Jane Doe v. Pommer Group, LLC** (Case No. 2025-CP-10-03124, due August 1, 2025), loss of real estate, and damage to the trust beneficiaries. The no-contact order prevents Plaintiff from coordinating with Defendant, rendering effective trust administration impossible. Defendant's refusal to resign despite this impasse exacerbates the deadlock, threatening the Trust's purpose. See **Holland v. Holland**, 355 S.C. 318, 584 S.E.2d 447 (Ct. App. 2003) (courts may remove trustees to protect beneficiaries when administration is impracticable).
 15. Further, Defendant and Plaintiff are estranged spouses subject to a no-contact order issued by Charleston County General Sessions Court (Warrant Nos. 2025A1011100011, 2025A1011100012, dated April 15, 2025), which prohibits all verbal, written, or electronic communication, rendering trust administration impossible and exacerbating the deadlock caused by Defendant's refusal to resign. Defendant has refused to resign despite this impasse and has **stated an intent to force the sale of trust-owned property**, an act which directly contradicts the trust's protective purpose.
 16. The minor beneficiaries, face irreparable harm if the property is lost, as it is their primary residence and a unique asset critical to their housing and financial security. Monetary damages cannot adequately remedy this loss. See **Holland**, 355 S.C. at 325 (courts prioritize protecting minor beneficiaries' interests in trust proceedings).
-

IV. SUCCESSOR TRUSTEE EXISTS

17. Upon information and belief, the Trust document names a successor trustee to serve in the event of the current trustee's removal, resignation, or incapacity.
 18. Plaintiff requests that the Court appoint the named successor trustee pursuant to S.C. Code Ann. § 62-7-704(b), ensuring seamless administration in accordance with the Trust's terms.
 19. If no successor is able or willing to serve, Plaintiff reserves the right to request a **neutral fiduciary or receiver** pursuant to **S.C. Code Ann. § 15-65-10**.
-

V. PRAYER FOR RELIEF


WHEREFORE, Plaintiff respectfully prays that this Court:

20. Remove Defendant Melissa Britton as trustee of the Pommer Group, LLC Qualified Personal Residence Trust under S.C. Code Ann. § 62-7-706, due to her breach of fiduciary duty, conflict of interest, and persistent failure to administer the Trust effectively;
 21. Appoint the named successor trustee pursuant to S.C. Code Ann. § 62-7-704(b); or if that person is not available, appoint a qualified neutral fiduciary or receiver under S.C. Code Ann. § 15-65-10 to administer the Trust and act for Pommer Group, LLC;
 22. Enjoin Defendant from taking any further action on behalf of the Trust or Pommer Group, LLC pending resolution of this proceeding, consistent with Plaintiff's Emergency Motion for Temporary Restraining Order filed concurrently;
 23. Schedule an expedited hearing to address this Complaint and prevent further harm to the Trust's assets and beneficiaries;
 24. Award such other and further relief as the Court deems just and equitable.
-

VI. VERIFICATION

25. I, Eric Bernard Bowman, verify under penalty of perjury that I have read the foregoing Complaint, and the facts stated herein are true and correct to the best of my knowledge, information, and belief. I further certify that this Complaint is not filed for any improper purpose, such as to harass or cause unnecessary delay, pursuant to Rule 11, SCRPC.

Respectfully submitted,



Eric Bowman
Pro Se Plaintiff
11 eWall Street
Mount Pleasant, SC 29464
(843) 693-8720
ericbowman.kids@gmail.com
Dated: August 4, 2025

USA PATRIOT ACT NOTICE

Borrower: Pommer Group, LLC
3024 Marshall Blvd.
Sullivan's Island, SC 29482-0000

Lender: Pinnacle Bank, a Tennessee bank
CAG - SC Coastal
534 Johnnie Dodds Blvd
Mount Pleasant, SC 29464

This USA PATRIOT ACT NOTICE is attached to and by this reference is made a part of the Promissory Note, dated May 20, 2021, and executed in connection with a loan or other financial accommodations between PINNACLE BANK, A TENNESSEE BANK and Pommer Group, LLC.

IMPORTANT INFORMATION ABOUT PROCEDURES FOR OPENING A NEW ACCOUNT

To help the government fight the funding of terrorism and money laundering activities, Federal law requires all financial institutions to obtain, verify, and record information that identifies each person who opens an account.

What this means for you: When you open an account, we will ask for your name, address, date of birth, and other information that will allow us to identify you. We will also ask to see your driver's license or other identifying documents.

THIS USA PATRIOT ACT NOTICE IS EXECUTED ON MAY 20, 2021.

BORROWER:

POMMER GROUP, LLC

POMMER GROUP, LLC, QUALIFIED PERSONAL RESIDENCE TRUST, Sole Member of Pommer Group, LLC


By: 
Melissa R Britton, Trustee of Pommer Group, LLC,
Qualified Personal Residence Trust

Exhibit A

STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

IN COURT OF COMMON PLEAS
IN THE NINTH JUDICIAL CIRCUIT

Jane Doe,

Plaintiff,

v.

Patrick Bryant, John Osborne, Eric
Bowman, and Pommer Group LLC.
Assignment Desk Works LLC., and
GLT2, LLC.,

Defendants.

C/A No.: 2025-CP-10-03124

SUMMONS

TO THE DEFENDANTS ABOVE NAMED

YOU ARE HEREBY SUMMONED and required to answer the Complaint in this action, a copy of which is herewith served upon you, and to serve a copy of your answer to the Complaint to Plaintiff's attorney, Marybeth Mullaney, at the address below, within thirty (30) days after service hereof, exclusive of the day of such service, and if you fail to answer the Complaint within the time aforesaid, Plaintiff will apply to the Court for the relief demanded in the Complaint, including the rendering of judgment by default against you.

Respectfully submitted,

s/Marybeth Mullaney
Marybeth Mullaney (S.C. Bar #6685)
4900 O'Hear Ave Suite 100 & 200
North Charleston, South Carolina 29405
(843) 588-5587
marybeth@mullaneylaw.net
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

Jane Doe,

Plaintiff,

v.

Patrick Bryant, John Osborne, Eric
Bowman, and Pommer Group LLC.,
Assignment Desk Works LLC., and
GLT2, LLC.,

Defendants.

C/A No.: 2025-CP-10-03124

FIRST AMENDED COMPLAINT
(Jury Trial Requested)

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 Victimizers 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 ADW, 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 SCRCPP 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. SCRCPP 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 INFLICTION 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, ADW)

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, NINTH, 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
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ATTORNEY FOR PLAINTIFF

June 10, 2025
North Charleston, South Carolina

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