

STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
	)	
COUNTY OF BEAUFORT	)	C/A: 2025-CP-07-_____
	)	
JOE PEPITONE, as GAL for N.P.,	)	
minor child, JOE PEPITONE,	)	
LAUREN PEPITONE, and	)	
DOMINIC PEPITONE, individually.	)	
	)	
Plaintiffs,	)	
	)	
-vs-	)	SUMMONS
	)	
Sgt. WILLIAM P. SQUIRES, Individually	)	
and in His Official Capacity as a	)	
BEAUFORT COUNTY SHERIFF'S	)	
DEPUTY, BRIAN STAHLHEBER,	)	
JOHN DOES 1-5,	)	
	)	
Defendants.	)	
	)	

TO: THE ABOVE-NAMED DEFENDANTS:

YOU ARE HEREBY SUMMONED and REQUIRED to Answer the attached Complaint within thirty (30) days, exclusive of the days of service, by serving a copy of your Answer on the subscriber at 1508 Paris Avenue, Port Royal, S.C. 29935 or P.O. Box 515, Port Royal, S.C. 29935. If you fail to Answer the Complaint within the time aforesaid, the Plaintiffs will move for a Judgment of Default against you for all damages alleged and all remedies available at law assessed against you. Herein fail not to answer the attached Complaint within the time aforesaid.

S/ Jared Sullivan Newman

Jared S. Newman, P.A.  
1508 Paris Avenue/ P.O. Box 515  
Port Royal, South Carolina 29935  
SC Bar Id. No: 12930  
Ph. (843) 522-1313 / Fax: (843) 521-0421  
E/M: [jnewman@jnewmanlaw.com](mailto:jnewman@jnewmanlaw.com)  
Attorney for the Plaintiffs

Port Royal, South Carolina  
October 20, 2025

STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
	)	
COUNTY OF BEAUFORT	)	C/A: 2025-CP-07-_____
	)	
JOE PEPITONE, as GAL for N.P.,	)	
minor child, JOE PEPITONE,	)	
LAUREN PEPITONE, and	)	
DOMINIC PEPITONE, individually.	)	
	)	
Plaintiffs,	)	
	)	
-vs-	)	VERIFIED COMPLAINT
	)	( Jury Trail Demanded )
Sgt. WILLIAM P. SQUIRES, Individually	)	
and in His Official Capacity as a	)	
BEAUFORT COUNTY SHERIFF'S	)	
DEPUTY, BRIAN STAHLHEBER,	)	
JOHN DOES 1-5,	)	
	)	
Defendants.	)	
	)	

TO: THE ABOVE-NAMED DEFENDANTS:

The Plaintiffs, Complaining of the Defendants, would alleged unto this Honorable Court the following:

**NATURE OF THE ACTION**

This case arises from a brazen and unlawful incident involving Master Sergeant William P. Squires of the Beaufort County Sheriff's Office, who, while visibly intoxicated and abusing his authority under color of law, launched an unprovoked assault on several teenagers lawfully walking along a street in Hilton Head Island, South Carolina. Squires deliberately enlisted neighborhood vigilantes to assist him, drew his service weapon, and pointed it at the unarmed teenagers, forcing them to fear for their lives. Video evidence captures the teenagers being held at gunpoint, physically assaulted, violently thrown to the ground, unlawfully detained and searched

without any legal basis. This shocking abuse of power represents a blatant violation of the victims' constitutional rights and demonstrates an egregious disregard for the law and public safety.

### THE PARTIES

1. Plaintiff, Joseph Pepitone, as Guardian *ad Litem* for N.P. who is a minor child (the "Parent") is the father of N. P. ("Plaintiff"), who is a minor child. Plaintiff is a resident and citizen of the State of South Carolina.
2. Plaintiff, Joseph Pepitone, is a resident and citizen of the State of South Carolina.
3. Plaintiff, Lauren Pepitone, is a resident and citizen of the State of South Carolina.
4. Plaintiff, Dominic Pepitone, is a resident and citizen of the State of South Carolina.
5. Defendant Beaufort County Sheriff's Office ("BCSO") is public agency operating in Beaufort County, South Carolina. At all times relevant herein, BCSO operated as the employer-in-fact of Defendant William P. Squires. As such, Plaintiff's are informed and believes BCSO is a political agency as defined by the South Carolina Tort Claims Act (SCTCA).
6. Defendant BCSO is responsible for law enforcement in Beaufort County, South Carolina. It is also responsible for ensuring that the individuals supervising and administering these programs knew, understood and followed the laws and policies governing the treatment of citizens including, and most importantly, children. Defendant BCSO is and was responsible for the training, discipline and supervision of the Sheriff's deputies. Accordingly, Defendant BCSO is liable for the conduct of William P. Squires as described more fully herein via the doctrine of *respondeat*

*superior*, by statute and/or other legal avenues such as the SCTCA.

7. Upon information and belief, Defendant William P. Squires (“Squires”) is an individual and resident of Beaufort County, South Carolina. At all material times herein, Squires was acting under color of state law as Master Sargent with the Beaufort County Sheriff’s Office and all acts and omissions were done in the course and scope of this employment with the Beaufort County Sheriff’s Office and Squires is named as an individual Defendant under 42 U.S.C. § 1983, 42 U.S.C. § 1985 and §1988 and the Fourteenth Amendment to the United States Constitution.
8. John Does 1-5 are Defendants whose identities are currently unknown. These individual Defendants are named under 42 U.S.C. § 1983, 42 U.S.C. § 1988 and the Fourteenth Amendment to the United States Constitution. Upon information and belief, John Does 1-5 are residents and citizens of Beaufort County, South Carolina.
9. Defendant Brian Stahlheber, is a resident and citizen of the State of South Carolina.
10. At all times relevant to the events of September 28, 2025, described below and involving the Plaintiffs, Defendant Squires was employed as a Master Sergeant with BCSO and was vested with the statutory powers of arrest.
11. On September 28, 2028, Plaintiff and his friends were lawfully walking along a street in the Squires Gate community located on Hilton Head Island, South Carolina.
12. Master Sergeant Squires, while visibly intoxicated and operating his work vehicle, approached the boys and, without probable cause or any legal justification, failing to identify himself as a law enforcement officer, verbally accosted them in an

- aggressive manner. Dominic Pepitone received a distress call from N.P. and responded wearing no shoes and pajamas.
13. Master Sergeant Squires then exited his work vehicle and identified himself as a law enforcement officer by wearing a clearly marked vest issued to him by the Beaufort County Sheriff's Office. Squires drew his loaded service pistol and pointed it at the boys while belligerently and repeatedly shouting at them, "Get on the fuckin' Ground and I will shoot you now."
  14. With his loaded pistol in hand, Master Sergeant Squires aggressively grabbed Plaintiffs by the arm/neck and attempted to drag N.P. to the ground in a grossly negligent and excessive manner. He did the same to Dominic.
  15. Master Sergeant Squires enlisted the assistance of John Does 1-5, who, without provocation, acted in concert with Squires and used grossly excessive physical force to restrain the boys on the roadway.
  16. Upon information and belief, multiple neighborhood residents witnessed the incident and called 911. When responding officers arrived, Master Sergeant Squires provided a false account of the events. Despite Squires' apparent intoxication and brandishing his service pistol at children, BCSO deputies first came to the aid of Squires and had him chug water.
  17. According to Beaufort County Sheriff P.J. Tanner, Squires was ordered to submit to a Datamaster (Breathalyser) test following the incident but willfully refused. Due to this deliberate insubordination, Squires was suspended from duty, highlighting the gravity of his misconduct.

18. Brian Stahlheber initially accosted the plaintiff teenagers while he was filming and unlawfully driving a four-wheeler on a public street. Defendant Stahlheber followed the plaintiff teenagers and continuously scolded the teens to get out of his neighborhood. The Plaintiff teenagers told Defendant Stahlheber to call the police if he wanted.
19. Defendant Stahlheber left the area and went back to inform Defendant Squires that the teens had disrespected him.
20. Defendant Squires then arrived in plain clothes and cautioned the Plaintiff teenagers to leave the area. When the Plaintiff teens told Squires to call the police, all Hell broke loose as Squires directed and forced to them to be assaulted and humiliated.
21. Defendant Stahlheber went back to Defendant Squires to aide and abet the vicious assaults and civil rights violations committed by the Squires and his mob.

**FOR A FIRST CAUSE OF STATE ACTION**  
(Gross Negligence - BCSO)

22. Plaintiff's reiterate and re-allege the preceding paragraphs as if fully set forth herein.
23. Plaintiffs, Joe Pepitone as *GAL* for N.P., a minor, Lauren Pepitone and Dominic Pepitone each allege that the Beaufort County Sheriff's Office was grossly negligent as defined in S.C. Code Section 15-78-60(25) and that such gross negligence was the direct and proximately caused harm to the said Plaintiffs.
24. Under the SCTCA, the Sheriff's Office is the responsible party for acts and omissions of Master Sgt. Squires and other unknown deputies for state torts committed by its

deputies.

- 25, Defendants' actions were objectively unreasonable when evaluated from the perspective of a reasonable law enforcement officer considering the scope, manner, justification and place where the incident occurred.
- 26 The totality of the clear evidence shows that Defendants' affirmative acts directly created or increased the risk of harm to Plaintiff in a multitude of ways.
27. On October 3, 2025, Beaufort County Sheriff, PJ Tanner, held a public press conference and stated that he was "appalled about what [he] saw" and that Squires had been permanently fired from his job as a Master Sergeant at BCSO. According to Sheriff Tanner, Squires violated the following BCSO policies:
- Code of Ethics: Failing to deal with the community in a manner that instills respect for law enforcement and inspires confidence and trust, to wit:
- a. Off-duty firearms policy: Consuming alcoholic beverages while armed in an off-duty capacity, presenting this firearm for an unlawful purpose which was outside of the compliance with the sheriff's office use of force policy;
  - b. Use of Force Policy: Using force, presentation of a firearm, soft hand and hand techniques against subjects without reasonable suspicion or probable cause;
  - c. Arrest and detention policy: Taking [unlawful] action by attempting to arrest and detain juveniles involving a neighborhood dispute where [Squires] resides without articulable independent justification known by him at the time, failing to contact the on-duty supervisor of the call and recusing himself from the law enforcement action;

- d. Communication policy: Failing to advise dispatch about the event;
- e. Body worn camera policy: Failing to activate body camera on Squires' duty vest.
- f. In failing to use even slight care and cautions when brandishing his service firearm multiple times at the Plaintiffs.
  
- g. In conducting an illegal search of Plaintiff's person;
- h. In conducting himself in an egregious and arbitrary manner without respect to the irreparable damage that could be caused to Plaintiff;
- i. In failing to protect the Plaintiff from harm;
- j. In creating a danger or an increased risk of harm to Plaintiff through his affirmative acts;
- k. In negligently, recklessly, willfully and wantonly using excessive force to detain and arrest Plaintiff;
- l. In negligently, recklessly, willfully and wantonly being under the influence of alcohol and attempting or unlawfully arresting Plaintiff;
- m. In negligently, recklessly, willfully and wantonly consuming alcoholic beverages while armed in an off-duty capacity and presenting his firearm for an unlawful purpose which was outside of the compliance with the sheriff's office use of force policy;
- n. In negligently, recklessly, willfully and wantonly using excessive force, presentation of a firearm, soft hand and hand techniques against Plaintiff without

- reasonable suspicion or probable cause;
- o. In negligently, recklessly, willfully and wantonly taking unlawful action by attempting to arrest and detain juveniles, including Plaintiff, involving a neighborhood dispute where Squires resides without articulable independent justification known by him at the time, failing to contact the on duty supervisor of the call and recusing himself from the law enforcement action;
  - p. In negligently, recklessly, willfully and wantonly failing to advise dispatch about the event;
  - q. In negligently, recklessly, willfully and wantonly failing to activate body camera on Squires' duty vest;
  - r. In negligently, recklessly, willfully and wantonly inviting or instructing civilians to participate in the incident and use excessive force to detain and arrest Plaintiff;
  - s. In other ways to be proven at trial.
28. That, as a direct and proximate result of the acts and omissions of its' deputy, BCSO under the SCTCA is responsible for all damages it caused the Plaintiffs named in this cause of action, such a morbid fear, shock, physical pain, emotional trauma, humiliation, human degradation, severe mental anguish and other losses, both now and in the future.

**FOR A SECOND CAUSE OF STATEACTION**  
(Gross Negligence/Reckless Infliction of Emotional Distress x2 - BCSO)

- 29. Plaintiffs reiterate and re-allege the preceding paragraphs as if fully set forth herein.
- 30. The negligence of the Defendant BCSO Master Sgt. Squires caused serious physical and

psychological trauma injury to N.P., a minor and Dominic Pepitone.

31. The Plaintiff, Lauren Pepitone, is the mother of N.P. and Dominic Pepitone
32. Plaintiff Lauren Pepitone was close in proximity and witnessed her minor son N.P. and her other son Dominic being physically assaulted and mentally abused by a wild-eyed pistol waving intoxicated deputy.
33. That, as a direct and proximate result of the acts and omissions of its' deputy, BCSO under the SCTCA is responsible for all damages it caused the Plaintiffs named in this cause of action, such a morbid fear, shock, physical pain, emotional trauma, humiliation, human degradation, severe mental anguish and other losses from the unreasonable use of a deadly weapon both now and in the future.

**FOR A THIRD CAUSE OF STATE ACTION**  
(Loss of Consortium - BCSO)

34. Plaintiffs reiterate and re-allege the preceding paragraphs as if fully set forth herein.
35. Plaintiff Joseph Pepitone at all times mentioned herein was and is married to Lauren Pepitone.
36. Plaintiff Lauren Pepitone was close in proximity and witnessed her minor son N.P. and her other son Dominic being physically assaulted and mentally abused by a wild-eyed pistol waving intoxicated deputy.
37. Plaintiff Joseph Pepitone has lost certain aide, comfort and society with his wife caused by the actions of BCSO and Master Sgt. Squires terrorizing her and her children.

38. Plaintiff Joseph Pepitone is entitled to be compensated for these losses which greatly affect him and his marriage.

**FOR A FOURTH CAUSE OF STATE ACTION**  
(False Imprisonment- BCSO)

39. Plaintiffs reiterate and re-allege the preceding paragraphs as if fully set forth herein.
40. At all times relevant to the allegations herein, Defendant Squires acted as an agent and/or servant of Defendant Beaufort County Sheriff's Office. As a result, under the doctrine of *respondeat superior*, Defendant Beaufort County Sheriff's Office was responsible for the actions of Squires and was liable for any damages proximately resulting from breaches of duty he might commit.
41. Defendants deprived Plaintiffs N.P. and Dominic Pepitone of their personal liberties and freedoms without lawful justification through an unjustified detention and arrest.
42. Probable cause did not exist to arrest Plaintiffs and Defendants lacked a good faith belief that Plaintiff was guilty of a crime as would induce an ordinarily prudent and cautious police officer, under the circumstances, to believe likewise. Defendants lacked evidence that Plaintiff had committed a crime or attempted to hinder any officer on scene, interfere, or resist arrest.
43. Probable cause did not exist to arrest Plaintiffs and Defendants lacked a good faith belief that Plaintiff was guilty of a crime as would induce an ordinarily prudent and cautious police officer, under the circumstances, to believe likewise.
44. Defendants lacked evidence that Plaintiffs had committed a crime or attempted to hinder

- any officer on scene, interfere, or resist arrest.
45. Defendants willfully, wantonly, carelessly, and recklessly restrained and imprisoned Plaintiffs through an unlawful arrest and detention in violation of their established legal rights.
  46. Plaintiffs are entitled to a judgment against Defendants to compensate them for the damages and injuries sustained and proximately caused by Defendants, including the recovery of actual, consequential, and compensatory damages in an amount to be determined by a jury.

**FOR A FIFTH CAUSE OF ACTION-FEDERAL**  
(Violation of Federally Protected civil rights)

47. Plaintiffs reiterate and re-allege the preceding paragraphs as if fully set forth herein.
48. The Plaintiffs, Joe Pepitone as *GAL* for N.P., Dominic Pepitone and Lauren Pepitone bring this cause of action pursuant to 42 U.S.C §§ 1983, 1985, 1988.
49. Plaintiffs will prove that Master Sgt, Squires was at times mentioned herein was acting under the color of state law, to wit: South Carolina.
50. Plaintiffs will prove that Brian Stahlheber aided, abetted and conspired with Squires in attacking, assaulting and unlawfully detaining Plaintiffs N.P. and Dominic Pepitone.
51. There are other conspirators and actors John Does 1-5) as yet unknown to the Plaintiffs who aided, abetted and conspired with Squires in attacking, assaulting and unlawfully detaining Plaintiffs N.P. and Dominic Pepitone.
52. Plaintiffs N.P. and Dominic suffered a deprivation of their federally protected civil

rights under the Fourth Eighth and Fourteenth Amendments to the United States Constitution because of the unlawful actions of Squires, Stahlheber, John Does, Specifically:

- A. The Defendants, jointly, severally and in combination thereof deprived Plaintiffs N.P. and Dominic of their right to be free unreasonable searches and seizures prohibited by the Fourth and Fourteenth Amendments.
  - B. The Defendants, jointly, severally and in combination thereof deprived Plaintiffs N.P. and Dominic of their right to be free unreasonable and excessive force prohibited by the Fourth, Eighth and Fourteenth Amendments.
  - C. The Defendants, jointly, severally and in combination thereof deprived Plaintiffs N.P. and Dominic of their right to be free against cruel and unusual punishment prohibited by the Fourth, Eighth and Fourteenth Amendments.
  - D. The Defendants Squires, Stahlheber and others not as yet known wilfully conspired with each other to violate and deprive the civil rights of N.P. and Dominic Pepitone of the above mentioned specific civil rights.
  - E. The Defendant, Squires, while acting under color of state law, violated Plaintiff Lauren Pepitone's civil rights found in the First and Fourteenth Amendments Defendant unconstitutionally deprived Lauren Pepitone the right of freedom of assembly, the right of free speech and the right to petition or question Squires as to why he was insanely pointing a firearm at her (and her children) and commanding her at gun point to "walk-away."
53. As a proximate result of the Defendants' unconstitutional conduct, the Plaintiff suffered

damages both now and in the future. Plaintiffs are entitled to recover actual and punitive damages as determined by a jury, as well as reasonable attorney's fees.

**WHEREFORE**, Plaintiff respectfully prays for judgment against Defendants for actual and punitive damages in such amount as a jury may deem appropriate, along with such other relief to which the Plaintiff may be entitled to and as this Court deems just and proper, including costs.

Respectfully Submitted,

S/ Jared Sullivan Newman

Jared S. Newman, P.A.  
1508 Paris Avenue/ P.O. Box 515  
Port Royal, South Carolina 29935  
Ph. (843) 522-1313 / Fax: (843) 521-0421  
E/M: [jnewman@jnewmanlaw.com](mailto:jnewman@jnewmanlaw.com)  
S.C. Bar Id. No.: 12930  
Fed Bar Id. No.: 5584  
Attorney for the Plaintiffs

Port Royal, South Carolina

October 20, 2025.

STATE OF SOUTH CAROLINA )  
 )  
COUNTY OF BEAUFORT )  
 )  
JOE PEPITONE, as GAL for N.P., )  
minor child, JOE PEPITONE, )  
LAUREN PEPITONE, and )  
DOMINIC PEPITONE, individually. )  
 )  
Plaintiffs, )  
 )  
-vs- )  
 )  
Sgt. WILLIAM T. SQUIRES, Individually )  
and in His Official Capacity as a )  
BEAUFORT COUNTY SHERIFF'S )  
DEPUTY, BRIAN STAHLHEBER, )  
JOHN DOES 1-5, )  
 )  
Defendants. )  
 )

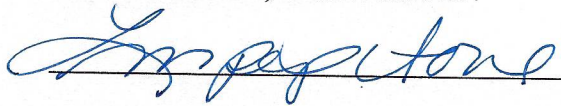
IN THE COURT OF COMMON PLEAS  
C/A: 2025-CP-07-\_\_\_\_\_

VERIFICATION

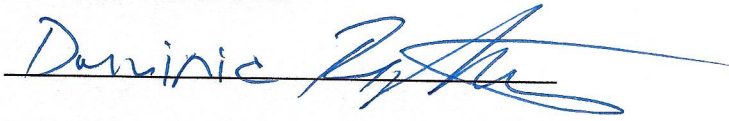
Personally appeared before me, Joe Pepitone as GAL for N.P., Lauren Pepitone and Dominic Pepitone. who, after being first duly sworn, state that he/she the Plaintiff above named; that he/she has read the foregoing COMPLAINT, and that the same is true to their own knowledge, except the matters and things stated therein on information and belief, and as to those things, he/she believes them to be true.

  
\_\_\_\_\_

JOE PEPITONE, GAL FOR N.P.

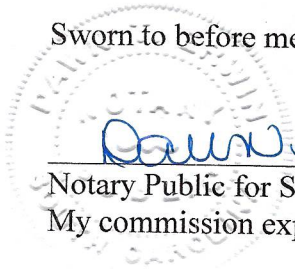
  
\_\_\_\_\_

LAUREN PEPITONE

  
\_\_\_\_\_

DOMINIC PEPITONE

Sworn to before me this 21<sup>st</sup> day of October, 2025



  
\_\_\_\_\_

Notary Public for South Carolina

My commission expires: 5-7-2034