

STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
	)	FOR THE NINTH JUDICIAL CIRCUIT
COUNTY OF CHARLESTON	)	
	)	CASE NO.: 2019-CP-10-_____
William Briggman,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	<b>SUMMONS</b>
	)	
John L. Steinberger, Robin Steinberger,	)	
and Lowcountry Source Media Group,	)	
LLC d/b/a Lowcountrysource.com,	)	
	)	
Defendants.	)	
_____	)	

TO: THE DEFENDANTS ABOVE NAMED:

YOU ARE HEREBY SUMMONED and required to answer the complaint herein, a copy of which is herewith served upon you, and to serve a copy of your answer to this complaint upon the subscriber, at the address shown below, within thirty (30) days after service hereof, exclusive of the day of such service, and if you fail to answer the complaint, judgment by default will be rendered against you for the relief demanded in the complaint.

Mt. Pleasant, South Carolina

/s/ Lawrence E. Richter, Jr.  
Plaintiff/Attorney for Plaintiff

Dated: December 10, 2019

Address:

The Richter Firm, LLC  
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STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
	)	
COUNTY OF CHARLESTON	)	CASE NO.: 2019-CP-10-_____
	)	
William Briggman,	)	
	)	
PLAINTIFF	)	<b>COMPLAINT</b>
	)	
vs.	)	(Jury Trial Demanded)
	)	
John L. Steinberger, Robin Steinberger, and	)	
Lowcountry Source Media Group LLC	)	
d/b/a Lowcountrysource.com	)	
	)	
DEFENDANTS	)	
_____	)	

TO: THE DEFENDANTS ABOVE NAMED

William Briggman ("Plaintiff"), complaining of the Defendants, alleges and says:

**PARTIES AND JURISDICTION**

1. At all times relevant, Plaintiff resided in Charleston County, State of South Carolina.
2. Defendant John L. Steinberger ("John Steinberger") is a resident of Charleston County, State of South Carolina. At all times relevant, John Steinberger was an owner, employee, agent, and/or representative of Lowcountry Source Media Group LLC, which operates Lowcountrysource.com (hereinafter "Lowcountry Source"). Lowcountry Source's website promotes John Steinberger as its Editor-in-Chief. John Steinberger authored the article that is at the center of this dispute and also, upon information and belief, is responsible for publishing and republishing the article on multiple occasions on social media.

3. Defendant Robin Steinberger is a resident of Charleston County, State of South Carolina. At all times relevant, on information and belief, Robin Steinberger was an owner, manager, employee, agent, and/or representative of Lowcountry Source. Lowcountry Source's website declares and promotes Robin Steinberger as its General Manager. Upon information and belief, Robin Steinberger was involved in preparing, publishing, editing and/or refusing to edit, and republishing the article.

4. Lowcountry Source Media Group LLC is a South Carolina limited liability company. It is doing business as Lowcountrysource.com ("Lowcountry Source"). The article at issue was originally published on Lowcountry Source's website.

5. This action involves a claim that Defendants defamed the Plaintiff by and through the Defendants' publication and/or republication of untrue and defamatory comments about the Plaintiff.

6. The most substantial acts and/or omissions giving rise to the causes of action occurred in Charleston County, South Carolina.

7. This court has jurisdiction over the parties hereto and the subject matter hereof, and venue is proper.

#### **FACTUAL SUMMARY**

8. On August 31, 2018, Defendant John Steinberger published an article on Lowcountry Source titled: "*CCSD HR Chief still on the job despite blunder in pedophile case*".

9. In essence, the article pins responsibility on Plaintiff for what was a gross mishandling of a child sex abuse matter by the Charleston County School District (hereinafter the “District”).

10. The “blunder” as Defendant John Steinberger captioned it, was that the District, having knowledge that a laptop in CCSD employee Gethers’ possession had been used to access pornographic sites, continued to allow Gethers to work in a District elementary school while the District awaited forensic analysis of the laptop by the North Charleston Police Department (“NCPD”), which, once completed, after a two year delay, revealed that the laptop had been used to access child pornography. It was later claimed that Gethers had obscenely interacted with children at the school in which he served. One information and belief those families sued the District and the District settled these matters. Gethers died awaiting criminal prosecution.

11. Plaintiff was not the District’s Chief Human Resources Officer during *any portion* of the relevant period, nor did he have any knowledge of, involvement in, or responsibility for the handling of the Gethers matter.

12. The body of the article reads, in part:

*Excerpt from first paragraph:*

[F]ormer Charleston County School District (CCSD) employee Marvin Gethers was flagged by the district’s Information Technology (IT) department in January 2014 for having child pornography images on his office computer. . . . [N]o personnel action was take (sic) against Gethers and that (sic) he was even promoted from student concern specialist to parent advocate at Dunston Elementary School after being flagged by IT. **The Chief Human Relations Officer for the district at the time of the incident, Bill Briggman, is still serving in that capacity (emphasis added).**

...

*Excerpt from third paragraph:*

Charleston County School Board member Chris Collins told Lowcountry Source that the full school board was never informed of the Gethers case until the arrest was made, two years after he was flagged by IT. Collins contends that Chairwoman Cindy Coats likely knew about the situation shortly after the suspicion arose and never informed the full school board. . . . Lowcountry Source cannot verify what Coats knew at the time. **What is known is that no action was taken against Briggman and other personnel officials after the details were made public in 2016 (emphasis added).**

13. On the same day at 2:53 p.m., Defendant John Steinberger posted the same article to the Charleston Area Community Voice for Education Public Facebook Group (hereinafter the “CACVE Page”), adding the following text: “In the aftermath of an employee pedophilia investigation and arrest, no CCSD HR personnel were fired. Who will hold the district accountable?”

14. There are presently 3,806 members of the CACVE Page. Defendants’ posting would have appeared in these members’ news feed instantaneously.

15. The republication of the Lowcountry Source article on the CACVE Page spread the article to thousands of subscribers and/or followers of the CACVE Page. Upon information and belief, the posting of the article caused the headline to appear in the personal news feed of the thousands of subscribers and/or followers of the CACVE Page.

16. The posting of the Lowcountry Source article on the CACVE page prompted multiple reactions, comments, and re-sharing of the article by its readers. The reactions included crying and raging emoticons and comments such as:

“How many more employees are the ‘powers at be’ covering up for??  
 Maybe not to this extent but I am sure it’s happening!! Any why is this  
 happening??? Those who do not speak out against this will suffer the  
 consequences.”

--

“What the F”

--

“This pedophile was allowed to work at a primary school around children  
 for almost two full years after the investigation about him began. I also  
 heard as hearsay that he would drive students to and from t-ball practice  
 and other places in his district issued vehicle that he had as part of his  
 award. In fact, I recall him being lauded for going above and beyond to  
 help students in need who did not have transportation. Once again, when  
 the pedophilia story became public and I became aware of who it was I  
 was physically sick about it for weeks as I know many of my colleagues  
 were.”

17. These and other comments to the posting were then in turn commented on and reacted to; i.e., the comments to the original posting were commented on and reacted to. These comments and reactions displayed the same tone of outrage, disgust and disgrace.

18. At 7:47 p.m. on August 31, 2018, Erica Taylor, the Chief Strategy and Communications Officer for the District emailed Defendants John and Robin Steinberger regarding their article.

19. In that email, Ms. Taylor stated: “The Office of Employee Relations did not report to now current HR Chief Bill Briggman in 2014. The office’s director and the deputy superintendent that she reported to are no longer employed with CCSD.”

20. Defendant Robin Steinberger replied to Ms. Taylor’s email seeking additional information relating to knowledge and the District’s Board’s involvement in the matter.

21. At 5:44 p.m. on August 31, 2018, after the original publication of the article and CACVE Page posting, Defendants added an addendum to the original article.

22. Defendants refused to edit the headline of the article or its reporting despite being requested to do so.

23. Defendants did not add the addendum from Ms. Taylor, described in paragraph 18 hereof, to the thread of comments on their CACVE Page posting or issue a new posting.

24. Defendants have since published other articles related to the Gethers’ matter with links back to the article about Plaintiff, identified solely by its headline.

25. These linked other articles have had many posters and commenters.

26. The article is accusatory and defaming comments were published, widely commented about, and republished many times; each republication and comment further damaging Plaintiff, and being attributable to Defendants under South Carolina law.

27. Chris Collins made a comment on the thread of the posting of the article of the CACVE Page. In that comment Collins stated: “Bridgman (sic) was still in position of high authority and had been over Human Resources for years. For a little while he was number (sic) the number two person in his department. This has been his department for years.”

28. As a direct and proximate result of the Defendants' conduct, Plaintiff has been embarrassed, humiliated, damaged and Plaintiff has endured mental suffering as a result of Defendants' casting of him as someone who was in a position of knowledge, responsibility, and/or opportunity to have prevented Gethers from allegedly engaging in wrongful sexual acts with elementary aged children or being terminated from his employment.

29. Plaintiff's reputation within the District and in the community has been tarnished. Plaintiff additionally has suffered anxiety, nightmares, and other physical manifestations of injury. Plaintiff's relationship with his family, his co-workers, and his friends has been negatively impacted, causing the Plaintiff additional mental distress and injury. Further, Plaintiff has incurred medical expenses, lost wages, and other economic and material damage. Defendants are jointly and severally liable to the Plaintiff for all damages.

30. Plaintiff is 20-year veteran of the District. Plaintiff began his career as a school-to-career facilitator.

31. Due to his performance and tenure, Plaintiff has advanced within the District and Plaintiff has worked to earn a reputation as a champion for students and teachers, spending most of his past decade working towards making advances in teacher recruitment, retention, and incentives.

32. Plaintiff's current title is Chief Human Resources Officer. Plaintiff was promoted from Executive Director of Human Resources to Chief Human Resources Officer in October 2016.



33. Plaintiff is eligible for retirement, with full benefits in May 2022. Plaintiff is fifty-one years old and plans on working in private practice after his retirement and has based his financial and career planning around this goal.

34. At the time of the discovery of pornography on Marvin Gethers' District issued laptop, January 2014, Plaintiff was serving the District as the Executive Director of Human Resources. Plaintiff's job responsibilities were: recruitment; hiring; benefits; and business services (i.e., retirement services).

35. On information and belief, the period of alleged wrongdoing related to the handling of the Marvin Gethers matter was from January 28, 2014, i.e., the date of discovery that the laptop had been used to access pornographic websites, to January 20, 2016, i.e., the date that Gethers was arrested and his employment terminated.

36. On information and belief, from a hierarchical perspective, the District had some six distinct offices underneath the Superintendent during this period.

37. Of these offices within the District, two dealt with employment matters: (1) the Chief Finance and Operations Office; and (2) the Human Capital Office.

38. Chief Finance and Operations Office: The Chief Finance and Operations Office had a human resources component, which from approximately 2010 to approximately 2014 was managed by Plaintiff. This office was responsible for recruitment, hiring, compensation, benefits, and business services (retirement); i.e., getting educators and employees in the door and managing their compensation and retirement benefits.

39. Human Capital Office: The Human Capital Office was responsible for managing District educators and employees on a day-to-day basis. Within the Human Capital

Office were three sub-offices: (1) the Human Capital Office; (2) Office of Teacher Effectiveness; and (3) Community Outreach Office. At the time of the discovery of pornography on Gethers' laptop, Audrey Lane was the Deputy of Human Capital and Sue Holiday was the Director of Employee Relations.

40. Sue Holiday was terminated on October 31, 2016.

41. Audrey Lane was terminated on September 3, 2015.

42. Upon the change in District leadership in 2016, the offices of Human Resources merged with Employee Relations.

43. Plaintiff assumed the helm under the title of Chief Human Resources Officer in October 2016 with responsibility for recruitment, compensation, and business service functions *and* employee relations functions.

44. This was the first time in Plaintiff's career with the District he has been responsible for employee relations.

45. Upon information and belief, Defendants John and Robin Steinberger knew of the District's organizational structure, a matter of public record, and those who were in position to deal with employee relations during the relevant time periods given Robin's years of employment in the District and John's special attention to District news and politics.

46. Nonetheless, Defendants negligently, recklessly and willfully published the article captioned "*CCSD HR Chief still on the job despite blunder in pedophile case*" on August 31, 2018 at some time prior to 2:53 p.m., and in the first paragraph thereof

claimed: “The Chief Human Relations Officer for the district at the time of the incident, Bill Briggman, is still serving in that capacity.”

**FOR A FIRST CAUSE OF ACTION:  
DEFAMATION**

47. Plaintiff incorporates the foregoing paragraphs as if fully stated herein.

48. The statements made by Defendants were published, non-privileged, false and defamatory *per se* as the statements insinuate that Plaintiff may have committed a crime and directly allege that Plaintiff has improperly and inadequately performed in his job/profession.

49. Given the nature of Defendants’ statements, malice and damages are implied, but Plaintiff further alleges that Defendants’ knew of Plaintiff’s lack of involvement and the falsity of their claims from their own knowledge and other investigative reports available at the time of publication but specifically named Plaintiff and ran the article on some political related cause or agenda and with actual malice towards Plaintiff.

50. Defendant Lowcountry Source is responsible for the torts committed by its employees acting within the scope of their employment, including Defendants Steinberger.

51. Defendant John Steinberger is responsible for the torts committed in his individual capacity.

52. Defendant Robin Steinberger is responsible for the torts committed in her individual capacity.

53. Defendants are at fault for the statements described herein. These false statements tended to impeach the honesty, integrity, virtue and reputation of the Plaintiff and were publications stating Plaintiff's failure to perform duties in his profession, protect children, and report crimes, which thereby exposed him to public hatred, contempt, ridicule, caused him to be shunned or avoided, and/or otherwise injured him in his employment, current and future, business, or occupation. Furthermore, the allegations made by the Defendant caused severe emotional distress and strain. Such comments were untrue.

54. As a direct and proximate result of these statements, Plaintiff has been damaged. Plaintiff has been embarrassed, humiliated, and endured mental suffering as a result of injury to his reputation. Moreover, Plaintiff has suffered physical bodily injuries in the form of nausea, headaches, loss of sleep, and other physical injuries, economic damage as a direct and proximate result of the defamatory statements, and has lost joy of life in many ways. Plaintiff is entitled to judgment against the Defendants for all general and special damages as well as punitive damages in an amount sufficient to deter similar conduct.

WHEREFORE, Plaintiff demands a trial by jury, requests actual, compensatory, special and punitive damages against the Defendant in amounts to be determined by the finder of fact for the various causes of action set forth above, that the costs of this action be taxed against the Defendants, and such other and further relief as the Court shall deem just and proper.

Respectfully submitted,

By: /s/Lawrence E. Richter, Jr.

Lawrence E. Richter, Jr.

**THE RICHTER FIRM, LLC**

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ATTORNEYS FOR PLAINTIFF

December 10, 2019

Mt. Pleasant, South Carolina