

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
)	
COUNTY OF HORRY)	
)	C/A: 2018-CP-26-_____
David Hucks,)	
)	
Plaintiff,)	
vs.)	SUMMONS
)	(Jury Trial Demanded)
Larry Bond, William Trotter, Brenda)	
Bethune, Gordon Hirsch, and the City of)	
Myrtle Beach,)	
)	
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.

/s/Tucker S. Player
 SCBAR # 16217
 Attorney for Plaintiff
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 Columbia, SC 29221
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 Email: Tucker@playerlawfirm.com

August 15, 2018

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
)	
COUNTY OF HORRY)	
)	C/A: 2018-CP-26-_____
)	
David Hucks,)	
)	
Plaintiff,)	
vs.)	COMPLAINT
)	(Jury Trial Demanded)
Larry Bond, William Trotter, Brenda)	
Bethune, Gordon Hirsch, and the City of)	
Myrtle Beach,)	
)	
Defendants.)	
_____)	

Plaintiff would show unto the Court the following:

- 1) Plaintiff is a citizen and resident of Horry County.
- 1) The individual Defendants are all citizens and residents of Horry County.
- 2) Defendant City of Myrtle Beach is a municipality within Horry County.
- 3) Jurisdiction and venue are proper in this Court.

FACTUAL ALLEGATIONS

- 4) Plaintiff is a local blogger and journalist with a primary focus on government accountability.
- 5) Plaintiff often publishes articles that are critical of the City Council of Myrtle Beach, the Mayor of Myrtle Beach, and the City Manager for Myrtle Beach. These articles are posted through Plaintiff’s blogging site “MyrtleBeachSC.com” and Facebook.
- 6) In May 2018, Defendant City of Myrtle Beach hired Defendant Hirsch as a “communications consultant” in part to combat “negative social media attacks.”

- 7) In July 2018, Defendant Hirsch began a campaign of defamatory remarks directed at Plaintiff. The defamatory statements published by Hirsch include, but are not limited to:
 - a) Plaintiff will only endorse political candidates who pay to advertise on his website;
 - b) Plaintiff will unfairly attack political opponents for an additional fee;
 - c) Plaintiff seeks hush money from his targets so that he will not write negative articles about them;
 - d) Plaintiff is unethical and untruthful;
 - e) Plaintiff is a purveyor of “fake news”; and
 - f) Plaintiff is either “delusional” or “paranoid;”
- 8) At all relevant times to this Complaint, Defendant Hirsch was acting in his capacity as an agent of the City of Myrtle Beach and in his capacity as a communications consultant.
- 9) Upon information and belief, Defendant Hirsch was acting at the direction of the Mayor and City Manager of Myrtle Beach when he made the above-referenced defamatory statements.
- 10) On August 3, Plaintiff published an article that quoted information from Zillow and SCDHEC regarding the property values of homes in the Myrtle Beach area and the water quality readings of the ocean water in the area.
- 11) In response to this article, numerous defamatory attacks were published by numerous defendants.
- 12) The defamatory statements published by Defendant Bond include, but are not limited to:

- a) Plaintiff attempted to extort money from the Myrtle Beach Area Chamber of Commerce through a proposed advertising contract for \$1.5 million in 2013;
 - b) Plaintiff is “terrorizing” Myrtle Beach;
 - c) Plaintiff is hurting families and businesses in Myrtle Beach by spreading lies;
 - d) Plaintiff is a liar and purveyor of fake news; and
 - e) Plaintiff is intentionally trying to destroy Myrtle Beach by publishing lies on his website;
- 13) The defamatory statements published by Defendant Bethune include, but are not limited to:
- a) Plaintiff spreads lies through his website;
 - b) Plaintiff practices “fake journalism;”
 - c) “There is nothing reputable about [Plaintiff’s] kind of journalism;” and
 - d) Plaintiff is spreading “lies and slander” and “poison;”
- 14) The defamatory statements published by Defendant Trotter include, but are not limited to:
- a) Plaintiff is “the lowest type of humanoid possible;”
 - b) Plaintiff is a “disgusting pig;” and
 - c) Plaintiff is a “psychotic lunatic.

Count I
Defamation

- 15) Plaintiff incorporates the foregoing allegations as if set forth here in full.

- 16) Defendants published statements in writing regarding allegations of wrongdoing by Plaintiff that have a defamatory meaning as they tend to impeach his honesty, integrity, virtue and reputation.
- 17) Defendants published statements were defamatory per se as those statements alleged that Plaintiff committed a crime of moral turpitude, contracted a loathsome disease, and/or was unfit in his business or profession
- 18) Defendants' statements were reckless and each Defendant either knew that they were false or recklessly disregarded the falsity of the statements when made.
- 19) Defendants published the statements with the clear intent of having others hear and read the statements.
- 20) Defendants made their statements in reckless disregard of Plaintiff's rights.

WHEREFORE, Plaintiff requests entry of judgment in an amount to be determined by the jury but which should include nominal or actual damages, compensatory damages, special damages of lost revenue from his website, and punitive damages, as well as any other relief shown to be appropriate including, but not limited to, costs and interest.

Respectfully submitted this 14th day of August, 2018.

/s/Tucker S. Player
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Attorney for Plaintiff