

6. Plaintiff is unaware of the residence or domicile of the remaining defendants named in the Complaint. To the extent that any Defendant is not a resident of South Carolina, their intentional tortious acts directed at and within this State subjects them to the jurisdiction of this Court pursuant to the South Carolina Long Arm Statute.
7. Jurisdiction and venue are proper before this Court.

FACTUAL BACKGROUND

8. Plaintiff purchased a ticket and attended the “Rock the Red” event in Greenville, South Carolina on June 5, 2021.
9. At the event, Plaintiff voluntarily posed for a picture with General Michael Flynn.
10. At the conclusion of General Michael Flynn’s speech, Plaintiff walked forward and picked up what he believed to be a public microphone. General Flynn was no longer in the room at the time Plaintiff grabbed the microphone.
11. Upon picking up the microphone, Plaintiff called for a toast to General Flynn and asked the attendees to raise their glasses in a toast. Once he saw numerous people with their glasses raised, he made the following statement: “General Flynn is the biggest scumbag traitor in the history of this country, next to Donald Trump.”
12. Upon the conclusion of the above-quoted statement, Plaintiff was physically seized by Defendant Magg and the microphone was taken from him.
13. After the microphone was taken from him, Defendant Caton walked up behind him, grabbed him, and slammed him to the ground.
14. Defendant Caton then grabbed Plaintiff in a horse-collar grip while he remained on the ground.

15. Once Plaintiff regained his feet, he was aggressively pushed and held by Caton as they moved through the crowd.
16. Defendant Caton slammed Plaintiff to the ground a second time and drug him on the floor. Once he regained his feet, Defendant John Doe #1 walked up to Plaintiff and punched him in the face while Defendant Caton did nothing to stop him.
17. Defendant Caton is approximately 6 inches taller than Plaintiff and nearly double the weight of Plaintiff.
18. At no point did Plaintiff ever threaten or attempt to strike anyone at the event.
19. Plaintiff is not and has never been a member of "Antifa," if such a group even exists.
20. Plaintiff did not possess any weapons of any kind on June 5, 2021.
21. Defendant Caton provided a false statement to the police on June 5, 2021.
22. Defendant Caton made numerous false and defamatory statements to police, attendees of the Rock the Red Event, on Tracey Beanz's podcast "Dark to Light with Frank and Beanz," and to Defendant TheStandardSC.org. Caton claimed:
 - a. Plaintiff possessed a weapon, despite the fact that Plaintiff possessed no weapon, the police found no weapon, and the official police report indicates there was never any weapon;
 - b. Plaintiff was a threat to General Flynn, despite the fact that nothing Plaintiff said was threatening and Flynn was not even in the room;
 - c. Plaintiff struck Caton in the jaw, despite the fact that Caton placed Plaintiff in a horse-collar hold and was never struck by anyone;
 - d. Defendant Caton ensured that none of the other guests harmed Plaintiff, despite the fact that Defendant Caton allowed another guest to punch him in the face; and

- e. Plaintiff did not stand for the National Anthem, despite the fact that Plaintiff did stand for the National Anthem on that night as he does at every occasion that the National Anthem is played.

23. Defendant Stutts released an Official Statement on behalf of MYSCGOP.COM that was false and defamatory to Plaintiff. In his official statement, Defendant Stutts claimed:

- a. Plaintiff “infiltrated” the event despite the fact that Plaintiff paid \$197.00 to attend the event and was wearing a lanyard with his credentials at the time he was physically seized and assaulted;
- b. Plaintiff “had what appeared to be a martial arts weapon in his hand,” despite the fact that Plaintiff possessed no weapon, the police found no weapon, and the official police report indicates there was never any weapon;
- c. Plaintiff was “crazed,” despite the fact that Plaintiff has never been diagnosed with any mental disease, disorder or defect other than depression; and
- d. Plaintiff created a “deadly” situation by calling General Flynn a traitor, despite the fact that no threat of physical harm was ever made verbally or any other type of communication.

24. In the days following the Rock the Red Event, Defendants HCGOP, Beanz, Slagle, and Halpin released a false and defamatory statement about the incident. In the “Official Press Release of the Horry County Republican Party,” these defendants claimed:

- a. Plaintiff was not a “guest” but was an “infiltrator” to the event, despite the fact that Plaintiff paid \$197.00 to attend the event and was wearing a lanyard with his credentials at the time he was physically seized and assaulted;

- b. Plaintiff was a “threat” to General Flynn, despite the fact that nothing Plaintiff said was threatening and Flynn was not even in the room;
 - c. Defendant Caton “ensured” that none of the other guests “harmed” Plaintiff, despite the fact that Defendant Caton allowed another guest to punch him in the face;
 - d. “The perpetrator was in possession of a weapon” despite the fact that no weapon was found by anyone at the event and the police report specifically states that there was no weapon in the possession of Plaintiff; and
 - e. Plaintiff was a member of Antifa, despite the fact he never made this claim to anyone, ever.
25. Defendant Beanz operates a podcast entitled “Dark to Light with Frank and Beanz.” On this podcast, Defendant Beanz stated that she was an eyewitness to the actions of Plaintiff and that he did, in fact, have a weapon. This was a lie.
26. All of these claims were false, Defendants knew or should have known that they were false, and made these statements maliciously and with the intent to harm Plaintiff.
27. The final paragraph of Defendant HCGOP’s Official Press Release states “We’d like everyone to think before they post, as each of you are the representatives of the Horry County GOP, and carefully decide how your own actions may be accomplishing of what we all claim to desire.” This demonstrates Defendant HCGOP’s acknowledgment of its own responsibility to investigate claims prior to making defamatory statements to a public audience.

28. This “Official Press Release” remains posted on the HCGOP’s website at the time of filing, despite the availability of numerous videos of the incident which clearly demonstrates the actual events of June 5, 2021.
29. Defendants TheStandardSC.org and Michael Reed published an article on June 9, 2021 that included numerous defamatory and false statements. These Defendants claimed:
- a. Plaintiff was an “unauthorized” “infiltrator” to the event, despite the fact that Plaintiff paid \$197.00 to attend the event and was wearing a lanyard with his credentials at the time he was physically seized and assaulted;
 - b. Plaintiff “escaped the others,” despite the fact that the two men were holding a nonresistant Plaintiff at the time Defendant Caton grabbed him and slammed him to the ground;
 - c. Plaintiff was a “terrorist,” despite the fact that he never claimed to be affiliated with Antifa and the official police report specifically states there were no ties to terrorism;
 - d. Plaintiff was an “obvious threat as he tried to hit Caton many times” and “”swung a weapon at Caton, striking him in the jaw”, despite the fact that there was never any weapon and Caton was never struck by anyone; and
 - e. Plaintiff possessed a weapon, despite the Official Police Report indicated there was no weapon and Defendant Reed told another reporter that the claim of a weapon was “bullshit.”
30. All of these claims were false, Defendants knew or should have known that they were false, and made these statements maliciously and with the intent to harm Plaintiff.

FOR A FIRST CAUSE OF ACTION AS TO ALL DEFENDANTS
(Defamation)

31. All allegations of fact made previously are repeated as if set forth here verbatim.
32. Defendants knowingly, or with reckless disregard for the truth, published false statements asserting Plaintiff committed crimes of moral turpitude. Defendants provided those statements to third parties by and through local news media and social media wherein any user can access and view.
33. The written allegations about Plaintiff were defamatory and published with actual malice, as they were disseminated despite Defendants knowing they were false.
34. The allegations by Defendants were false and made with the expectation and intention by Defendants that such allegations would harm Plaintiff's reputation and deter third persons from associating or dealing with Plaintiff.
35. As a result of Defendant's defamation, Plaintiff has been specially harmed and damages have been incurred, including but not limited to, actual and future damage to reputation.
36. Plaintiff is entitled to recover consequential, nominal, actual, and special damages, costs, and punitive damages as a direct result of Defendants' defamation.

**FOR A SECOND CAUSE OF ACTION AS TO DEFENDANTS MAGG, CATON AND
JOHN DOE #1
(Assault and Battery)**

37. All allegations of fact made previously are repeated as if set forth here verbatim.
38. Defendants willfully and maliciously inflicted unlawful and unauthorized violence on the person of Plaintiff without any justification or excuse.
39. As a direct and proximate result of Defendants' assault and battery, Plaintiff suffered actual damages in an amount to be determined by a jury.
40. Plaintiff is entitled to recover consequential, nominal, actual, and special damages, costs, and punitive damages from Defendants.

FOR A THIRD CAUSE OF ACTION AS TO DEFENDANTS MAGG AND CATON
(False Imprisonment)

41. All allegations of fact made previously are repeated as if set forth here verbatim.
42. Defendants intentionally, improperly and illegally restrained Plaintiff by physically grabbing him and restricting his movement.
43. As a direct and proximate result of Defendants actions, Plaintiff suffered actual damages in an amount to be determined by a jury.
44. Plaintiff is entitled to recover consequential, nominal, actual, and special damages, costs, and punitive damages from Defendants.

WHEREFORE, having fully set forth his Complaint against Defendant, Plaintiff prays for the following relief: That a jury be impaneled to decide all disputed issues of fact and that Plaintiff be awarded a judgment against Defendants in such amounts and upon such terms as will fully and fairly compensate Plaintiff for his nominal, actual, general, special and consequential damages as will be proven during the trial of this action; That Plaintiff be awarded punitive damages against Defendants as found appropriate by the Court and trier of fact; and for such other and further relief as this Court deems just and proper.

Respectfully Submitted

s/Tucker S. Player, Esq.
SC Bar 16217
Player Law Firm, LLC
PO Box 21005
Columbia, SC 29221
803-772-8008 (phone)
803-772-8037 (fax)
Tucker@playerlawfirm.com
Attorney for Plaintiffs

This 19th day of July, 2021