

FRAZIER LAW OFFICES, LLC

s/ Jerod D. Frazier, Esq.

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ATTORNEYS FOR PLAINTIFF

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North Charleston, South Carolina

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and reputational harm. The harassment was severe and pervasive, creating a hostile and intolerable work environment and discouraging Plaintiff from reporting the conduct under threat of retaliation. As a direct result, Plaintiff was forced to resign and has suffered significant emotional distress, economic loss, and damage to his professional reputation.

PARTIES

1. Plaintiff **Adrian Lewis** (“Plaintiff”) is an adult resident of the State of South Carolina and was employed as a constable assigned to courthouse duties in Charleston County.

2. Defendant **Charleston County** (“County”) is a political subdivision of the State of South Carolina and the employer responsible for the acts of its employees and agents.

3. Defendant **Magistrate Judge Mary Paige Adams** (“Judge Adams”) is, upon information and belief, a judicial officer employed within the Charleston County court system and is sued in both her individual and official capacities.

4. Defendant **Sonya Wilson** (“Wilson”) is, upon information and belief, a clerk or administrative employee within the Charleston County courthouse and is sued in both her individual and official capacities.

JURISDICTION AND VENUE

5. This Court has jurisdiction over this matter pursuant to the laws of the State of South Carolina.

6. Venue is proper in Charleston County because the acts and omissions giving rise to this action occurred within Charleston County.

FACTUAL ALLEGATIONS

7. Plaintiff began working as a constable assigned to the East Cooper Courthouse within Charleston County, where he performed courtroom and courthouse-related duties.

8. At the time Plaintiff began working at this location, there was no permanent presiding judge; however, Defendant Judge Adams was later appointed and began working at the courthouse on a regular basis.

9. From the outset of her tenure, Defendant Judge Adams initiated inappropriate and unwelcome personal interactions with Plaintiff, including repeatedly insisting that she and Plaintiff attended high school together, despite Plaintiff having no recollection of her.

10. Within days of her arrival, comments were made by courthouse staff, including Defendant Wilson, indicating that Judge Adams had a personal and sexual interest in Plaintiff, placing Plaintiff on notice of inappropriate workplace dynamics.

11. Defendant Judge Adams's conduct quickly escalated into unwelcome physical contact when she approached Plaintiff in the workplace, placed her hand in his hair, and commented on his appearance, all without consent and in the presence of coworkers.

12. Thereafter, Defendant Judge Adams began publicly focusing attention on Plaintiff, including obtaining and displaying his high school yearbook photograph to coworkers and distributing it electronically without his consent.

13. Defendant Judge Adams engaged in repeated sexually suggestive behavior in the workplace, including manipulating her clothing, exposing portions of her body, and engaging in flirtatious gestures and conduct directed toward Plaintiff in the presence of others.

14. Defendant Judge Adams regularly singled Plaintiff out for preferential and uncomfortable treatment, including requiring him to sit alone with her in the front seat of her vehicle during a work-related outing, despite Plaintiff's attempts to avoid such proximity.

15. Defendant Wilson and other staff members were aware of the inappropriate conduct and, rather than intervening, frequently made explicit sexual comments about Plaintiff and Defendant Judge Adams, further normalizing and encouraging the behavior.

16. On multiple occasions, Defendant Wilson made graphic and offensive statements of a sexual nature regarding Plaintiff and suggested that Plaintiff should engage in sexual activity with Judge Adams to resolve the situation.

17. Defendant Judge Adams continued to escalate her conduct by creating situations designed to ensure Plaintiff's physical proximity to her, including rearranging office space so that Plaintiff would be positioned directly in her line of sight upon entering her office.

18. Defendant Judge Adams also engaged in sexually suggestive conduct and gestures in Plaintiff's presence, including gyrating movements and comments of a sexual nature while interacting with Plaintiff in the workplace.

19. Defendant Judge Adams repeatedly addressed Plaintiff using intimate and inappropriate terms such as "honey," "sweetie," and similar language inconsistent with a professional workplace.

20. On one occasion, Defendant Judge Adams entered a confined storage space where Plaintiff was located and pressed her body against Plaintiff under the pretense of assisting him, despite the space being too small for multiple individuals.

21. Defendant Wilson was aware of this incident and, when Plaintiff expressed discomfort, discouraged Plaintiff from reporting the conduct and explicitly warned him that no one would believe him and that he would face termination and professional retaliation.

22. Defendant Wilson further reinforced a culture of intimidation by advising Plaintiff that reporting the misconduct would result in him being “blackballed” and unable to obtain future employment within the county.

23. Defendant Judge Adams continued to send Plaintiff personal and suggestive communications, including text messages and comments that blurred the line between professional and personal interactions.

24. The harassment was frequent, ongoing, and occurred over a period exceeding one year, permeating Plaintiff’s daily work environment.

25. As a result of Defendants’ conduct, Plaintiff began avoiding the workplace, including completing work from his vehicle or seeking assignments at alternate courthouse locations to minimize contact with Defendant Judge Adams.

26. Plaintiff experienced increasing stress, anxiety, and fear of retaliation, including concern for his personal safety and the safety of his family due to Defendants’ positions of authority and influence.

27. The working conditions became so severe and intolerable that Plaintiff was effectively deprived of any reasonable opportunity to continue his employment under normal conditions.

28. As a direct and proximate result of this hostile work environment, Plaintiff was forced to resign his position in or about September 2025.

29. Following his resignation, Plaintiff has encountered repeated difficulties obtaining comparable employment, further evidencing the retaliatory and reputational harm caused by Defendants’ conduct.

30. At all times relevant hereto, Defendant Charleston County knew or should have known of the unlawful conduct occurring within its courthouse and failed to take prompt and appropriate remedial action.

FIRST CAUSE OF ACTION
[Sexual Harassment / Hostile Work Environment]

31. Plaintiff incorporates and realleges each and every preceding paragraph as if fully set forth herein.

32. At all times relevant hereto, Plaintiff was an employee within the Charleston County courthouse system and was entitled to a workplace free from unlawful discrimination, harassment, and abuse.

33. Defendants, individually and collectively, engaged in a continuous pattern of unwelcome conduct directed at Plaintiff because of his sex, including but not limited to repeated sexual comments, sexually suggestive behavior, unwanted physical contact, and the deliberate creation of situations designed to place Plaintiff in close physical proximity to Defendant Judge Adams.

34. The conduct described herein was not isolated or sporadic. Rather, it was **frequent, pervasive, and escalating**, occurring over the course of more than a year and forming a consistent pattern of behavior that permeated Plaintiff's daily work environment.

35. Defendant Judge Adams, acting under color of her authority and position, used that authority to target Plaintiff for personal and sexual attention, thereby abusing her role and creating an inherently coercive and intimidating environment.

36. Defendant Judge Adams's conduct included, but was not limited to:

- a) Unwanted physical contact, including touching Plaintiff's hair and pressing her body against him in confined spaces;
- b) Repeated use of intimate and inappropriate terms of address such as "honey," "sweetie," and similar language;

- c) Sexually suggestive gestures, body movements, and manipulation of clothing in Plaintiff's presence;
- d) Publicly objectifying Plaintiff and drawing attention to him in a manner that subjected him to humiliation and discomfort; and
- e) Engineering workplace situations to isolate Plaintiff and force interaction despite his clear discomfort.

32. Defendant Wilson, rather than intervening or reporting the misconduct, actively contributed to and reinforced the hostile environment by making explicit sexual remarks about Plaintiff, encouraging inappropriate conduct, and normalizing the behavior within the workplace.

33. Defendant Wilson further exacerbated the hostile work environment by discouraging Plaintiff from reporting the misconduct and threatening adverse consequences, including termination and damage to his professional reputation, should he come forward.

34. The conduct of Defendants was **objectively offensive, abusive, and severe**, and would have been perceived as hostile and intimidating by any reasonable person in Plaintiff's position.

35. Subjectively, Plaintiff found the environment to be hostile, abusive, and intolerable, as evidenced by his efforts to avoid the workplace, his increasing distress, and his ultimate resignation.

36. The harassment unreasonably interfered with Plaintiff's ability to perform his job duties and deprived him of the ability to work in a professional environment free from intimidation and abuse.

37. Defendant Charleston County knew or, in the exercise of reasonable care, should have known of the unlawful conduct occurring within its courthouse, particularly given that the conduct was open, notorious, and witnessed by multiple employees.

38. Despite this knowledge, Defendant Charleston County failed to take prompt, adequate, or effective remedial action to stop the harassment, thereby ratifying and allowing the conduct to continue.

39. The conduct described herein was undertaken intentionally, recklessly, and/or with conscious disregard for Plaintiff's rights.

40. As a direct and proximate result of Defendants' unlawful conduct, Plaintiff suffered damages including, but not limited to, emotional distress, mental anguish, humiliation, loss of enjoyment of life, lost wages, and loss of future earning capacity.

41. The actions of Defendants were willful, wanton, and in reckless disregard of Plaintiff's rights, entitling Plaintiff to recover all damages available under South Carolina law, as well as any applicable statutory remedies.

SECOND CAUSE OF ACTION
[Constructive Discharge]

42. Plaintiff incorporates and realleges each and every preceding paragraph as if fully set forth herein.

43. At all times relevant hereto, Defendants owed Plaintiff a duty to provide a workplace that was lawful, safe, and free from harassment, intimidation, and abuse.

44. Instead of fulfilling this duty, Defendants created, permitted, and actively contributed to a workplace environment that was hostile, degrading, and intolerable.

45. As set forth above, Plaintiff was subjected to a continuous and escalating pattern of sexual harassment, inappropriate physical contact, and coercive behavior by Defendant Judge Adams, which was known to and reinforced by Defendant Wilson.

46. The conduct was not limited to isolated incidents, but rather was **persistent, pervasive, and inescapable**, occurring regularly over an extended period of time and fundamentally altering the conditions of Plaintiff's employment.

47. Defendant Judge Adams used her position of authority to engage in conduct that placed Plaintiff in an untenable position—forced to endure the harassment or risk retaliation for reporting it.

48. Defendant Wilson compounded this coercive environment by explicitly discouraging Plaintiff from reporting the misconduct and by warning him that he would be terminated, disbelieved, and effectively blacklisted from future employment opportunities if he did so.

49. As a result, Plaintiff was placed in a **no-win situation**, where continuing his employment required him to endure ongoing harassment, and reporting the conduct carried a credible threat of retaliation and career harm.

50. The workplace environment became so objectively hostile and abusive that a reasonable person in Plaintiff's position would have found the conditions intolerable.

51. Plaintiff, in fact, found the conditions intolerable and experienced significant stress, anxiety, and fear as a direct result of Defendants' conduct.

52. Plaintiff attempted to cope with and mitigate the situation by avoiding the workplace when possible, including isolating himself in his vehicle and seeking assignments away from Defendant Judge Adams.

53. Despite these efforts, the harassment persisted and remained unavoidable, leaving Plaintiff with no meaningful avenue to continue his employment under acceptable conditions.

54. The failure of Defendant Charleston County to intervene, investigate, or correct the ongoing misconduct further reinforced the intolerable nature of the working environment and signaled to Plaintiff that no relief would be provided.

55. Faced with these circumstances, and with no reasonable expectation that the unlawful conduct would cease, Plaintiff was compelled to resign his position in or about September 2025.

56. Plaintiff's resignation was not voluntary in any meaningful sense; rather, it was the **direct and foreseeable result** of Defendants' unlawful conduct and the intolerable working conditions they created and allowed to persist.

57. As a direct and proximate result of Defendants' actions, Plaintiff has suffered damages including, but not limited to, lost wages, loss of future earning capacity, emotional distress, mental anguish, and damage to his professional reputation.

58. Defendants' conduct was willful, wanton, and carried out in reckless disregard of Plaintiff's rights, thereby entitling Plaintiff to recover all damages available under South Carolina law.

THIRD CAUSE OF ACTION
[Negligence / Gross Negligence (SCTCA)]

59. Plaintiff incorporates and realleges each and every preceding paragraph as if fully set forth herein.

60. At all times relevant hereto, Defendant Charleston County, as a political subdivision of the State of South Carolina, owed Plaintiff a duty to exercise reasonable care in the hiring, training, supervision, and retention of its employees, agents, and officials, and to provide a workplace that was reasonably safe and free from unlawful harassment, intimidation, and abuse.

61. This duty included, but was not limited to, the obligation to:

- a) Implement and enforce policies prohibiting workplace harassment and misconduct;
- b) Properly train employees and supervisors regarding appropriate workplace behavior and reporting procedures;
- c) Supervise employees to ensure compliance with applicable laws and policies;
- d) Promptly investigate complaints or known instances of misconduct; and
- e) Take immediate and effective corrective action to prevent ongoing harm.

62. Defendant Charleston County breached these duties through its acts and omissions, including its failure to properly supervise and control Defendant Judge Adams and Defendant Wilson, both of whom were acting within the course and scope of their employment and/or under color of their authority.

63. Upon information and belief, the conduct at issue was not hidden or isolated, but was **open, obvious, and repeatedly witnessed by multiple employees**, such that Defendant Charleston County knew or, in the exercise of reasonable diligence, should have known of the ongoing misconduct.

64. Despite actual and/or constructive knowledge of the unlawful conduct, Defendant Charleston County failed to take any prompt, reasonable, or adequate steps to investigate, correct, or prevent the misconduct.

65. Defendant Charleston County further breached its duty by allowing a workplace culture to develop and persist in which inappropriate sexual conduct was tolerated, normalized, and even encouraged by supervisory personnel.

66. Defendant Charleston County's failure to act created a foreseeable risk of harm to Plaintiff, including emotional distress, economic loss, and constructive discharge.

67. The actions and omissions of Defendant Charleston County constitute negligence in that it failed to exercise the degree of care that a reasonably prudent governmental entity would have exercised under similar circumstances.

68. Additionally, Defendant Charleston County's conduct rises to the level of **gross negligence**, in that it demonstrated a conscious failure to exercise even slight care and a reckless disregard for the safety, rights, and well-being of Plaintiff.

69. The County's inaction in the face of prolonged, pervasive, and egregious misconduct—particularly conduct involving a judicial officer and supervisory personnel—reflects a systemic failure that goes beyond mere inadvertence or mistake.

70. As a direct and proximate result of Defendant Charleston County's negligence and gross negligence, Plaintiff suffered damages including, but not limited to, emotional distress, mental anguish, humiliation, lost wages, loss of future earning capacity, and damage to his professional reputation.

71. Plaintiff brings this claim pursuant to the South Carolina Tort Claims Act, S.C. Code Ann. § 15-78-10, et seq., and seeks all damages permitted thereunder.

72. To the extent applicable, Defendant Charleston County is liable for the acts and omissions of its employees and agents acting within the course and scope of their employment.

73. Plaintiff reserves the right to establish at trial that any limitations on liability under the South Carolina Tort Claims Act do not apply or are otherwise inapplicable under the facts of this case.

FOURTH CAUSE OF ACTION
[Intentional Infliction of Emotional Distress (Outrage)]

74. Plaintiff incorporates and realleges each and every preceding paragraph as if fully set forth herein.

75. At all times relevant hereto, Defendants owed Plaintiff a duty to refrain from engaging in conduct that was extreme, outrageous, and beyond all possible bounds of decency.

76. Defendants, individually and collectively, engaged in a sustained course of conduct that was **intentional, reckless, and calculated to humiliate, degrade, and intimidate** Plaintiff.

77. Defendant Judge Adams, acting under the authority and prestige of her judicial position, repeatedly subjected Plaintiff to unwelcome sexual advances, inappropriate physical contact, and overtly suggestive behavior in the workplace.

78. This conduct included, but was not limited to:

- a) Unwanted physical contact and invasion of Plaintiff's personal space;
- b) Repeated sexually suggestive gestures, comments, and body movements directed at Plaintiff;
- c) Publicly singling out and objectifying Plaintiff in front of coworkers; and
- d) Creating situations designed to force Plaintiff into uncomfortable and coercive proximity.

79. Defendant Wilson compounded and amplified this conduct by making explicit and degrading sexual remarks about Plaintiff, encouraging inappropriate behavior, and normalizing the misconduct within the workplace.

80. Defendant Wilson further engaged in coercive and intimidating conduct by discouraging Plaintiff from reporting the harassment and warning him that he would be disbelieved, terminated, and effectively blacklisted if he spoke out.

81. The conduct of Defendants was not merely inappropriate or offensive—it was **extreme and outrageous**, exceeding all bounds of decency tolerated in a civilized society, particularly within a courthouse setting where professionalism and integrity are paramount.

82. The abuse of authority by a judicial officer, combined with the deliberate reinforcement of that conduct by other staff, created a uniquely coercive and degrading environment that magnified the severity of the misconduct.

83. Defendants knew or should have known that their actions would cause Plaintiff severe emotional distress, or, at a minimum, acted with reckless disregard of the probability that such distress would result.

84. Plaintiff, in fact, suffered severe emotional distress as a direct and proximate result of Defendants' conduct, including anxiety, humiliation, fear, and ongoing mental anguish.

85. The distress experienced by Plaintiff was not fleeting or trivial, but substantial and enduring, affecting his ability to work, his sense of personal security, and his overall quality of life.

86. The severity and duration of Defendants' conduct—occurring repeatedly over an extended period of time and in a setting where Plaintiff was compelled to be present—further exacerbated the emotional harm suffered.

87. Defendants' conduct was willful, wanton, malicious, and carried out with conscious indifference to Plaintiff's rights.

88. As a direct and proximate result of Defendants' extreme and outrageous conduct, Plaintiff has suffered damages including, but not limited to, severe emotional distress, mental anguish, humiliation, loss of enjoyment of life, and other consequential damages.

89. Plaintiff is entitled to recover actual damages, as well as punitive damages, in an amount sufficient to punish Defendants and deter similar conduct in the future.

FIFTH CAUSE OF ACTION
[Retaliation]

90. Plaintiff incorporates and realleges each and every preceding paragraph as if fully set forth herein.

91. At all times relevant hereto, Plaintiff engaged in protected activity and/or was perceived by Defendants as engaging in protected activity, including opposing, resisting, and expressing intent to report unlawful workplace harassment and misconduct.

92. Plaintiff communicated his discomfort with the ongoing harassment and made clear that he could not continue working under such conditions, including expressing his intent to report the conduct to appropriate authorities.

93. Defendants were aware of Plaintiff's opposition to the unlawful conduct and his potential reporting of the same.

94. In response, Defendants engaged in retaliatory conduct designed to silence Plaintiff, discourage reporting, and protect the ongoing misconduct.

95. Defendant Wilson, acting within the scope of her employment and/or under color of authority, explicitly warned Plaintiff that if he reported the harassment:

- a) He would not be believed;
- b) He would lose his job; and
- c) He would be "blackballed" and unable to obtain future employment within Charleston County or related agencies.

96. These threats were credible and coercive given Defendants' positions of authority and influence within the courthouse system.

97. As a result of these threats and the hostile environment, Plaintiff was deterred from formally reporting the misconduct at the time it occurred.

98. The retaliatory conduct was not limited to verbal threats, but included the creation and maintenance of a workplace environment in which Plaintiff reasonably believed that reporting the misconduct would result in immediate and severe adverse consequences.

99. Following Plaintiff's separation from employment, Plaintiff has experienced repeated and unexplained barriers to obtaining comparable employment, including positions that became unavailable after initial progress in the hiring process.

100. Upon information and belief, these employment barriers are the result of retaliatory actions, negative influence, or reputational harm stemming from Defendants' conduct.

101. Defendants' actions would dissuade a reasonable employee from engaging in protected activity, including reporting unlawful harassment or opposing discriminatory conduct.

102. The retaliatory conduct described herein was intentional, willful, and carried out with the purpose of suppressing Plaintiff's rights and shielding Defendants from accountability.

103. As a direct and proximate result of Defendants' retaliation, Plaintiff has suffered damages including, but not limited to, lost wages, loss of future earning capacity, emotional distress, mental anguish, and damage to his professional reputation.

104. Defendants' conduct was willful, wanton, and in reckless disregard of Plaintiff's rights, thereby entitling Plaintiff to recover all damages available under South Carolina law, as well as any applicable statutory remedies.

DAMAGES

105. As a direct and proximate result of Defendants' conduct, Plaintiff has suffered:
- a) Lost wages and loss of earning capacity;
 - b) Emotional distress and mental anguish;
 - c) Damage to reputation;
 - d) Other actual and consequential damages to be proven at trial.

WHEREFORE, Plaintiff prays for judgment against Defendants for an amount to be ascertained by the jury at the trial of this action, for all damages available under South Carolina law, for the cost of disbursements of this action, and post-judgment interest, and for such other and further relief, in law or equity, as this Court may deem just and proper.

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