

STATE OF SOUTH CAROLINA  
COUNTY OF GREENVILLE

IN THE COURT OF COMMON PLEAS  
THIRTEENTH JUDICIAL CIRCUIT

Allyson Southerland as legal guardian and  
next friend of Jane Doe<sup>1</sup>, a minor under the  
age of 14 years,

C.A. No. 2022-CP-23-\_\_\_\_\_

Plaintiff,

**SUMMONS**

vs.

**(Jury Trial Demanded)**

Bradley Post and the Estate of Christina  
Larain Parcell,

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, to file your Answer with the clerk of Court, and to serve a copy of your Answer upon the counsel of record below within thirty (30) days after the service hereof, exclusive of the day of such service. If you fail to answer the Complaint within the time aforesaid, judgment by default may be rendered against you for the relief demanded in the Complaint.

DAVIS LAW GROUP, LLC

s/ Richard V. Davis  
Richard V. Davis (SC Bar No. 1589)  
P.O. Box 576  
Greenville, SC 29606  
Tel. (864) 999-2019  
[ric@davis.law](mailto:ric@davis.law)  
*Attorney for Plaintiff*

Greenville, SC  
August 15, 2022

---

<sup>1</sup> Given the sensitive nature of the facts of this case and the age of the child, the minor shall be referred to as Jane Doe in all publicly filed pleadings and throughout the proceedings. The name of the minor child will be set out in a redacted identifier filed with the court and not subject to public review.

STATE OF SOUTH CAROLINA  
COUNTY OF GREENVILLE

IN THE COURT OF COMMON PLEAS  
THIRTEENTH JUDICIAL CIRCUIT

Allyson Southerland as legal guardian and  
next friend of Jane Doe, a minor under the age  
of 14 years,

C.A. No. 2022-CP-23-\_\_\_\_\_

Plaintiff,

**COMPLAINT**

vs.

**(Jury Trial Demanded)**

Bradley Post and the Estate of Christina  
Larain Parcell,

Defendants.

COMES NOW the Plaintiff, complaining of the Defendants herein as named above, and shows unto this Honorable Court the following:

**JURISDICTION AND VENUE**

1. Jane Doe is a minor child under the age of 14 years<sup>2</sup>. The Plaintiff, Allyson Southerland, is the temporary legal custodian of the minor child and brings this action on her behalf as her next friend and as her legal guardian. A petition to appoint the Plaintiff as guardian ad litem is filed herewith.
2. The Plaintiff and minor child are citizens and residents of the state of South Carolina, County of Pickens.
3. Defendant Bradley Post (hereinafter referred to as “Defendant Post”), is a citizen and resident of the state of South Carolina, County of Greenville. He is currently incarcerated in Greenville County.
4. The Estate of Christina Lorain Parcell (hereinafter referred to as “Defendant Parcell”) is being administered in state of South Carolina, County of Greenville, where Parcell was a

---

<sup>2</sup> Given the sensitive nature of the facts of this case and the age of the child, the minor shall be referred to as Jane Doe in all publicly filed pleadings and throughout the proceedings. The name of the minor child will be set out in a redacted identifier filed with the court and not subject to public review.

citizen and a resident at the time of her death (21-ES-23-3088). Charles Marchbanks, Jr. has been appointed by the probate court as guardian ad litem for the probate estate until a Personal Representative is appointed.

### **FACTUAL BACKGROUND**

5. The minor child was in the custody and care of Christina Parcell at the time of Defendant Parcell's death on October 13, 2021, and at various times prior thereto.
6. Jane Doe and Christina Parcell lived with Parcell's sister, Lutina Parcell, from approximately April 2021 until October 2021. Christina Parcell was murdered in Lutina Parcell's home. Prior to Christina Parcell's death, the minor often spent time with Defendant Parcell and Defendant Post in Lutina Parcell's home.
7. Upon information and belief, during the course of the law enforcement investigation of Christina Parcell's murder, law enforcement discovered numerous photographs and videos of various minor children, including minor Jane Doe, in various stages of undress and in sexually explicit and nude positions, which had been taken over the course of several years.
8. Upon information and belief, the videos and photographs of Jane Doe graphically depict her genitals and breasts. Further, Petitioner is informed and believes that the photographs and videos of Jane Doe were taken by, with, and/or in the presence of Defendant Post and Defendant Parcell.
9. Upon information and belief, Defendant Post aided, abetted and conspired with Defendant Parcell to obtain the inappropriate photographs and videos of Jane Doe.
10. Jane Doe is a victim of child pornography perpetrated by Defendant Post and Defendant Parcell. All videos and photographs of Jane Doe were illegally obtained and taken without her consent.

11. Upon information and belief, Defendant Post, with the knowledge, consent, and assistance of Defendant Parcell, duplicated photographs and videos of minor Jane Doe to a cellphone, computer, and/or other electronic storage devices. The duplication of the sexually explicit photographs of Jane Doe constitutes violations of various state and federal laws, including child endangerment, sexual exploitation of a minor, criminal sexual conduct involving a minor, and constitutes child pornography.
12. Plaintiff is informed and believes that the Defendants knowingly and intentionally forwarded sexually exploitive photographs and videos of Jane Doe to third parties to be viewed and further disseminated for viewing by others.
13. The Defendants' criminal, willful, and inappropriate sexual conduct towards minor Jane Doe include but are not limited to: taking sexually explicit and provocative photographs of and with the minor child, taking sexually explicit and provocative video recordings of and with the minor child, and sharing these images with third parties. Said conduct was a violation of Jane Doe's personal rights, including her right to privacy, as well as her right to be free from sexual exploitation and abuse.
14. Multiple criminal charges are currently pending against Defendant Post which include sexual exploitation of a minor, criminal sexual conduct with a minor, and possession of child pornography as the result of the Defendants' abominable actions towards minor Jane Doe and other minor victims.

**FOR A FIRST CAUSE OF ACTION**  
**(ASSAULT AND BATTERY)**

15. Plaintiff incorporates Paragraphs 1-14 above as if repeated herein verbatim.
16. Upon information and belief, the Defendants' inappropriate conduct involving Jane Doe constitute sexual assault, battery, sexual abuse, and sexual exploitation. Said conduct

includes taking photographs and videos portraying Jane Doe in varying degrees of nudity, posing Jane Doe in sexually provocative positions, and inappropriate physical touching of the minor's body.

17. The Defendants' conduct placed the minor child in reasonable fear of bodily harm, physical abuse, and sexual abuse. The Defendants knew or should have known that their conduct was being done with the likely intent and effect of causing the minor child serious harm.
18. As a direct and proximate result of the above referenced acts, Jane Doe has suffered and continues to suffer physical and emotional harm, resulting in the need for medical treatment, counseling, and long term, if not permanent emotional and psychological distress, shock, embarrassment, loss of self-esteem, humiliation, loss of enjoyment of life, damage to her reputation, and other damages yet to be determined. The minor's damages are likely to occur well into the future and have caused and continue to cause medical bills and expenses to be incurred.
19. Plaintiff is entitled to an award of actual damages resulting from the Defendants' actions.

**FOR A SECOND CAUSE OF ACTION**  
**(INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS/OUTRAGE)**

20. Plaintiff incorporates Paragraphs 1-19 above as if repeated herein verbatim.
21. The Defendants' acts, as noted above, were so extreme, outrageous, and intentional that they exceed all possible bounds of decency, which the Defendants knew or should have known would result in significant emotional and psychological trauma to minor Jane Doe, and are regarded as totally intolerable in a civilized community.
22. As a direct and proximate result of the Defendants' intentional and outrageous conduct, Jane Doe has suffered physical and emotional injuries, required her to undergo past,

present, and future medical and significant psychological treatment, and has caused Jane Doe future economic loss, much of which remains undetermined to date.

23. Plaintiff is entitled to an award of actual and punitive damages for the outrageous conduct of the Defendants.

**FOR A THIRD CAUSE OF ACTION**  
**(NEGLIGENCE, RECKLESSNESS, WILLFULNESS, WANTONNESS)**

24. Plaintiff incorporates Paragraphs 1-23 above as if repeated herein verbatim.

25. The Defendants, by and through their acts and omissions, were negligent, grossly negligent, reckless, willful, and wanton in one or more of the following:

- a) By engaging Jane Doe and other minor children, in immoral and unlawful sexual acts;
- b) By sexually exploiting minor Jane Doe for personal gain and financial benefit;
- c) By allowing other adults to engage in the abuse of Jane Doe, and in failing to take any precautions to prevent such abuse from occurring;
- d) By failing to adequately supervise Jane Doe around adults whom the Defendants knew or should have known had the potential to cause imminent harm to a minor child;
- e) By permitting the Jane Doe to become a victim of sexual abuse, child pornography, exploitation, and sexual harassment;
- f) By failing to inform adults who had a duty to protect Jane Doe that a potential danger or harm existed;
- g) By failing to provide a safe and moral environment for Jane Doe;
- h) By failing to take action to protect Jane Doe from risk of harm which a reasonably prudent adult or parent would have done under the same or similar circumstances;
- i) By failing to report ongoing child abuse and/or criminal acts against a minor child to the appropriate authorities;

- j) Acts and conduct in violation of the statutory and common law of the state of South Carolina and the United States of America.
26. As a direct and proximate cause of the Defendants' acts and omissions, minor Jane Doe was injured and has suffered severe past, present and future emotional distress; past and future medical expenses; and permanent impairments/disabilities including impaired cognitive/emotional functioning and loss of future earnings.
27. Plaintiff is entitled to an award of actual damages as well as punitive damages.

**FOR A FOURTH CAUSE OF ACTION**  
**(INVASION OF PRIVACY)**

28. Plaintiff incorporates Paragraphs 1-27 above as if repeated herein verbatim.
29. Upon information and belief, the Defendants' engaged the minor Jane Doe in various illegal and sexually explicit acts for the purpose of exploiting the minor child and disseminated sexually explicit videos and photographs of Jane Doe to third parties for personal gain.
30. The Defendants wrongfully appropriated the likeness and image of minor Jane Doe, and such misappropriation, particularly under these circumstances, was substantial and intentional.
31. As a direct and proximate cause of the Defendants' conduct the Plaintiff has sustained substantial damages as outlined hereinabove and is entitled to actual and punitive damages.

**FOR A FIFTH CAUSE OF ACTION**  
**(MOTION FOR INJUNCTION AND APPOINTMENT OF A RECEIVER)**

32. Plaintiff incorporates Paragraphs 1-31 above as if repeated herein verbatim.
33. Plaintiff hereby moves the Court pursuant to Rule 65 of *the South Carolina Rules of Civil Procedure* for an order issuing a temporary injunction which prohibits Defendant Bradley

Post and/or the Defendant Estate of Christina Purcell from distributing, hiding, concealing, misappropriating, selling, encumbering, transferring, impairing the value of, or otherwise disposing of either Defendants' assets in whole or in part during the pendency of and through the final resolution of this lawsuit.

34. The grounds for the injunction sought by the Plaintiff are such that an irreparable injury, loss, or damage will result in the absence of an injunction to this effect. Equitable considerations and the substantial harm which has been caused by the Defendants to Jane Doe warrant a likely jury award of substantial damages from the Defendants, and the granting of such temporary injunction will prevent harm to the Plaintiff's ability to recover on behalf of Jane Doe. Accordingly, a temporary injunction is warranted pursuant to SCRCF Rule 65 and applicable caselaw.

35. In addition, Plaintiff hereby moves the court pursuant to SC Code §15-65-10 for an order appointing a receiver over all of the assets of both Defendants, with the exclusive power and authority to: 1) investigate, identify, and attempt to locate all subject assets; 2) collect, marshal, and administer all subject assets; 3) accept service on behalf of the Defendants with respect to the assets; 4) to engage counsel on behalf of the Defendants as relates to the assets; 5) take any and all steps necessary to identify, recover, protect, collect, preserve, receive, manage, liquidate, sell, administer, marshal, and to do all things incidental and necessary relating to the assets of the Defendants during the pendency of and until final resolution of this lawsuit is reached.

**WHEREFORE**, Plaintiff Allyson Southerland, as legal guardian and next friend of minor Jane Doe prays for judgment against Defendant Bradley Post and Defendant Estate of Christina Purcell jointly and severally as to all causes of action and seek the following:



- a. For actual damages to be determined by the trier of fact;
- b. For punitive damages in a reasonable sum to be determined by the trier of fact;
- c. For the issuance of an order granting temporary injunction restraining the Defendants from disposal of any assets;
- d. Appointment of a receiver to investigate and preserve the Defendants' assets pending the resolution of this lawsuit;
- e. For the costs and disbursements of this action; and
- f. For such other and further relief as this Court deems just and proper.

The Plaintiff hereby requests a jury trial.

DAVIS LAW GROUP, LLC

s/ Richard V. Davis  
Richard V. Davis (S.C. Bar No. 1589)  
P.O. Box 5576  
Greenville, SC 29606  
Tel. (864) 999-2019  
[ric@davis.law](mailto:ric@davis.law)  
*Attorney for Plaintiffs*

Greenville, South Carolina  
Date: August 15, 2022