

STATE OF SOUTH CAROLINA

COUNTY OF BEAUFORT

Carla Shelton,

Plaintiff,

v.

Ingrid Boatright, Earl Campbell, Carlton Dallas, Richard Geier, Choloe Gordon, Christina Gwozdz, Elizabeth Hey, Angela Middleton, Victor Ney, William Smith, and Rachel Wisnefski, Members of the Beaufort County School District Board of Education as of April 2023; and The McClatchy Company, LLC d/b/a The Island Packet,

Defendants.

IN THE COURT OF COMMON PLEAS  
FOURTEENTH JUDICIAL CIRCUIT

**SUMMONS**

TO THE DEFENDANTS ABOVE NAMED:

YOU ARE HEREBY SUMMONED and required to answer the Complaint herein, a copy of which is 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 (thirty five (35) days if served by United States Mail) after service hereof, exclusive of the date 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.

BY:           s/J. Paul Porter            
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January 24, 2024  
Columbia, South Carolina

STATE OF SOUTH CAROLINA

COUNTY OF BEAUFORT

Carla Shelton,

Plaintiff,

v.

Ingrid Boatright, Earl Campbell, Carlton Dallas, Richard Geier, Choloe Gordon, Christina Gwozdz, Elizabeth Hey, Angela Middleton, Victor Ney, William Smith, and Rachel Wisnefski, Members of the Beaufort County School District Board of Education as of April 2023; and The McClatchy Company, LLC d/b/a The Island Packet,

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**COMPLAINT**

**DEFAMATION CASE**

The Plaintiff, complaining of the Defendant, respectfully alleges as follows.

**PARTIES AND JURISDICTION**

1. Plaintiff is a citizen and resident of Georgia. She was a citizen of Beaufort County during the 2022-2023 school year.
2. Defendant Board Members collectively referred to as “Members of the Beaufort County School District Board of Education as of April 2023” means: Ingrid Boatright, Earl Campbell, Carlton Dallas, Richard Geier, Choloe Gordon, Christina Gwozdz, Elizabeth Hey, Angela Middleton, Victor Ney, William Smith, and Rachel Wisnefski. Defendant Board Members are citizens and residents of Beaufort County South Carolina.
3. Defendant The McClatchy Company, LLC is a Delaware Corporation that owns and operates The Island Packet in Beaufort, South Carolina.
4. This action alleges claims of defamation under South Carolina common law.

5. This Court has personal jurisdiction over these parties because they either reside in Beaufort County (the Board Members) or they conduct sufficient business in Beaufort County (McClatchy) to be subject to the jurisdiction of this Court.

6. The acts and omissions in this case happened in Beaufort County and this Court is the proper venue for this lawsuit.

7. Plaintiff demands a jury trial on all triable claims and issues.

### **FACTUAL ALLEGATIONS**

8. Plaintiff is an educator with approximately 30 years of experience as a teacher and principal in Georgia and South Carolina.

9. Plaintiff retired from Georgia Public Schools in 2022 and she relocated to Beaufort County, South Carolina.

10. Plaintiff was hired to serve as Principal for Beaufort County School District at Beaufort County High School for the 2022-2023 school year.

11. The environment at Beaufort High School was turbulent upon Plaintiff's hire, and had been beforehand, due to circumstances outside of Plaintiff's control, including a change to the school's mascot that had stoked community tensions due to a past merger of majority white and majority black high schools.

12. In late Fall Semester 2022, Plaintiff encountered difficulties with a long-tenured teacher who ran an academic program that was beneficial for college applicants, for which the long-tenured teacher had created arbitrary prerequisite barriers.

13. Plaintiff observed that those barriers, including a pre-entry interview process that was not required by the College Board, discouraged minority students from participating.

14. Plaintiff directed that the pre-entry interview process be terminated to remove the arbitrary barriers she observed.

15. The teacher who ran the program took Plaintiff's directive personally.

16. In retaliation, in Spring Semester 2023, she became openly insubordinate to Plaintiff, filed frivolous complaints with the District Office about Plaintiff, and then encouraged other teachers and students to do the same.

17. After a meeting with the District Office on March 30, 2023, appropriate District Officials knew about the teacher's conduct and Plaintiff's lack of culpability with respect to the complaints that teacher had made.

18. Nonetheless, the District Office expressed to Plaintiff on April 18, 2023, that it would be sending Plaintiff an informal letter to counsel about her interactions with the teacher, even though she had done nothing wrong.

19. Plaintiff refused to accept that and recognizing that her District Office would not support her, she resigned effective the end of the School Year.

20. On April 24, 2023, the District Office agreed to allow Plaintiff to serve out the remainder of her contract year, until her resignation, on Administrative Leave to allow for new leadership to take over Beaufort High School.

21. That day, Defendant McLatchy's newspaper, The Island Packet, ran a story that said Plaintiff had been fired.

22. In that article, McLatchy attributed the statement that Plaintiff had been fired by "two board members."

23. The article did not say who the board members were.

24. The article stated that Plaintiff was fired, which was false.

25. Notably, Plaintiff was not even asked to resign, but had done so based on her own observations about the level of support that she received from the District Office in dealing

with a problem teacher, who upon information and belief, had a track record for being difficult to deal with in the past.

26. The article was then changed to say that Plaintiff “was put on administrative leave for disciplinary reasons . . . according to Beaufort County School Board Members.”

27. The amended article did not identify the School Board Members it attributed its new claim about Plaintiff to.

28. That Plaintiff “was put on administrative leave for disciplinary reasons” was also false.

29. Plaintiff’s administrative leave was voluntary and mutually agreed to allow Plaintiff to be removed from a mutually acknowledged toxic environment and to allow the district to try to remedy that environment with a fresh set of hands.

30. The Island Packet never sought comment from the Plaintiff before running either of their stories.

31. The Island Packet’s story has been republished to the world at large through Yahoo News.

32. The Defendant Board Members each deny having made the false statements at issue in this case to the Island Packet.

33. Their position suggests that the Island Packet falsely attributed the falsehoods in the original and corrected article.

34. Plaintiff, through counsel, wrote the Island Packet on June 5, 2023, asking what Board Members attributed the comments at issue.

35. The Island Packet acknowledged Plaintiff’s inquiry through counsel and said it would be in touch with a formal response, but it never provided a response.

**FIRST CAUSE OF ACTION**  
**(Defamation)**  
**Against the Defendant Board Members**

36. Plaintiff realleges the forgoing where consistent.

37. Some or all the Defendant Board Members made false statements to the Island Packet first, that Plaintiff was terminated and second, that she was placed on administrative leave for disciplinary reasons.

38. Those false statements were either knowingly false or in reckless disregard for the truth.

39. Reckless disregard is shown by the Board Members' failure to inquire to District Leadership, prior to making background off-record comments to the media about a District Personnel matter, which as noted by Board Member Geier, on record, in the revised article was "the Superintendent's business."

40. Those false statements have been published and republished to the community at large via the Island Packet and Yahoo News.

41. Those false statements are *per se* defamatory and have lessened Plaintiff's esteem amongst her peers.

42. The same amounts to defamation, for which the Defendant Board Members are liable.

43. Plaintiff has suffered and should receive recompense for reputational harm, loss of good will, emotional pain and suffering, and stress and anxiety.

44. Defendant's conduct was reckless, and wanton and Plaintiff should be awarded punitive damages, too.

**SECOND CAUSE OF ACTION**  
**(Defamation)**  
**Against the Island Packet**

45. Plaintiff realleges the foregoing where consistent and in the alternative to ¶¶ 37-44.

46. Defendant Board Members have suggested they were not responsible for the background, off-record comments that were attributed to them by the Island Packet, which said Plaintiff was terminated and then later said that she was placed on administrative leave for disciplinary reasons.

47. The Island Packet, though asked, has failed to confirm that it even had sources, much less reveal who they are.

48. The Island Packet's rush to publish the above articles is demonstrated by their failure to ever seek comment from the Plaintiff.

49. The Island Packet did falsely attribute the false statements above.

50. That amounts to constitutional malice because it renders the initial and revised article knowingly false with respect to the two falsehoods at issue.

51. Those false statements are *per se* defamatory and have lessened Plaintiff's esteem amongst her peers.

52. The same amounts to defamation for which Defendant McClatchy is liable.

53. Plaintiff has suffered and should receive recompense for reputational harm, loss of good will, emotional pain and suffering, and stress and anxiety.

54. Defendant's conduct was intentional, and wanton and Plaintiff should be awarded punitive damages, too.

#### **PRAYER FOR RELIEF**

55. Plaintiff reallages the foregoing where consistent.

56. Plaintiff requests a jury trial on all claims and all triable issues.

57. Plaintiff requests that the jury award, within its discretion, a reasonable sum for all damages sought on the above claims including punitive damages where legally cognizable.

58. Plaintiff requests that the Court award all equitable relief it deems just and necessary up to and including reinstatement or front pay.

59. Plaintiff also requests pre-judgment interest.

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