

STATE OF SOUTH CAROLINA )  
 )  
COUNTY OF BEAUFORT )  
 )  
Amanda Paulsen, )  
 )  
Plaintiff, )  
 )  
v. )  
 )  
Beaufort County and James Beckert, )  
Individually and in his Official Capacity, )  
 )  
Defendants. )  
\_\_\_\_\_ )

IN THE COURT OF COMMON PLEAS  
CIVIL ACTION NO.: 2022-CP-07-

**SUMMONS**  
*(Jury Trial Demanded)*

**TO THE 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, Parker Law Group, LLP, at 101 Mulberry Street, P.O. Box 487 Hampton, SC, 29924, 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.

PARKER LAW GROUP, LLP

BY:           /s/Chelci S. Avant            
Ronnie L. Crosby  
S.C.. Bar No. :66481  
[rcrosby@parkerlawgroupsc.com](mailto:rcrosby@parkerlawgroupsc.com)  
Chelci S. Avant  
S.C. Bar No.:104067  
[cavant@parkerlawgroupsc.com](mailto:cavant@parkerlawgroupsc.com)  
101 Mulberry Street East  
Post Office Box 487  
Hampton, SC 29924  
803.903.1781

ATTORNEYS FOR PLAINTIFF

September 26, 2022  
Hampton, South Carolina

IN THE STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
	)	
COUNTY OF BEAUFORT	)	CIVIL ACTION NO.: 2022-CP-07-
	)	
Amanda Paulsen,	)	
	)	
Plaintiff,	)	
	)	
v.	)	<b>COMPLAINT</b>
	)	<i>(Jury Trial Demanded)</i>
	)	
Beaufort County and James Beckert,	)	
Individually and in his Official Capacity,	)	
	)	
Defendants.	)	
	)	

---

Plaintiff alleges:

1. Plaintiff (“Paulsen”) is a citizen and resident of Beaufort County, South Carolina. Paulsen was the Assistant Deputy Auditor for Beaufort County.
2. Paulsen began working for Beaufort County in 2008 as a Property Tax Technician. Paulsen was promoted in 2018 to Assistant Deputy Auditor. Paulsen was terminated from her position on November 9, 2021.
3. Defendant James “Jim” Beckert (“Beckert”) is a citizen and resident of Beaufort County, South Carolina. Beckert is the elected Auditor for Beaufort County, elected pursuant to the Constitution of the State of South Carolina, the laws of the State of South Carolina, local law. He is subject to suit pursuant to 42 U.S.C.A. § 1983 – he is sued in both his individual capacity and in his official capacity as Auditor of Beaufort County, South Carolina.
4. This lawsuit is being brought after years of Paulsen being subjected to Beckert’s harassment, bullying and belittling. Prior to this suit, Paulsen exhausted all other resources, including informing and/or seeking help from County Administrator, Eric Greenway, Beaufort County’s Human Resources Department, and others.

5. Beckert's conduct, seemingly permitted by Beaufort County, created a hostile work environment<sup>1</sup> permeated with discriminatory intimidation, ridicule, harassment, and insult, severe enough to alter the conditions of Paulsen's work environment, along with that of other County employees, and create an abusive work environment.

6. Beaufort County ("The County") is a party to this lawsuit because it owes a duty to protect its employees and to provide a safe, non-hostile workplace free from bullying, intimidation, threats, and other forms of abuse that create a hostile environment. The County is subject to suit pursuant to 42 U.S.C.A. § 1983 and the South Carolina Tort Claims Act.

7. Paulsen alleges she suffered discrimination and a hostile work environment in violation of Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. § 2000e et seq.

8. This Court has jurisdiction over the claims alleged herein pursuant to 42 U.S.C. § 1331 and 42 U.S.C. § 1983.

9. Paulsen timely filed her charge with the Equal Employment Opportunity Commission ("EEOC") and received a Notice of Right to Sue, dated July 28, 2022. Paulsen has timely filed this action within the ninety (90) days of receiving the Notice of Right to Sue from the EEOC.

10. The County has failed to provide a safe and non-hostile work environment for its employees despite its longstanding knowledge and recognition that Beckert has systematically, for years, harassed and intimidated County employees, including Paulsen.

11. As Assistant Deputy Auditor, Paulsen was an employee of The County while Beckert is an elected official<sup>2</sup>, seemingly operating as a silent County Council member. As an

---

<sup>1</sup> The very nature of a hostile work environment is that it involves repeated conduct that cannot occur in a single day, but occurs over days, weeks, months and/or years.

employee of The County, Paulsen could have been terminated at any time, whereas Beckert, an elected official, reports to the taxpayers via elections. However, Beckert is still expected to adhere to and enforce The County's policies and procedures, including those related to inappropriate behavior and ensuring a safe work environment.

12. Immediately after Beckert took office, Paulsen was forced to interact with him daily.

13. Beckert constantly and publicly questioned Paulsen's work, without explaining his concerns and/or why he believed her work to be inadequate, belittled her in front of her coworkers, harassed her and attacked Paulsen's character.

14. Multiple County Council members and/or County employees had become aware of Beckert's attacks and accusations against Paulsen, as well as several other female employees.

15. Because of Beckert's behavior, Paulsen suffered severe physical, mental and emotional stress. Paulsen has sought medical treatment related to the facts surrounding the subject incident.

16. On January 20, 2021, Beckert loudly demanded that Paulsen turn over her personal cell phone to him. Paulsen refused and explained that should her children or her children's school need her, they would call her cell phone. Beckert then ordered Paulsen to place her cell phone on top of a filing cabinet in her office and ordered she not touch it or the phone provided and maintained by The County. This interaction took place in front of Paulsen's coworkers.

17. That same day, Beckert pulled each of Paulsen's coworkers into his office to discuss Paulsen. When it was Paulsen's turn to speak with Beckert, he insisted Ms. Paulsen's coworker sit in on the meeting with them. Paulsen was then spoken down to, belittled and humiliated in front of her coworker.

18. During said meeting, Beckert made several comments directed at Paulsen's lack of higher education. These comments were made in front of Paulsen's coworker and were in a derogatory, condescending tone.

19. During Paulsen's tenure, Beckert instructed her coworkers, many of whom she was responsible for supervising, to cease speaking to Paulsen. Not only did this alienate Paulsen and create a hostile work environment, but it also made it difficult for Paulsen to do her job.

20. Beckert also forced Paulsen to attend off-campus meetings. These meetings took place in a park on Ribaut Road. The only persons present were Beckert, one of Paulsen's coworkers and Paulsen. Paulsen was not comfortable meeting with Beckert and her coworker off-campus, but Beckert insisted she do so.

21. Beckert would use these off-campus meetings as another means to demean, bully, harass and intimidate Paulsen. Upon information and belief, Beckert recorded these meetings.

22. On May 19, 2021, Beckert informed Paulsen, at an off-campus meeting, that her performance score was a 2.99. This score was significantly less and not consistent with Paulsen's score in previous years. In fact, in Paulsen's thirteen (13) years of employment with The County, that was the lowest score she had ever received.

23. In an attempt to get rid of Paulsen, Beckert began creating and/or fabricating issues with Paulsen and/or her job performance.

24. On May 28, 2021, Beckert and The County placed Paulsen on probation (six-months) and issued her a reprimand.

25. On June 1, 2021, Paulsen was issued a second reprimand.

26. Shortly after Paulsen's reprimands, Beckert and The County moved her office to the Bluffton location.

27. On June 15, 2021, Beckert and The County placed Paulsen on suspension without pay.

28. Paulsen sought help from The County, including The County's HR Department and The County Administrator, Eric Greenway. Paulsen was told no action would be taken against Beckert.

29. Throughout Beckert's tenure, Paulsen was attacked, humiliated, belittled and harassed. During this time, Paulsen feared for her job and safety. Further, Paulsen was forced to defend herself against the baseless attacks, accusations and reprimands.

30. Paulsen was terminated on November 9, 2021.

FIRST CAUSE OF ACTION – BREACH OF CONTRACT  
(BECKERT)

31. Paulsen realleges and reincorporates all preceding paragraphs as if fully set forth herein.

32. A valid contract existed between Paulsen and Beckert whereby Paulsen agreed to work for Beckert in exchange for compensation.

33. As of the date of her termination, November 9, 2021, Paulsen duly and expertly performed her duties under the contract.

34. Beckert, without true cause, breached this contract on November 9, 2021.

35. Paulsen has suffered damages as a result of Beckert's action(s).

36. Both Paulsen and Beckert signed the Beaufort County Personnel Handbook – pledging to provide a healthy, safe work environment for all County employees and others on County property.

37. Beckert breached the contract that is the Beaufort County Personnel Handbook via his actions referenced herein.

38. Paulsen is informed and believes that she is entitled to actual damages, compensatory damages, attorneys' fees and costs, and punitive damages.

SECOND CAUSE OF ACTION – BREACH OF IMPLIED CONTRACT  
(BECKERT)

39. Paulsen realleges and reincorporates all preceding paragraphs as if fully set forth herein.

40. Paulsen is informed and believes that Beckert and/or The County (adopted by Beckert and/or the Auditor's Office) has policy manuals and procedures that are to be followed when terminating an employee.

41. Paulsen performed all duties expected of her.

42. Beckert ignored his own policies and procedures regarding termination and thereby breached the employment contract with Paulsen.

43. Paulsen has suffered damages as a result of Beckert's actions.

44. Paulsen is informed and believes that she is entitled to actual damages, compensatory damages, attorneys' fees and costs as well as punitive damages.

THIRD CAUSE OF ACTION – WRONGFUL TERMINATION  
(BECKERT)

45. Paulsen realleges and reincorporates all preceding paragraphs as if fully set forth herein.

46. Paulsen was an at-will employee and was wrongfully terminated from her position as an Assistant Deputy Auditor in the Beaufort County Auditor's Office.

47. Paulsen was fired for fabricated issues. Beckert created and/or fabricated said issues in order to bully, harass, intimidate, belittle and attack Paulsen.

48. Beckert, as Beaufort County Auditor, took adverse action against Paulsen, i.e., reprimanded, placed on probation, suspended and fired Paulsen, an at-will employee, in violation of established public policy or policies.

49. Paulsen realleges and reincorporates all preceding paragraphs as if fully set forth herein.

FOURTH CAUSE OF ACTION – RETALIATORY DISCHARGE  
(BECKERT)

50. Paulsen realleges and reincorporates all preceding paragraphs as if fully set forth herein.

51. After seeking help for Beckert’s behavior and/or reporting Beckert’s conduct, Beckert created and perpetuated “issues” in Paulsen’s work as well as contrived false performance reviews on Paulsen.

52. Paulsen’s termination arose directly from Beckert’s behavior towards Paulsen.

53. Paulsen’s termination, in fact, was retaliatory in nature for Paulsen acknowledging the hostile work environment Beckert has created within Beaufort County Government, including the Auditor’s Office.

54. Due to the acts of Beckert, his agents and/or employees, Paulsen is entitled to back wages, interest on said back wages from the date of her termination to the present date, and front pay for wages she will lose in the future.

55. Paulsen is informed and believes that she is entitled to actual damages, compensatory damages, attorneys’ fees and costs, and punitive damages.

FIFTH CAUSE OF ACTION – EQUAL PROTECTION UNDER  
42 U.S.C. § 1983 – HARASSMENT AND DISCRIMINATION  
(BEAUFORT COUNTY)<sup>3</sup>

---

<sup>3</sup> Municipalities and other local governmental bodies are “persons” within the meaning of § 1983.



56. Paulsen realleges and reincorporates all preceding paragraphs as if fully set forth herein.

57. Beaufort County, via County Council and/or County Administration, developed a policy and/or custom allowing Beckert to harass, threaten, intimidate and/or bully its employees. This policy and/or custom created a hostile work environment permeated with discriminatory intimidation, ridicule and insult, severe enough to alter the conditions of Paulsen's work environment, along with that of County employees', and create an abusive working environment.

58. Beaufort County Council and/or County Administration are considered policy makers for The County.

59. Beaufort County acted with deliberate indifference as to the obvious consequences of failing to take action when it was notified, *repeatedly by multiple women*, of Beckert's conduct. Beaufort County Council Vice Chair, Paul Sommerville, admitted that the County has received complaints about Beckert "on an ongoing basis" and that he just kept thinking "there has to be something we can do to help these poor people." Yet, the County created a de facto policy and/or custom of tolerating Beckert's behavior and ignoring Beckert's victims.

60. The County's policy and/or custom was and is the moving force behind Beckert's behavior and Paulsen's damages.

61. As a direct and proximate result of the County's policy and/or custom, Paulsen was subjected to a hostile work environment fueled by sexual harassment and discrimination.

62. The County's policy and/or custom deprived Paulsen of her right to equal protection guaranteed by the Fourteenth Amendment to the United States Constitution and caused Paulsen damages as set forth herein.

SIXTH CAUSE OF ACTION – NEGLIGENCE  
(BEAUFORT COUNTY)

63. Paulsen realleges and reincorporates all preceding paragraphs as if fully set forth herein.

64. Beckert harassed, bullied, belittled and intimidated Paulsen on The County's premises, often with The County's property (i.e., computer, letterhead, email, etc.).

65. Paulsen was one of several of Beckert's victims. Beckert has treated multiple female County employees in a condescending, derogatory, aggressive and bully-like manner. As a result, past and current employees work in constant fear of Beckert and his erratic, threatening behavior.

66. Beckert's behavior was reported to many County officials in various departments. Paulsen was informed nothing would be done against Beckert.

67. Upon information and belief, The County maintains a file of complaints and/or grievances against Beckert.

68. The County has a duty to provide a safe working environment for its employees.

69. The County enabled Beckert in continuing to allow him to use County property to harass, intimidate, belittle and bully Paulsen and County employees. The County's nonchalant attitude towards Beckert's disturbing, bully-like and abusive behavior toward Paulsen and County employees, especially women, has enabled Beckert to continue this inappropriate behavior.

70. As a result, Paulsen has sustained injuries and damages, including but not limited to fear, anxiety and distress.

71. Paulsen's injuries and damages complained of herein were due to and proximately caused by the negligence, grossly negligent action and inaction of The County in the following particulars:

- a. In failing to properly maintain its premises such that employees and others working thereon were assured of a safe, non-hostile work environment;
- b. In failing to properly secure its premises;
- c. In maintaining and managing an unsafe hostile environment on its premises in violation of The County's policies;
- d. In failing to exercise reasonable care in the performance of its security measures, methods and procedures;
- e. In failing to properly maintain its property (i.e. email, letterhead, etc.) to prevent the misuse thereof to harm others all in violation of its policies;
- f. In voluntarily undertaking a duty to protect Paulsen on the premises from Beckert's behavior, but failing to properly use and implement those protections for Paulsen's safety;
- g. In failing to protect Paulsen when it knew that Beckert's behavior and conduct on its premises posed a substantial and unreasonable risk of harm to Paulsen;
- h. In any other particulars as the evidence may show.

72. By reason of and in consequence of these negligent actions and inactions of the County, Paulsen suffered the injuries and losses complained of herein.

SEVENTH CAUSE OF ACTION – ASSUMPTION OF A DUTY  
(BEAUFORT COUNTY)

73. Paulsen realleges and reincorporates all preceding paragraphs as if fully set forth herein.

74. The County assumed the duty to provide a safe work environment and/or protect Paulsen via the Beaufort County Personnel Handbook.

75. Both Beckert and Paulsen signed the Beaufort County Personnel Handbook – pledging to provide a healthy, safe work environment for all County employees and others within the County Administrative Building.

76. The County warranted to provide a safe working environment, via the Beaufort County Personnel Handbook –

- i. The County endeavors to provide a working environment in which employees are free from discomfort or pressure resulting from jokes, ridicule, slurs, gossip, threats, bullying and harassment, whether relating to such distinctions or simply resulting from a lack of consideration for a fellow human being;
- j. The County does not tolerate harassment of any kind, and strictly forbids retaliation against anyone who has reported harassment in good faith;
- k. The County, via the handbook, also lists examples of conduct that warrant disciplinary action, including:
  - i. Incompetence;
  - ii. Unauthorized possession or removal, misappropriation, destruction, theft or conversion of County property or the property of others (includes information and electronic files and data);
  - iii. Interference with the work of others;
  - iv. Threatening, coercing, harassing, bullying, or intimidating fellow employees, including “joking” threats;
  - v. Physical aggression while on duty or on County premises;
  - vi. Inappropriate or offensive language;
  - vii. Unprofessional behavior when dealing with the public or coworkers;
  - viii. Dishonesty; and
  - ix. Violation of state or federal laws or regulations

77. Beckert has demonstrated conduct that meets each of these categories, all of which are forbidden of County employees and/or on County property.

78. The Beaufort County Personnel Handbook forbids using County property (i.e., computers, email addresses, etc.) to actively engage in procuring or transmitting material that is in

violation of hostile workplace laws. Slander, libel, and deliberate misinformation is also forbidden through County property (i.e., computers, email addresses, postage, letterhead, etc.). The County monitors and inspects County property, including its computers and email addresses. The County assumed the duty to monitor Beckert's computer and email account to ensure County property was not used to belittle and threaten Paulsen. The County failed to properly monitor and/or inspect Beckert's computer and email account as Beckert used County property (computers, letterhead, email account, and postage) to belittle, threaten and intimidate Paulsen.

79. The County also assumed a duty to monitor its computers, computer assets and/or property in order to provide a safe work environment via the Beaufort County Computer and Information Systems Acceptable Use Policy.

80. Both Beckert and Paulsen signed the Beaufort County Computer and Information Systems Acceptable Use Policy and were bound by the terms thereof and entitled to the protections set forth therein.

81. The Beaufort County Computer and Information Systems Acceptable Use Policy states it is unacceptable to use a Beaufort County computing asset to actively engage in procuring or transmitting material that is in violation of sexual harassment or hostile workplace laws, to slander, libel or deliberately distribute misinformation, or to threaten and/or harass. This policy also prohibits any emails "containing disruptive, abusive, harassing, threatening or offensive language...." The County monitors the use of its computers and computer assets, warranting they will not be used for any of the aforementioned acts.

82. Beckert used The County's computers, his County email address, and County letterhead to engage in the prohibited acts detailed herein to damage the health, safety and

reputation of Paulsen due to the County's failure to use reasonable care to enforce policies designed to protect Paulsen.

EIGHTH CAUSE OF ACTION – OUTRAGE  
(BECKERT)

83. Paulsen realleges and reincorporates all preceding paragraphs as if fully set forth herein.

84. The facts set forth above demonstrate Beckert inflicted severe emotional distress on Paulsen through intimidation, threats and other related conduct.

85. Beckert's conduct toward Paulsen was so extreme and outrageous as to exceed all bounds of decency and must be regarded as atrocious and utterly intolerable in a civilized society.

86. The distress Paulsen has suffered and continues to suffer is so severe that no reasonable person could be expected to endure it.

87. Paulsen is entitled to recover damages against Beckert as a result of his outrageous acts.

NINTH CAUSE OF ACTION – EQUAL PROTECTION UNDER  
42 U.S.C. § 1983 – HARASSMENT AND DISCRIMINATION  
(BECKERT)

88. Paulsen realleges and reincorporates all preceding paragraphs as if fully set forth herein.

89. Beckert unlawfully harassed and discriminated against Paulsen on the basis of her sex, subjecting Paulsen to a hostile work environment fueled by sexual harassment and discrimination.

90. Beckert's harassment and discrimination deprived Paulsen of her right to equal protection guaranteed by the Fourteenth Amendment to the United States Constitution.

91. Beckert's harassment and discrimination caused Paulsen damages as set forth herein.

WHEREFORE, Paulsen prays for judgment against Defendants for actual damages, together with punitive damages in an appropriate amount, for the costs and disbursement of this action, and for such other and further relief as the Court may deem just and proper.

PARKER LAW GROUP, LLP

BY:           /s/Chelci S. Avant          

Ronnie L. Crosby  
S.C. Bar No.: 66481

[rcrosby@parkerlawgroupsc.com](mailto:rcrosby@parkerlawgroupsc.com)

Chelci S. Avant  
S.C. Bar No.: 104067

[cavant@parkerlawgroupsc.com](mailto:cavant@parkerlawgroupsc.com)

101 Mulberry Street East  
Post Office Box 487  
Hampton, SC 29924  
803.903.1781

ATTORNEYS FOR PLAINTIFF

September 26, 2022  
Hampton, South Carolina