

STATE OF SOUTH CAROLINA
COUNTY OF GEORGETOWN

IN THE COURT OF COMMON PLEAS
FIFTEENTH JUDICIAL CIRCUIT
C/A NO. 2026-CP-22-

John Doe and Jane Doe, on behalf of their
minor children and on behalf of all others
similarly situated,

Plaintiffs,

vs.

Pawleys Island Christian Academy and
Pawleys Island Community Church,

Defendants.

SUMMONS

TO: THE DEFENDANT 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, at the address shown below, 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.

s/L. Sidney Connor, IV
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July 17, 2026

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COMPLAINT

(CLASS ACTION)

The Plaintiffs, complaining of the Defendants herein, would show and allege unto this Honorable Court as follows:

1. The named Plaintiffs are citizens and residents of the State of South Carolina, County of Georgetown.
2. The Defendant Pawleys Island Christian Academy is a private school organized and existing pursuant to the laws of the State of South Carolina and doing business in Georgetown County, South Carolina.
3. The Defendant Pawleys Island Community Church is a church organized and existing pursuant to the laws of the State of South Carolina and doing business in Georgetown County, South Carolina.
4. This action is brought as a class action under Rule 23 of the South Carolina Rules of Civil Procedure. The named Plaintiffs bring this class action on behalf of their children and on behalf of all other persons similarly situated which would include all parents and guardians who have children who at any time during the past six (6) years have attended school at Pawleys Island Christian Academy or have attended any activities at Pawleys Island Community Church or been involved in any events whatsoever at which the subject sex offender was present.

CLASS ALLEGATIONS

5. Plaintiffs would show that they are the appropriate class representatives for a class of persons to include parents and guardians and their children who were in any way present at any event where the subject sex offender was also present over the past six (6) years, under the authority or with the permission of the Defendants.

6. Plaintiffs would show that the number of potential class members is so numerous that joinder of all members is impractical.

7. Plaintiffs would show that there are questions of law and fact common to the class.

8. Plaintiffs would show that the claims of the representative parties are typical of the claims of the class.

9. Plaintiffs would show that they will fairly and adequately protect the interests of the class.

10. Plaintiffs would show that the amount in controversy exceeds One Hundred Dollars for each member of the class.

11. This action is brought pursuant to Rule 23 of the South Carolina Rules of Civil Procedure.

FOR A FIRST CLAIM (Negligent Hiring)

12. The allegations of Paragraphs 1 through 11 are incorporated as fully as if set forth herein.

13. Plaintiffs would show that the Defendants were negligent, reckless, willful and wanton in the hiring or retention of a known sex offender to supervise and oversee activities which involved the children of the parents and guardians in the class action.

14. Plaintiffs would show that the Defendants intentionally failed to inform or advise the parents and guardians that the employee or volunteer was in fact an alcoholic and a known sex

offender and intentionally placed their children in harms way by allowing the sex offender to have access to their children and to supervise activities which involved being in close proximity to their children with an opportunity to touch their children.

15. Plaintiffs would show that the Defendants had a duty and obligation to screen the sex offender and to prohibit him from any contact with children and to inform all parents and guardians of children of his presence so that the parents and guardians could make an informed decision about whether to involve their children in the activities of the Defendants both in the school and at church.

16. Plaintiffs would show that they have paid money to have their children attend the school and/or made significant contributions to the church and that all of these payments and contributions constitute damages to the class members. Furthermore, all class members would show that there were numerous touchings of children by the sex offender the extent of which in many cases will never be known because of the age of the children and the lack of supervision by the Defendants.

17. All class members would show that they have suffered severe emotional distress and fear for the safety of their children as a result of the Defendants' actions.

18. Plaintiffs would show that they have suffered actual damages.

19. Plaintiffs would show that the acts and omissions of the Defendants were outrageous and egregious, intentional and without any support.

20. Plaintiffs would show that even after confrontation by the parents, the Defendants assumed an attitude of incredible arrogance in defending the sex offender over the interest of their children.

21. Plaintiffs would even show that the Defendants even attempted to defend their actions by using biblical quotes and references once again in complete disregard for the safety of their children.

22. Plaintiffs would show that the Defendants' arrogant and insensitive actions along with their complete disregard for the safety of their children warrants an award of punitive damages.

23. Plaintiffs pray for actual and punitive damages for the class in an amount exceeding Twenty-Five Million Dollars.

FOR A SECOND CLAIM
(Breach of Fiduciary Duties)

24. The allegations of Paragraphs 1 through 23 are incorporated as is fully set forth herein.

25. Plaintiffs would show that the Defendants owed a fiduciary obligation to the Plaintiffs in their positions at church and school.

26. Plaintiffs would show that they entrusted the safety and well being of their children to the Defendants relying on the Defendants' responsibility to appropriately screen all persons who are involved in any type of childcare or child supervision.

27. Plaintiffs would show that the Defendants completely disregarded their fiduciary duty and allowed a known sex offender access to their children despite hundreds of years of church history which would dictate to the contrary.

28. Plaintiffs would show that they have been damaged by the breach of fiduciary duties of the Defendants and seek actual and punitive damages in an amount exceeding Twenty-Five Million Dollars.

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