

STATE OF SOUTH CAROLINA)
)
 COUNTY OF GEORGETOWN)
)
 Jane Doe, as Mother and Natural Guardian)
 of John Doe, a minor,)
)
 Plaintiff,)
)
 v.)
)
 Pawleys Island Community Church d/b/a)
 Pawleys Island Christian Academy,)
 Donald Williams, Ginny Williams, and)
 Jennifer N. Howard,)
)
 Defendants.)

IN THE COURT OF COMMON PLEAS
 FIFTEENTH JUDICIAL CIRCUIT

C/A No.: _____

SUMMONS
 (Jury Trial Demanded)

TO THE ABOVE-NAMED DEFENDANTS:

A lawsuit has been filed against you. You are hereby summoned and required to answer the Complaint in this action, of which a copy is hereby served upon you, and to serve a copy of your Answer to the Complaint to said Plaintiff's attorney at the address listed below within thirty (30) days after the service hereof (exclusive of the day of such service). If you fail to do so, judgment by default will be rendered against you for the relief demanded in the Complaint. You also must file your Answer or Motion with the Court.

[Signature page follows.]

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July 21, 2026

Columbia, South Carolina

STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
	)	FIFTEENTH JUDICIAL CIRCUIT
COUNTY OF GEORGETOWN	)	
	)	C/A No.: _____
Jane Doe, as Mother and Natural Guardian	)	
of John Doe, a minor,	)	
	)	
Plaintiff,	)	
	)	COMPLAINT
v.	)	(Jury Trial Demanded)
	)	
Pawleys Island Community Church d/b/a	)	
Pawleys Island Christian Academy,	)	
Donald Williams, Ginny Williams, and	)	
Jennifer N. Howard,	)	
	)	
Defendants.	)	

TO THE ABOVE-NAMED DEFENDANTS:

INTRODUCTION

Pawleys Island Community Church, by and through both its religious and lay leadership, deliberately and recklessly hid a sex offender within its walls. Over the course of many years, through Defendants' indifference and willful concealment, John Doe, a minor, and likely many others, suffered sexual abuse and lifelong harm. This action attempts to right those wrongs, provide justice for a child, and hold these Defendants accountable.

Therefore, Plaintiff Jane Doe, as Mother and Natural Guardian of John Doe, a minor (hereinafter styled "Plaintiff"), brings this Complaint against Defendant Pawleys Island Community Church d/b/a Pawleys Island Christian Academy (hereinafter styled "Defendant PICC"), Defendant Donald Williams (hereinafter styled "Defendant Pastor Williams"), Defendant Ginny Williams (hereinafter styled "Defendant Ms. Williams"), and Defendant Jennifer N. Howard (hereinafter styled "Defendant Howard") (hereinafter collectively referred to as "Defendants") based upon the allegations set forth below.

PARTIES, JURISDICTION, AND VENUE

Plaintiff

1. Plaintiff is a person over the age of eighteen (18) and is the mother and natural guardian of John Doe, a minor.
2. John Doe is currently a minor and was a minor at the time of the events giving rise to the causes of action alleged in this Complaint.
3. Plaintiff is a resident and citizen of South Carolina.
4. Plaintiff is filing this action anonymously under the pseudonyms Jane Doe and John Doe, a minor, because the subject matter of this lawsuit could bring embarrassment and publicity to Plaintiff and the family.
5. Plaintiff risks humiliation and embarrassment if she is identified since some of her allegations involve descriptions of sexual acts forced upon John Doe, a minor, and allowing her to proceed with a pseudonym brings her comfort.
6. If the ability to proceed with a pseudonym is not allowed, Plaintiff will experience further harm because of exercising her legal rights.
7. If Plaintiff is forced to disclose her identity, that disclosure will amplify the injuries that are at issue in this litigation.
8. The public interest in the disclosure of Plaintiff's identity is minimal and not outweighed by the substantial harm of revealing her identity.
9. There will be no furtherance of justice by requiring the public disclosure of Plaintiff.
10. Once the Defendants are served and retain counsel, Plaintiff and John Doe's identity will be revealed to Defendants in a confidential manner, if not already known.

11. Defendants are not prejudiced by allowing Plaintiff to proceed anonymously, and any potential prejudice will be mitigated by the confidential disclosure of Plaintiff's actual identity soon after this lawsuit is filed.

Defendants

12. Upon information and belief, Defendant PICC is both a church and a school academy organized and existing under the laws of South Carolina, and located and doing business in Georgetown County, South Carolina.
13. The church and school are operated at the same location and are under the direct control, oversight, and management of Defendant PICC.
14. Upon information and belief, Defendant Pastor Williams is a citizen and resident of South Carolina.
15. At all times relevant to this action, Defendant Pastor Williams was a pastor at Defendant PICC.
16. Upon information and belief, Defendant Ms. Williams is a citizen and resident of South Carolina.
17. At all times relevant to this action, Defendant Ms. Williams was a lay leader at Defendant PICC.
18. Upon information and belief, Defendant Howard is a citizen and resident of South Carolina.
19. At all times relevant to this action, Defendant Howard was a school director at Defendant PICC.
20. Each negligent, grossly negligent, or reckless act and/or omission of any named Defendant, or identified actions of employees and/or agents of any Defendant identified in this action, were performed individually and/or as an agent, servant, and/or employee of Defendant PICC, and within the scope of their agency and/or employment with Defendant PICC.

21. At all times relevant to this action, Defendant PICC is liable for the acts and/or omissions of its agents, servants, and/or employees within the scope of their agency and/or employment with Defendant PICC.
22. Defendant Pastor Williams, Defendant Ms. Williams, and Defendant Ms. Howard are alleged to have committed grossly negligent or reckless acts and/or omissions in their individual capacities and on behalf of Defendant PICC.
23. If a jury find that any Defendant was grossly negligent or reckless in regard to their actions with Plaintiff and John Doe, a minor, they are subject to liability outside of any alleged “cap” promulgated by the South Carolina Torts Claims Act or Charitable Immunity Act, and Defendants will face unlimited exposure for damages.
24. This Court has jurisdiction over the parties and subject matter.
25. Venue is proper in this Court, as the most substantial acts and/or omissions giving rise to this matter occurred in Georgetown County, South Carolina.

FACTS

26. Plaintiff incorporates all preceding paragraphs into this statement of facts.
27. Defendant PICC is located at 10304 Ocean Highway, Pawleys Island, South Carolina 29585.
28. This property has both a church for religious services and a private school with over three hundred children attending.
29. Defendant PICC has duties and responsibilities to protect minor children from foreseeable harm on the premises.
30. In August 2020, Warren Perry (hereinafter “Sex Offender”) was arrested for two counts of third-degree sexual exploitation of a minor.
31. In late-2020, Sex Offender began working at Defendant PICC as a maintenance worker.
32. Upon information and belief, one or more Defendant was aware of Sex Offender’s criminal

history when Defendant PICC chose to hire him.

33. From 2020 through July 2026, Sex Offender worked as a custodian/maintenance worker at the school. He had full access to the school grounds, frequently entering classrooms while school was in session, and interacted with children daily.
34. In one instance, Defendant PICC advertised an auction for the students where the winner would spend a day shadowing the custodians of the property, including Sex Offender.
35. There are several photographs taken on the premises depicting Sex Offender around children.
36. In 2022, John Doe, a minor, attended Defendant PICC's school, which was known and doing business as Pawleys Island Christian Academy.
37. Defendants did not inform John Doe's parents that Defendants harbored Sex Offender and recklessly put him in contact with minors.
38. Over a weekend in late-July 2022, John Doe informed his parents of a game he learned at Pawleys Island Christian Academy.
39. The game involved trying to insert a penis into someone else's rectum.
40. Plaintiff and her husband asked John Doe, who was 5 years old at the time, who taught him this game.
41. John Doe told his parents it was a man at the school with white hair.
42. Upon information and belief, that man was Sex Offender.
43. Upon information and belief, Sex Offender attempted and/or did insert his penis into John Doe's rectum while at Pawleys Island Christian Academy.
44. John Doe told his parents where in the school it happened.
45. The following Monday, Plaintiff immediately reported the abuse to Defendant Howard.
46. Defendant Howard claimed nothing like that had ever happened at the school before and

questioned whether John Doe was making it up.

47. Plaintiff removed John Doe from Pawleys Island Christian Academy and reported the abuse to law enforcement.
48. John Doe began receiving counseling and will forever carry this disgusting abuse with him.
49. In November 2023, Sex Offender was convicted of one count of third-degree sexual exploitation of a minor stemming from his 2020 crime, placed on probation, and required to register with the Sex Offender Registry.
50. Upon information and belief, one or more Defendant was aware of this conviction and subsequent probation.
51. Thereafter, Defendant Pastor Williams provided a character witness statement to the South Carolina Department of Probation, Parole, and Pardon Services (PPP).
52. Upon information and belief, Defendant Pastor Williams omitted the fact that Sex Offender is working with and around children from his statement to PPP.
53. In February 2024 and March 2024, the South Carolina Department of Social Services (DSS) audits Defendant PICC and finds they are noncompliant with background check requirements.
54. In March 2026, another DSS review finds continued noncompliance with incomplete background checks.
55. In April 2026, Sex Offender executes a power of attorney naming Defendant Ms. Williams as his agent and Defendant Pastor Williams as his successor.
56. On or about July 10, 2026, former and current teachers at Defendant PICC discover Sex Offender's criminal status and bring it to Defendant Pastor Williams and Defendant Howard. Defendant Pastor Williams and Defendant Howard inform the teachers that they are already aware of this information and are otherwise dismissive of their concerns.

57. Upon knowledge and belief, prior to this, another teacher brought forth concerns regarding Sex Offender, where she was effectively silenced and forced out of her position with Pawleys Island Christian Academy.
58. On or about July 13, 2026, deputies with the Georgetown County Sheriff's Department receive an anonymous call from a parent reporting Sex Offender working as a custodian at the school.
59. On or about July 13, 2026, a teacher at Defendant PICC reports Sex Offender to the authorities, who then notify Sex Offender's parole officer.
60. On or about July 14, 2026, Sex Offender is arrested for violation of his probation, where it is cited that Sex Offender was untruthful to his agent in reporting his interaction with the students at the custodian job and for failure to refrain from contact with minors.
61. On July 15, 2026, in a meeting with the congregation and parents, one or more Defendant confirms they were aware of Sex Offender's criminal history and maintain they implemented strict oversight measures regarding Sex Offender.
62. On July 15, 2026, DSS conducts a cite inspection, citing four deficiencies, including staff requirements and direct supervision.
63. On July 17, 2026, the individual Defendants resign from their positions at Defendant PICC.
64. Defendants had actual and apparent knowledge of prior sexual misconduct involving Sex Offender.
65. Defendants deliberately suppressed abuse allegations and performed an institutional cover-up, including, but not limited to:
- a. Choosing not to inform students or their parents of Sex Offender's prior sexual misconduct, arrest, and conviction;
 - b. Dismissing Jane Doe's report of sexual abuse against her little boy, John Doe:

- c. Forcing a Pawleys Island Christian Academy teacher out of her position after she brought up concerns surrounding Sex Offender's criminal past and sexual offender status; and
 - d. Choosing not to inform PPP or other law enforcement of Sex Offender's daily interaction with children.
66. Despite having knowledge of prior allegations and incidents of sexual misconduct, Defendants failed to act, failed to implement reasonable protective measures, and failed to warn parents and children about the dangers present within the school. Not only that, but they actively, at an institutional level, tried to protect Sex Offender and cover-up his history of sexual abuse.
67. John Doe sustained lifelong harm as a result of these acts and/or omissions, particularly in the form of sexual abuse.
68. By reason and in consequence of Defendants' aforesaid acts and/or omissions, John Doe sustained past, present, and future damages, including, but not limited to:
- a. Lost enjoyment of life;
 - b. Physical pain and suffering;
 - c. Mental anguish; and
 - d. Such other particulars as may be found through discovery or trial.

FOR A FIRST CAUSE OF ACTION
(Negligent Hiring, Supervision, Monitoring, and Retention against All Defendants)

69. Plaintiff incorporates all allegations of the preceding paragraphs into this cause of action.
70. Defendants were negligent, negligent *per se*, grossly negligent, reckless, and/or willful in the hiring, supervision, monitoring, and/or retention of Sex Offender.

71. Defendants put Sex Offender in close, unsupervised contact with children even though they knew or should have known that Sex Offender was dangerous, reckless, and forbidden to work near or with minors.
72. Defendants' insane choices created an appreciable risk of harm to minors in their care, custody, and control, including John Doe.
73. Defendants owed the public, including John Doe, a duty to properly screen its employees or agents prior to hiring to ensure those employees or agents did not pose a danger to minors in their care, custody, and control.
74. Upon information and belief, Defendants chose not to take reasonable and prudent measures in hiring, screening, and retaining Sex Offender as a maintenance worker, as he was not safe to work with or near children in South Carolina.
75. The negligence, gross negligence, recklessness, willfulness, and/or negligence *per se* of Defendants likewise includes but is not limited to:
- a. Hiring, retaining, and permitting Sex Offender to work with or near children at the childcare facility without first conducting a proper background check, in violation of S.C. Code Ann. § 63-13-40, -1010 and 23-3-538;
 - b. Hiring or retaining anyone, including Sex Offender, determined to have committed child abuse or neglect, in violation of SCDSS Regulation 114-503(K)(1)(c) and 114-503;
 - c. Choosing not to report Sex Offender's status as a sexual offender, in violation of S.C. Code Ann. § 63-7-310;
 - d. Choosing not to take proper and adequate measures to prevent Sex Offender from endangering children, including John Doe;

e. Choosing not to establish, implement, or enforce a system of safeguards to protect minors from harm, despite the well-known risks associated with unsupervised interactions between Sex Offender and minors; and

f. In any other particulars, as may be found through discovery or trial.

76. Defendants' acts and/or omissions surrounding the hiring, supervision, monitoring, and retention of Sex Offender, were a direct and proximate cause of John Doe's damages.

77. The above-referenced statutes and regulations have the essential purpose of protecting a class of persons from the kind of harm Plaintiff and John Doe suffered.

78. Plaintiff and John Doe are a member of the class of persons the above-referenced statutes and regulations are intended to protect.

79. Plaintiff is entitled to judgment against Defendants for the above-mentioned actual damages and for punitive damages in an amount to be determined by the jury.

FOR A SECOND CAUSE OF ACTION
(Civil Conspiracy against All Defendants)

80. Plaintiff incorporates all allegations of the preceding paragraphs into this cause of action.

81. Defendants knowingly engaged in a concerted effort to conceal, suppress, and enable the continued sexual misconduct of Sex Offender, thereby conspiring to protect him from accountability while placing minors, including John Doe, in foreseeable danger.

82. This conspiracy was motivated by Defendants' financial interests, institutional reputation, and personal loyalty to Sex Offender, rather than any legitimate school purpose.

83. Defendants knew or should have known that Sex Offender was a danger to minors as early as 2020 based on a prior arrest for criminal sexual conduct involving children.

84. Defendants were aware of specific allegations against Sex Offender, yet deliberately chose to protect him rather than remove him from a position within the school.

85. Despite knowledge of Sex Offender's predatory behavior, Defendants took affirmative steps to hide, suppress, and prevent the reporting of Sex Offender's actions, including:

- a. Knowingly allowing Sex Offender to remain in employment at Defendant PICC despite allegations and legal matters arising from misconduct with minors;
- b. Refusing to report Sex Offender's conduct to law enforcement despite being legally and morally obligated to do so;
- c. Suppressing reports made by victims, families, and/or academy teachers;
- d. Discouraging or intimidating victims and witnesses from coming forward with allegations of abuse;
- e. Choosing not to remove Sex Offender from work at Defendant PICC;
- f. Providing Sex Offender continued access to minors despite past allegations and known risks;
- g. Misrepresenting the safety of Pawleys Island Christian Academy to parents while knowingly harboring a predator;
- h. Allowing Sex Offender to engage in unsupervised interactions with minors;
- i. Choosing not to implement or enforce policies that would have restricted Sex Offender's access to vulnerable minors, despite their affirmative duty to do so; and
- j. Ensuring that all decisions related to Sex Offender's misconduct and criminal history remained within a small, controlled group of Defendant PICC leadership, preventing outside intervention or oversight.

86. Defendants actively conspired to hide Sex Offender's pattern and history of inappropriate conduct with minors, knowing that exposure would result in significant fallout for Defendants, including legal liability, financial consequences, and reputational damage.
87. The access to minor children by Sex Offender, facilitated by the conspiratorial actions of all Defendants, directly resulted in the harm suffered by Plaintiff and John Doe.
88. The predicate acts necessary to constitute civil conspiracy include, but are not limited to:
- a. Defendants' collective and deliberate efforts to prevent others from discovery of Sex Offender's inappropriate actions with minors;
 - b. Defendants' failure to report Sex Offender's sexual misconduct and inappropriate conduct to law enforcement, despite a clear duty to do so;
 - c. Defendants' failure to disclose Sex Offender's actions to external oversight bodies, thereby ensuring that complaints remained within a controlled, internal circle;
 - d. Defendants' coordination to protect Sex Offender from scrutiny, including by silencing victims, teachers, and families, shielding him from investigations, and continuing to allow him access to minor children despite known risks;
 - e. Defendants' failure to take corrective action after learning of Sex Offender's conduct, thereby allowing other minors to likely be abused without intervention; and
 - f. Defendants' refusal to take disciplinary measures against Sex Offender or remove him from being able to interact with children, despite overwhelming evidence of his predatory behavior.
89. As a direct and proximate result of the civil conspiracy between Defendants, John Doe suffered harm and Plaintiff is entitled to judgment against Defendants for actual and punitive damages.

WHEREFORE Plaintiff prays for judgment against Defendants for: 1) actual damages, jointly and severally; 2) punitive damages, individually; all in an amount to be determined by a jury, and 3) such further relief this Court deems just and proper.

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