

STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
	)	THE TENTH JUDICIAL CIRCUIT
COUNTY OF ANDERSON	)	
	)	Case No:
	)	
TAVARIS RICHARDSON,	)	
	)	
Plaintiff,	)	SUMMONS
	)	(JURY TRIAL DEMANDED)
vs.	)	
	)	
ANDERSON COUNTY SHERIFF'S	)	
OFFICE,	)	
	)	
Defendant.	)	

YOU ARE HEREBY SUMMONED and required to answer the Complaint in this action, of which a copy is herewith served upon you, and to serve a copy of your Answer to said Complaint on the subscriber, Axelrod & Associates, P.A., at 4701 Oleander Drive, Myrtle Beach, South Carolina 29577, within thirty (30) days after the service hereof, exclusive of the date of such service; and if you fail to answer the Complaint within thirty (30) days after such service, judgment by default will be rendered against you for the relief demanded in the Complaint.

Respectfully Submitted,

s/ Stuart M. Axelrod
Stuart M. Axelrod (SC Bar # 14678)

Tristan M. Shaffer (SC Bar # 77565)
AXELROD & ASSOCIATES, PA
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Tristan@gotaxelrod.com
ATTORNEYS FOR PLAINTIFF

July 20, 2026

STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
	)	THE TENTH JUDICIAL CIRCUIT
COUNTY OF ANDERSON	)	
	)	Case No:
TAVARIS RICHARDSON,	)	
	)	
Plaintiff,	)	COMPLAINT
	)	(JURY TRIAL DEMANDED)
vs.	)	
	)	
ANDERSON COUNTY SHERIFF'S	)	
OFFICE,	)	
	)	
Defendant.	)	
	)	

Plaintiff Tavaris Richardson, complaining of Defendant Anderson County Sheriff's Office, would respectfully show unto this Court as follows:

PARTIES

1. Plaintiff Tavaris Richardson ("Plaintiff") is, upon information and belief, a citizen and resident of the State of South Carolina.
2. Defendant Anderson County Sheriff's Office ("ACSO") is a law enforcement agency of the State of South Carolina, operating within Anderson County, South Carolina, pursuant to S.C. Code Ann. § 23-13-10, et seq.
3. Upon information and belief, the law enforcement officers referenced in this Complaint all worked for the Anderson County Sheriff's Office. However, some of the officers may have been working as federal task force officers at the time of the actions giving rise to this Complaint.
4. At all times relevant to this Complaint, all law enforcement personnel contained in this Complaint were acting within the course and scope of their employment with either the Anderson County Sheriff's Office or the respective federal agency.

JURISDICTION AND VENUE

5. This Court has subject matter jurisdiction over this action pursuant to the South Carolina Tort Claims Act, S.C. Code Ann. § 15-78-10, et seq.
6. Venue is proper in Anderson County, South Carolina, because the acts and omissions giving rise to this action occurred in Anderson County, South Carolina.

FACTS

7. According to an incident report, on or about July 16, 2026, deputies with the ACSO Fugitive Investigations Unit were tasked with locating and arresting Plaintiff pursuant to a warrant reported by the Greenville County Sheriff's Office.
8. ACSO deputies located Plaintiff at the Horizon Inn and Suites, 3025 N. Main Street, Anderson, South Carolina, and observed him leaving Room 124.
9. As the Plaintiff was walking with a friend, ACSO Detective Eli Pierce yelled freeze and threatened to let be the K-9 loose.
10. Not fully comprehending the situation, Plaintiff ran from the yelling officer.
11. ACSO Deputy Darius Foster, a K-9 handler with ACSO, directed his dog to attack Plaintiff.
12. The K-9 made contact with Plaintiff, knocking him to the ground. As Plaintiff was being mauled by the canine, he was trying to get away and protect himself.
13. Multiple ACSO deputies pinned Plaintiff to the ground. at this location and physically restrained him, placing him in handcuffs.
14. The number of deputies on top of Plaintiff exceeded the number appropriate given the situation.

15. The K-9 was initially stopped from continuing to maul Plaintiff. However, after the plaintiff was already pinned to the ground and not actively resisting, ACSO deputies allowed the K-9 to re-engage the Plaintiff and to continue to maul him.
16. Plaintiff sustained serious injuries due to the dog bites.
17. The deputies also began striking the Plaintiff as he was on the ground.
18. These strikes continued even when Plaintiff was not actively resisting.
19. Following the beating described above, ACSO officers dragged Plaintiff's exhausted and barely conscious body across the pavement.
20. Bystanders began filming the beating with their phones. (See Exhibits A and B).
21. The deputies can be heard yelling, stop resisting even when Plaintiff was not actively resisting.
22. Upon information and belief, the deputies have been trained to yell "stop resisting" even when a suspect is not resisting, justify the unlawful use of excessive force.
23. Multiple ACSO deputies were present at the scene and observed the conduct described in the foregoing paragraphs. None of these deputies intervened to stop the ongoing use of force against Plaintiff, and none of the deputies rendered aid to Plaintiff notwithstanding his visibly diminished physical condition.
24. After the beating two deputies were grossly negligent in using an unauthorized method of attempting to lift Plaintiff and drag him across the asphalt.
25. After the beating, members of the community began posting comments on social media about the improper use of force by the ACSO.
26. Upon information and belief, one of the ACSO deputies who was a bystander to the beating, made a Facebook post which indicated that he thought the beating was funny.

27. The Facebook comment, described above, is evidence that ACSO has fostered and permitted an institutional culture in which the use of excessive force by its deputies is treated as unremarkable, or even as a subject of humor, rather than as conduct warranting discipline, retraining, or correction.

28. Deputy Sipe's Incident Report concerning this matter lacks sufficient detail to determine the full extent of the use of force in this case. Upon information and belief this was an intent by Deputy Sipe to conceal the full nature of the beating.

29. As a direct and proximate result of the conduct described above, Plaintiff suffered physical injury, pain and suffering, medical expenses, and other damages.

FOR A FIRST CAUSE OF ACTION

(Gross Negligence – Failure to Supervise and Failure to Intervene, Pursuant to the South Carolina Tort Claims Act)

30. Plaintiff incorporates by reference all preceding paragraphs as if fully restated herein.

31. Pursuant to S.C. Code Ann. § 15-78-60(25), ACSO owed Plaintiff a duty to exercise at least slight care in the supervision, protection, and custody of persons, such as Plaintiff, who come under the control of its deputies.

32. The individual ACSO deputies present at the scene, acting within the course and scope of their employment with ACSO, owed Plaintiff a duty to intervene to stop the ongoing use of force against him once he had been restrained and no longer was actively resisting.

33. As described above, multiple ACSO deputies observed Plaintiff being struck about the face and body while being restrained and observed K-9 continue to bite and maul Plaintiff after he had already been stopped actively resisting.

34. Despite these observations, the ACSO deputies did not intervene or act to protect the Plaintiff from the beating

35. Multiple ACSO deputies saw Plaintiff's exhausted and barely conscious body being dragged across the pavement by their fellow deputies, yet they did not act to intervene or rendered aid to Plaintiff.

36. ACSO failed to train and supervise its deputies regarding the duty to intervene in, and to report, the use of excessive force by fellow deputies, and permitted an institutional environment in which deputies believe the use of excessive force is acceptable.

37. ACSO's failure in this regard was an intentional, conscious failure to do that which it ought to have done and constitutes gross negligence within the meaning of S.C. Code Ann. § 15-78-60(25).

38. As a direct and proximate result of ACSO's gross negligence in supervision, Plaintiff sustained the injuries and damages described above, for which he is entitled to recover actual, consequential, and special damages.

FOR A SECOND CAUSE OF ACTION

(Gross Negligence – Negligent Hiring, Pursuant to the South Carolina Tort Claims Act)

39. Plaintiff incorporates by reference all preceding paragraphs as if fully restated herein.

40. ACSO owed a duty to Plaintiff and to the public to exercise care in the hiring and selection of its deputies, including those deputies who participated in and/or witnessed the events described above.

41. Upon information and belief, ACSO failed to exercise slight care in screening, evaluating, and investigating the fitness of its deputies before hiring them.

42. ACSO's failure in this regard was an intentional, conscious failure to do that which it ought to have done and constitutes gross negligence.

43. As a direct and proximate result of ACSO's gross negligence in hiring, Plaintiff sustained the injuries and damages described above, for which he is entitled to recover actual, consequential, and special damages.

FOR A THIRD CAUSE OF ACTION

(Gross Negligence – Negligent Retention, Pursuant to the South Carolina Tort Claims Act)

44. Plaintiff incorporates by reference all preceding paragraphs as if fully restated herein.

45. ACSO owed a duty to Plaintiff and to the public to retrain, reassign, or discipline deputies whom it knew or should have known posed a risk of using excessive force, and to correct an institutional culture that tolerates such conduct.

46. Upon information and belief, ACSO knew or should have known, before and at the time of the incident described above, that its deputies had a propensity to use excessive force.

47. ACSO had fostered an environment in which such the use of excessive force was tolerated, condoned, or treated as a subject of humor, as evidenced by the above described Facebook post.

48. Notwithstanding this knowledge, ACSO continued to retain and to entrust these deputies with the authority to make arrests and to use force upon members of the public.

49. ACSO's failure in this regard was an intentional, conscious failure to do that which it ought to have done and constitutes gross negligence within the meaning of S.C. Code Ann. § 15-78-60(25).

50. As a direct and proximate result of ACSO's gross negligence in retention, Plaintiff sustained the injuries and damages described above, for which he is entitled to recover actual, consequential, and special damages.

WHEREFORE, Plaintiff Tavaris Richardson respectfully prays that this Honorable Court enter judgment in his favor and against Defendant Anderson County Sheriff's Office as follows:

- A. For his actual, consequential, and special damages in an amount to be determined by a jury;
- B. For the costs of this action;
- C. For trial by jury on all issues so triable; and
- D. For such other and further relief as this Court deems just and proper.

Respectfully Submitted,

s/ Stuart M. Axelrod
Stuart M. Axelrod (SC Bar # 14678)

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