

STATE OF SOUTH CAROLINA
COUNTY OF RICHLAND

IN THE COURT OF COMMON PLEAS
FIFTH JUDICIAL CIRCUIT

Allison R. Dunavant,

Plaintiff,

SUMMONS

v.

University of South Carolina, The
International Center For The Arts, LLC,
David W. Voros, and Harris Pastides,

Defendants.

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.

CROMER BABB PORTER & HICKS, LLC

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May 15, 2018
Columbia, South Carolina

STATE OF SOUTH CAROLINA
COUNTY OF RICHLAND

IN THE COURT OF COMMON PLEAS
FIFTH JUDICIAL CIRCUIT

Allison R. Dunavant,
Plaintiff,

**COMPLAINT
(Jury Trial Demanded)**

v.

University of South Carolina, The
International Center For The Arts, LLC,
David W. Voros, and Harris Pastides

Defendants.

The Plaintiff, complaining of the Defendants, would respectfully show to the Court:

PARTIES AND JURISDICTION

1. The Plaintiff Allison R. Dunavant (“Plaintiff”) is a citizen and resident of Lexington County, South Carolina.
2. The Defendant University of South Carolina, (“USC”), is an agency of the State of South Carolina with its primary campus located in Richland County, South Carolina.
3. The Defendant International Center For The Arts, LLC (“ICA”) is a limited-liability company registered in South Carolina and headquartered in Italy. Defendant Voros is a co-owner and director of the ICA.
4. The Defendant David W. Voros (“Voros”) resides, upon information and belief, in Lexington County, South Carolina. At all times mentioned herein, Voros was a Professor of Art for USC.

5. The Defendant Harris Pastides (hereinafter “Pastides”) resides, upon information and belief, in Richland County, South Carolina. At all times mentioned herein, Pastides was the President of USC.

6. This action arises under federal law and the common law of South Carolina.

7. Jurisdiction and venue are proper, because the parties have sufficient connections to this circuit, and the events giving rise to this action occurred in Richland County, South Carolina.

FACTUAL ALLEGATIONS

8. Plaintiff began at Defendant USC in the Fall of 2015 as a graduate student pursuing a master’s degree in studio art with a concentration in painting.

9. During her first semester at USC, Plaintiff learned about the “USC in Italy” program which is ran during the summer semester. Plaintiff reached out to Voros, one of her professors, to inquire as to whether graduate level courses would be offered through the USC in Italy program and what outlets existed for financial aid and/or funding for the program.

10. Plaintiff applied for a SPARC grant with the assistance of Defendant Voros in hopes of obtaining funding for the USC in Italy program. Defendant Voros also wrote a recommendation for Plaintiff to be nominated for the Rhude M. Patterson Graduate Fellowship.

11. In the Spring 2016 semester, Plaintiff took a course in Advanced Life Drawing which was taught by Defendant Voros. During Plaintiff’s Advanced Life Drawing course, Defendant Voros approached her to discuss the USC in Italy program and explained that her artwork would benefit greatly from visiting Italy and seeing artwork – such as that of Titian and Michelangelo – in person.

12. Plaintiff did not receive an award to provide funding for the USC in Italy trip. In response, Voros presented Plaintiff with the opportunity to go to Montecatello di Vibio, Italy for three weeks either during May or during the same time as the USC in Italy program.

13. On or around March 3, 2016, Defendant Voros used the USC email system to email Plaintiff and CU, a graduate student, to request they meet with him to discuss Italy.

14. Voros represented to Plaintiff, as her professor and her supervisor for her Graduate Assistantship, that the opportunity to go to Italy was a USC sanctioned trip.

15. Voros continued to discuss the opportunity to go to Italy with Plaintiff during class time. Voros also discussed the opportunity with CU, and AG, an undergraduate student at USC. Voros offered to provide meals and accommodations in Italy for the three weeks prior to the USC in Italy program in exchange for help setting up for the program.

16. Plaintiff believed, based on representations made by Voros, that she would be helping to prepare art supplies, performing light cleaning activities, and engaging in other activities to help set up for USC in Italy that were similar to the duties she had as a Graduate Teaching Assistant at USC.

17. On or about March 24, 2016, Defendant Voros used the USC email system to email Plaintiff, CU, and AG to discuss the details of the upcoming trip to Italy including:

- a. Required dates of arrival;
- b. Requesting the students pack light so they could help transfer supplies for the USC in Italy trip;
- c. Advice on where to book plane tickets;
- d. Passport and travel insurance requirements for the trip;
- e. Information about the weather in Italy in May;

f. A promise from Voros that the students would see as much as possible while in Italy; and

g. A promise that the students would have studio time in the itinerary.

18. On or about May 3, 2016, Defendant Voros sent an email from his USC email address to Plaintiff, CU, and AG with travel instructions for their trip to Italy.

19. On May 4, 2016, Plaintiff arrived in Italy with CU and AG.

20. The ICA building, where Plaintiff was to stay, was cold. Plaintiff slept in three layers just to combat the frigid temperatures. There were no bed linens or towels. The building was filled with cat urine, scorpions, and spiders. There were locked bars on the windows simulating a prison environment.

21. The building was deemed unfit for the USC in Italy students; however, Voros felt it appropriate for Plaintiff.

22. Beginning the day after Plaintiff arrived, May 5, 2016, Plaintiff, CU, and AG immediately began working to prepare the school for the USC in Italy program. The three worked from approximately 8:00 am until 8:00 or 9:00 pm with an hour lunch break.

23. The nature of the work that Plaintiff was required to complete was beyond any reasonable expectation or representation. Some of the tasks required to be completed were cleaning a terrace covered with cat feces and debris, dumping out dirt filled planters, pulling nails and tacks out of walls, moving furniture, scraping tape off of shelves, scrubbing dried clay off of tables and boards, using brooms to knock down spider webs, removing paint from bricks with a sponge, painting a basement and attached room, and scrubbing cat urine from couches and their cushions.

24. As a result of inhabitable accommodations and manual labor in unbearable conditions, Plaintiff began having headaches and congestion; overall feeling unwell the entire trip.

25. Though Plaintiff did not agree with the type of work assigned by Voros, she complied with her assignments. The sole task from which she refrained was moving couches down flights of stairs. She did not believe that this type of labor was safe for her given her physique and the other students willingness to engage in the activity.

26. All meals were served at Voros' private residence because the kitchen in the ICA was not prepared for their stay. Plaintiff, CU, and AG were required to clean up after the meals.

27. Plaintiff's last day being paid as Graduate Assistant for Voros was May 7, 2016.

28. On or about May 9, 2016, AM, a recent graduate of USC's graduate art program, arrived at the ICA in Italy. AM did not stay at the ICA, but rather stayed at Voros' private residence. Plaintiff was unsure what role AM played in this trip or even why she was at the ICA.

29. Plaintiff did not receive studio time as promised by Voros. Voros told Plaintiff and the other students that they could use the studio, which was separate from the building in which they were staying, after dinner, but dinner did not typically end until 12:00AM and the students had to be up at 7:00AM each morning.

30. While at Voros' house for a meal, Plaintiff walked in on Voros and AM engaging in sexual acts.

31. After this, when Plaintiff attended meals at Voros' house, Voros would make statements to Plaintiff which implied he wanted to engage in sexual acts with her as well. Voros' indicated that if Plaintiff would engage in sexual acts with him, Plaintiff would be able to go on shopping trips in Italy like AM.

32. Voros would host dinners late into the night in which he would place his hands on Plaintiff's face and legs sexually.

33. During these late dinners, Voros also told Plaintiff that if she acted more like AM, that she would not have to perform as much work at the ICA. Voros implied that acting “more like AM” would include engaging in sexual acts with him.

34. On or around May 13, 2016, Voros had agreed to take Plaintiff, CU, AG, and AM to Rome. That day, Voros dropped off Plaintiff, CU, and AG and left them to explore Rome alone with a paper map that had locations circled and instructions to take the train back to a stop near the ICA, while Voros took AM shopping.

35. On or about May 14, 2016, Plaintiff took a train to Terni with CU and AG on their way back to Fratta Todina, the nearest stop to the ICA. When the group arrived in Terni, they missed their next train to Fratta Todina based on confusion over the travel instructions they had been given.

36. Around 9:00 pm that evening Plaintiff contacted Voros to inform him that the group had missed their train. Voros stated that Terni was a 2.5-hour drive from the ICA and he would not be able to pick them up. Voros proceeded to tell them they would have to stay the night in Terni.

37. Plaintiff also contacted Eros Tassi, an employee of the ICA, who stated that the station in Terni was only a 30-minute drive from the ICA.

38. Plaintiff continued to call Voros, but he stopped answering the calls.

39. Plaintiff, CU, and AG spent the night in a hotel in Terni, which they paid for out of pocket.

40. On or about May 15, 2016, very early in the morning, around midnight, Plaintiff, through the USC email system, emailed Voros about her travel concerns and her concerns about

being stuck in Terni for the night unprepared. Voros responded to Plaintiff email, through the USC email system, about 1:00 am stating:

- a. Plaintiff was disobedient;
- b. Plaintiff was being left in Terni for the night as punishment;
- c. That he did not have time to come pick Plaintiff up in Terni because of work that needed to be done at the ICA for the USC group that was coming; and
- d. That Plaintiff's request to be picked up in Terni was unacceptable.

41. On or about May 15, 2016, very early in the morning, around 2:00 a.m., Voros through the USC email system, emailed Plaintiff again stating:

- a. Plaintiff is not in Italy as a part of a USC program;
- b. Plaintiff is in Italy as an employee of the ICA, which Voros is a co-owner of;
- c. The cost of staying at the ICA for one week is 3400 Euros, which up until now, Plaintiff has been paying for through her work at ICA;
- d. Plaintiff has been deficient in her work;
- e. Plaintiff is not permitted to contact Voros through the USC email system;
- f. Plaintiff must work for Voros in order to continue to receive accommodations and food;

42. During the morning of May 15, 2016, Plaintiff, CU, and AG were able to call Voros who told the group that if they did not make it to Fratta Todina by 1:30 pm, they would be on their own to get up the hill to Montecastello where the ICA was located.

43. Plaintiff arrived in Fratta Todina with CU and AG at approximately 3:40 pm because of the limited train schedule. The group tried to call Voros but received no response. Because of the lack of response and the message they had received previously, they began walking the several miles from Fratta Todina up the hill to Montecastello.

44. While walking back along the road, Voros came to pick up the group. Voros did not initially allow the students in the car because he wanted to have a group discussion. During that “discussion” he berated the students for not following his vague directions and claimed they were all adults. Voros also stated that they were not in Italy in conjunction with USC and were instead there based on Voros’ generosity.

45. As a result of this altercation, Plaintiff looked away from Voros in an effort to compose herself. Plaintiff was hungry, thirsty, tired, and being scolded at in a tone perceived to be hostile. Voros took this turning away as offensive. Voros left Plaintiff to walk the rest of the way to Montecastello by herself, while Voros drove CU, AG, and AM.

46. AM then got out of the vehicle and flagged down another car to give Plaintiff a ride to Montecastello. Plaintiff had never met the person driving the car and did not speak enough Italian to communicate with the driver on her own.

47. When Plaintiff got back the Montecastello, she walked to the only hotel in town and tried to get a room because she feared for her safety. The only hotel in the town did not have any vacancies.

48. Plaintiff walked back to the ICA and sat outside. AM came outside and told Plaintiff that the ICA was Voros property and if he wanted her to leave he could call the police to remove her. Plaintiff expressed concern about this because Voros could not just kick her out in a foreign country, where she did not know the language, with no place to go. AM told Plaintiff that she

should apologize and that Voros was her boss. Plaintiff corrected AM's false statement because Plaintiff had never entered into any type of employment agreement. Later AM came out and told Plaintiff she could come back inside and go to her room, but she could not come to dinner that evening or breakfast the next morning.

49. The next morning, during breakfast, Voros came to see Plaintiff while the ICA was empty and told Plaintiff if she did not perform the work he wanted her to perform, he would not provide her with meals. Voros attempted to state that Plaintiff owed him 5 hours of work, 5 days a week and that Voros was Plaintiff's employer. Plaintiff expressed that an employer-employee relationship was never a part of her agreement in coming to Italy.

50. Plaintiff offered to work quietly and fulfill her duties, so she had a place to stay and food to eat. Voros rejected this offer and stated that Plaintiff could not work until her attitude changed and if Plaintiff did not work, she would not be provided meals. No reasonable person could have felt safe in a situation in which a professor was willing to let them starve because of an attitude one-sidedly perceived to be inappropriate.

51. Plaintiff, with concerns about her safety and where she would be able to go if she was kicked out of the ICA, contacted her parents and USC representatives.

52. During this time Voros kept Plaintiff in her room and denied her access to food and transportation. Plaintiff feared that if she left her room, Voros would call the police to remove her from the ICA property.

53. Voros was aware of Plaintiff's discomfort while in Italy; however, he informed Plaintiff that she must tell her mother that she was "safe." At this time, Voros was aware that the University of South Carolina had offered to remove Plaintiff from Italy; however, Voros did not

inform Plaintiff of this fact until much later leaving Plaintiff to continue to panic. Plaintiff also had additional fears from having no access to food and being stuck in a bedroom.

54. Plaintiff's parents had previously contacted Magdalena Grudzinski, USC Study Abroad Director, regarding the horrible conditions of the ICA informing USC about the inedible food, faulty utilities, rodents and insects within the rooms, and multiple other issues.

55. Voros subsequently removed Plaintiff from what she believed to be a USC program.

56. Plaintiff's mother then sent a series of emails to Magdalena expressing her concern with Voros removing Plaintiff from the program and the University's lack of expedience in resolving the matter. Additionally, these emails included a series of photos showing pictures of scorpions, spiders, cat urine, and cat feces.

57. Magdalena continued to assure Plaintiff's mother that Plaintiff was safe even though Plaintiff told her mother on multiple occasions that she was not safe.

58. On one occasion, Plaintiff had a phone call with Dr. Allen Miller of the University of South Carolina. Dr. Miller told Plaintiff she was safe despite Plaintiff's concerns. Dr. Miller subsequently lied to Magdalena in saying Plaintiff told him she was fine.

59. Plaintiff reached out to Magdalena on Facebook summarizing her call with Dr. Miller and informed Magdalena that Dr. Miller lied to her in stating that Plaintiff said she felt safe.

60. Plaintiff and her mother were informed that the highest authorities at the university were notified about Plaintiff's issue and would be in contact in an effort to resolve the matter. During this time Plaintiff continued to sit in her room at the ICA and was not permitted to attend meals.

61. Helen Doerpenhaus spoke to Plaintiff's mother regarding the resolution of Plaintiff's issue: 1) USC would make arrangements for Plaintiff to return home; 2) Voros would make hotel arrangements and ensure that Plaintiff had a meal at the hotel – Plaintiff already knew there was no vacancy at the hotel as Plaintiff had already walked there; and 3) Voros would make sure someone drove Plaintiff to the airport the next morning. Plaintiff agreed to this resolution in order to get home.

62. Plaintiff's mother attempted to speak with Dr. Miller on the phone regarding the situation. Dr. Miller told Plaintiff's mother that he had spoken with Plaintiff and that Plaintiff was fine. This was a lie.

63. Plaintiff spent the night at a hotel and then flew home as planned.

64. Dale Moore, Assistant Dean and Ombudsman, thereafter filed an Interpersonal Violence Report ("BIT report") on behalf of Plaintiff.

65. The BIT Report stated that Plaintiff's mother made allegations against "host and employer." Plaintiff's mother did not use this language instead calling Voros a "professor."

66. Plaintiff's mother reported the entire incident regarding the Plaintiff to Campus Police, the Office of Study Abroad, and the Office of the Provost.

67. After Plaintiff returned home, she requested information on the process to report and review what occurred in Italy. Plaintiff emailed Dale Moore requesting the information. Dale Moore responded by stating he cannot provide information or resources on making a complaint or grievance or counseling until he deems a complaint is warranted.

68. Plaintiff subsequently emailed Carl Wells, Assistant Director of the Office of Equal Opportunity Programs, a copy of the recorded conversation between Voros and herself from the

time she was in Italy. During the conversation, Voros told Plaintiff what she was permitted to do in Italy.

69. On June 24, 2016, Wells sent Plaintiff a letter as well as a carbon copy of a letter he sent to Voros. The letter to Voros was addressed informally, referenced Plaintiff's *formal* complaint but listed a 2015 complaint number which correlated to a former complaint made against Voros by a faculty member, and discussed mediation of the complaint, which had not been discussed with Plaintiff.

70. On July 1, 2016, Plaintiff filed a *formal* Notice of Charge of Discriminatory Harassment. Voros was given 5 days to respond; however, he failed to timely respond. Copies of the charge were sent to ranking individuals of the University.

71. On July 22, 2016, Plaintiff emailed Dr. Graciano, Graduate Director in the School of Visual Art and Design, to change Teaching Assistant positions for the coming year. Plaintiff was scheduled to work for Voros' wife, Pam Bower-Voros. Bower-Voros is an instructor in the painting department. Together, Voros and Bowers-Voros comprise the painting department's only professors.

72. Plaintiff was given positive indications that a switch may be possible; however, she was told that in order to switch TA positions, another student would need to be qualified. That student would additionally have to agree to the switch. Plaintiff did not perceive this to be likely as the semester was due to begin in a matter of weeks.

73. On or about July 26, 2016, in a meeting, Dr. Graciano told Plaintiff that they were "pretty sure" they could make the switch work and proceeded to have Plaintiff contact another university employee.

74. On or about July 29, 2016, Plaintiff received an email from Wells stating that Plaintiff had books in her possession that were the property of School of Visual Art and Design, and that she should return the books per faculty request to David Voros.

75. On or about July 29, 2016, Plaintiff emailed Wells to ask if Voros had responded to her June 15, 2016 Formal Complaint because if Voros had time to request books, he had time to respond to a Formal Complaint.

76. On August 3rd, Carl Wells sent out an email requesting a meeting with several individuals within the University, and cc'd Plaintiff and Voros. Voros had informed Wells he wished to resolve the situation. Plaintiff did not wish to resolve the matter as she had not yet received a response to her charge of harassment from Voros.

77. On August 10, 2016, Wells emailed Plaintiff stating that thus far he had attempted to mediate and resolve the issue and that if Plaintiff was not pleased with the recommendations that have come about as a result of the mediation/resolution that he could move forward with a full fledged investigation.

78. Shortly thereafter, Plaintiff emailed Wells stating that a full investigation should have been completed. In that same email, Plaintiff presented a timeline of her complaint to Wells including:

- a. Wells' official USC letter of receipt of her Formal Complaint dated June 17th.
- b. Wells' official USC letter dated June 24th to Voros following Wells' audio recorded meeting with Plaintiff. The June 24th letter served Voros with a Notice of Discriminatory Harassment.
- c. A reminder of Wells' official USC July 21st letter where Wells stated he had apprised Voros of his investigation and made a second attempt to contact Voros. Voros had still not replied.

79. Plaintiff then filed a Title IX complaint to which the EOP acknowledged receipt.

80. Three months passed, and no investigation had been initiated on Plaintiff's behalf and Voros still had not responded to Plaintiff's charge.

81. Carl Wells subsequently sent Voros a third letter requesting a response to Plaintiff's charge and recognized Voros' desire to resolve the issue. As no investigation had been initiated nor a response from Voros regarding Plaintiff's charge, Plaintiff did not believe a resolution was appropriate given Voros' decision not to comply with procedure.

82. Throughout the process, Wells asked Plaintiff, "What is your desire at this time?" Plaintiff requested that the University abide by EOP policies and law regarding Title IX and complete the investigation that Wells had finally begun.

83. The current situation has had an impact on Plaintiff both professionally as a student and an employee of the university, and personally. Plaintiff has had to significantly change her daily schedule going as far as to use restroom on different floors and in different buildings in fear that she will come into contact with Voros. Plaintiff had to change her Graduate Assistantship to avoid Voros' wife out of fear of retaliation for filing a charge about her husband.

84. Plaintiff received a poor grade in Voros' 2016 spring semester class, Advanced Life Drawing. Plaintiff believes this grade to be unjustified and an act of retaliation for filing a charge against Voros.

85. Plaintiff inquired as to how to protest a grade. Andrew Graciano emailed Plaintiff with a link to the graduate bulletin. Dr. Graciano stated they have no authority to make Voros change a grade; however, Graciano would convey Plaintiff's concerns to Voros. It was noted that Voros was the *only* individual who could change her grade.

86. Plaintiff reiterated to Graciano that Plaintiff could not discuss this matter with Voros because Wells had directed no contact while he investigated. Plaintiff informed Wells of this statement and called the process “unacceptable.”

87. Defendants required Plaintiff to make her own accommodations throughout this process. No accommodations were made in an effort to limit the contact Plaintiff would have with Voros nor were accommodations made for an upper level credit for an independent study.

88. Two weeks after the Fall 2016 Semester started, an Independent Study appeared on Plaintiff’s schedule without her enrolling in the course. At this point, Voros’ class still appeared on Plaintiff’s schedule as well. As this occurred after the Drop/Add date, Plaintiff would receive a Withdraw on her transcript in order to get out of taking Voros’ course.

89. On September 13, 2016, Plaintiff emailed Wells summarizing the Title IX process and procedures, and re-requested documents related to her case.

90. Plaintiff followed the Title IX procedures precisely and was met with hostility by the USC Office of Equal Opportunity Programs (“EOP”). The EOP consistently ignored the Title IX procedures and timeline, and to this day is not following procedure. Plaintiff has not been treated with respect throughout this process and has been ignored by the EOP office. Plaintiff’s complaint has not been treated with the severity warranted.

91. On September 15, 2016, a Letter of Determination and Voros’ response letter was received from Wells. In summary, the letter stated that the Office of Equal Opportunity Programs has completed its investigation and determined that there was no reasonable cause to believe that Voros violated any University policy. The Letter also stated that the result of the investigation had been shared with the appropriate administrative officials who have concurred with the finding.

92. On September 20, 2016, Plaintiff emailed Terry Parham, General Counsel and Executive Director of Compliance Programs, University President Pastides, Henry White, Joan Gabel, George Lampl and attached Carl Wells' Closure LOR of her case along with an Appeal letter to the President requesting an appeal to the Conclusion and Determination of her Title IX Complaint by Carl Wells.

93. On September 26, 2016, Andrew Graciano emailed Plaintiff regarding the books again and now referring to multi-volume books that Voros would like returned. Plaintiff responded that she does not have any books and that Voros had her and other students travelling to Italy transport materials. Plaintiff stated that she cannot return something that she does not have, questioned whether Voros might have overlooked the book in Italy, and referred Graciano to the no contact instruction.

94. Plaintiff emailed Terry Parham, President Pastides, Joan Gabel, Henry White, and George Lampl that she has not heard back from them citing EOP 1.01 procedure.

95. Terry Parham emailed Plaintiff and copied President Pastides and Joan Gabel: on behalf of President Pastides that the President was putting together a Presidential Review Panel to consider Plaintiff's appeal.

96. Canty Heath emailed Plaintiff and copied Terry Parham and Edwin Evans that the President had appointed a Presidential Review Panel to consider the issues raised in Plaintiff's Appeal. President Pastides appointed Dr. Terrie Smith, Director of Faculty Affairs as the Chair of the Panel.

97. Plaintiff reported to Graciano that Voros' purported lost book concerns were an attempt by Voros to make Plaintiff look bad within the department.

98. Dr. Smith requested evidence from Wells to which Wells complied. Plaintiff emailed Dr. Smith requesting clarification on the additional evidence requested and reminded Dr. Smith that Wells did not acknowledge any of the produced evidence in the EOP's Final Determination.

99. On October 12, 2016, four days after the initial email, Plaintiff emailed Dr. Smith that she had not heard back from her regarding her last email. Additionally, Plaintiff requested the evidence that was provided to Dr. Smith from Wells previously. Plaintiff informed Dr. Smith that this case has been riddled with conflict of issues and blatant disregard for policy and procedure.

100. Dr. Smith's reply to Plaintiff's email was obscenely indirect and did nothing to address Plaintiff's concerns. Again, Plaintiff requested a list of the materials contained in the EOP file which was the record of what Wells shared with her. Plaintiff gave the example that Wells summarized Plaintiff's complaint and his findings based on whether Voros called Plaintiff's *bitch*. Plaintiff explained that Wells' summary was not Plaintiff's complaint.

101. On October 17, 2016, Plaintiff emailed Dr. Smith again and submitted three different pieces of evidence which should be in the EOP record. Plaintiff again tried to obtain a list of materials and evidence contained in the EOP record and reiterated that she is disheartened that policy and procedure were not being followed.

102. On October 28, 2016, President Pastides presented a letter which stated that he concurred with the Panel and said that there was substantial evidence in the record to support the factual findings made by EOP and the Panel – a no cause ruling.

103. President Pastides acknowledged Plaintiff's complaint regarding the absence of evidence and the Panel's lack of adherence to university policy; however, he still claimed that the

EOP determinations are supported by substantial evidence in the record. The Panel went further in saying that Plaintiff's complaint is not generally within the jurisdiction of the EOP.

104. Plaintiff continued to work with USC to complete her courses and activities required to graduate but received constant pushback and felt that USC was retaliating against her for her EOP complaint.

105. Plaintiff experienced a number of issues when it came time to complete her thesis project in the Spring of 2018.

106. On April 2, 2018, Plaintiff had her first day of her thesis project up in the art gallery. At that time, Bradford Collins emailed Plaintiff, Lauren Greenwald, Naomi Falk, Hyunji Kwon, and Mary Robinson (Plaintiff's faculty thesis committee members) and copied Graciano stating that the committee asked for Plaintiff to make thesis show changes by April 2nd and that if the changes are not made by April 4th at 8:00AM, he will consider failing Plaintiff.

107. Dr. Collins reminded Plaintiff that she was not yet an artist in the fullest sense, and that Plaintiff was an "*art student*" subject to the rules and regulations of the school.

108. Plaintiff explained to the committee that any changes that she is forced to make is an appeasement that she was intimidated into by the threat of not receiving her degree.

109. Graciano emailed Plaintiff informing her that: 1) The committee unanimously made a list of changes that Plaintiff needed to make; 2) Plaintiff had not yet passed and had not yet failed; and 3) Plaintiff choosing not to make changes was choosing to fail. Graciano told Plaintiff she was wasting her time arguing about the situation and that she was sabotaging her own success. Graciano cautioned Plaintiff to choose wisely and make the changes to her work in order to not throw her degree away.

110. Voros and other members of the department would not allow Plaintiff's lab fees to cover any printing costs, so throughout her tenure with the university Plaintiff has had to pay double lab fees. In order to reprint and rehang Plaintiff's eight large prints for a second time, Plaintiff again had to pay out of pocket.

111. Plaintiff responded to Graciano and the committee expressing concern over the requested changes. Plaintiff expressed her opinion that her work would be more successful without the committee required changes. Plaintiff further stated that her choices were intentional and explained why her artistic choice was significant. Plaintiff informed the committee that making the changes would compromise the integrity and meaning of her work.

112. Plaintiff questioned the committee's decision that she should receive a failing grade on the basis of a subject concern of her committee and defended her stance in stating that she was not being argumentative or sabotaging her own success.

113. Despite Plaintiff's resilience, she agreed to make the committee's changes for the sole reason that she did not want to fail. Plaintiff informed her committee that making a change after her thesis show project had been hung in the gallery in front of the public and her peers looks poorly on Plaintiff as an artist. Plaintiff had so many visitors to her thesis show that she had to obtain a second guest book after the first was full and had to empty her box because of the numerous comments she received from visitors.

114. Additionally, Plaintiff expressed that the changes required by the committee solely to receive a passing grade were not insignificant and required a substantial level of work for the few hours Plaintiff's changes would be in the gallery.

115. Despite her objections, Plaintiff reprinted her eight pictures at a personal cost, deinstalled and reinstalled the pictures after the gallery closed for the day, and reinstalled her thesis

exhibition show in the gallery, so she would not fail. No graduate MFA student has ever had to take down their show after installation.

116. Plaintiff had more visitors and guests than all of her peers combined. Plaintiff's reception for her thesis exhibition had a guest turnout larger than all of her peers and larger than her committee and SVAD faculty have at their art gallery exhibitions. All reviews were positive.

117. On April 9, 2018, Lauren Greenwald emailed Plaintiff regarding completion of Plaintiff's final thesis paper and submission. Greenwald stated that, "Your committee has reviewed your latest draft, and have no further recommendation beyond those provided to date."

118. On April 12, 2018, Greenwald emailed Plaintiff stating that the committee doesn't need to see another version of the paper for further edits and Plaintiff should make this paper her Final revision. Greenwald told Plaintiff to submit the final version and provide a hard copy of the signature page so the committee can all complete it and send it to Graciano.

119. On April 16, 2018, Thesis Committee Member Naomi Falk emailed Plaintiff to put the signature form in Plaintiff's mailbox for the committee to sign. Plaintiff confirmed the signature form was in her mailbox.

120. On April 17, 2018, Greenwald emailed Plaintiff and copied her thesis committee; The committee reviewed Plaintiff's thesis and asked her to make some revisions to the Conclusion section. Greenwald stated that "Once the changes are made, we will then proceed with signature." If the changes were not made, Plaintiff would fail. The changes were substantial; however, Plaintiff completed the necessary changes in order to not fail.

121. Plaintiff emailed the committee after the changes were made and stated, "I believe we are ready to move forward. The GTSF form is in my mailbox."

122. Dr. Collins emailed Plaintiff stating that, “It is we who will decide when it is time to move forward, to decide when the paper is acceptable. It is hard to believe that you could have addressed all of our concerns in a few hours. Our aim is not to antagonize you, although you seem to imagine that it is: our aim is to produce something you and we can be proud of.”

123. Plaintiff emailed Dr. Collins apologizing if he feels as though Plaintiff has stepped on his toes and expressed her confusion as to where he got that impression. Plaintiff explained that she received the email thesis changes at 8:00AM and that she worked diligently to make the changes in the span of four hours. Plaintiff explained that the email from Greenwald expressed that all final revision have been submitted to her and that Plaintiff was to email a copy to everyone and produce the GTSF Form.

124. Greenwald subsequently emailed Plaintiff and said that Greenwald’s April 12th email said that the committee had no further recommendations to date and that this was not a tacit acceptance of anything Plaintiff might submit. Greenwald said that her email assumed that Plaintiff would submit a satisfactory paper. Greenwald went on to tell Plaintiff that the changes the committee have now asked Plaintiff to make are required to make her paper minimally passable.

125. Plaintiff’s GTSF form was only signed by three of her five committee members, which caused Plaintiff to fear she would not be able to graduate. Garciano sent Plaintiff a private email to tell her he would allow her to graduate anyways.

126. Plaintiff did not attend her graduation ceremony or her hooding ceremony because of the level of discomfort she felt around the graduate arts faculty members.

**FOR A FIRST CAUSE OF ACTION
AGAINST DEFENDANTS VOROS AND ICA
(False Imprisonment)**

127. Where not inconsistent herewith, Plaintiff realleges the foregoing.

128. Defendant Voros himself, and by and through his powers as the alter ego for the ICA, restrained Plaintiff.

129. The restraint was intentional.

130. The restraint was unlawful, because probable cause for the restraint did not exist.

131. As a direct and proximate cause of the false imprisonment referred to herein, Plaintiff suffered from harm to her reputation, humiliation, and severe and continuing emotional distress.

132. Plaintiff is entitled to actual damages from Defendant Voros and Defendant ICA, in an amount determined by a jury.

**FOR A SECOND CAUSE OF ACTION
AGAINST DEFENDANTS VOROS AND ICA
(Assault)**

133. Where not inconsistent herewith, Plaintiff realleges the foregoing.

134. The Defendant Voros, himself, and by and through his powers as the alter ego for the ICA, placed Plaintiff in an insect ridden, urine stained house and forced Plaintiff to conduct hard, manual labor without providing Plaintiff food, without a legitimate right or license to do so.

135. Such conduct reasonably placed Plaintiff in fear of imminent bodily harm.

136. Such conduct has proximately and directly caused the Plaintiff damages for which the Defendant Voros and Defendant ICA are liable.

137. Such damages include severe and continuing emotional distress, the costs of any and all medical bills incurred by the Plaintiff, pain and suffering, anxiety, depression, embarrassment, damage to reputation, shock, and humiliation.

138. Such actions by Voros were willful, wanton, reckless and mean-spirited, and the Plaintiff is entitled to punitive damages for the same. The Plaintiff is also entitled to pre-judgment interest on all applicable damages alleged.

**FOR A THIRD CAUSE OF ACTION
AGAINST DEFENDANTS VOROS AND ICA
(Battery)**

139. Where not inconsistent herewith, Plaintiff realleges the foregoing.

140. The Defendant Voros, himself, and by and through his powers as the alter ego for the ICA, inflicted unwelcomed sexual contact on the Plaintiff.

141. The same resulted in physical and emotional injury to the Plaintiff.

142. Such conduct constitutes an actionable battery.

143. The Defendant Voros and Defendant ICA have proximately and directly caused and is liable for damages to the Plaintiff including severe and continuing emotional distress, the costs of any and all medical bills incurred by the Plaintiff, pain and suffering, stress, anxiety, depression, embarrassment, damage to reputation, shock, and humiliation.

144. Such actions by Voros were willful, wanton, reckless and mean-spirited, and the Plaintiff is entitled to punitive damages for the same. The Plaintiff is also entitled to pre-judgment interest on all applicable damages alleged.

**FOR A FOURTH CAUSE OF ACTION
AGAINST DEFENDANTS VOROS
(Civil Conspiracy)**

145. Where not inconsistent herewith, Plaintiff realleges the foregoing.

146. Defendant Voros and others met at various times and places, schemed, conspired, and planned in secret to damage Plaintiff's career opportunities and cause Plaintiff physical and emotional harm. Such actions and activities are well outside of the course and scope of their

employment and done as a part of a malicious agenda to harm the Plaintiff and to cause her special damages such as of loss of future earning capacity.

147. Such a combination of persons acting, planning, and scheming outside the course and scope of their employment duties to promote personal interests constitutes an unlawful civil conspiracy for which Defendant Voros is liable. Voros through his actions, words, and the actions of others was able to accomplish his purpose and further his personal agenda against the Plaintiff, resulting in the diminished value of her Master's degree and being ostracized and singled out among her colleagues and peers.

148. Defendant Voros and others used their respective positions of authority to perpetuate their personal vendettas against the Plaintiff. They were threatened by the Plaintiff's knowledge of improper activities authorized and carried out by Defendant Voros and others, including Voros' sexual encounters with AM and interference with the investigation into his harassment of Plaintiff.

149. Such a civil conspiracy on the part of the Defendant Voros and others, acting as set forth herein, caused the Plaintiff injuries that are personal to her, pain and suffering, and other intangible damages. The Plaintiff is further entitled to an award of punitive damages against Defendant Voros for his willful, wanton, and grossly negligent conduct.

**FOR A FIFTH CAUSE OF ACTION
AGAINST DEFENDANTS VOROS AND USC
(Defamation)**

150. Where not inconsistent herewith, Plaintiff realleges the foregoing.

151. Defendant USC, through its employees and representatives, and Defendant Voros, accused Plaintiff of having exaggerated about the problems she experienced in Italy, having

behavior problems, and being unfit to in her professional field. Such accusations have a defamatory meaning about Plaintiff and are false.

152. Defendants USC and Voros knew that such allegations surrounding Plaintiff were false. Defendants further recklessly disregarded the truth in taking action against Plaintiff's education.

153. The accusations of Defendants, including, but not limited to, accusing Plaintiff of being unfit fit for her profession, and actions associated therewith have defamed the Plaintiff by word and act.

154. Such statements were false, known to be false, and maliciously published by Defendants to members of the university administration, members of the community, and Plaintiff's peers and colleagues. Such publications were made with malice, mean-spirit, and without justification.

155. Further, such statements are defamatory *per se* as they accuse Plaintiff of being unfit to participate in her professional field.

156. As a result, Plaintiff has suffered severe economic losses and reputational loss both professionally and personally; Defendants caused and is liable to Plaintiff for the same.

157. As a direct and proximate result of the defamation alleged herein, Defendants have caused and are liable for severe and continuing injury to Plaintiff's reputation, loss of wages and benefits, diminished earning capacity and future benefits, humiliation, embarrassment, pain and suffering, severe stress and anxiety, loss of sleep, and other losses. Plaintiff is also entitled to pre-judgment interests; as well as attorney's fees, pursuant to S.C. Code Ann. § 15-77-300.

**FOR A SIXTH CAUSE OF ACTION
AGAINST DEFENDANTS VOROS AND USC
(Fraud)**

158. Where not inconsistent herewith, Plaintiff realleges the foregoing.

159. Defendant Voros as professor for and on behalf of Defendant USC represented to Plaintiff that if she went to Italy she would be attending a USC sanctioned trip that would further her education in the arts and allow her to gain valuable experience that would boost her upcoming career. Additionally, Voros represented to Plaintiff that should she attend this three-week trip, she would be helping to prepare art supplies, performing light cleaning activities, and engaging in other activities to help set up for USC in Italy that were similar to the duties she had as a Graduate Teaching Assistant.

160. That representation was material and the sole incentive which induced the Plaintiff to agree to attend the three-week trip to Italy.

161. That representation was false; furthermore, the Defendants knew of its falsity at the time the representation was made as the Defendants had prior knowledge of Voros taking students to Italy on non-USC sanctioned trips.

162. The Defendants intended for the Plaintiff to attend the unofficial three-week Italy trip to help Voros prepare for the official USC in Italy trip.

163. The Defendants used USC's reputation, email accounts, power points, etc., to get Plaintiff to commit to the unofficial USC in Italy trip.

164. Had Plaintiff been notified that the trip was not sanctioned by USC and was not an educational cultural trip, she would not have attended.

165. Defendant Voros, was authorized by Defendant USC, to make representations about USC's study abroad opportunities in Italy.

166. The Plaintiff had the right to rely on his representation, and reasonably did so.

167. Because of the fraud and deceit alleged herein the Plaintiff has been injured.

168. As a direct and proximate result of the fraud and deceit alleged here the Defendants are liable to the plaintiff for pain and suffering, anxiety, depression, embarrassment, damage to reputation, shock, and humiliation, and expenses she would have not otherwise incurred.

169. The Defendants' behavior described herein was willful, wanton and reckless, and the Plaintiff is also entitled to punitive damages. Plaintiff also requests and is entitled to pre-judgment interest on all damages alleged.

**FOR A SEVENTH CAUSE OF ACTION
AGAINST DEFENDANTS VOROS AND USC
(Negligent Misrepresentation)**

170. Where not inconsistent herewith, Plaintiff realleges the foregoing.

171. The Defendants made a material representation to Plaintiff that the ICA had a MOU with USC and that the three-week trip to Italy was a USC sanctioned trip.

172. The Defendants gained a pecuniary reward as a result of that representation, namely that Plaintiff agreed to go to Italy for three weeks.

173. A reasonable person under the circumstances would have acted differently than the Defendants and would have warned Plaintiff that the trip to Italy was a private agreement being made.

174. The Defendant recklessly and willfully breached its duty to the Plaintiff to act reasonably in transacting with the Plaintiff.

175. Plaintiff relied on the Defendants' negligent misrepresentation and suffered damages as a result of the same.

176. Those damages were directly and proximately caused by the Defendants' negligence and resulted in the loss of profits, earnings, legal expenses, pain and suffering, and diminished earning capacity.

177. Plaintiff is also entitled to punitive damages and pre-judgment interest against Defendant Voros.

**FOR AN EIGHTH CAUSE OF ACTION
AGAINST DEFENDANT USC
(Negligent Supervision)**

178. Where not inconsistent herewith, Plaintiff realleges the foregoing.

179. The Defendant owed Plaintiff a legal duty to act with due care in supervising Plaintiff's professors and otherwise. That duty arose out of Plaintiff's protected property interests in continuing her education through the university.

180. Defendant was grossly negligent in supervising Voros, allowing him to intentionally harm Plaintiff through sexual harassment and creating a hostile environment in which no reasonable individual could feel safe while acting as an agent of Defendant USC where Voros was an employee.

181. Defendant had reason to know Voros required excessive supervision given his past conduct which included being visibly intoxicated, threatening other employees, and his history or violence.

182. Defendant's negligence was reckless, willful, and wanton amounting to gross negligence and the failure to act with even the slightest care.

183. Plaintiff suffered the dignitary and pecuniary damages detailed below as a direct and proximate result of the Defendant's gross negligence.

184. Those damages include dignitary losses such as: reputational loss, loss of goodwill, pain and suffering, shock, humiliation and economic losses such as: back pay, front pay, back benefits, front benefits, loss of earning capacity. The Plaintiff is further entitled to an award of attorney's fees and costs under South Carolina Law, and pre and post-judgment interest.

**FOR A NINETH CAUSE OF ACTION
AGAINST DEFENDANT USC
(Gross Negligence in Handling of Investigation)**

185. Where not inconsistent herewith, Plaintiff realleges the foregoing.

186. Defendant USC owed Plaintiff a duty of care in handling the investigation into Plaintiff's Sexual Harassment EEO complaint.

187. By allowing coercive, outside involvement with the investigation and failing to investigate Plaintiff's allegations against Defendant Voros, Defendant USC consciously exercised a failure to take reasonable precaution to ensure that the investigation was conducted in a manner that would not prejudice the Plaintiff. Defendant USC further negligently selected the Plaintiff for blame and adverse treatment when others were obviously more responsible.

188. Such conduct constitutes the intentional failure of Defendant USC, through its agents and employees, to exercise even the slightest care to protect the Plaintiff from improper adverse action.

189. The same constitutes gross negligence and indifference by Defendant USC toward the Plaintiff, who it owed a duty to protect.

190. As a direct and proximate result of Defendant USC's gross negligence referred to herein, Plaintiff suffered from harm to reputation, humiliation, and severe and continuing emotional distress.

191. Plaintiff is entitled to actual damages from Defendant USC for the gross negligence referred to herein.

**FOR A TENTH CAUSE OF ACTION
AGAINST DEFENDANT USC
(Violation of Title IX – The School's Deliberate
Indifference to Alleged Sexual Harassment)**

192. Where not inconsistent herewith, Plaintiff realleges the foregoing.

193. The sex-based harassment articulated in the Plaintiffs' General Allegations was so severe, pervasive, and objectively offensive that it deprived Plaintiff of access to educational opportunities or benefits provided by the school.

194. The Defendant School District created and/or subjected Plaintiff to a hostile educational environment in violation of Title IX of the Education Amendments of 1972, 20 U.S.C. § 1681(a) ("Title IX"), because

- a. Plaintiff was a member of a protected class;
- b. she was subjected to sexual harassment in the form of a sexual assault by professor;
- c. she was subjected to harassment based on her sex; and
- d. she was subjected to a hostile educational environment created by Defendant USC's lack of graduate student policies and procedures and failure to properly investigate and/or address the sexual assault and subsequent harassment.

195. Defendant USC and its officials had actual knowledge of the sexual harassment of Plaintiff created by its failure to investigate and discipline Plaintiff's harasser in a timely manner and consistent with its own policy and federal and state law.

196. The Defendant USC's failure to promptly and appropriately respond to the alleged sexual harassment, resulted in Plaintiff, on the basis of her sex, being excluded from participation in, being denied the benefits of, and being subjected to discrimination in the District's education program in violation of Title IX.

197. Defendant USC failed to take immediate, effective remedial steps to resolve the complaints of sexual harassment and instead acted with deliberate indifference toward Plaintiff.

198. Defendant USC persisted in its actions and inaction even after it had actual knowledge of the harm suffered by Plaintiff.

199. Defendant USC engaged in a pattern and practice of behavior designed to discourage and dissuade students and parents of students who had been sexually assaulted from seeking prosecution and protection and from seeking to have sexual assaults from being fully investigated.

200. This policy and/or practice constituted disparate treatment of females and had a disparate impact on female students.

201. Plaintiff has suffered emotional distress and psychological damage, and her character and standing in her community have suffered from the harassment fostered as a direct and proximate result of Defendant USC's deliberate indifference to her rights under Title IX.

**FOR A ELEVENTH CAUSE OF ACTION
AGAINST DEFENDANT USC
(Violation of Title IX – Retaliation)**

202. Where not inconsistent herewith, Plaintiff realleges the foregoing.

203. Fellow students and faculty harassed Plaintiff for reporting her harassment to the school and made conscious effort to interfere with her reporting.

204. Plaintiff reported this harassment to USC officials, who declined to intervene to stop it.

205. That the actions taken against the Plaintiff and the actions which have resulted in her disparate treatment and damages all are the result of the planned and concerted effort to retaliate against the Plaintiff for the charges which she has filed against the Defendants in the past for harassment. This further discriminates against the Plaintiff as does the withholding of positive references to which Plaintiff was promised and the arbitrary request for Plaintiff to alter her work in an effort to sabotage the value of Plaintiff's degrees.

206. Defendants are liable to the Plaintiff for the willful, wrongful and bad faith retaliation against the Plaintiff for protected actions she took opposing unfair and egregious harassment. Plaintiff is entitled to an award of actual damages as well as reasonable attorney's fees and for the cost of this action.

207. As a direct and proximate result of the Defendants' actions, Plaintiff has suffered, and the defendants are liable to Plaintiff for, loss of prospective earnings, loss of benefits, prospective benefits, embarrassment, humiliation, pain and suffering and mental anguish; as well as, the reasonable attorney's fees and costs associated with this action

**FOR A TWELTH CAUSE OF ACTION
AGAINST DEFENDANT USC
(Promissory Estoppel)**

208. Where not inconsistent herewith, Plaintiff realleges the foregoing.

209. Defendant USC made an unambiguous promise to accommodate Plaintiff while she completed her degree.

210. Plaintiff reasonably relied upon the promises of Defendant USC. Such reliance is expected and foreseeable by Defendant USC, who should fully expect an employee to rely on promises to pay her increased compensation for an increase in work and responsibilities.

211. As a direct and proximate result of the reliance on these promises, the Plaintiff has been deprived of the full value of her degree, future damages, and any other economic or equitable remedies available. Plaintiff also seeks reasonable attorney's fees and the costs of this action and any prejudgment interest allowed under the law

**FOR A THIRTEENTH CAUSE OF ACTION
AGAINST DEFENDANT PASTIDES
(Violation of 42 U. S. C. § 1983)**

212. Where not inconsistent herewith, Plaintiff realleges the foregoing.

213. Under the Fourteenth Amendment, Plaintiff had the right as a public-school student to personal security and bodily integrity and Equal Protection of Laws.

214. Defendant Pastides was a state actor acting under the color of state law.

215. Defendant subjected Plaintiff to violations of her right to personal security and bodily integrity and Equal Protection of Laws by: failing to investigate Voros' misconduct; failing to appropriately discipline Voros; and manifesting deliberate indifference to the sexual harassment and ongoing disparate treatment of Plaintiff by Voros and members of the administration.

216. The University has and/or had unconstitutional customs or policies of

a. failing to investigate evidence of criminal and tortious misconduct against USC students in the nature of violations of their right to personal security and bodily integrity and

b. failing to adequately train and supervise USC employees with regard to maintaining, preserving and protecting students from violations of their right to personal security, bodily integrity, and Equal Protection of the Laws.

217. On information and belief, USC has followed these unconstitutional customs and policies not only with regard to Plaintiff but also with regard to criminal and tortious misconduct committed against other USC students.

218. USC's policies and/or practices constituted disparate treatment of females and had a disparate impact on female students.

219. Defendant Pastides is or was at the time of events complained of within, a policymaker for the purpose of implementing USC's unconstitutional policies or customs.

220. Plaintiff has suffered emotional distress and psychological damage, and her character and standing in her community have suffered from the harassment fostered as a direct

and proximate result of Defendant USC's deliberate indifference to her rights under the Fourteenth Amendment.

**FOR A FOURTEENTH CAUSE OF ACTION
AGAINST DEFENDANT PASTIDES
(Violation of 42 U.S.C. § 1985)**

221. Where not inconsistent herewith, Plaintiff realleges the foregoing.

222. That the Defendant Pastides and others conspired together and acted collectively to cause the gender discrimination as alleged herein which has proximately caused the Plaintiff's as earlier damages set forth in this complaint.

223. Defendant Pastides and others met at various times and places, schemed, conspired, and planned in secret to damage Plaintiff's career opportunities, interfere with Plaintiff's harassment investigation. Such actions and activities are well outside of the course and scope of their employment and done as a part of a wicked and malicious agenda to harm the Plaintiff and to cause her special damages such as of loss of future earning capacity.

224. Such a combination of persons acting, planning, and scheming outside the course and scope of their employment duties to promote personal interests constitutes an unlawful civil conspiracy for which Defendant Pastides is liable. The Individual Defendant through his actions, words, and the actions of others were able to accomplish their wicked purpose and further their personal agendas against the Plaintiff, resulting in the diminished value of her Master's degree and being ostracized and singled out among her colleagues and peers.

225. Defendant Pastides and others used their respective positions of authority to perpetuate their personal vendettas against the Plaintiff. They were threatened by the Plaintiff's knowledge of improper activities authorized and carried out by Defendant Pastides and others, including interference with the investigation into his harassment of Plaintiff.

226. Such a civil conspiracy on the part of the Individual Defendants, acting as set forth herein, caused the Plaintiff injuries that are personal to her, pain and suffering, the loss of her job, and other intangible damages. The Plaintiff is further entitled to an award of punitive damages against Defendant Pastides for his willful, wanton, and grossly negligent conduct

PRAYER FOR RELIEF

WHEREFORE, Plaintiff Allison Dunavant prays for judgment against Defendants, jointly and severally, in amounts equal to the sum of her actual damages, including embarrassment and suffering, as well as punitive damages, in amounts to be determined by a jury, together with an award of reasonable attorney's fees and costs of this action, and for any such other and further relief as this Honorable Court deems just and proper.

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May 15, 2018
Columbia, South Carolina