

STATE OF SOUTH CAROLINA  
COUNTY OF CHARLESTON

IN THE COURT OF COMMON PLEAS  
FOR THE NINTH JUDICIAL CIRCUIT

CONGRESSWOMAN NANCY R. MACE, an  
individual,

Case No.:

COMPLAINT

Plaintiff,

v.

ERIC BERNARD BOWMAN,

Defendant.

The Plaintiff, United States Representative Nancy R. Mace (“Plaintiff” or “Rep. Mace”), for her Complaint against Defendant Eric Bernard Bowman (“Defendant” or “Bowman”), hereby alleges as follows:

#### **NATURE OF THE CASE**

1. Plaintiff is a duly elected Member of the United States House of Representatives (the “House”). She has proudly served the citizens of the State of South Carolina with distinction since 2021 as the representative for the state’s first congressional district. On February 10, 2025, Rep. Mace courageously took to the floor of the House and delivered an impassioned speech during which she pledged to do all she could in support of the countless women who have had their rights, dignity, security, and physical and psychological safety violated by predators of every type. In announcing her commitment and encouraging other survivors to report their assaults, Rep. Mace identified four individuals whom she understood to have been involved in or aware of wrongdoing. One of the four individuals identified by Rep. Mace in her speech was Eric Bowman, the Defendant in this action.

2. In the days and weeks that followed, Bowman repeatedly and maliciously defamed Rep. Mace through the dissemination of numerous patently false assertions of objective fact. As

detailed herein, Bowman, on multiple occasions, baselessly asserted as objective fact that Rep. Mace has committed criminal acts by illegally influencing the award of United States Department of Veterans Affairs (the “VA”) contracts and steering them to personal friends and political allies. Bowman disseminated such objective falsehoods to thousands of third parties through his personal “X” (formerly known as Twitter) account. Layered on top of these objectively false assertions, Bowman has also spent months smearing Rep. Mace’s name and reputation through wide range of vile, contemptible, and repugnant character attacks.

3. Bowman’s assertions that Rep. Mace illicitly acted to help direct VA contracts to friends and political allies is objectively and demonstrably false. Bowman knew these statements were patently false when made. Bowman acted with reckless disregard to the truth and with actual malice towards Rep. Mace through his utter disregard of and callousness to her rights as a South Carolinian in purposely making such knowingly false declarations. Indeed, Bowman’s objectively false statements were part of a deliberate effort to attack her fitness to maintain the public trust and undermine the public’s faith in her ability to fulfill her oath of office and represent the citizens of South Carolina’s First Congressional District.

4. Rep. Mace has suffered reputational harm and damages arising directly out of Bowman’s defamatory statements and seeks that relief to which she is entitled under South Carolina law.

### **THE PARTIES**

5. Rep. Mace is a private citizen of the State of South Carolina, domiciled in Charleston, South Carolina. Rep. Mace is also a Member of the United States House of Representatives, serving as the representative for South Carolina’s First Congressional District.

6. Defendant Eric Bowman (again, “Defendant” or “Bowman”) is a citizen of the State

of South Carolina. Upon information and belief, Bowman is domiciled in Sullivan's Island, South Carolina.

### **JURISDICTION**

7. This Court has jurisdiction over the subject matter of this dispute and the parties to this action. In particular, this Court has subject matter jurisdiction because the amount in controversy, to include costs, fees, and damages, exceeds \$7,500. This Court also has personal jurisdiction over Plaintiff and Defendant because they are citizens of the State of South Carolina.

8. Venue is proper in this Court as both Plaintiff and Defendant are domiciled in Charleston County, situated within the Ninth Judicial District.

### **STATEMENT OF FACTS**

#### **A. Representative Mace**

9. Rep. Mace proudly serves the citizens of the State of South Carolina as the congressional representative for the state's first congressional district. Rep. Mace was elected to office in November of 2020, and assumed office in January 2021.

10. As a member of Congress, Rep. Mace serves on the House Committee on Oversight and Government Reform, the House Armed Services Committee, and the House Veterans' Affairs Committee. With respect to the Veterans' Affairs Committee, Rep. Mace sits on the Subcommittee on Disability Assistance and Memorial Affairs as well as the Subcommittee on Technology Modernization.

11. Rep. Mace's committee and subcommittee assignments are a matter of public record, and can be found on her congressional office's website, as well as many other readily available sources.

12. On February 10, 2025, Rep. Mace, acting with courage and conviction, gave a

powerful speech from the House floor. In delivering this speech, Rep. Mace identified herself as the victim of sexual violence and assault and spoke of acts of sexual abuse and other criminal misconduct that had been perpetrated against herself and other women. Rep. Mace's speech was, in no small part, her pledge to do all she could in support of the countless women who have needlessly suffered abuses at the hands of predators and to empower women to report their experiences of assault in order to seek and obtain justice.

13. During her speech, Rep. Mace identified four individuals whom she understood to have taken part in or been aware of wrongdoing. One such individual was Bowman, the Defendant in this lawsuit.

14. Following her speech, Rep. Mace has continued to take action in support of women who are the victims of abuse, including setting up a dedicated Women and Survivor Support page on her congressional office's website, establishing a confidential hotline for victims and witnesses to provide information that could be securely related to the appropriate law enforcement entities, and providing a list of reputable resources for those negatively affected by sexual or family abuse.

15. Additionally, Rep. Mace has authored and introduced dozens of bills while in Congress that seek to address and combat violence against women and protect survivors.

**B. Bowman's Defamatory Statements Towards Representative Mace**

16. After being identified by Rep. Mace, Bowman decided on a prospective course of action: retaliate against Rep. Mace through the dissemination of objectively false statements to third parties in a calculated effort to portray her as unfit for public office to the voters of the first congressional district and the general public.

17. In the days and weeks that followed, Bowman took to his own personal, digital platform to publish these defamatory statements – his personal "X" (the popular social media app

known formerly as “Twitter”) account, operating under the handle “@\_ericbowman.”



18. Upon information and belief, Bowman changed his X screen name (but not his handle) from “ericb” to “NotEricB” on or about April 9, 2025. The posts forming the basis of the allegations herein were captured prior to this change, and thus reflect the X screen name “ericb”:



19. Bowman used his personal X account to repeatedly assert as objective fact, without any support, the blatant falsehood that Rep. Mace abused her position as a member of the House Veterans’ Affairs Committee to illegally steer or influence the award of contracts with the VA to friends, associates, and political allies. In particular:

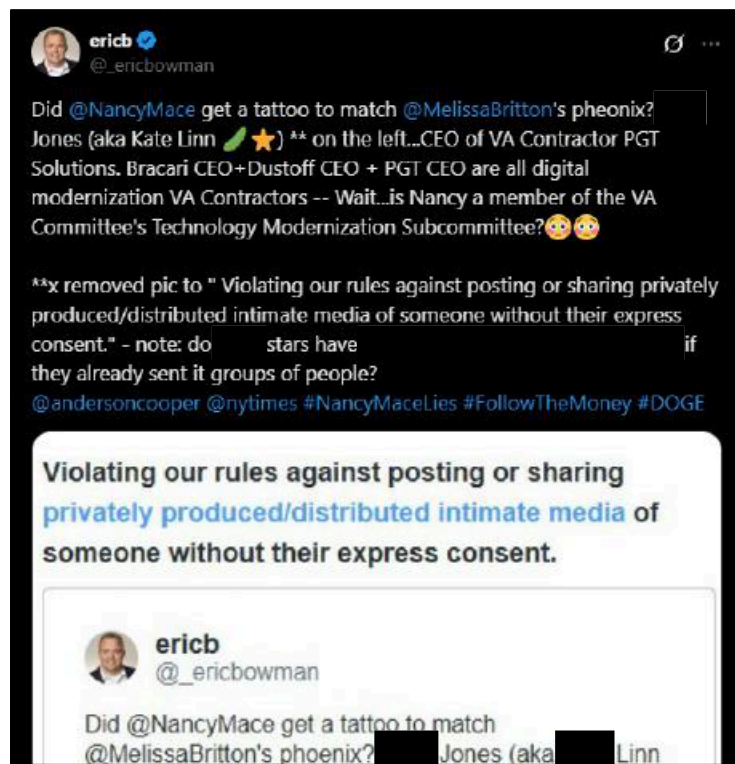
- a. On February 27, 2025, Bowman falsely asserted that law enforcement should investigate Rep. Mace and her friends concerning contracts they purportedly had

with the VA and specifically invoked Rep. Mace’s position “on the VA Oversight Committee.” Exhibit 1. Bowman also expressly identified his “estranged wife” ██████████ asserting she “owns the VA contractor company Bracari” and deliberately linked Ms. ██████████ and her purported “VA contractor company” to Rep. Mace and the abuse of her position on the House Veterans’ Affairs Committee. *Id.*:



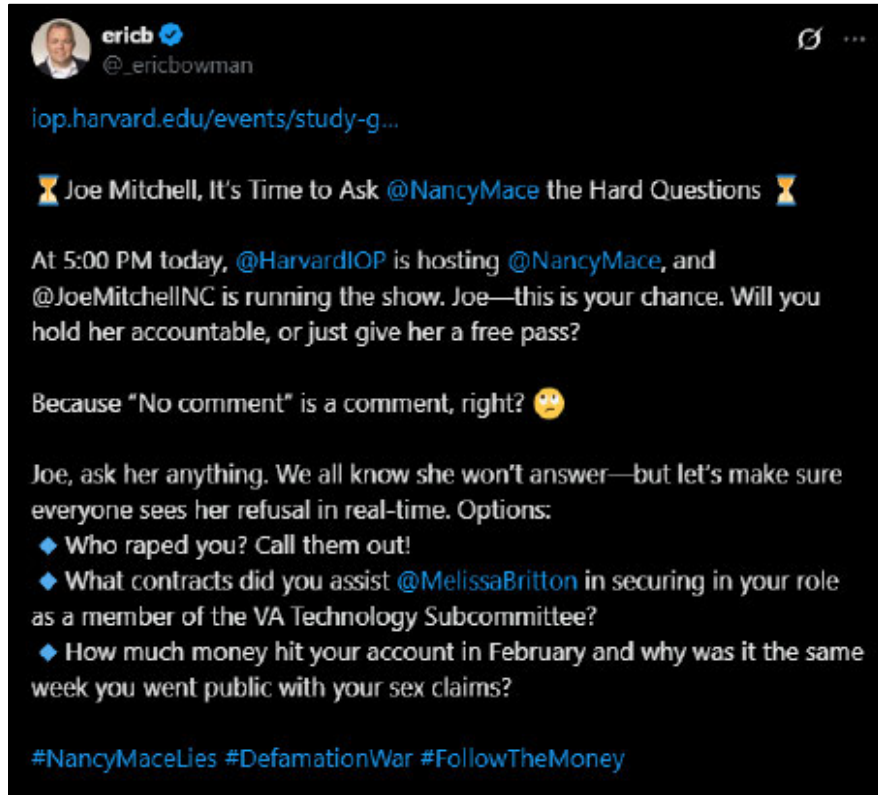
- b. On February 28, 2025, Bowman falsely claimed that Ms. ██████████ was Rep. Mace’s “co-conspirator” and that Rep. Mace was influencing the award of VA contracts to Ms. ██████████ and others with whom Ms. ██████████ was purportedly intimately involved. Exhibit 2.

- c. On March 3, 2025, Bowman falsely asserted that Rep. Mace was abusing her position as a member of the House Veterans' Affairs Committee, claiming that Rep. Mace has personal relationships with the "CEO of VA Contractor PGT Solutions," the "Bracari CEO," Ms. [REDACTED] the "Dustoff CEO" and the "PGT CEO," all of whom Bowman claimed are "digital modernization VA Contractors" and falsely asserting as objective fact that Rep. Mace was illicitly influencing the award of contracts to those individuals. Exhibit 3:

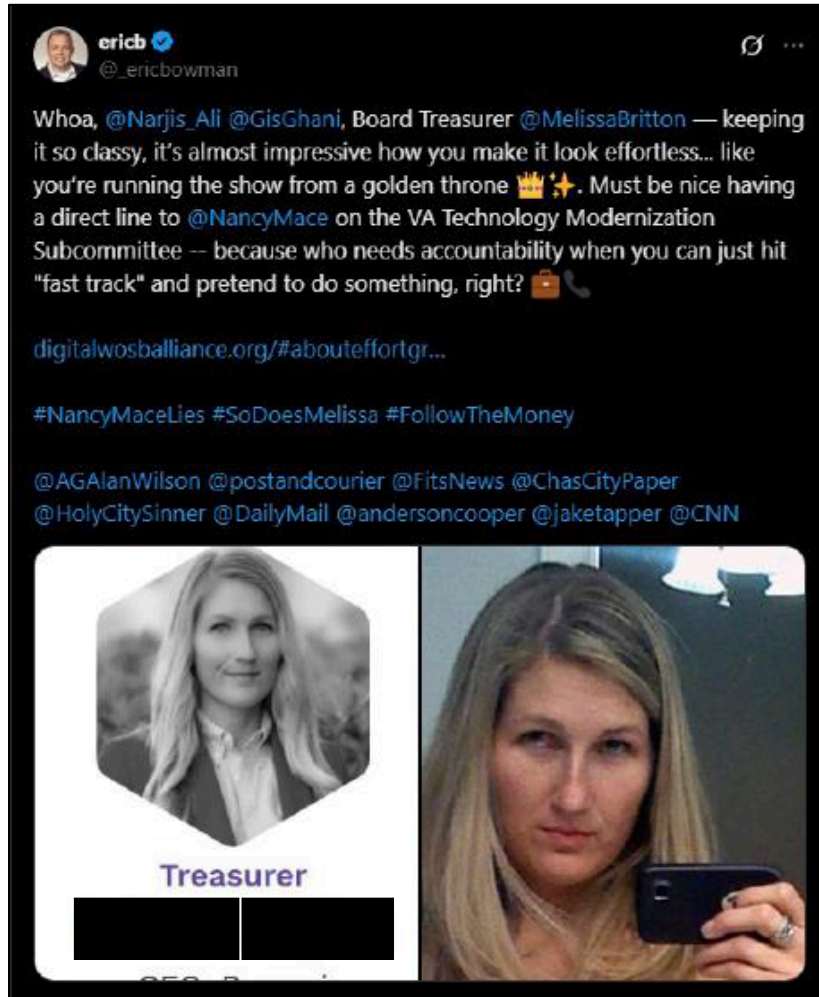


- d. On March 4, 2025, Bowman falsely asserted as objective fact that Rep. Mace illicitly influenced the award of technology modernization contracts by virtue of her position as a member of the Subcommittee on Technology Modernization, which has oversight and investigative jurisdiction over major information technology projects and modernization programs for the VA. Exhibits 4 and 5.
- e. On March 6, 2025, Bowman falsely claimed that Rep. Mace was illegally

influencing the award of contracts to Ms. ██████ stating “[w]hat contracts did you assist ██████ in securing in your role as a member of the VA Technology Subcommittee?” Exhibit 6:



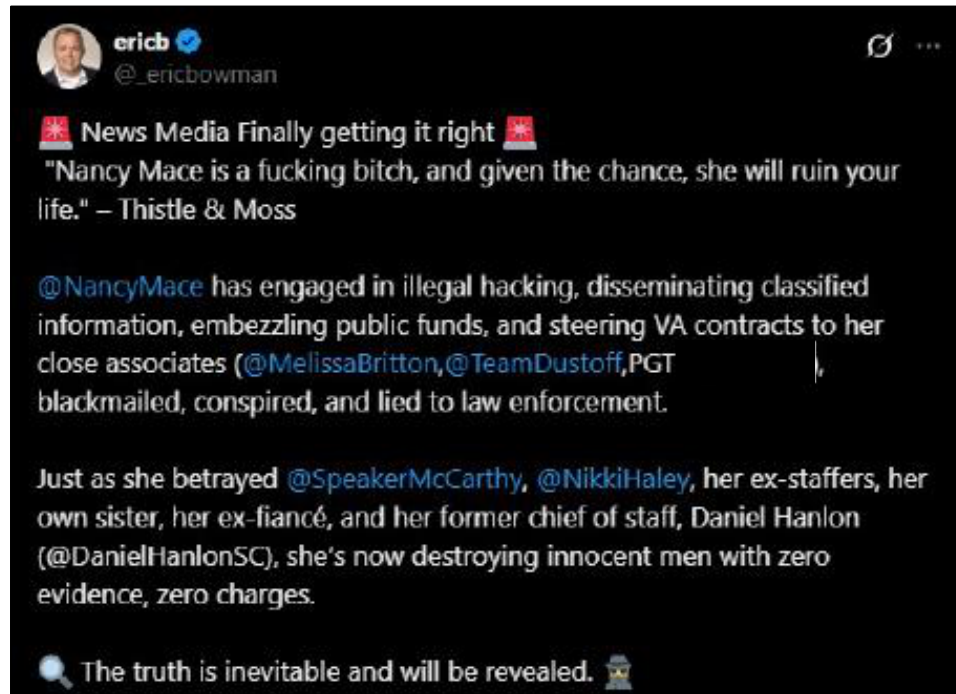
f. On March 10, 2025, Bowman falsely claimed as objective fact that Rep. Mace was illicitly steering VA contracts to, among others, Ms. [REDACTED] by virtue of her position on “the VA Technology Modernization Subcommittee.” Exhibit 7:



g. On March 15, 2025, Bowman falsely asserted as objective fact that Rep. Mace was “co-conspirators” with Ms. [REDACTED] and [REDACTED] and again insinuated that Rep. Mace was illegally influencing the award of “VA contracts” to Mesdames [REDACTED] and [REDACTED] Exhibit 8:



- h. On March 17, 2025, Bowman falsely asserted as objective fact that Rep. Mace was illegally “steering VA contractors to her close associates ( [REDACTED] @TeamDustoff, [and] PGT [REDACTED] [.]” Exhibit 9. In that same post, Bowman falsely accused Rep. Mace of committing a litany of criminal acts, including “illegal hacking, disseminating classified information, embezzling public funds,” as well as blackmail, conspiracy, and lying to law enforcement. *Id.*:



- i. That same day, Bowman separately and falsely claimed as objective fact that Rep. Mace impermissibly influenced the award of a digital modernization contract for VA claims processing worth \$39 million to PGT Solutions through her position as chair of the House Subcommittee on Technology Modernization. Exhibit 10:



20. These assertions of objective fact were false when made by Bowman. Bowman knew these statements were objectively false when they were made. Bowman acted with a reckless disregard for the truth in repeatedly making such statements without support or any attempt to verify the veracity of such statements.

21. Bowman acted with actual malice towards Rep. Mace, as evidenced – in part – by his consistent and reckless refusal to verify the accuracy or authenticity of his claims, his willful and persistent dissemination of demonstrably false allegations, and the design and goal of such false assertions.

22. Bowman made such objectively false statements for the specific purpose of and with the express intent to impugn Rep. Mace’s fitness to hold public office and undermine the public’s faith in her ability to perform her professional responsibilities and uphold her oath of office. Bowman’s objectively false assertions of fact claim that Rep. Mace committed criminal acts in order to reward personal friends and political connections with purportedly lucrative government contract opportunities. By their very nature, such objectively false assertions of fact injure Rep. Mace and undermine both her ability to execute the duties of her office and the citizenry’s confidence in such abilities.

23. Bowman’s actual malice is further evidenced by the voluminous number of repugnant, vile, and noxious character attacks Bowman has made about Rep. Mace contemporaneously with the actionable false assertions set forth herein.

24. Bowman’s publishing the objectively false statements identified herein through his personal X account widely disseminated those statements to thousands of other users, and have been viewed, collectively, thousands of times by third parties accessing the X platform.

25. Bowman’s actions did not go unnoticed. Indeed, on April 8, 2025, Will Folks of “FITSNEWS” reported (in a story covering Bowman’s recent arrest by the Sullivan’s Island Police Department) that Bowman “has launched a full-scale jihad against the congresswoman on his social media feeds – accusing her of all manner of depravity and corruption.” Will Folks, FITSNEWS, [Nancy Mace Touts Arrest Of Alleged 'Sexual Predator' - FITSNews](#) (last visited on

May 1, 2025).

**FIRST CAUSE OF ACTION**

**Defamation Per Se**

**(Statements Falsely Asserting Rep. Mace Illegally Influenced the Award of Contracts)**

26. Rep. Mace repeats and restates the allegations contained in the foregoing paragraphs as if fully set forth herein.

27. Between at least February 27, 2025, and March 17, 2025, Bowman made multiple, objectively false, assertions of fact to third parties asserting that Rep. Mace committed illegal acts and abused her office as a member of the House of Representatives by steering and influencing the award of VA contracts to friends and political connections, including:

- a. On February 27, 2025, Bowman falsely and maliciously asserted that law enforcement should investigate Rep. Mace and her friends concerning contracts they purportedly had with the VA and specifically invoked Rep. Mace’s position “on the VA Oversight Committee.” Exhibit 1. Bowman also expressly identified his “estranged wife” [REDACTED] [REDACTED] asserting she “owns the VA contractor company Bracari” and deliberately linked Ms. [REDACTED] and her purported “VA contractor company” to Rep. Mace and the abuse of her position on the House Veterans’ Affairs Committee. *Id.*
- b. On February 28, 2025, Bowman falsely and maliciously claimed that Ms. [REDACTED] was Rep. Mace’s “co-conspirator” and that Rep. Mace was influencing the award of VA contracts to Ms. [REDACTED] and others with whom Ms. [REDACTED] was purportedly intimately involved. Exhibit 2.
- c. On March 3, 2025, Bowman falsely and maliciously asserted that Rep. Mace was

abusing her position as a member of the House Veterans' Affairs Committee, claiming that Rep. Mace has personal relationships with the "CEO of VA Contractor PGT Solutions," the "Bracari CEO," Ms. [REDACTED] the "Dustoff CEO" and the "PGT CEO," all of whom Bowman claimed are "digital modernization VA Contractors" and falsely asserting as fact that Rep. Mace was illicitly influencing the award of contracts to those individuals. Exhibit 3.

- d. On March 4, 2025, Bowman falsely and maliciously asserted as fact that Rep. Mace influenced the award of technology modernization contracts by virtue of her position as a member of the Subcommittee on Technology Modernization, which has oversight and investigative jurisdiction over major information technology projects and modernization programs for the VA. Exhibits 4 and 5.
- e. On March 6, 2025, Bowman falsely and maliciously insinuated that Rep. Mace was illegally influencing the award of contracts to Ms. [REDACTED] stating "[w]hat contracts did you assist [REDACTED] in securing in your role as a member of the VA Technology Subcommittee?" Exhibit 6.
- f. On March 10, 2025, Bowman falsely and maliciously claimed as objective fact that Rep. Mace was illicitly steering VA contracts to, among others, Ms. [REDACTED] by virtue of her position on "the VA Technology Modernization Subcommittee." Exhibit 7.
- g. On March 15, 2025, Bowman falsely and maliciously asserted as objective fact that Rep. Mace was "co-conspirators" with Ms. [REDACTED] and [REDACTED] and again insinuated that Rep. Mace was illegally influencing the award of "VA contracts" to Mesdames [REDACTED] and [REDACTED] Exhibit 8.

- h. On March 17, 2025, Bowman falsely and maliciously asserted as fact that Rep. Mace was illegally “steering VA contractors to her close associates ( [REDACTED] @TeamDustoff, [and] PGT [REDACTED] [.]” Exhibit 9. In that same post, Bowman falsely accused Rep. Mace of committing a litany of criminal acts, including “illegal hacking, disseminating classified information, embezzling public funds,” as well as blackmail, conspiracy, and lying to law enforcement. *Id.*
- i. On March 17, 2025, in a separate X post, Bowman falsely and maliciously claimed as fact that Rep. Mace impermissibly influenced the award of a digital modernization contract for VA claims processing to PGT Solutions through her position as chair of the House Subcommittee on Technology Modernization. Exhibit 10.

28. These assertions of objective fact were false when made by Bowman. Bowman knew these statements were objectively false when they were made and acted with a reckless disregard for the truth in repeatedly making such statements without support or any attempt to verify the veracity of such statements.

29. Bowman acted with actual malice towards Rep. Mace, as evidenced by his consistent, willful and reckless refusal to verify the accuracy or authenticity of his claims, his persistent dissemination of demonstrably false allegations, and the design and goal of such false assertions.

30. Indeed, Bowman made such objectively false statements for the specific purpose of and with the express intent to maliciously impugn Rep. Mace’s fitness to hold public office, undermine the public’s faith in her ability to perform her professional responsibilities and uphold her oath of office. Bowman’s objectively false assertions of fact claim that Rep. Mace committed

criminal acts in order to reward personal friends and political connections with purportedly lucrative government contract opportunities. By their very nature, such objectively false assertions of fact injure Rep. Mace and undermine both her ability to execute the duties of her office and citizenry's confidence in such abilities.

31. Bowman's actual malice is further evidenced by the voluminous number of repugnant, vile, and noxious character attacks Bowman has made about Rep. Mace in a deliberate effort to degrade her name and reputation.

32. As a direct and proximate result of Bowman's malicious, vindictive, and defamatory statements, Rep. Mace has suffered reputational harm and damages arising therefrom in an amount to be established at trial but exceeding \$7,500.

33. Bowman, in making such statements, acted willfully, wantonly, and with reckless disregard for the truth and with a callous disregard for Rep. Mace's rights. Bowman is singularly culpable for making such statements while consciously failing to recognize their falsity, he made these statements repeatedly over an extended period of time, he is unlikely to be deterred in the absence of the imposition of punitive damages, and, upon information and belief, has the means to pay such damages. Rep. Mace is thus also entitled to punitive damages in an amount to be determined at trial.

### **PRAYER FOR RELIEF**

WHEREFORE, Plaintiff respectfully asks this Court to find in her favor and award the following relief:

1. Enter judgment in Plaintiff's favor and against Defendant;
2. Award Plaintiff monetary damages in an amount to be determined at trial, but in an amount in excess of \$7,500;

3. Pursuant to and consistent with South Carolina Code § 15-32-510, award Plaintiff punitive damages in an amount to be determined at trial;
4. Award Plaintiff prejudgment interest on her total damages; and
5. Grant Plaintiff all such other and further relief that the Court deems just and proper under the circumstances.

Dated: May 12th, 2025.

By: s/Andrew B. Moorman, Sr.

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