

STATE OF SOUTH CAROLINA

COUNTY OF CHARLESTON

Alexis Berg,

Plaintiff,

vs.

Patrick Bryant, John Osborne, Eric Bowman, Pom-
mer Group LLC, Assignment Desk Works LLC
and GLT2, LLC,

Defendants.

IN THE COURT OF COMMON PLEAS
FOR THE NINTH JUDICIAL CIRCUIT
C/A NO.: 2025-CP-10-03124

**DEFENDANT AND THIRD-PARTY PLAIN-
TIFF PATRICK BRYANT'S AMENDED
COUNTER-CLAIMS AND THIRD-PARTY
COMPLAINT**

Patrick Bryant,

Third Party Plaintiff,

vs.

Nancy Ruth Mace, and Melissa Britton,

Third Party Defendants.

FACTS COMMON TO ALL COUNTS

1. Defendant Nancy Mace ("Mace") claims, without any proof, that Bryant and three other men assaulted the Plaintiff in this action, Alexis "Ali" Berg ("Berg") on October 26, 2018, and videotaped it.

2. The truth is Mace initially conspired with several people in Bryant's inner-circle, but after several failed attempts, morphed her conspiracy plans to include Eric Bowman's estranged wife, Defendant Melissa Britton ("Britton"). Mace and Britton fabricated an alleged

assault involving Berg, that occurred on October 26, 2018, and claim that Britton witnessed it and allegedly authored an e-mail the next day of the assault.

3. Mace did not stop there. She told Berg, a young and impressionable woman who had worked for Bryant years earlier, that she obtained a video of the alleged assault from Bryant's cell phone. Berg instituted the present suit on or about June 10, 2025, based on Mace's false allegations.

4. What Mace did not tell Berg is that she concocted an entire false narrative of an assault, to blackmail Bryant, gain leverage in their separation proceedings, and try to ruin Bryant for her personal gain. Britton also had her own motives against Bowman.

5. Unfortunately for Berg, she is a pawn in Mace's and Britton's elaborate scheme for their personal gain. There is no video of the alleged assault, and no assault took place. Still, Berg is not without fault as she furthered the conspiracy and filed this instant action.

6. Now, Mace is judicially estopped from seeking Westfall certification as she engaged in solely personal acts, for her personal gain, without any relationship to her position as a United States Congresswoman.

7. The only victim is Bryant. An innocent and respected businessman who has been falsely branded a rapist and voyeur by Mace, Britton, and Berg. The citizens of South Carolina and the United States rightly expect that elected leaders will wield the immense power of public office only for the public good. But when a sitting United States Congresswoman instead privately weaponizes falsehoods to extort private property, fabricates criminal allegations to destroy a citizen's reputation, and abuses her private relationships to coerce private citizens, that conduct shocks the conscience of every voter who entrusted her with their vote.

Bryant therefore prays not only for full damages but also for a public verdict that holds Mace to the higher standard the Constitution and the people demand.

PARTIES

8. Bryant is a resident of Charleston County, South Carolina, the founder of the Harbor Entrepreneur Center, a past Chairman of the Charleston Chamber of Commerce, and a technology entrepreneur and businessman in good standing whose companies employ hundreds.

9. Defendant Mace is a resident of Charleston County and sued in her personal capacity.

10. Defendant Britton is a resident of Charleston County.

11. Berg is a former resident of Charleston County, now residing in Minnesota.

JURISDICTION AND VENUE

12. All acts alleged herein occurred within Charleston County, South Carolina. Venue is proper pursuant to S.C. Code Ann. § 15-7-30.

13. This Court has personal jurisdiction over Berg because she invoked the jurisdiction of this Court as the original Plaintiff this action, filed in the Charleston County Court of Common Pleas. By voluntarily commencing that lawsuit in this forum and alleging tortious conduct by Bryant occurring in Charleston County, Berg subjected herself to the Court's jurisdiction for all counterclaims arising from the same transaction or occurrence.

14. This Court has personal jurisdiction over Defendant Mace who wrongfully converted Bryant's phone and data in Charleston County, South Carolina and attempted to use the manipulated data to blackmail Bryant within the county, prior to allegedly notifying law enforcement of the alleged assault/rape. Moreover, Mace conspired with Britton, who is also subject to personal jurisdiction in this county, to fabricate an alleged assault, and the existence of

a video capturing the assault that she allegedly witnessed and failed to report for almost six (6) years, at her home in Charleston County, South Carolina.

RELATIONSHIP BETWEEN BRYANT AND MACE

15. Prior to November 2023, Bryant and Mace were involved in a romantic relationship and were engaged to be married.

16. During their relationship, Bryant and Mace jointly purchased and owned two properties located in Charleston County, South Carolina (the “Properties”).

17. Sometime in the fall of 2023, Mace became paranoid that Bryant was dating other women.

18. As a result of these suspicions, the parties began to experience significant strain and conflict in their relationship.

19. The deterioration of their relationship ultimately gave rise to the disputes and events that form the basis of this action.

HACKING ALLEGATIONS

20. In or about the fall of 2023, because of Mace’s unfounded suspicions that Bryant was cheating on her, Mace began to search for ways to access Bryant’s phone (“Phone”).

21. Despite multiple requests from Mace, Bryant refused to provide Mace access to his Phone. Bryant repeatedly told Mace that she was not permitted to search the Phone and declined on multiple occasions to provide his passcode, fingerprint, or any other means of access to the Phone. Mace had previously admitted to searching Bryant’s laptop in violation of his privacy after he found the names of his ex-girlfriends in his search history and placing an air tag on his car tracking his locations while she was traveling internationally.

22. Throughout the months of September through early November 2023, Eric Bowman, a Charleston County resident and former business associate of Bryant, received multiple messages and calls from Mace.

23. In these messages, Mace asked Bowman if he knew anyone who could hack into Bryant's Phone and whether he could hire a private investigator to monitor Bryant's condominium. Bowman initially agreed but was later told by Mace to disregard the request because she had already "taken care of it." Mace also changed the message settings on her communications with Bowman to automatically delete after one day, indicating an intent to conceal her activities.

24. After Mace told Bowman she no longer needed his assistance to access Bryant's Phone, she again inquired about hiring a private investigator and begged Bowman to provide any incriminating data he might have on Bryant.

25. Throughout these events, Bryant and Mace were still engaged to be married and living together.

26. On or about the morning of November 13, 2023, Bryant woke to find Mace actively searching through the Phone while he was asleep and without his permission.

27. Bryant immediately retrieved his Phone from Mace and subsequently reviewed it. Upon doing so, Bryant discovered that Mace had accessed a secure area of the Phone that required additional access. He was unaware she had hacked the Phone or removed data. Later in mid-December 2023 Bryant became concerned she had hacked the Phone and discovered she had downloaded an application called "Mr. Fone" on the morning of the break-up, which was November 13, 2018.

28. Upon information and belief, Mr. Fone is a software program designed to recover, extract, or otherwise access data from electronic devices, including deleted messages and files.

29. Upon information and belief, Mace used Mr. Fone to extract and download certain information from Bryant's Phone without his permission or authorization.

30. Upon information and belief, Mace subsequently transferred files from Bryant's Phone to her own laptop, further exploiting private data without consent and compounding her violation of his privacy rights.

MACE'S ATTEMPTS TO BLACKMAIL BRYANT

31. Unbeknownst to Bryant, on or about November 7-9, 2023, Mace met with her political consultant, Wesley Donehue ("Donehue"). During this meeting, Mace showed Donehue images she said were taken from Bryant's Phone.

32. Mace admitted to Donehue during this conversation that she had hacked Bryant's devices. Mace told Donehue that Bryant had "filmed women without their consent" and said she would "use the information she found on his phone to get her houses."

33. Mace told Donehue that she intended to use the information as leverage to gain ownership of the Properties.

34. During this meeting, Donehue urged Mace to report what she had allegedly found on Bryant's Phone to the authorities. Mace refused, stating, "I'm going to use this information to get my houses."

35. Mace also told Donehue that she felt unsafe around Bryant. Donehue questioned if she felt unsafe why would she travel with him that weekend. She said she was going to get her free Caribbean vacation. She also stated while on her upcoming trip to the Caribbean with Bryant, she was "going to try to get more information out of his phone."

36. Importantly, during this November 2023 meeting, Mace made no mention of sex trafficking, or gang rape, nor did she mention any desire to introduce legislation related to these alleged discoveries on Bryant's Phone.

37. On one occasion, Mace asked Donehue to meet with Bryant, show him the images she took from his phone, and tell him that Mace would make the photographs public if he did not give Mace the Properties.

38. On November 13, 2023, Bryant received a letter from Mace's attorneys, which purported to be a preservation of evidence letter. The letter included accusations of criminal voyeurism against Bryant and demanded preservation of all digital evidence. The letter also warned of "disastrous financial consequences" from the photographs and videos Mace alleged to have found on Bryant's Phone. A copy of the letter is enclosed as **Exhibit A.**

39. On November 24, 2023, Mace called Bowman and asked him to share incriminating information about Bryant and asked if he would be willing to testify against him.

40. Bryant also received calls from Mace after their breakup where she flip-flopped between wanting to get back together and blackmailing him with information she had claimed to see on his Phone. There are scores of Verizon records of the phone calls and screenshots of text messages of Mace's threatening conduct.

41. On January 8, 2024, Mace and Bryant participated in pre-suit mediation to resolve the issues regarding the Properties. During this mediation, Mace attempted to use a folder of photos allegedly taken from Bryant's Phone to pressure Bryant into transferring ownership of the Properties to Mace.

THE OCTOBER 2018 POOL INCIDENT AT BRITTON'S RESIDENCE

42. In October 2018, a social gathering took place at the home of Defendant Britton in Charleston County. During the event, Berg voluntarily attended along with Bryant, Bowman, and Osborne. Later in the evening, Berg became heavily intoxicated, fell into Britton's swimming pool, and was assisted by others back into the house.

43. At the time of the incident, Britton and Bowman were married, but the residence was titled to a trust for which Britton served as trustee, making her responsible for the property and its guests.

44. Britton later claimed she witnessed portions of the evening through home security cameras and alleged that Bryant and others had acted inappropriately toward Berg after she passed out on the couch. Britton recorded her version of events in a "diary email," asserting misconduct that she did not report to law enforcement for at least five and a half years, if not more.

45. Bryant and the other men deny any alleged assault or wrongdoing. To the extent a trier of fact determines that wrongdoing occurred, Britton aided and abetted the wrongful behavior. She spoke to Bowman who instructed her to get clean clothes for Berg after the alleged assault. Moments later, Britton appeared in the living room and dressed Berg. At no time did Britton tell Berg what she now claims had allegedly occurred. After Britton assisted Berg, she left the room and did not report any wrongdoing.

46. In the days following the October 2018 pool incident, in which Berg, while intoxicated, fell into the pool after she had been drinking for multiple hours that evening, Britton continued to socialize with Bryant and Bowman, hosting further gatherings and taking photographs with them, demonstrating her claims of outrage were inconsistent with her behavior.

47. Britton concealed her "diary email" and related allegations for more than five years, only disclosing them in early 2024 after being contacted by Mace, at which point the conspiracy

was formed and the story was repurposed and publicized as part of a coordinated effort to harm Bryant (and Bowman).

48. As alleged in Berg's Complaint, Mace and Britton met in early 2024, but not to find the victim in the alleged assault video. No such video exists. Rather, Mace and Britton met and conspired to frame and defraud Bryant, Bowman, and Osborne relating to the happenings at Britton's home in October 2018.

MACE CONTACTS BERG

49. Once Mace and Britton fully developed their conspiracy, they turned their sights on a victim. They needed someone who was friendly with Bryant and who socialized with him. Berg, a former employee of Bryant's at ADW, was the perfect target. She was young, vulnerable and would believe anything that they told her.

50. On or about April 6, 2024, while in Charleston, South Carolina, Mace called Berg. During this call, Mace told Berg she had discovered a "video" on Bryant's Phone depicting Berg being "gang raped" six-years earlier in October 2018 while unconscious. Mace claimed to have recognized the location in the recording as the home of Eric Bowman. She said the men involved were Bryant, Osborne, and Bowman.

DEFAMATORY STATEMENTS BY BERG

51. Berg had no independent memory of the alleged events reported to her by Mace on April 6, 2024.

52. During this conversation, Mace gave varying versions of events, alternately asserting that she had provided information to law enforcement and that she possessed materials herself. During this call, Berg stated she had no memory of any assault and expressed disbelief.

Mace urged Berg to undergo medical testing even though the alleged event had occurred almost six years earlier and to speak with investigators.

53. On February 10, 2025, Berg placed a phone call to Erin Gunther, an employee of Assignment Desk Works (“ADW”).

54. During this call, Berg told Gunther that Berg was one of the victims of John Osborne’s actions. Berg told Gunther that there was video footage of it, and Bryant and Bowman filmed Berg while she was being assaulted, while unconscious, by Osborne.

55. Berg made these statements despite also admitting during this phone call with Gunther that she has no memory of it and that she had not seen the video. Berg also explained that Mace did not have the video.

56. Berg also told Gunther that Bryant is a really scary person who records women without them knowing.

57. Despite admitting she lacked any firsthand knowledge and that her only source of this information was Mace, Berg did not stop there. She told Gunther that Bryant is a professional at hiding cameras, and that there are terabytes of other women, on other nights involving Bryant and other women.

58. During this call, Berg encouraged Gunther to avoid Bryant and leave her employment with ADW.

59. Berg also encouraged Gunther to tell other women to leave their employment with ADW and/or to share with other female employees at ADW the false accusations about Bryant.

60. Berg emphasized to Gunther that she wanted every girl that worked for ADW to understand the kind of person Bryant was and to understand what he had done.

61. Despite Berg's emphatic insistence that she was telling the truth, she readily admitted to Gunther that she had no personal or firsthand knowledge of the accusations she made against Bryant,

62. Berg has acknowledged her doubts about the truth of what Mace told her and acknowledged that she called her lawyer and told them Mace is making everything up.

63. Berg also acknowledged that Mace may have an ulterior motive related to her claims about Bryant.

TORTIOUS INTERFERENCE BY BERG

64. Berg previously worked for ADW as a production coordinator.

65. Berg's duties while working for ADW gave Berg access to sensitive business information of both ADW and Bryant.

66. Berg shared with Mace documents containing sensitive business information of ADW and Bryant.

67. Berg provided the documents Mace so that the information could be used to damage the business operations of ADW and Bryant and otherwise interfere with their contractual relations.

68. Upon information and belief, Berg also shared other sensitive information with Mace and other persons on separate occasions for the purpose of damaging Bryant's business and contractual relationships.

COUNTER-CLAIM AGAINST BERG

69. Bryant incorporates by reference and reiterates each and every allegation set forth in the preceding paragraphs as if fully set forth herein.

70. Venue is proper in Charleston County as this is a counter-claim arising out of the transaction or occurrence that is the subject matter of Berg's claim.

71. This Court has subject matter jurisdiction over this matter.

COUNT I – DEFAMATION

(Berg)

72. Bryant incorporates by reference and reiterates each and every allegation set forth in the preceding paragraphs as if fully set forth herein.

73. Berg made false and defamatory statements regarding Bryant by falsely and with a reckless disregard for the truth, stating without personal knowledge that Bryant recorded women without their permission and by affirming Mace's false and defamatory claims that Bryant and others committed rape and took nonconsensual photos of women, including underage girls. These defamatory statements were made prior to filing of any lawsuit against Bryant.

74. In her official court filings, including the Jane Doe complaint and subsequent amended complaint, Berg reiterated false allegations that she had been sexually assaulted and filmed without her consent, despite privately and publicly acknowledging that she had no memory of any such incident, and that she was not in a private place at the time of the alleged events.

75. Including these defamatory statements in sworn pleadings amplified the harm to Bryant's reputation, as they were placed on the public record, accessible to the media, and disseminated widely through court filings.

76. Among the false claims Berg made in those filings were direct assertions that Osborne, who was her boyfriend at the time, digitally penetrated her vagina and performed cunnilingus on her while Bowman and Bryant filmed it. These allegations were demonstrably false and entirely uncorroborated, yet were presented in official court records as factual, compounding the damage to Bryant's personal and professional reputation.

77. Berg's statements constitute defamation *per se* because she accused Bryant of, among other things, committing a crime.

78. Berg published these comments to a third-party, Erin Gunther, on February 12, 2025.

79. Berg made these statements without privilege.

80. Berg's statements were false, malicious, and published with reckless disregard for their truth.

81. As a direct and proximate result of Berg's statements, Bryant has suffered harm to his reputation, humiliation, emotional distress, and other damages. Bryant is entitled to recover compensatory and punitive damages in an amount to be determined by the trier of fact.

82. Berg further conspired with Mace and Britton when she they devised a plan to convince ADW employees to turn on Bryant and leave the company, and furthermore, to file this instant frivolous action without any proof of any alleged assault.

COUNT II- TORTIOUS INTERFERENCE
(Berg)

83. Bryant incorporates by reference and reiterates each and every allegation set forth in the preceding paragraphs as if fully set forth herein.

84. Berg intentionally provided sensitive business information of Bryant and ADW to Mace.

85. Berg provided the sensitive business information to Mace knowing Mace's adversarial history to Bryant for the purpose of interfering with Bryant's current and future contractual and business relationships.

86. Berg's actions in sharing the information were not only unlawful but were undertaken with an improper motive, to disrupt Bryant's contractual relationships and future business prospects with potential renters, buyers, investors, and other entities involved with Plaintiff's properties.

87. Berg's actions were taken without justification or privilege.

88. As a direct result of Berg's conduct, Bryant has suffered harm to his business and contractual relationships.

89. As a proximate result of Berg's tortious interference, Bryant has incurred economic damages, including lost profits, diminished property value, and reputational harm, as well as incurring costs to mitigate the effects of Bryant's actions. Bryant is also entitled to recover punitive damages for Berg's actions.

COUNT III – CIVIL CONSPIRACY
(Berg)

90. Bryant incorporates by reference and reiterates each and every allegation set forth in the preceding paragraphs as if fully set forth herein

91. Mace and Britton plotted to fabricate an alleged assault and the existence of an alleged video and e-mail and falsely representing the events that occurred in October 2018 to Berg.

92. Mace and Britton committed overt acts including falsely communicating the alleged events in October 2018, to Berg, in furtherance of their agreement

93. Berg furthered their conspiracy when she communicated with Gunther and other ADW employees.

94. Bryant was personally and professionally damaged due to Mace, Britton, and Berg's agreements to commit these unlawful acts.

BRYANT'S THIRD-PARTY CLAIMS AGAINST MACE AND BRITTON

95. Bryant incorporates by reference and reiterates each and every allegation set forth in the preceding paragraphs as if fully set forth herein.

96. Venue is proper in Charleston County as this is a Third-Party Complaint arising out of the transaction or occurrence occurred in Charleston County.

97. This Court has subject matter jurisdiction over this matter.

COUNT I - DEFAMATION

(Mace)

98. Bryant incorporates by reference and reiterates each and every allegation set forth in the preceding paragraphs as if fully set forth herein.

99. Mace made false and defamatory statements about Bryant to Donehue, claiming that Bryant recorded women without their consent and possessed illicit materials.

100. At the time of this personal conversation between Mace and Donehue, Donehue was not employed by Mace as a member of her congressional staff, nor was he otherwise affiliated with Mace's duties as a United States Congresswoman.

101. Mace made these statements without privilege and with the knowledge that her statements were false and/or with a reckless disregard for the truth.

102. These statements were made outside the scope of Mace's employment as a United States Congresswoman. At the time of these statements, Mace had not introduced any bill or other proposed legislation regarding the subject of voyeurism, nor had Mace conceived or drafted any measure related to video-voyeurism or sexual-assault reform. Further, she had not reported any of the alleged actions to law enforcement, by her own admission.

103. These actions were directed solely at Bryant as a result of the end of their personal and romantic relationship.

104. As a direct and proximate result of Mace's false and defamatory statements, Bryant has suffered damages, including injury to his reputation, humiliation, emotional distress, mental anguish, and loss of personal and professional standing. Bryant is entitled to recover compensatory and punitive damages in an amount to be determined by the trier of fact.

COUNT II – INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
(Mace)

105. Bryant incorporates by reference and reiterates each and every allegation set forth in the preceding paragraphs as if fully set forth herein.

106. Mace intentionally and without authorization accessed Bryant's Phone and obtained Bryant's personal and private information, including photographs and other sensitive data.

107. Mace illegally obtained highly sensitive data that was never meant to be obtained by any third party.

108. Mace thereafter used the personal and private information she improperly obtained, much of which was innocuous and grossly exaggerated in her later descriptions, to threaten Bryant, both directly and through third parties, stating that she would release or publicly disclose the information unless Bryant agreed to transfer ownership of the Properties to her.

109. Mace's conduct was intentional, reckless, and carried out with the knowledge that it would cause Bryant severe emotional distress, or with substantial certainty that such distress would result.

110. Mace's conduct was extreme and outrageous, exceeding all possible bounds of decency and utterly intolerable in a civilized community.

111. As a direct and proximate result of Mace's conduct, Bryant has suffered severe emotional distress, including anxiety, humiliation, fear, and mental anguish, of such intensity that

no reasonable person could be expected to endure it. Bryant is entitled to recover compensatory and punitive damages in an amount to be determined by the trier of fact.

112. Mace engaged in these actions on a solely personal basis without relationship to her position as a United States Congresswoman. None of the acts described herein bear any relation to legitimate legislative, official, or constituent functions. Mace's sole motivation in engaging in these actions was to coerce Bryant into relinquishing ownership of the two Properties.

COUNT III - CONVERSION
(Mace)

113. Bryant incorporates by reference and reiterates each and every allegation set forth in the preceding paragraphs as if fully set forth herein.

114. Bryant had a legal right to ownership and possession of his Phone at the time of Mace's wrongful conversion. Bryant denied each and every request by Mace to access and/or possess his Phone.

115. Mace ignored Bryant's request and wrongfully converted and retained Bryant's Phone. By her actions, Mace interfered with Bryant's rights to the property without his consent.

116. Mace's actions significantly impaired Bryant's ability to use and/or possess his Phone. Mace wrongfully extracted and deleted data from Bryant's Phone during and after the taking. This will be the subject of a spoliation charge during discovery.

117. Bryant suffered concrete and quantifiable damages as a result of Mace's conversion including but not limited to loss of his Phone, loss of data on his Phone, the cost of a replacement phone and investigatory costs to determine the data stolen and deleted.

118. Mace engaged in these actions on a solely personal basis without relationship to her position as a United States Congresswoman. None of the acts described herein bear any relation

to legitimate legislative, official, or constituent functions. Mace's sole motivation in engaging in these actions was to coerce Bryant into relinquishing ownership of the two Properties.

COUNT IV - INVASION OF PRIVACY
(Mace)

119. Bryant incorporates by reference and reiterates each and every allegation set forth in the preceding paragraphs as if fully set forth herein.

120. Bryant had a reasonable expectation of privacy in the personal and private information, including photographs and other data, stored on his Phone.

121. Without Bryant's knowledge or consent, Mace intentionally accessed Bryant's Phone and obtained personal and private photographs and information.

122. Mace thereafter used the private materials she obtained to threaten Bryant, stating that she would disclose or publicize the photographs and other private information unless Bryant agreed to transfer ownership of the Properties to her.

123. Upon information and belief, Mace also shared or otherwise disclosed portions of Bryant's private information to others without his consent, including to Donehue.

124. Mace's conduct constituted a wrongful intrusion into Bryant's private affairs in a manner that would outrage or cause mental suffering, shame, or humiliation to a person of ordinary sensibilities.

125. As a direct and proximate result of Mace's actions, Bryant has suffered emotional distress, mental anguish, humiliation, and damage to his reputation.

126. Mace's conduct was willful, wanton, and malicious, entitling Bryant to compensatory and punitive damages.

127. These actions were also undertaken as part of Mace's personal investigation into the status of her personal relationship with Bryant, solely without relationship to her position as a United States Congresswoman. None of the acts described herein bear any relation to legitimate legislative, official, or constituent functions. Mace's sole motivation in engaging in these actions was to coerce Bryant into relinquishing ownership of the two Properties.

COUNT V – CIVIL CONSPIRACY
(Mace, and Britton)

128. Bryant incorporates by reference and reiterates each and every allegation set forth in the preceding paragraphs as if fully set forth herein.

129. Initially, Defendant Mace initiated and directed a private campaign to injure her then-fiancé, Defendant Bryant, and later enlisted others to assist her in fabricating and spreading a false narrative of criminal conduct.

130. Beginning in November 2023, while still in a personal relationship with Bryant and before she had reported anything to law enforcement or contemplated legislation on the subject, Mace unlawfully accessed Bryant's Phone and devices, extracted private images, and sought to use them as leverage to obtain full ownership of the Properties.

131. Mace then recruited political consultant Wesley Donehue, asking him to confront Bryant and convey threats that the images would be made public unless Bryant "gave her the houses."

132. These acts—occurring months before any contact with the South Carolina Law Enforcement Division—show that the conspiracy's object was personal retaliation and financial gain, not any legislative or governmental purpose.

133. When Donehue refused, Mace turned to Britton and planned to perpetrate several unlawful acts against Bryant, Bowman, and Osborne and to inflict harm on them. They agreed to commit an unlawful act by unlawful means.

134. Mace and Britton plotted to fabricate an alleged assault and the existence of an alleged video and e-mail and falsely representing the events that occurred in October 2018 to Berg.

135. Mace and Britton committed overt acts including falsely communicating the alleged events in October 2018, to Berg, in furtherance of their agreement.

136. Berg further conspired with Mace and Britton when she they devised a plan to convince ADW employees to turn on Bryant and leave the company, and furthermore, to file this instant frivolous action without any proof of any alleged assault.

137. Berg furthered their conspiracy when she communicated with Gunther and other ADW employees.

138. Bryant was personally and professionally damaged due to Mace, Britton, and Berg's agreements to commit these unlawful acts.

COUNT VI – AIDING AND ABETTING CRIMINAL CONDUCT
(Britton)

139. Bryant incorporates by reference and reiterates each and every allegation set forth in the preceding paragraphs as if fully set forth herein.

140. Although Bryant, Bowman, and Osborne deny that they conspired to commit any unlawful act, including assaulting Berg, to the extent they are found liable, Britton must share in the liability as she aided and abetted their criminal conduct.

141. Britton was present at her home where the alleged criminal conduct occurred on October 26, 2018. Britton claims that she witnessed the alleged assault by Osborne, as Bryant and Bowman filmed it. She did nothing and watched as Berg was unconscious and assaulted.

142. Britton aided and abetted the criminal acts when she brought clothes to Berg and dressed her. Britton did not tell Berg what happened and after getting her dressed, left the room.

143. Britton knowingly and substantially assisted in committing and/or concealing the wrongdoing.

144. Britton concealed the events that occurred on October 26, 2018, by not notifying Berg, or law enforcement. She further concealed the existence of an e-mail she allegedly authored the following morning describing the assault. Britton failed to disclose the existence of the e-mail or her first hand-knowledge of the assault until Mace approached her in early 2024 – more than five-years later.

145. Britton's actions of aiding and abetting the wrongdoing caused harm to Berg.

PRAYER FOR RELIEF

WHEREFORE, Bryant is entitled to and prays for a judgment against the Counter and Third-Party Defendants, both actual and punitive damages in an amount to be determined by a jury at the trial of this matter, as well as an Order permanently enjoining the Defendants from defaming the Plaintiff, together with an award of attorney's fees and costs and such additional relief as the Court deems just and proper.

SAXTON & STUMP, LLC

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Charleston, South Carolina