

Exhibit 1

20

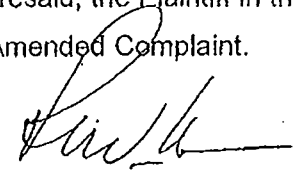
STATE OF SOUTH CAROLINA)
)
 COUNTY OF BEAUFORT)
)
 MAUREEN T. COFFEY,)
)
 Plaintiff,)
)
 v.)
)
 COMMUNITY SERVICES ASSO-))
 CIATES, INC., GEORGE F.))
 BREED, JR., SEA PINES))
 RESORT, LLC, and ASSOCIA-))
 TION OF SEA PINES PLANT-))
 ATION PROPERTY OWNERS,))
 INC., AND THE ADVISORY))
 BOARD,))
))
 Defendants.))

IN THE COURT OF COMMON PLEAS
 (Case No. 2011-CP-07-00013)

SUMMONS
 (Amended Complaint)
 (Jury Trial Demanded)

TO: THE DEFENDANT ASSOCIATION OF SEA PINES PLANTATION
 PROPERTY OWNERS, INC., AND THE ADVISORY BOARD.

YOU ARE HEREBY SUMMONED and required to answer the Amended
 Complaint in this action, a copy of which is herewith served upon you, and to serve a
 copy of your Answer to the Amended Complaint upon the subscribers at their offices at
 203 Fountain Center, 55 New Orleans Road, Hilton Head, South Carolina, within thirty
 (30) days after the service hereof, exclusive of the date of such service; and, if you fail
 to answer the Amended Complaint in the time aforesaid, the Plaintiff in this action will
 apply to the Court for the relief demanded in the Amended Complaint.

By: 
 Robert V. Mathison, Jr.
 Attorney for the Plaintiff
 Maureen T. Coffey

February 10, 2011
 Hilton Head Island, South Carolina.

MATHISON & MATHISON
 Post Office Box 5271
 Hilton Head Island, SC 29938
 Telephone: (843) 785-6503

STATE OF SOUTH CAROLINA)
)
 COUNTY OF BEAUFORT)
)
 MAUREEN T. COFFEY,)
)
 Plaintiff,)
)
 v.)
)
 COMMUNITY SERVICES ASSO-))
 CIATES, INC., GEORGE F.)
 BREED, JR., SEA PINES)
 RESORT, LLC, and ASSOCIA-))
 TION OF SEA PINES PLANT-))
 ATION PROPERTY OWNERS,)
 INC., AND THE ADVISORY)
 BOARD,)
)
 Defendants.)
 _____)

IN THE COURT OF COMMON PLEAS
 (Case No. 2011-CP-07-00013)

AMENDED COMPLAINT
 (Jury Trial Demanded)

The Plaintiff, Maureen T. Coffey, complaining of the Defendants, alleges:

PROLOGUE

1. The Plaintiff, Maureen T. Coffey, is a citizen and resident of Hilton Head Island in Beaufort County, South Carolina.
2. The Plaintiff is an attorney employed as a municipal judge by the Town of Hilton Head Island, South Carolina.
3. The Defendant, Community Services Associates, Inc. (herein "CSA"), is a corporation organized and existing under the laws of the state of South Carolina which maintains its principal place of business, as well as a general agent, at Hilton Head Island in Beaufort County, South Carolina.

4. CSA is the corporate entity that owns and manages the common property in Sea Pines Plantation—a planned unit development at Hilton Head Island, South Carolina.

5. The Defendant, George F. Breed, Jr. (herein "Breed"), is a citizen and resident of Beaufort County, South Carolina.

6. Breed is employed as the Director of Security and Community Affairs by CSA—a position that puts him in charge of a force of private security officers (herein "Sea Pines Security") that serves Sea Pines Plantation.

7. Sea Pines Resort, LLC ("Resort"), is a limited liability company organized and existing under the laws of the state of Virginia which maintains its principal place of business, as well as a general agent, at Hilton Head Island in Beaufort County, South Carolina.

8. Sea Pines Resort is a for profit company that owns and manages the real estate and rental operations, as well as a number of commercial enterprises, primarily located within Sea Pines Plantation.

9. Sea Pines Resort is the assignee of and/or the successor in interest to numerous rights and obligations created under the covenants applicable to Sea Pines Plantation, which heretofore were held by numerous discrete entities, including, without limitation, Sea Pines Associates, Inc., Sea Pines Company, Inc., Sea Pines Real Estate Company, Inc., Sea Pines Plantation Company, Inc., The Fifth Golf Course Club, Inc., Sea Pines Forest Preserve Conservation Association, Inc., Lighthouse Realty, Inc., Sea Pines/Tide Pointe, Inc., and Tide Pointe, Inc.

10. The Association of Sea Pines Plantation Property Owners, Inc., and the Advisory Board (herein "ASPPPO") is a non-profit corporation organized and existing under the laws of the state of South Carolina which maintains its principal place of business, as well as a general agent, at Hilton Head Island in Beaufort County, South Carolina.

11. ASPPPO is the organization in Sea Pines Plantation that is responsible for enforcing the covenants running with the land.

12. Each of the officers, directors, agents and employees, of the Defendants, at all relevant times, was acting within the course of his or her agency or employment.

13. Any act, action, statement, failure or omission, if not authorized by a Defendant at the time of its occurrence, was subsequently adopted and/or ratified by the Defendant in question.

14. On or about June 6, 2008, Breed prepared a letter addressed to the Commission on Judicial Conduct (herein "the Letter") in which he impugned the character, honesty and fitness of the Plaintiff to engage in her business, trade, profession and/or office.

15. The Letter contained numerous false and defamatory statements about the Plaintiff, including, without limitation, the following:

- (a) As "a result of Judge Coffey's actions, she has given the distinct and transparent appearance of bias and partiality";
- (b) She "is not able to be a neutral and detached arbiter of the many cases that have been and will be pending before her";
- (c) She has engaged "in a pattern of reactive and overt actions that have/are undermining the criminal justice process";

- (d) "Judge Coffey has engaged in conduct prejudicial to the effective and expeditious administration of the business of the courts & criminal justice procedure";
- (e) Her "conduct was/is pervasive and invasive in nature and directly results in Judge Coffey's inability to maintain the impartiality so necessary to the successful balance of our legal system"; and
- (f) Judge Coffey's "overt involvement both past and present caused her to insert herself in these scenarios to the detriment of the community."

16. Before and after mailing the Letter to its ostensible addressee—an action that is privileged by rule—Breed and/or other officers, directors, agents and employees of CSA:

- (a) Delivered and/or displayed one or more copies of the Letter to officials of the Town of Hilton Head Island, with whom they discussed the contents of the Letter in an effort to have the Plaintiff fired by her employer;
- (b) Delivered and/or displayed multiple copies of the Letter to the Board of Directors of CSA, with whom they discussed the contents of the Letter;
- (c) Delivered and/or displayed one or more copies of the Letter to the Members of the Board of Directors of the Association of Sea Pines Plantation Property Owners (ASPPPO), with whom they discussed the contents of the Letter;
- (d) Delivered and/or displayed one or more copies of the Letter to the officers, directors, agents and employees of Sea Pines Resort, with whom they discussed the contents of the Letter; and
- (e) Delivered and/or displayed one or more copies of the Letter to members of the general public.

17. Both before and after the mailing of the Letter to its ostensible addressee, the officers, directors, agents and employees of the Town, of CSA, of ASPPPO and of Sea Pines Resort, upon information and belief, made repeated,

unprivileged, republications of the Letter and its contents to the general public so that the existence of the Letter and the defamatory statements about the Plaintiff became widely known.

18. Breed, as well as the officers, directors, agents and employees of CSA, of Sea Pines Resort and of ASPPPO, repeated and embellished the statements set forth in the Letter, as described in paragraph 15 above, to each other and to members of the general public, thereby broadcasting to the public the falsehood that the Plaintiff had been biased and partial in her judicial decision making, as well as the falsehood that the Plaintiff had intruded upon or impeded the investigation of her brother, Otis Coffey.

19. Breed, as well as other officers, directors, agents and employees of CSA, in order to further discredit the Plaintiff, who is a married woman, accused her of having an affair with a security officer, because the officer had refused to participate in Breed's efforts to falsify evidence of a positive identification of Otis Coffey on or about May 20, 2008.

FOR A FIRST CAUSE OF ACTION
(Libel at Common Law)

20. The allegations of paragraphs 1 through 17 above are hereby adopted and by express reference made a part of this First Cause of Action.

21. The quoted statements described in paragraph 15 were utterly false.

22. The quoted statements in paragraph 15 were defamatory on their face, and, because they were written, printed or typed, they constitute libel.

23. The statements described in paragraph 15 were actionable *per se* because they degrade the Plaintiff, that is, they reduce her character or reputation in the estimation of her friends or acquaintances, as well as in the eyes of the public at large, thereby disgracing the Plaintiff, and rendering her odious or contemptible.

24. Because the statements are actionable *per se*, at common law actual malice by the Defendants is implied, and general damages to the Plaintiff are presumed.

25. As an alternative to the implied malice and presumed damages described in paragraph 24, the Defendants were motivated by actual malice, their conduct constituted negligence, if not greater fault, and the Plaintiff, as a consequence, has sustained actual injury, including both general damages and special damages.

26. As the direct and proximate result of the libel of the Defendants, the Plaintiff has sustained and is entitled to recover actual damages in the amount determined by the jury, including, without limitation, general damages for injury to the Plaintiff's reputation, her shock, humiliation, distress, mental anguish, pain and suffering, and also special damages for the Plaintiff's out-of-pocket expenses incurred as a consequence of the Plaintiff's injuries and the treatment thereof, including, without limitation, the cost of medical treatment, psychological counseling, medication, lost sick days from work and increased child care, as well as attorney's fees to vindicate the Plaintiff's reputation.

27. The conduct of the Defendants was willful, wanton, reckless and malicious, amounting to a conscious disregard for the rights of the Plaintiff, who is, therefore, entitled to recover punitive damages.

FOR A SECOND CAUSE OF ACTION
(Libel—Constitutional Claim)

28. As an alternative to the First Cause of Action, if the Plaintiff were deemed a public official or a public figure—an averment that is expressly denied—the following allegations are applicable.

29. The allegations of paragraphs 1 through 17 and 23 above are hereby adopted and by express reference made a part of this Second Cause of Action.

30. Each of the statements set forth in the Letter, as described in paragraph 15 above, was made and published by the Defendants with actual malice under the United States Constitution, that is, either with knowledge that each such statement was false or with reckless disregard for whether it was true or false (herein "Constitutional actual malice").

31. Each of the statements made by the Defendants, as set forth in paragraph 15, caused actual injury to the Plaintiff in the form of special damages and general damages.

32. The quoted statements described in paragraph 15 were utterly false.

33. The statements described in paragraph 15 were defamatory on their face, and, because they were written, printed or typed, they constitute libel.

34. As the direct and proximate result of the libel of the Defendants, the Plaintiff has sustained and is entitled to recover actual damages in the amount determined by the jury, including, without limitation, general damages for injury to the Plaintiff's reputation, her shock, humiliation, distress, mental anguish, pain and suffering, and also special damages for the Plaintiff's out-of-pocket expenses incurred as a consequence of the Plaintiff's injuries and the treatment thereof, including, without limitation, the cost of medical treatment, psychological counseling, medication, lost sick days from work and increased child care, as well as attorney's fees to vindicate the Plaintiff's reputation.

35. Because the Defendants' statements were made and published with Constitutional actual malice, as defined in paragraph 30 above, the Plaintiff is entitled to recover punitive damages.

FOR A THIRD CAUSE OF ACTION
(Slander at Common Law)

36. The allegations of paragraphs 1 through 25 above are hereby adopted and by express reference made a part of this Third Cause of Action.

37. Each of the statements set forth in paragraphs 15, as modified or embellished when repeated verbally, namely, that the Plaintiff was biased and partial in her decision making and/or that the Plaintiff had intruded upon or impeded an investigation, was utterly false.

38. The statements described in paragraph 19 above, namely, that the Plaintiff had an affair with a security officer, were utterly false.

39. Each of the statements described in paragraphs 37 and 38 constitutes slander that is actionable *per se* because:

- (a) The first impugns the character, honesty and fitness of the Plaintiff to engage in her business, trade, profession and/or office; and
- (b) The second not only impugns the character and honesty of the Plaintiff, but also alleges a lack of chastity and/or adultery on her part.

40. Because the statements are actionable *per se*, at common law actual malice by the Defendants is implied, and general damages to the Plaintiff are presumed.

41. As an alternative to the implied malice and presumed damages described in paragraph 40, the Defendants were motivated by actual malice, their conduct constituted negligence, if not greater fault, and the Plaintiff, as a consequence, has sustained actual injury, including both general damages and special damages.

42. As the direct and proximate result of the slander of the Defendants, the Plaintiff has sustained and is entitled to recover actual damages in the amount determined by the jury, including, without limitation, general damages for injury to the Plaintiff's reputation, her shock, humiliation, distress, mental anguish, pain and suffering, and also special damages for the Plaintiff's out-of-pocket expenses incurred as a consequence of the Plaintiff's injuries and the treatment thereof, including, without limitation, the cost of medical treatment, psychological counseling, medication, lost sick days from work and increased child care, as well as attorney's fees to vindicate the Plaintiff's reputation.

43. The conduct of the Defendants was willful, wanton, reckless and malicious, amounting to a conscious disregard for the rights of the Plaintiff, who is, therefore, entitled to recover punitive damages.

FOR A FOURTH CAUSE OF ACTION
(Slander—Constitutional Claim)

44. As an alternative to the Third Cause of Action, if the Plaintiff were deemed a public official or a public figure—an averment that is expressly denied—the following allegations are applicable.

45. The allegations of paragraphs 1 through 19 and 28 through 33 above are hereby adopted and by express reference made a part of this Fourth Cause of Action.

46. Each of the statements set forth in paragraph 15, as modified or embellished when repeated verbally, namely, that the Plaintiff was biased and partial in her decision making and/or that the Plaintiff had intruded upon or impeded an investigation, was utterly false.

47. The statement that the Plaintiff had an affair with a security officer was utterly false.

48. Each of the statements described in paragraphs 46 and 47 constitutes slander that is actionable *per se* because:

- (a) The first impugns the character, honesty and fitness of the Plaintiff to engage in her business, trade, profession and/or office; and
- (b) The second not only impugns the character and honesty of the Plaintiff, but also alleges a lack of chastity and/or adultery on her part.

49. Each of the statements by the Defendants described in paragraphs 15, 16, 17, 18, 19, 46 and 47 above, was made and published with actual malice under the United States Constitution, that is, either with knowledge that each such statement was false or with reckless disregard for whether it was true or false (herein "Constitutional actual malice").

50. Each of the statements made by the Defendants, as set forth in paragraphs 15, 16, 17, 18, 19, 46 and 47 above caused actual injury to the Plaintiff in the form of special damages and general damages.

51. As the direct and proximate result of the slander of the Defendants, the Plaintiff has sustained and is entitled to recover actual damages in the amount determined by the jury, including, without limitation, general damages for injury to the Plaintiff's reputation, her shock, humiliation, distress, mental anguish, pain and suffering, and also special damages for the Plaintiff's out-of-pocket expenses incurred as a consequence of the Plaintiff's injuries and the treatment thereof, including, without limitation, the cost of medical treatment, psychological counseling, medication, lost sick days from work and increased child care, as well as attorney's fees to vindicate the Plaintiff's reputation.

52. Because the Defendants' statements were made and published with Constitutional actual malice, as defined in paragraph 49 above, the Plaintiff is entitled to recover punitive damages.

FOR A FIFTH CAUSE OF ACTION
(Conspiracy)

53. The allegations of paragraphs 1, 3, 5, 7 and 10 above are hereby adopted and by express reference made a part of this Fifth Cause of Action.

54. The Defendants combined and conspired for the purpose of doing injury to a third person, namely, the Plaintiff.

55. As a consequence of the conspiracy of the Defendants, the Plaintiff has sustained injury, including, without limitation, special damages in the form of the cost of investigating the Defendants' scheme.

56. As a direct and proximate result of the conspiracy of the Defendants, the Plaintiff has sustained and is entitled to recover actual damages in the amount determined by the jury.

FOR A SIXTH CAUSE OF ACTION
(Negligence)

57. The allegations of paragraphs 1 through 19 above are hereby adopted and by express reference made a part of this Sixth Cause of Action.

58. The Defendants each owed a duty to the Plaintiff to properly instruct, train and supervise its employees.

59. As a consequence of the Defendants' breach of duty, Breed and other employees conducted an unlawful investigation that exceeded the statutory authority of a security company, conducted a continuing program of harassment against the Plaintiff and her family, and, when these measures failed, they resorted to threats and falsifying evidence, in addition to disseminating the defamatory invective directed at the Plaintiff.

60. The Defendants' were negligent, willful, wanton and/or reckless in allowing the abuses described in paragraph 59 to begin and to continue.

61. As a direct and proximate result of the negligent, willful, wanton and reckless conduct of the Defendants, the Plaintiff has sustained and is entitled to recover actual damages in the amount to be determined by the jury.

62. The conduct of the Defendants was willful, wanton reckless and malicious, amounting to a conscious disregard for the rights of the Plaintiff, who is, therefore, entitled to recover punitive damages.

WHEREFORE, the Plaintiff prays that the Court inquire into the facts and matters alleged herein; and

- (a) Grant judgment in favor of the Plaintiff's and against the Defendants for actual and punitive damages;
 - (i) With respect to the First or Second Cause of Action;
 - (ii) With respect to the Third or Fourth Cause of Action;
 - (iii) With respect to the Fifth Cause of Action; and
 - (iv) With respect to the Sixth Cause of Action; and
- (b) Tax all costs of this action against the Defendants

Respectfully Submitted,

By: 

Robert V. Mathison, Jr.
Attorney for the Plaintiff
Maureen T. Coffey

MATHISON & MATHISON
Post Office Box 5271
Hilton Head Island, SC 29928
Telephone: (843) 785-6503
Facsimile: (843) 785-6170
Email: rmathlaw@aol.com

February 8, 2011

Hilton Head Island, South Carolina.

STATE OF SOUTH CAROLINA)
)
COUNTY OF BEAUFORT)
)
MAUREEN T. COFFEY,)
)
Plaintiff,)

v.)

COMMUNITY SERVICE ASSO-)
CIATES, INC., SEA PINES COM-)
PANY, INC., SEA PINES RE-)
SORT, LLC, SEA PINES ASSO-)
CIATES, INC., SEA PINES SEC-)
URITY COMMITTEE and)
GEORGE F. BREED, JR.,)
)
Defendants.)

IN THE COURT OF COMMON PLEAS
(Case No. 2011-CP-07-00013)

CERTIFICATE OF MAILING

I, Robert V. Mathison, Jr., hereby certify that, on February 8, 2011, I filed and served by mail the Amended Complaint, dated February 8, 2011, by depositing copies of same, with sufficient first class postage prepaid, at the United States Post Office at Hilton Head Island, South Carolina, and addressed to the following:

Celeste T. Jones, Esquire
Kelly Jolley, Esquire
McNair Law Firm
Post Office Box 11390
Columbia, SC 29211

Phillip S. Ferderigos, Esquire
Barnwell, Whaley, Patterson & Helms
Post Office Drawer H
Charleston, SC 29402

Russell P. Patterson, Esquire
Russell P. Patterson, P.A.
Post Office Box 8047
Hilton Head Island, SC 29938

William C. McDow, Esquire
Richardson, Plowden & Robinson, P.A.
Post Office Drawer 7788
Columbia, SC 29202

Andrew S. Halio, Esquire
Halio & Halio
Post Office Box 747
Charleston, SC 29402-0747

Stevens B. Elliott, Esquire
Attorney at Law
Post Office Box 6922
Columbia, SC 29620-6922

E. Mitchell Griffith, Esquire
Griffith, Sadler & Sharp, P.A.
Post Office Box 570
Beaufort, SC 29901



Robert V. Mathison, Jr.
Attorney for the Plaintiff
Maureen T. Coffey