

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
)	
COUNTY OF BEAUFORT)	CIVIL ACTION NO.: 2017-CP-07-_____
)	
LISA SULKA,)	
)	
Plaintiff,)	
)	
v.)	<u>COMPLAINT</u>
)	<i>(Jury Trial Demanded)</i>
)	
C.C. "SKIP" HOAGLAND AND)	
DOMAINS NEW MEDIA, LLC,)	
Defendants.)	

The Plaintiff alleges:

1. The individual Defendant is a resident of Beaufort County, South Carolina and pursuant to § 15-7-30, South Carolina Code (1976 amended) venue is proper in Beaufort County. At all times mentioned below the defendant, Hoagland, was an agent and/or employee of Domains New Media, LLC acting within the scope of his agency and/or employment. Domains New Media, LLC is liable for Hoagland's acts and/or omissions.

2. The Plaintiff is the mayor of Bluffton, South Carolina and was the mayor of Bluffton at all times mentioned herein.

3. On October 7, 2015 the individual Defendant published a false email to Bill Evans and others that the Plaintiff had used (city) employees to sell memberships in the Hilton Head Chamber of Commerce. The Defendant, Hoagland, stated that the Plaintiff should be booted from office because of this. He further falsely stated in the email that the Plaintiff was a criminal and she should be booted from office and publicly disgraced. He also falsely accused the Plaintiff of knowing of abuse, violations and corruption and by implication ignoring these acts. The individual Defendant by his statements falsely accused the Plaintiff of a crime and of being unfit for her office of mayor.

4. On October 8, 2015, the individual Defendant published by email to Ami Franklin and others that the Plaintiff had misappropriated and misused funds, engaged in unfair competitive practices,

and committed IRS violations. In the same email he states: “[w]e are seeking to prove all and any crimes and many serious charges on many fronts. We have identified most and now request a major criminal investigation be launched.” The individual Defendant was referring to Plaintiff in stating ‘a major criminal investigation should be launched.’ The above statements which were false, accused the Plaintiff of a crime and of being unfit for office.

5. On October 8, 2015, by email to the Plaintiff and others, Hoagland, stated that “no credited newspaper or magazine would ever take my ads if they weren’t true.” In the email he states that Plaintiff “must pay for the suffering and stress you caused others and be publically disgraced to everyone in Bluffton including your family.” He further states that his job is to “expose corruption like you and turn into the authorities any info we have we feel is criminal.” The above statements falsely accuse the Plaintiff of crimes and of being unfit for office.

6. On October 22, 2015, the Defendant sent an email to Cathy Carstensen and others which stated “what Lisa Sulka did deserves much more that I stated. She not only needs to be booted from office but disgraced to everyone.” This false statement accuses Plaintiff of being unfit for office.

7. On October 26, 2015, in an email sent to Roberts Vaux and others, the individual Defendant stated; “Lisa Sulka is guilty of wrongdoing and I now believe what she did is a scheme with [redacted] was wrong and her empty words cannot make this better.” The above false statement falsely accuses Plaintiff of the crime of conspiracy.

8. On December 8, 2015, the individual Defendant emailed Taylor Smith and others that the Plaintiff “like [redacted] thinks they are dictators above the law or live in some fantasy world or suffer from megalomania disorder.” He further states in the email that he “will go on public record that once [redacted] and Lisa Sulka are both fully investigated I am convinced corruption will be found and it will be up to SC Courts if there are crimes to send them both to prison.” The above statements by the

Defendants are false and falsely accuse Plaintiff of a crime of being mentally ill, unfit for the office of mayor and of committing crimes.

9. On December 9, 2015, the individual Defendant emailed Taylor Smith and others and stated “again there is no nice word for people who lie, commit corruption, steal, abuse and more. We must not lose site (sic) of the victims who suffer from what Lisa Sulka and [redacted] actions.” This statement falsely accuses Plaintiff of committing crimes and being unfit for office of mayor.

In the email he further states: “I again stake my 40 year reputation on massive wrong doing by both Lisa Sulka and [redacted].” The above statement by the individual Defendant is false and falsely accuses Plaintiff of being unfit for office.

10. On December 10, 2015, the individual Defendant by email to Terry Finger and others published the following about the Plaintiff: “Really you are not fit to be a mayor and perhaps not even a real estate agent. I am also waiting the ruling from authority’s and ethic commission as you could actually be removed from office for what you did in breaking laws.” The above statements are false and falsely accuse the Plaintiff of being unfit for office and for her profession.

11. On April 12, 2017, the individual Defendant published by email to South Carolina Attorney General, Alan Wilson, and others about the Plaintiff: “what are you all going to do about our lying crooked, corrupt real estate agent Mayor Lisa Sulka? Add [redacted]. How much of her incompetent corrupt happy horse manure are we all supposed to stand? You understand she illegally used town employees to profit a private corporation correct? Not to mention her real estate dealings.” This statement falsely accuses the Plaintiff of being unfit for office and her profession, and further falsely accuses her of the crime of conspiracy.

12. The false and defaming statements made by the Defendants were published to numerous individuals listed in the above described emails. The false and defaming statements damaged the

Plaintiff's reputation by falsely accusing her of crimes, being unfit for office, being mentally ill, and being unfit for her profession.

13. The above described defamatory statements were published with actual malice by the Defendants with the intent to harm Plaintiff's reputation and to cause her to suffer mental anguish.

14. Because of the reckless and intentional conduct by the Defendants, Plaintiff is entitled to punitive damages.

WHEREFORE, Plaintiff prays for judgment against the Defendants for actual damages, punitive damages and for the costs of this action.

PETERS, MURDAUGH, PARKER, ELTZROTH
& DETRICK, P.A.

BY: /s/ John E. Parker

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ATTORNEYS FOR PLAINTIFF

July 26, 2017
Hampton, South Carolina