

RICO A. HICKMAN #297987
Plaintiff

VS

Lieutenant Anthony DAVIS,
(South Carolina Dept. of Corr.)
Respondent

In The State of South Carolina
In the Court of Common Pleas
Bishopville County, South Carolina

Tort Claim
Request for Evidentiary
Hearing

RECEIVED

SEP 25 2013

S.C. Supreme Court

Comes now, the petitioner in the above referenced matter and who brings this action against the respondent who acted under the color of state law and with deliberate intent are being sued in their official and individual capacities for sexual harassment against a/m of the South Carolina Dept of Corr.

On November 28, 2010, approx 4⁰⁰ Lieutenant Anthony Davis was conducting a security check on Lee C.I. smu (lock up) on the south wing. Plaintiff argues that he was standing in front of his cell door, Rm #103 during this time when, A. Lieutenant Anthony Davis approached his cell door, placing both hands in front of his mid section then proceeded to wash his eye while making an "R" inappropriate comment towards plaintiff, stating; "I bet you can suck a mean one. Lieutenant Anthony Davis continued in the same manner stating; I know you suck D*** and for plaintiff roommate Curtis Green to sleep with one eye open if he knew what he knew. Prior to this incident, November 28, 2010, Lieutenant Anthony Davis conducted a cell search on plaintiff cell, Rm #103 smu (lock up), in which plaintiff had to strip naked during this time Lieutenant Anthony Davis made an inappropriate comment that fell well below the standards of a sworn officer of the state, stating; "Plaintiff had a nice body and should consider exercising his beauty. There after, the prior incident that lead up to November 28, 2013. Plaintiff argues that Lieutenant Anthony Davis sexual harassment continued up until he left for the reserves. Actions taken in this matter; Plaintiff complained to the appropriate staff members at Lee C.I. as well as filed a step 1 & 2 inmate grievance that was both denied by the inst. & head quarters. Inmate grievance branch chief Ann. Hallman. In this civil

suit Plaintiff stated the names of four(4) witness that can can verify his claim against lieutenant Anthony Davis. witness names are as followed. Curtis Green, Demetrus Lewis, Roderick Drawhorn and (ofc) officer mihens who's first name is ulk at this time. Plaintiff has suffered from threats from other I/MS, emotional humiliation from staff members perfering him to being homosexual. Plaintiff has been deprived of partaking in any muslim practice at Lee CI south because it's been removed plaintiff carbon to name muslim acts.

Plaintiff moves to state that the foregoing is true and correct.


Respectfully submitted