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EXHIBIT B

Price II Complaint

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STATE OF SOUTH CAROLINA,

COUNTY OF SALUDA

HUGH PARKS PRICE

Plaintiff,

vs.

REBECCA BARTLEY

Defendant.

IN THE COURT OF COMMON PLEAS

SUMMONS

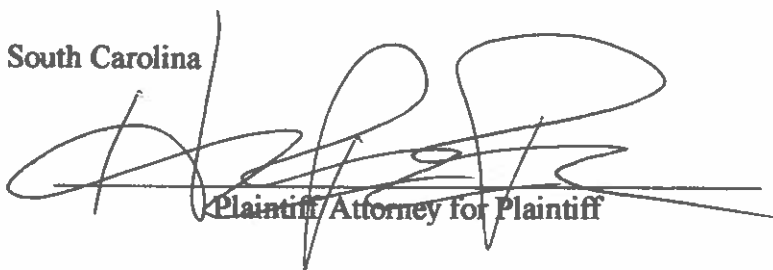
FILE NO. 2026-CP-41-00059

TO THE DEFENDANT ABOVE-NAMED: REBECCA BARTLEY

YOU ARE HEREBY SUMMONED and required to answer the complaint herein, a copy of which is herewith served upon you, and to serve a copy of your answer to this complaint upon the subscriber, at the address shown below, within thirty (30) days after service hereof, exclusive of the day of such service, and if you fail to answer the complaint, judgment by default will be rendered against you for the relief demanded in the complaint.

SALUDA COUNTY, South Carolina

Dated: 4/9/20


Plaintiff Attorney for Plaintiff

Address: 187 SPRUCE RD
WARD SC 29166

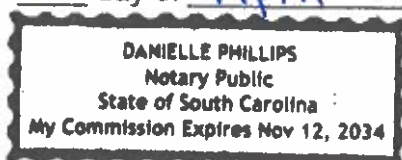
**SOUTH CAROLINA NOTARIAL CERTIFICATE
(JURAT STATEMENT)**

State of South Carolina

County of Richland

Sworn and Subscribed before me

On this 9 day of April (Month), 2020 (Year)





Notary Public for South Carolina

Commission Expires Nov 12, 2034

**STATE OF SOUTH CAROLINA
IN THE COURT OF COMMON PLEAS
COUNTY OF SALUDA
11TH JUDICIAL CIRCUIT**

HUGH PARKS PRICE, pro se
Plaintiff

v.

Case No. 2026-41-00059

REBECCA BARTLEY, in
her individual capacity
Defendant.

**COMPLAINT
(Jury Trial Demanded)**

INTRODUCTION

Plaintiff Hugh Parks Price brings this action against Rebecca Bartley, in her individual capacity. Ms. Bartley is a Victim's Advocate employed by the Saluda County Sheriff's Department, for malicious prosecution, abuse of process, slander per se, civil conspiracy, and defamation arising from a sustained multi-year pattern of false representations to courts and law enforcement that caused Plaintiff to be wrongfully detained, subjected to oppressive and unconstitutional bond conditions, denied bond altogether on charges that were subsequently dismissed, and deprived of his liberty for 354 cumulative days.

The timely counts of this Complaint arise from specific acts occurring within the two-year limitations period, principally: (1) Defendant's false representations to the court at the April 9, 2024 bond hearing, in furtherance of a charge subsequently dismissed; (2) Defendant's false representations at the June 12, 2024 bond revocation hearing that resulted in 318 days of incarceration; (3) Defendant's sworn testimony on January 8, 2026 admitting that she routinely designates conduct as stalking without regard to whether any stalking has occurred; and (4)

Defendant's June 18, 2025 participation in an unauthorized restraining order renewal hearing during the pendency of an appeal.

The pattern of conduct predating the limitations period is incorporated as background and pattern evidence demonstrating Defendant's modus operandi, actual malice, and the absence of probable cause in all of her representations. Critically, Defendant made the identical admission — that she **always** checks the stalking box on restraining order petitions regardless of whether stalking has occurred — on a recording obtained in 2023, confirming that her January 8, 2026 sworn admission was no isolated remark but the acknowledgment of a longstanding and deliberate practice.

PARTIES, JURISDICTION, AND VENUE

1. Plaintiff Hugh Parks Price is a citizen and resident of Saluda County, South Carolina, residing at 187 Spruce Rd. , Ward, South Carolina 29166.
2. Defendant Rebecca Bartley is employed as a Victim's Advocate by the Saluda County Sheriff's Department, with a place of business at 100 Law Enforcement Way, Saluda, South Carolina 29138. She is a civilian, non-sworn employee who holds no law enforcement commission or certification, no arrest authority, and exercises no sovereign governmental power. At all times relevant to this Complaint, Defendant acted in her individual capacity for her own purposes, motivated by actual malice, and — to the extent her conduct exceeded the bounds of legitimate victim advocacy — outside the scope of any official function immunized by statute.

3. This Court has subject matter jurisdiction pursuant to S.C. Code Ann. § 14-11-35. Venue is proper in Saluda County because the acts giving rise to this Complaint occurred in Saluda County, South Carolina.
4. Defendant is sued exclusively in her individual capacity. Personal service upon Defendant under Rule 4(d)(1), SCRPC, is the correct and legally sufficient method of service for an individual defendant sued in her individual capacity. Service is also being made upon the Saluda County Sheriff's Office and the Office of the South Carolina Attorney General pursuant to Rule 4(d)(5), SCRPC, without waiver of Plaintiff's position that such service is not legally required for a civilian employee sued individually.

BACKGROUND AND PATTERN EVIDENCE

(Historical context establishing pattern, modus operandi, and actual malice; not asserted as independent counts for limitations purposes)

5. On July 13, 2023, Defendant drafted and signed restraining order petitions on behalf of Lisa Lee Molstad and Brian Pippin — Case Nos. 2023-OR-41-10100009 and 2023-OR-41-10100010, respectively — containing knowingly false representations, including the designation of Plaintiff's conduct as stalking. At that time, Plaintiff held a lease on the subject property, shared a mailbox, and was residing there. Defendant knew or should have known these facts, yet affixed the stalking designation without factual basis.
6. On July 31, 2023, Defendant appeared at the restraining order hearing to represent both Molstad and Pippin simultaneously, presenting an inherent conflict of interest. Defendant requested a stalking injunction against Plaintiff. The transcript of that hearing has never

been produced; however, the Clerk D. Corbett confirmed in emails and the conclusion of the hearing that a transcript did exist. Its loss or suppression is unexplained.

7. On August 8, 2023, Defendant appeared by video conference at a bond hearing before Judge Shults and requested maximum bond in connection with Case No. 2023-A-411-02-00072 (Violation of Restraining Order — a 30-day misdemeanor carrying a \$500 fine) and Case No. 2023-A-411-02-00073 (Aggravated Stalking — a 10-year felony). Judge Shults set bond at \$100,000 on the misdemeanor and \$250,000 on the felony. Plaintiff remained incarcerated for 25 days — a period that satisfied the full sentence of the misdemeanor charge with more than sixty percent time served. That video bond hearing was not recorded in violation of state law, a fact subsequently admitted in email writings by the Clerk of Court, Victoria Maples.
8. On September 28, 2023, Plaintiff's own restraining order petitions against Molstad and Pippin were dismissed in a hearing before Judge Freeman. Defendant and the Sheriff's Department Service Officer had failed to properly serve Plaintiff with notice of the hearing — a fact documented by Officer Wilson's Affidavits of Non-Service. Judge Freeman's written decision nonetheless falsely states that Defendant was present and testified that Plaintiff had been notified. In fact, Defendant was out of town and Officer Crouch appeared in her place. This false statement of fact in a judicial order is provable by video evidence and contemporaneous records. Defendant has admitted on a recording that she failed to properly serve Plaintiff at this juncture.
9. Also in the fall of 2023, Defendant made admissions on recordings in which she acknowledged: (a) the failure to properly serve Plaintiff in connection with the September

28, 2023 proceedings; and (b) that she **"always"** checks the stalking box on restraining order petitions regardless of whether any stalking has occurred. This statement — made in 2023 — is substantively identical to Defendant's sworn admission on January 8, 2026, confirming that this practice was longstanding and deliberate, not an isolated remark.

10. On November 7, 2023, Defendant dispatched officers to Molstad's location based on a complaint — apparently submitted directly to Defendant by Molstad — that Plaintiff's mother was "harassing" Molstad. In fact, Plaintiff's mother was lawfully caring for Plaintiff's animals within the bounds permitted by court order. Plaintiff was not present on the restricted property. Defendant's dispatch of officers on this basis reflects her participation in efforts to manufacture violations of Plaintiff's restraining order conditions.
11. On December 12, 2023, Defendant denied Plaintiff the opportunity to file restraining order petitions against Barbara Hughes and Stephanie Gentry. This denial was recorded on body camera at Plaintiff's request and occurred in the presence of Investigator Hardin. Defendant led Plaintiff to believe that he could not pursue restraining orders without her assistance, when in fact such petitions are available as pro se actions. Defendant's refusal obstructed Plaintiff's access to legal process to which he was entitled.
12. On March 30, 2024, Defendant received emails forwarded by Molstad from Frank Vajo. Defendant forwarded those emails to Lieutenant Christopher Hartless of the Saluda County Sheriff's Department, who had been conducting ongoing investigations of Plaintiff. "Intimidation Of A Witness" warrant no. 2024A4110100041 was served upon Plaintiff. Frank Vajo is not a witness in any proceeding involving Plaintiff. These emails between Columbia, South Carolina and New York — were outside Saluda County's

territorial jurisdiction — Frank Vajo, forwarded these to Molstad without authorization and contrary to express instructions, in apparent retaliation for Plaintiff's cooperation with the Screven County Sheriff regarding "victim" Erin Grace Vajo, who didn't learn of the emails until more than two weeks after her relevant deposition had been taken.

13. On April 2, 2024, Defendant met with Molstad and Lieutenant Hartless at the Saluda County Sheriff's Department. The purpose of that meeting was to formulate new criminal charges against Plaintiff. Molstad's 911 later that day call corroborates this meeting.

STATEMENT OF FACTS — ACTS WITHIN LIMITATIONS PERIOD

A. The April 9, 2024 Bond Hearing _ Fabricated Charge

14. On April 9, 2024, Plaintiff appeared for a bond hearing in connection with Case No. 2024-A-411-01-00041, which included a charge of Witness Intimidation — a ten-year felony. Defendant appeared at that hearing.
15. At the April 9, 2024 hearing, Defendant stated to the presiding judge that Plaintiff had been "making threats against a witness." Defendant stated that she was "representing the state and the victim" simultaneously — a structural conflict of interest that undermined her role as an objective advocate. Neither Erin Vajo nor Lisa Molstad — the alleged victims — was present at the hearing.
16. Defendant requested that bond be denied, or maximum cash surety, mirroring the identical request she had made at the August 8, 2023 hearing. The presiding Judge Freeman denied bond altogether.
17. The factual predicate for the Witness Intimidation charge was fatally defective. The emails on which the charge was based were sent by Plaintiff — from Columbia, South Carolina to New York, entirely outside Saluda County jurisdiction.

Frank Vajo was not a case witness. His daughter Erin Grace Vajo had no knowledge of the emails until more than two weeks after the deposition in question. The charge was in substance a fabrication, developed in the April 2, 2024 meeting between Defendant, Molstad, and Lieutenant Hartless. Ms. Vajo was not present.

18. Approximately one month after the April 9, 2024 hearing, Saluda County Summary Court was recused from Case No. 2024-A-411-01-000041 by order of the South Carolina Supreme Court. The Witness Intimidation charge and Restraining Order violation were subsequently dismissed and/or entered as a nolle prosequi, constituting a termination in Plaintiff's favor. A concurrent charge of Driving Under Suspension 4/5/24 was also dismissed, further confirming the absence of probable cause underlying the entire proceeding.

Defendant knew, or should have known with reasonable inquiry and the knowledge she possessed from the 4/2/24 meeting, that the Witness Intimidation charge lacked a lawful factual predicate. Her appearance at the 4/9/24 hearing to oppose bond and characterize Plaintiff as threatening was undertaken with actual malice and without probable cause.

B. The June 12, 2024 – Bond Revocation; 318 Days of Continual Incarceration

20. On June 12, 2024, Defendant appeared at a bond revocation and denial hearing concerning Plaintiff. Defendant made the following false and material representations to the presiding judge:
 - a. That she had "been knowing the victims for over a year" — a statement calculated to suggest an ongoing and serious victim relationship, when in fact Defendant's contact with Molstad had begun only on July 13, 2023 and Vajo on December 22, 2023;

- b. That "the Sheriff's Department has been out there over 20 times" — an inflated and unverified number unsupported by the actual record of law enforcement contacts;
- c. That she had "seen where the defendant has violated his bond both before and after his time to be there". Plaintiff was fully compliant with the terms and conditions of his bond at all relevant times. Counsel objected to Defendant's baseless and unsupported statement
- d. That "the victims are fearful of this defendant" — a characterization made without factual support and designed to inflame the court's assessment of Plaintiff's dangerousness.

21. Based in material part on Defendant's false representations, the presiding judge revoked and denied Plaintiff's bond. Plaintiff was thereafter incarcerated for 318 cumulative days 4/5/24 thru 2/18/25— a period of detention that constitutes the most severe consequence flowing from Defendant's false statements in these proceedings.

22. Defendant's statement regarding familiarity with "the victims" was designed to convey a long history of involvement suggesting persistent danger to those victims. In fact, Defendant's involvement began in July 2023 and was limited to her role in proceedings against Plaintiff — proceedings infected throughout by the same pattern of unsupported stalking designations described in this Complaint.

C. June 18, 2025 — Unauthorized Restraining Order Renewal

23. On June 18, 2025, Defendant appeared with opposing counsel Christian G. Spradley at a restraining order renewal hearing before Judge Halfacre. At that time, the underlying restraining order was expired and the matter was pending before the South Carolina

Court of Appeals. Defendant presented to the court and requested renewal of both the restraining order and the stalking injunction. Judge Halfacre granted the petition.

24. Defendant's participation in a renewal hearing on an expired, appealed restraining order with no new incidents or allegations of any contact with "victim" whatsoever—reflects a willful continuation of the pattern of process abuse described in this Complaint.

D. January 8, 2026 — Sworn Admission of Systematic Stalking-Box Practice

25. On January 8, 2026, Defendant testified under oath at a hearing in Saluda County again concerning the restraining order matter with whom Plaintiff had a phone conversation in 2023 in which Defendant made an identical statement on recording, asked Defendant a question designed to confirm whether she would repeat that admission under oath.
26. Defendant testified: **"I always check the stalking box."** This sworn statement — made in open court and on the record — confirms that Defendant's designation of Plaintiff's conduct as stalking across all prior petitions and proceedings was made as a matter of fixed practice, without individual factual assessment, without regard for whether any stalking had in fact occurred, and in order to achieve maximum criminal consequences.
27. This admission constitutes direct evidence of actual malice pervading every representation Defendant has made to courts and law enforcement concerning Plaintiff. It also constitutes slander per se insofar as it reflects Defendant's standing representation — made through her petitions and testimony in multiple proceedings — that Plaintiff is a stalker and a threat to the community, without factual basis.
28. Defendant also appeared at a bond hearing before Judge Shults on March 17, 2026. Plaintiff objected to Defendant's participation on grounds of conflict of interest, given the

pendency of this litigation. Defendant's continued appearances in proceedings adverse to Plaintiff, after having been served with a civil lawsuit arising from those very appearances, demonstrates the willful and ongoing nature of her conduct.

COUNT I — MALICIOUS PROSECUTION

29. Plaintiff realleges and incorporates by reference all preceding paragraphs.
30. The elements of malicious prosecution under South Carolina law are: (1) institution of criminal proceedings by the defendant against the plaintiff; (2) termination of those proceedings in the plaintiff's favor; (3) absence of probable cause; (4) malice; and (5) damages. *Jordan v. Deese*, 317 S.C. 260, 452 S.E.2d 838 (1995).
31. Institution of Proceedings: Defendant actively participated in the institution and continuation of criminal proceedings against Plaintiff, including the Witness Intimidation charge in Case No. 2024-A-411-01-00041, by: (a) receiving, evaluating, and forwarding the Vajo emails to Lieutenant Hartless on March 30, 2024; (b) participating in the April 2, 2024 planning meeting with Molstad and Hartless; and (c) appearing at the April 9, 2024 bond hearing to advocate for bond denial and characterize Plaintiff as threatening.
32. Favorable Termination: The Witness Intimidation and Restraining Order charge was dismissed and/or nolle prossed. The accompanying Driving Under Suspension charge was also dismissed. Saluda County Summary Court was thereafter recused from the cases by Supreme Court order. These dispositions constitute terminations in Plaintiff's favor.
33. Absence of Probable Cause: No probable cause existed for the Witness Intimidation charge. The factual predicate — Frank Vajo's emails — was generated by a person who was not a case witness, sent from outside Saluda County, without authorization, and

unknown to the putative complaining witness Erin Vajo until weeks after her relevant deposition. Defendant knew these facts or had access to information establishing them before she appeared at the April 9, 2024 hearing to oppose bond.

34. **Malice:** Defendant acted with actual malice. Her 2023 audio recording admission and her January 8, 2026 sworn admission that she routinely designates conduct as stalking without factual basis establish actual malice as a matter of practice. Her participation in the April 2, 2024 charge-formulation meeting — three days before the bond hearing — establishes that her April 9, 2024 advocacy was not a good-faith exercise of victim services but a coordinated effort to harm Plaintiff.
35. **Damages:** As a direct and proximate result of Defendant's malicious prosecution, Plaintiff suffered: denial of bond; continued pre-trial detention; humiliation and emotional distress; damage to reputation; loss of income and economic opportunity; and costs of legal defense.

COUNT II — ABUSE OF PROCESS

36. Plaintiff realleges and incorporates by reference all preceding paragraphs.
37. The elements of abuse of process under South Carolina law are: (1) a willful act in misuse of process; and (2) an ulterior purpose not proper in the regular conduct of the proceeding. *Huggins v. Winn-Dixie Greenville, Inc.*, 252 S.C. 353, 153 S.E.2d 297 (1969).
38. **Willful Misuse:** Defendant's admitted practice of designating conduct as stalking on restraining order petitions as a matter of fixed routine — confirmed on recording in 2023 and under oath on January 8, 2026 — constitutes a willful and systematic misuse of the

judicial process. Defendant used the stalking label not because any individual factual assessment supported it, but to trigger the enhanced legal consequences associated with that designation: higher bonds, more restrictive conditions, greater reputational damage, and increased prosecutorial leverage.

39. **Ulterior Purpose:** The restraining order and bond petition process exists to protect genuine victims from imminent harm. Defendant perverted that process to accomplish purposes not proper in its regular conduct, including: (a) securing conditions of pretrial release so oppressive as to amount to constructive exile; (b) depriving Plaintiff of his ability to reside on property to which he held a lawful lease; (c) suppressing Plaintiff's ability to pursue legitimate civil remedies; and (d) using the court process as an instrument of retaliation for Plaintiff's cooperation with other law enforcement agencies.

Defendant's abuse of process was ongoing from July 2023 through at least March 2026, with each appearance she made at proceedings adverse to Plaintiff constituting a further overt act in furtherance of the same ulterior purpose.

Damages: As a direct and proximate result of Defendant's abuse of process, Plaintiff suffered the damages described in Paragraph 35 above, plus 318 days of incarceration following the April 9, 2024 bond denial and June 12, 2024 bond denial/revocation.

COUNT III — SLANDER PER SE

42. Plaintiff realleges and incorporates by reference all preceding paragraphs.
43. The elements of defamation under South Carolina law are: (1) a false, defamatory statement; (2) unprivileged publication to a third party; (3) fault on the part of the

defendant; and (4) damages or, for per se categories, presumed damages. Holtzscheiter v. Thomson Newspapers, 332 S.C. 502, 506 S.E.2d 497 (1998).

44. False Statements — April 9, 2024: Defendant told the court that Plaintiff had been "making threats against a witness" and characterized Plaintiff as dangerous. These statements were false. The Witness Intimidation charge arising from the same period was subsequently dismissed for want of probable cause, confirming the absence of any factual basis for Defendant's characterizations.
45. False Statements — June 12, 2024: Defendant told the court: (a) she had known the victims "for over a year" (false — her involvement began July 2023, approximately eleven months before the June 12, 2024 hearing); (b) the Sheriff's Department had responded more than twenty times (unsubstantiated and inflated); (c) she had personally observed Plaintiff violating his bond conditions (false — Plaintiff was compliant); and (d) the victims were fearful of Plaintiff (unsupported by competent evidence and used to manufacture a dangerousness finding).
46. Slander Per Se: Statements that falsely impute criminal conduct are slander per se under South Carolina law, warranting presumed damages. Murray v. Holnam, Inc., 344 S.C. 129, 542 S.E.2d 743 (Ct. App. 2001). Defendant's false oral characterizations of Plaintiff as threatening witnesses, violating bond conditions, and engaging in stalking conduct constitute slander per se in each instance.
47. Privilege Defeated: The qualified privilege attaching to statements in judicial proceedings is defeated by actual malice — knowledge of falsity or reckless disregard for truth. Bell v. Evening Post Pub. Co., 318 S.C. 558, 459 S.E.2d 315 (Ct. App. 1995); Cullum v. Dun &

Bradstreet, Inc., 228 S.C. 384, 90 S.E.2d 370 (1955). Defendant's 2023 recording admission and her January 8, 2026 sworn admission that she routinely designates conduct as stalking without factual basis establish reckless disregard for truth as a matter of fixed practice, not isolated error.

48. Damages: Plaintiff is entitled to presumed damages on the slander per se claims. Plaintiff also suffered actual damages including continued adverse legal treatment, reputational harm, humiliation, and emotional distress.

COUNT IV — CIVIL CONSPIRACY

49. Plaintiff realleges and incorporates by reference all preceding paragraphs.
50. The elements of civil conspiracy under South Carolina law are: (1) a combination of two or more persons; (2) for the purpose of injuring the plaintiff; (3) which causes Plaintiff special damage. Lee v. Chesterfield Gen. Hosp., 257 S.C. 252, 185 S.E.2d 263 (1971).
51. Combination: Beginning no later than April 2, 2024, Defendant combined with Lieutenant Christopher Hartless and Lisa Lee Molstad to formulate and advance criminal charges against Plaintiff. That meeting — corroborated later by Molstad's own 911 call — demonstrates the coordinated nature of the scheme. Defendant's earlier act of forwarding the Vajo emails to Hartless on March 30, 2024 demonstrates her role in initiating and advancing the conspiracy.
52. Purpose of Injury: The purpose of the combination was to injure Plaintiff by: fabricating a basis for felony charges that would justify denial of bond; securing Plaintiff's prolonged pre-trial detention; suppressing Plaintiff's ability to pursue civil remedies; and perpetuating Plaintiff's removal from property to which he held a lawful lease.

53. Special Damages: As a direct result of the conspiracy, Plaintiff suffered: 318 days of incarceration; bond revocation; loss of income and business opportunity; relocation expenses; legal defense costs; and the permanent adverse effects of having been held on a ten-year felony charge that was ultimately dismissed.

DAMAGES

54. As a direct and proximate result of Defendant's conduct as alleged herein, Plaintiff has suffered the following damages:

a. Actual Damages: 318 cumulative days of incarceration; loss of liberty; relocation expenses; GPS monitoring costs; lost income and business opportunities; legal defense costs; and severe emotional distress.

b. Presumed Damages: Arising from slander per se across multiple hearings, entitling Plaintiff to a damages award without proof of specific economic loss on each occasion.

c. Special Damages: Loss of civil remedies; damage to ongoing legal proceedings; loss of leasehold interest; and consequential economic losses flowing from 318 days of incarceration.

d. Punitive Damages: Defendant's conduct was willful, wanton, and malicious. Her admitted practice of falsely designating conduct as stalking as a matter of fixed policy — confirmed on recording in 2023 and under oath in 2026 — warrants punitive damages to deter this conduct and protect others subjected to the same practice. *Fleming v. Rose*, 350 S.C. 488, 567 S.E.2d 857 (2002).

INJUNCTIVE RELIEF

55. Plaintiff respectfully requests that this Court enter an injunction prohibiting Defendant from making any further representations to courts, law enforcement, or prosecutors characterizing Plaintiff as a stalker or as threatening, unless and until Defendant can establish an individual factual basis for such a characterization. Defendant's admitted practice of reflexively applying the stalking designation creates an ongoing risk of irreparable harm to Plaintiff's reputation and liberty interests that monetary damages cannot fully redress.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff Hugh Parks Price respectfully requests that this Court enter judgment in his favor and against Defendant Rebecca Bartley as follows:

- A. Compensatory and actual damages in an amount to be determined by the jury;
- B. Presumed damages on the slander per se counts;
- C. Special damages as proven at trial;
- D. Punitive damages in an amount sufficient to deter Defendant and others similarly situated;
- E. Injunctive relief as described above;
- F. Pre- and post-judgment interest as allowed by law;
- G. Costs of this action; and
- H. Such other and further relief as this Court deems just and proper.

Respectfully submitted,

s/ Hugh Parks Price Hugh
Parks Price, pro se
Defendant/Appellant

187 Spruce Rd, Pine Grove
Rd Ward, SC 29166

Dated: April 9, 2026


4/9/26

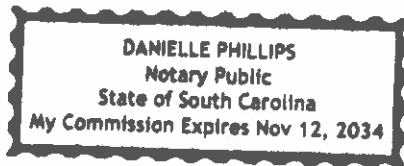
**SOUTH CAROLINA NOTARIAL CERTIFICATE
(JURAT STATEMENT)**

State of South Carolina

County of Richland

Sworn and Subscribed before me

On this 9 day of April (Month), 2020 (Year)




Notary Public for South Carolina

Commission Expires: NOV 12, 2034