

STATE OF SOUTH CAROLINA
COUNTY OF BEAUFORT

IN THE COURT OF COMMON PLEAS
FOURTEENTH JUDICIAL CIRCUIT

CASE NO: 2026-CP-

SUNDEYA CLARK,

PLAINTIFF,

VS.

SUMMONS

WILLIE TURRAL FOOD
SERVICES, LLC D/B/A WILLIE'S,

DEFENDANT.

TO: THE ABOVE-NAMED DEFENDANT:

YOU ARE HEREBY SUMMONED and required to answer the Complaint in this action, a copy of which is herewith served upon you, and to serve a copy of your Answer to said Complaint upon the subscribers at their office, 4401 Belle Oaks Drive, 3rd Floor, North Charleston, South Carolina 29405, within thirty (30) days from the service hereof, exclusive of the day of such service; except that the United States of America, if named, shall have sixty (60) days to answer from the service hereof, exclusive of such service; and if you fail to Answer the Complaint within the time aforesaid, judgment by default will be rendered against you for the relief demanded in the Complaint.

MORGAN & MORGAN

/s/ Jason Daigle

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February 27, 2026
North Charleston, South Carolina

**STATE OF SOUTH CAROLINA
COUNTY OF BEAUFORT**

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FOURTEENTH JUDICIAL CIRCUIT**

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SUNDEYA CLARK,

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VS.

**WILLIE TURRAL FOOD
SERVICES, LLC D/B/A WILLIE'S,**

DEFENDANT.

**COMPLAINT
(JURY TRIAL DEAMANDED)**

Plaintiff, by and through the undersigned counsel, complaining of the above-named Defendant, alleges unto this Honorable Court as follows:

JURISDICTION AND VENUE

1. Plaintiff, Sundeya Clark, is a citizen and resident of the County of Beaufort, State of South Carolina.

2. Defendant Willie Turral Food Services, LLC d/b/a Willie's (hereinafter "Willie's") is a domestic limited liability company organized and existing under the laws of the State of South Carolina where it has a principal place of business in the County of Beaufort.

3. At all times relevant to the matters set forth herein, Defendant was the owner, operator and principal manager of Willie's, a bar and grill located at 7 Dr. Martin Luther King Jr. Drive, St. Helena Island, South Carolina 29920 and was responsible for its existence and maintenance.

4. The parties and subject matter contained herein are within this Court's jurisdiction.

5. Venue is proper because the most substantial part of the alleged acts or omissions giving rise to the cause of action occurred in Beaufort County, South Carolina.

FACTS

6. Plaintiff incorporates by reference the allegations of the Paragraphs above as if fully repeated herein.

7. On October 11, 2025, Plaintiff was seriously and permanently injured while at Defendant's establishment, Willie's.

8. Willie's was licensed by the State of South Carolina and was subject to all applicable statutes, state administrative regulations, and the common law concerning the sale of alcohol.

9. At all times herein, Willie's acted by and through its employees and/or agents.

10. At all times herein, Willie's employees and/or agents were acting within the course and scope of their employment.

11. On October 11, 2025, Anferny Freeman arrived at Willie's with a firearm.

12. Mr. Freeman consumed alcohol at Willie's and Willie's served Mr. Freeman a quantity of alcohol causing him to become intoxicated and/or served him while he was intoxicated, in violation of state law.

13. The alcoholic beverages sold or given to Mr. Freeman by Willie's contributed to, or caused him to become, or remain intoxicated, at all times relevant hereto.

14. Mr. Freeman, being intoxicated as a result of alcohol served to him by Willie's, seriously and permanently injured Plaintiff.

15. Plaintiff went to Willie's with a group of friends. While Plaintiff was at Willie's, Mr. Freeman used his firearm and began shooting patrons. During this mass shooting, Mr. Freeman

shot numerous patrons including Plaintiff.

16. Despite the mass shooting occurring in close proximity and in clear view of Willie's and its employees and agents, nothing was done to prevent the shooting or to intervene to minimize the damages sustained by Plaintiff.

FIRST CAUSE OF ACTION
(Negligence and Negligence *Per Se*)

17. Plaintiff incorporates by reference the allegations of the Paragraphs above as if fully repeated herein.

18. Willie's owed Plaintiff a duty of reasonable care.

19. Willie's owed Plaintiff a statutory duty not to serve alcohol to intoxicated persons.

20. Willie's was negligent, grossly negligent, negligent *per se*, careless, reckless, willful and wanton in one or more of the following particulars:

- a. Serving alcohol to Mr. Freeman when it knew or should have known that he was intoxicated, in violation of the common law and statutory laws of the State of South Carolina;
- b. Serving alcohol to Mr. Freeman in an amount causing him to become intoxicated, in violation of the common law and statutory laws of the State of South Carolina;
- c. In failing to appreciate Mr. Freeman's intoxication while being served alcohol and for failure to remove him from the premises;
- d. In failing to ensure, after serving Mr. Freeman alcohol, that he would not be a danger to invitees;
- e. In failing to properly and adequately supervise employees, bartenders, and wait staff with regard to the proper service of alcohol;
- f. In failing to adequately and properly monitor the activities of its employees, waitstaff, bartenders and servers in the service of alcohol to Mr. Freeman;
- g. In failing to sufficiently train employees in their duties with regard to the service of alcohol to the general public;
- h. In failing to implement and maintain policies and procedures necessary for the

reasonable service of alcohol to the general public;

- i. In deviating from the accepted standards of care in the service of alcohol to intoxicated persons;
- j. In creating an atmosphere of encouraging the consumption of excessive amounts of alcohol;
- k. In allowing Mr. Freeman to remain on the premises while in a dangerous state or condition;
- l. In failing to observe or supervise Mr. Freeman to ensure he would not cause harm or injury to innocent third person, including Plaintiff;
- m. In failing to warn Plaintiff and other innocent third persons of Mr. Freeman's intoxication and danger, and;
- n. In any other such further particulars as the evidence may show.

21. As a direct result of Willie's negligence, gross negligence, negligence *per se*, carelessness, willful and wantonness, and recklessness, Plaintiff has sustained the following damages:

- a. Physical pain;
- b. Suffering;
- c. Emotional distress;
- d. Embarrassment and humiliation;
- e. Loss of enjoyment of life;
- f. Increased susceptibility to future injury;
- g. Past and future medical expenses;
- h. Permanent disfigurement and scarring;
- i. Permanent mental injury;
- j. Permanent physical injury, and;
- k. Other injuries and damages that may be shown at trial.

22. Due to the reckless, willful, and wanton actions and/or omissions of Willie's, Plaintiff is entitled to recover actual and punitive damages in whatever amount the finder of fact determines.

SECOND CAUSE OF ACTION
(Negligence/Gross Negligence/Recklessness)

23. Plaintiff incorporates by reference the allegations of the Paragraphs above as if fully repeated herein.

24. At all times relevant hereto, Plaintiff was an invitee of Willie's and Willie's accepted responsibility for and undertook to protect Plaintiff from both latent and known dangers at the premises.

25. Willie's owed a duty of care to Plaintiff to discover safety risks and dangers and take safety precautions to warn Plaintiff of or eliminate unreasonable safety risks and dangers which it knew to exist or should have discovered.

26. Willie's had a non-delegable duty on the above date and an obligation to make its premises reasonably safe for its business invitees, including taking into account the use for which the premises are put.

27. Willie's knew the use to which the premises would be put – a bar in which large amounts of alcohol would be sold and served to the business invitees.

28. The primary purpose of Willie's invitation is the consumption of alcohol by its customers, and Willie's is obligated to make its premises reasonable safe in light of that purpose.

29. Willie's knew or should have known that intoxicated patrons, such as Mr. Freeman, posed a danger to innocent third persons, including Plaintiff.

30. Despite this knowledge, Willie's did not properly or adequately ensure the safety of their business invitees, including Plaintiff.

31. Plaintiff entered the premises of Willie's on October 11, 2025, with the consent and with the implied assurance of preparation and reasonable care for her protection and safety while she was there.

32. While on the premises of Willie's, Plaintiff encountered unreasonably dangerous conditions in intoxicated and violent Mr. Freeman.

33. A reasonable inspection of the premises would have revealed the dangerous conditions which were created and maintained by Willie's.

34. Willie's created and maintained the dangerous conditions despite having actual and/or constructive knowledge of the dangerous conditions.

35. Willie's did not warn Plaintiff of the dangerous conditions that then and there existed.

36. Willie's did not eliminate the dangerous conditions prior to Plaintiff's injury.

37. As a direct result of Willie's negligence, gross negligence, carelessness, willful and wantonness, and recklessness, Plaintiff has sustained the following damages:

- a. Physical pain;
- b. Suffering;
- c. Emotional distress;
- d. Embarrassment and humiliation;
- e. Loss of enjoyment of life;
- f. Increased susceptibility to future injury;
- g. Past and future medical expenses;
- h. Permanent disfigurement and scarring;
- i. Permanent mental injury;

- j. Permanent physical injury, and;
- k. Other injuries and damages that may be shown at trial.

38. Due to the reckless, willful, and wanton actions and/or omissions of Defendant, Plaintiff is entitled to recover actual and punitive damages in whatever amount the finder of fact determines.

THIRD CAUSE OF ACTION
(Negligent Security)

39. Plaintiff incorporates by reference the allegations of the Paragraphs above as if fully repeated herein.

40. Willie's undertook a duty to Plaintiff to exercise reasonable and ordinary care to maintain the premises, including adjacent areas thereto, in a condition reasonably safe for use by invitees and the public.

41. Willie's undertook a duty to take such precautions as were reasonably necessary to protect invitees and the public, including Plaintiff, from reasonably foreseeable criminal attacks.

42. At all material times, Willie's, through its agents and/or employees, knew, or should have known, through the exercise of reasonable and ordinary care, that the premises was subject to criminal activity. Specifically, said criminal acts were reasonably likely to be perpetuated on invitees and the public unless Willie's took appropriate measures to provide reasonable security for such individuals.

43. Willie's, through its agents and/or employees, knew, or in the exercise of reasonable care, should have known that individuals, including Plaintiff, could not take the necessary and reasonable measures to provide for their own security while on the subject premises, including areas adjacent thereto.

44. As a result of the allegations set forth herein, at all material times the criminal attack

perpetrated against Plaintiff was reasonably foreseeable to Willie's and Willie's was in a superior position to appreciate such hazards and take necessary steps to prevent harm to invitees and the public, including, but not limited to, Plaintiff.

45. Willie's, by and through its agents and/or employees, breached its duty to exercise reasonable care for the safety and protection of invitees and the public, including Plaintiff, and acted in a careless and negligent manner in various respects including, but not limited to, the following acts of omission or commission:

- a. Failing to provide competent security for the premises;
- b. Failing to warn, protect, guard and secure the safety of patrons, including Plaintiff, when Willie's knew or should have known that the subject premises had a history of similar criminal acts;
- c. Failing to police, patrol, guard, deter and otherwise provide adequate protection when Willie's knew or should have known of foreseeable criminal acts on persons;
- d. Failing to prepare and/or implement and/or properly implement adequate security policies, security measures and security procedures necessary to protect Plaintiff and others on the premises;
- e. Failing to take additional security measures after being put on notice that the security measures in force were inadequate;
- f. Failing to adequately provide overall security plan that would meet known industry standards and customs for safety in the community;
- g. Failing to hire persons, employees, companies or agents reasonably suited for providing, implementing and maintaining property security measures adequate

to ensure the safety of its patrons, including the area of the premises where the subject incident occurred;

- h. Failing to intervene in the assault on Plaintiff;
- i. Failing to stop Mr. Freeman from committing a mass shooting;
- j. Failing to allow Mr. Freeman on the premises with a firearm;
- k. Failing to properly train its employees/agents in a reasonable manner, and;
- l. Any such other particulars the evidence may show.

All of which were the direct and proximate cause of the injuries and damages suffered by Plaintiff herein.

46. As a direct and proximate result of Willie's negligence, gross negligence, willful, wanton, reckless and careless conduct, Plaintiff has incurred and will continue to incur medical treatment and expenses, loss of income, pain and suffering, emotional anguish, and loss of enjoyment of life.

47. As a direct and proximate result of the acts and omissions of Willie's, Plaintiff is entitled to an award of actual and punitive damages in an amount to be determined by the trier of fact.

WHEREFORE, Plaintiff respectfully prays for judgment against Defendant for actual, consequential, and punitive damages in an amount to be determined by the trier of fact, for the costs and disbursements of this action, and for such other and further relief as this Court deems just and proper.

Plaintiff demands a trial by jury on all issues so triable.

[Signature page to follow]

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/s/***Jason Daigle***

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