ELECTRONICALLY FILED - 2026 Aug 10 4:59 PM - BEAUFORT - COMMON PLEAS - CASE#2026CP0701970

STATE OF SOUTH CAROLINA COUNTY OF BEAUFORT Stephanie Fritz, Plaintiff, v. City of Beaufort, Dale McDorman, and Stephanie Price, Defendants.	IN THE COURT OF COMMON PLEAS FOURTEENTH JUDICIAL CIRCUIT **SUMMONS**

TO THE DEFENDANTS ABOVE NAMED:

YOU ARE HEREBY SUMMONED and required to answer the Complaint herein, a copy of which is 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 (thirty five (35) days if served by United States Mail) after service hereof, exclusive of the date 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.

BY: s/J. Paul Porter

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August 10, 2026
Columbia, South Carolina

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EMPLOYMENT CASE

The Plaintiff, complaining of the Defendants, respectfully alleges as follows.

PARTIES AND JURISDICTION

1. Plaintiff Stephanie Fritz ("Plaintiff") is a citizen and resident of Beaufort County, South Carolina.

2. Defendant City of Beaufort ("Defendant City") is a municipality organized under the laws of South Carolina and located in Beaufort County, South Carolina.

3. Defendant Dale McDorman ("Defendant McDorman") is a citizen and resident of Trumbull County, Ohio.

4. Defendant Stephanie Price ("Defendant Price") is a citizen and resident of Beaufort County, South Carolina.

5. This action alleges malicious prosecution; abuse of process; civil conspiracy; and tortious interference with contract in violation of South Carolina law and a violation of the South Carolina Payment of Wages Act, S.C. Code Ann. §§ 41-10-10 et seq. This action also seeks an order of this court to mandate the Defendant City to provide Plaintiff with a grievance hearing.

ELECTRONICALLY FILED - 2026 Aug 10 4:59 PM - BEAUFORT - COMMON PLEAS - CASE#2026CP0701970

6. This Court has subject matter jurisdiction over these claims because circuit courts have subject matter jurisdiction over matters arising under South Carolina law.

7. This Court has personal jurisdiction over the Defendants because they reside in Beaufort County or committed torts therein.

8. This Court is a proper venue because the acts and omissions occurred in Beaufort County.

9. Plaintiff demands a jury trial on all triable claims and issues.

FACTUAL ALLEGATIONS

10. Plaintiff was hired by Defendant City on or about July 8, 2008, as a police officer with the Beaufort City Police Department.

11. Plaintiff worked initially as a patrolman. Later Plaintiff worked several other roles for Defendant City, such as school resource officer, victim advocate, and investigator in the special victim's unit.

12. Plaintiff's employment evaluations were positive, and Plaintiff had no prior disciplinary actions until the events contained herein.

13. In 2022, Plaintiff began a role as investigator and was promoted to sergeant.

14. Defendant Dale McDorman was formerly employed by Defendant City as Chief of Police.

15. Defendant Stephanie Price is employed by Defendant City as Chief of Police and was formerly employed as its Deputy Chief of Police

16. In 2022, Plaintiff was appointed to the Police Chief's improvement council.

17. The Council was then given a survey to complete.

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18. The survey asked for sex, age, division, and tenure such that its results were not truly anonymous.

19. Plaintiff truthfully expressed concerns about the work environment at the City of Beaufort Police Department when she filled out the Survey including, but not limited to: below average performance on responding to juvenile delinquency and calls involving a person in a mental health crisis; poor performance on maintaining officer's job satisfaction and maintaining regionally competitive officer compensation; and concerns about the work environment, equal opportunity, and morale at the Department.

20. After she turned in the survey, Plaintiff was called into Chief McDorman's office and he proceeded to challenge her on her survey responses because "she was given whatever [she] want[s]." The Chief then suggested that Plaintiff had made negative survey responses not because she had legitimate concerns but instead because she was stressed out due to the fact that she had just gone through a divorce.

21. Plaintiff felt the Chief's response to her survey response was sex-based and that she would not have received the same sort of response and criticism if she were a man.

22. Plaintiff then filed an internal hostile work environment and sexual harassment complaint.

23. Defendant hired an employment defense lawyer to perform an investigation of the complaint.

24. After Plaintiff submitted the survey and made the internal complaint, she experienced heightened job oversight from her superiors. One example included when Plaintiff attended a multi-agency Internet Crimes Against Children Task Force meeting in December 2022,

Defendant McDorman questioned where she was and whether she had approval to attend the meeting. That never happened in the past when Plaintiff attended task force meetings.

25. The employer-side law firm investigating the complaints found that the conduct did not rise to the level of unlawful discrimination but did not find that the merits of the Plaintiff's allegations were unfounded.

26. Indeed, Defendant McDorman received disciplinary action as a result of the factual basis of her complaint.

27. Retaliation to Plaintiff continued thereafter.

28. Defendant Price was hired by the Defendant City as Deputy Chief in February 2023.

29. In April 2023, Plaintiff was belittled simultaneously with being assigned to a murder case. Although she was assigned the important case, she was belittled by being asked basic questions when she was assigned the case which undermined her trust and the importance of the assignment.

30. In June 2023, Defendant McDorman, Defendant Price, and Plaintiff's captain gave Plaintiff a deficiency letter in the form of a disciplinary action.

31. Plaintiff immediately filed a grievance for the disciplinary action and was told that the grievance was accepted.

32. A few days later, Price informed Plaintiff that her grievance was no longer accepted because the deficiency letter would no longer be treated as a disciplinary action.

33. The Defendants took away the disciplinary action aspect of the letter because they knew their complaints lacked substantive merit and would not withstand a grievance process.

ELECTRONICALLY FILED - 2026 Aug 10 4:59 PM - BEAUFORT - COMMON PLEAS - CASE#2026CP0701970

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34. In July 2023, Plaintiff was assigned to more cases due to another investigator leaving employment.

35. In turn, Plaintiff repeatedly requested reassignment of other of her cases to other investigators because she was feeling overwhelmed by the large caseload.

36. Despite being overloaded, Plaintiff continued to perform her job under the stress and heavy caseload.

37. In September 2023, the Beaufort Police Department informed Plaintiff that she was being placed on administrative leave, citing inaccuracies in her documentation.

38. A week later, on October 3, 2023, Plaintiff returned from administrative leave and was demoted from investigator to Patrolwoman.

39. Plaintiff, who had worked in investigations for nearly 10 years, was given only 4 days to prepare for this transition.

40. Defendant City required Plaintiff to clean out her office in a public display within the view of her peers, which was embarrassing and humiliating to Plaintiff.

41. Investigators at the Defendant Department maintained a shared investigation drive on Defendant City's server.

42. The purpose of the shared drive was to keep up with investigations while in a work product stage.

43. Final versions of official documents were saved in a formal agency management system.

44. When Plaintiff was demoted to patrolwoman, she was set to lose access to investigative shared drive.

ELECTRONICALLY FILED - 2026 Aug 10 4:59 PM - BEAUFORT - COMMON PLEAS - CASE#2026CP0701970

45. Plaintiff agreed to wrap up certain open files as part of the transition of her cases to a new investigator.

46. As such, Plaintiff downloaded her files from this shared drive.

47. This action did not violate any policy of the Defendant Department or any directive.

48. Indeed, this action was in furtherance of a transition arrangement involving command staff for investigations.

49. Plaintiff subsequently filed a grievance for her demotion.

50. The Defendant Department did not officially acknowledge her grievance.

51. Plaintiff's transition to road patrol was set to cause a major disruption to her life as a single mother. Including that she was set to transition from working a business day to 12-hour road shifts including weekends.

52. In turn, after working her initial weekend road shifts, Plaintiff began experiencing further stress and anxiety and Plaintiff's physician put her on medical leave for two weeks.

53. Plaintiff was then directed to return all paper files she had at home to headquarters. She obliged.

54. No request was made regarding electronic files at that time.

55. Keeping working files at home did not violate any policy of the Defendant Department or any directive.

56. On October 11, 2023, was next informed that because she was on mental health leave, she would have to participate in Defendant City's Employee Assistance Program to return to work and would have to sign a medical release. She obliged.

ELECTRONICALLY FILED - 2026 Aug 10 4:59 PM - BEAUFORT - COMMON PLEAS - CASE#2026CP0701970

57. Unbeknownst to Plaintiff, on October 11, 2023, Defendant made a referral to the South Carolina Law Enforcement Division stating that Plaintiff had "improperly deleted electronic files from the BPD server."

58. That allegation was false and knowingly or recklessly filed with disregard for the truth.

59. Two (2) days later, on October 13, 2023, Defendant Price directed Plaintiff to return to headquarters for a meeting. There, without any substantive investigation or inquiry, Defendant Price told Plaintiff she was terminated for removing files from the shared drive.

60. Plaintiff's removal of files from the shared drive violated no Department policy and no directive.

61. Subsequently, Defendant City denied payout for Plaintiff's accrued PTO and vacation time, despite Defendant City's handbook policy that employees were entitled to such payouts.

62. Plaintiff filed a timely grievance of her termination.

63. On October 18, 2023, the Defendant Department by and through Defendant McDorman and Defendant Price filed a personnel change of status form with the South Carolina Criminal Justice Academy asserting that Plaintiff had "intentionally deleted case information, failed to complete reports, failed to follow direct orders, and mishandle[ed] [] evidence."

64. That allegation was false and knowingly or recklessly filed with disregard for the truth.

65. Plaintiff defended her license before the South Carolina Criminal Justice Academy.

66. On or around October 25, 2023, the Plaintiff's termination grievance was placed in abeyance pending the outcome of SCCJA certification hearing.

ELECTRONICALLY FILED - 2026 Aug 10 4:59 PM - BEAUFORT - COMMON PLEAS - CASE#2026CP0701970

67. Plaintiff also cooperated with the SLED investigation resulting from the Defendants' referral.

68. On August 30, 2024, SLED concluded its investigation finding no criminal wrongdoing by Plaintiff.

69. On November 5, 2025, following a council hearing, SCCJA found no wrongdoing by Plaintiff.

70. Nonetheless, Defendant City has failed to consider Plaintiff's grievance.

FIRST CAUSE OF ACTION
MALICIOUS PROSECUTION
(Against All Defendants)

71. Plaintiff realleges the foregoing where consistent.

72. Defendant City by and through Defendants McDorman and Price instituted and referred Plaintiff to SLED for investigation and criminal proceedings without probable cause.

73. Defendant City by and through Defendants McDorman and Price instituted proceedings with the South Carolina Law Enforcement Training Council and South Carolina Criminal Justice Academy against Plaintiff without probable cause.

74. Defendant McDorman and Defendant Price acted with malice by instituting the proceedings.

75. Following an investigation, SLED terminated the proceedings in Plaintiff's favor and found no criminal wrongdoing by Plaintiff.

76. Following a hearing on the merits, the South Carolina Law Enforcement Training Council found that Plaintiff had not committed misconduct and that the Defendant City's misconduct allegations should be dismissed.

77. Defendants' conduct was a direct and proximate cause to the economic, emotional, mental, and reputational damage suffered by Plaintiff.

78. Defendants are liable to Plaintiff for loss of income and earning capacity, mental and emotional suffering, anxiety and nervousness, humiliation, embarrassment, and reputational harm.

SECOND CAUSE OF ACTION
Abuse of Process
(Against All Defendants)

79. Plaintiff realleges the foregoing where consistent.

80. Defendant City through McDorman and Defendant Price unlawfully prosecute SCCJA proceedings with Plaintiff in an effort to retaliate against her for filing an internal grievance of her demotion, to avoid a hearing on that matter, and in retaliation her prior internal complaint.

81. Defendants, in doing this, had an ulterior purpose to deprive Plaintiff of her grievance and to avoid immediate scrutiny for their actions.

82. Defendants' conduct was a direct and proximate cause to the economic, emotional, mental, and reputational damage suffered by Plaintiff.

83. Defendants are liable to Plaintiff for loss of income and earning capacity, mental and emotional suffering, anxiety and nervousness, humiliation, embarrassment, and reputational harm.

THIRD CAUSE OF ACTION
Negligence
(Against the Defendant City)

84. Plaintiff realleges the foregoing where consistent.

85. Defendant City knew of should have known about the foreseeability of harm to the Plaintiff based on her prior workplace complaint regarding Defendant McDorman.

ELECTRONICALLY FILED - 2026 Aug 10 4:59 PM - BEAUFORT - COMMON PLEAS - CASE#2026CP0701970

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86. Defendant City failed to exercise due care in supervising Defendant McDorman when it knew that foreseeable harm to Plaintiff was likely to occur if it failed to exercise due care.

87. Defendant City, prior to hiring Defendant Price, knew or should have known of the Defendant Price's penchant for foreseeably harming the employment relationships of employees in her charge based on prior media reports and filed legal actions.

88. Defendant City failed to exercise due care in hiring Defendant Price and supervising her when it knew of foreseeable harm to Plaintiff and her fellow coworkers.

89. This breach of the duty of due care by the Defendant City resulted in economic and noneconomic damages to the Plaintiff.

90. Plaintiff did not suffer physical injuries on account of this harm.

91. Plaintiff did not suffer any compensable injury under the South Carolina Worker's Compensation Act on account of this harm.

92. Plaintiff has no compensable claim against the Defendant City on account of this harm.

93. Plaintiff has suffered and is entitled to recover damages for loss of income and earning capacity, humiliation, embarrassment, and reputational harm.

FOURTH CAUSE OF ACTION
VIOLATION OF THE SOUTH CAROLINA PAYMENT OF WAGES ACT, S.C. CODE ANN. §§ 41-10-10 ET SEQ.
(Against Defendant City)

94. Plaintiff realleges the foregoing where consistent.

95. Defendant City is an "employer" within the meaning of the South Carolina Payment of Wages Act ("SCPWA").

96. Plaintiff was an "employee" of Defendant City within the meaning of the SCPWA.

ELECTRONICALLY FILED - 2026 Aug 10 4:59 PM - BEAUFORT - COMMON PLEAS - CASE#2026CP0701970

97. During employment, Plaintiff accrued paid time off ("PTO"), a "wage" under the SCPWA.

98. Plaintiff accrued PTO hours, totaling approximately thirteen thousand dollars ($13,000).

99. Defendant City terminated Plaintiff and refused to render a payout of Plaintiff's PTO as required by the SCPWA.

100. Defendant City violated the SCPWA and is liable to Plaintiff for treble the amount of the unpaid PTO wage, plus costs and attorney's fees.

FIFTH CAUSE OF ACTION
WRIT OF MANDAMUS
(Against Defendant City)

101. Plaintiff realleges the foregoing where consistent.

102. S.C. Code Ann. § 8-17-150 expressly provides that if municipal employee, who has completed six months of satisfactory service, asserts a timely grievance, then a municipality "shall schedule the requested hearing and notify the grievance committee and the employee requesting the hearing" "[w]ithin 10 days of a request."

103. Defendant City had a grievance procedure.

104. Plaintiff timely requested a grievance.

105. Defendant City has failed to schedule a grievance hearing as required by statute.

106. Plaintiff requests that this Court mandate the Defendant City to call its grievance committee to a formal hearing on Plaintiff's grievance of her termination.

SIXTH CAUSE OF ACTION
CIVIL CONSPIRACY
(Against Defendant McDorman and Defendant Price)

107. Plaintiff realleges the foregoing where consistent.

ELECTRONICALLY FILED - 2026 Aug 10 4:59 PM - BEAUFORT - COMMON PLEAS - CASE#2026CP0701970

108. Defendant McDorman and Defendant Price worked together for the purpose of injuring Plaintiff through demotion, termination, and referral to SLED and SCCJA.

109. Such actions were tortious and unlawful amounting to defamation, tortious interference with contract, abuse of process, malicious prosecution, wrongful discharge, and unlawful retaliation.

110. Defendant McDorman and Defendant Price acted in furtherance of their conspiracy to injure Plaintiff by actively participating in her demotion, termination, and subjecting her to investigation by SLED and an administrative proceeding with SCCJA.

111. Defendant McDorman and Defendant Price were personally motivated to harm the Plaintiff and to retaliate against her as a result of her prior internal complaint.

112. As a direct and proximate cause of Defendant McDorman and Defendant Prices' conduct, Plaintiff suffered termination, mental and emotional distress, reputational harm, embarrassment, and humiliation.

113. Defendant McDorman and Defendant Price are liable to Plaintiff for economic, mental and emotional, and reputational damages.

114. Defendant McDorman and Defendant Prices' actions were willful and wanton and Plaintiff is entitled to punitive damages resulting from the same.

SEVENTH CAUSE OF ACTION
TORTIOUS INTERFERENCE
(Against Defendant McDorman and Defendant Price)

115. Plaintiff and Defendant City had an at-will contract for Plaintiff's employment.

116. Defendant McDorman and Defendant Price knew about Plaintiff's employment contract.

ELECTRONICALLY FILED - 2026 Aug 10 4:59 PM - BEAUFORT - COMMON PLEAS - CASE#2026CP0701970

117. Defendant McDorman and Defendant Price intended to interfere with Plaintiff's employment without cause.

118. Defendant McDorman and Defendant Price interfered with Plaintiff's employment actively participating in her demotion and subsequent termination without cause.

119. Defendant McDorman and Defendant Price did not have legal justification for interfering with Plaintiff's employment contract.

120. As a direct and proximate cause of Defendant McDorman and Defendant Prices' conduct, Plaintiff suffered termination, mental and emotional distress, reputational harm, embarrassment, and humiliation.

121. Defendant McDorman and Defendant Price are liable to Plaintiff for economic, mental and emotional, and reputational damages.

122. Defendant McDorman and Defendant Prices' actions were willful and wanton and Plaintiff is entitled to punitive damages resulting from the same.

PRAYER FOR RELIEF

123. Plaintiff realleges the foregoing where consistent.

124. Plaintiff requests a jury trial on all claims and all triable issues.

125. Plaintiff requests that the jury award, within its discretion, a reasonable sum for all damages sought on the above claims including punitive damages where legally cognizable.

126. Plaintiff requests that the Court award her all equitable relief it deems just and necessary up to and including reinstatement or front pay.

127. Plaintiff also requests pre-judgment interest.

128. Plaintiff requests punitive damages where legally recoverable.

129. Plaintiff requests an award of attorney fees and costs wherever legally recoverable.

BY: s/J. Paul Porter

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