

STATE OF SOUTH CAROLINA )  
COUNTY OF RICHLAND )  
David Voros and Alexandra Stasko, )  
 )  
Plaintiffs, )  
vs. )  
Allison Dunavant; and Fitsnews, LLC and )  
Mandy Matney, )  
Defendants. )

IN THE COURT OF COMMON PLEAS  
FIFTH JUDICIAL CIRCUIT

Civil Action No.: 2022-CP-40-\_\_\_\_\_

**SUMMONS**  
*(Jury Trial Demanded)*

**TO: THE ABOVE-NAMED DEFENDANTS AND THEIR ATTORNEYS:**

YOU ARE HEREBY SUMMONED and required to answer the Complaint in this action, of which a copy is herewith served upon you, and to serve a copy of your Answer to said Complaint on the subscribed, the HHP Law Group, LLC, located at 924 Gervais Street, Columbia, South Carolina, 29201, within thirty (30) days after the service hereof, exclusive of the date of such service. 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.

Respectfully submitted,

s/ William R. Padget  
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*Attorneys for the Plaintiffs*

March 17, 2022  
Columbia, South Carolina

STATE OF SOUTH CAROLINA )  
COUNTY OF RICHLAND )  
David Voros and Alexandra Stasko, )  
Plaintiffs, )  
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IN THE COURT OF COMMON PLEAS  
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**COMPLAINT**  
*(Jury Trial Demanded)*

**TO: THE ABOVE-NAMED DEFENDANTS AND THEIR ATTORNEYS:**

COMES NOW Plaintiffs David Voros and Alexandra Stasko, by and through their undersigned counsel, complaining of the above-named Defendants, who would respectfully allege and show as follows:

**THE PARTIES, JURISDICTION, VENUE, AND APPLICABLE LAW**

1. At all times pertinent to this action David Voros and Alexandra Stasko (“Plaintiffs”) are citizens and residents of and employed within the territorial limits of Richland County, State of South Carolina.
2. Defendant Allison Dunavant is, upon information and belief, a citizen and resident of Charleston County, State of South Carolina who did commit tortious acts in Richland County, State of South Carolina.
3. Defendant, Fitsnews, LLC, is a news organization, incorporated in the State of South Carolina, and doing business in Richland County, South Carolina.
4. This Court has jurisdiction over the parties and venue is appropriate pursuant to S.C. Code Ann. § 15-7-30.

**FACTS COMMON TO ALL CAUSES OF ACTION**

5. Plaintiff David Voros is a Professor of Studio Art at the University of South Carolina School of Visual Art and Design. He has been employed as a professor at the University of South Carolina for approximately twenty-five (25) years and has taught thousands of students during his tenure at the university. He is also an owner of the International Center for the Arts, located in Monte Castello, Italy, a business that hosts retreats and events promoting the study of the arts and humanities in an historic Italian setting.

6. Plaintiff Alexandra Stasko was formerly an instructor at the University of South Carolina teaching Figure Structure and Ceramic classes. She is formerly a master's student at the University of South Carolina.

7. Over the course of thirteen-months, beginning in the fall of 2019, and culminating in December of 2020 and March of 2021, FitsNews published a series of stories relating to claims of harassment made by several individuals against Professor Voros, which also contained negative implications and insinuations relating to Professor Stasko.

8. In a December 9, 2020 article entitled "Former Student Who Sued USC: System for Harassment Complaints Revictimizes the Victims" relating to allegations made by Allison Dunavant, the article is replete with false statements regarding Plaintiffs; specifically the following statements:

- a. "Voros allegedly engaged in sexual acts in front of Dunavant, sexually harassed her, then deprived her of food when she wouldn't comply."
- b. "One evening, as Dunavant entered Voros' home to get dinner, she said she walked in on Voros and the other female student having sex."

- c. “Then, he started to make sexual comments, according to her lawsuit. He’d say things like if she were “more like” the other female student who was having sex with him, things would be much easier for her on the trip.”
  - d. Voros “ordered her to stay in her room – with bars on the windows- until she changed her attitude toward him”
  - e. With respect to the allegation that Voros somehow withheld food from Ms. Dunavant, “Thankfully, another student would sneak me food. It was the only way I could eat for a few days.”
9. These statements are entirely false, inaccurate, and defamatory.
  10. Further, these material allegations were recanted by Ms. Dunavant’s sworn deposition testimony taken in April of 2019, over 18 months prior to Defendants’ publication of these defamatory statements.
  11. In the December 9th article, Defendant Dunavant is even quoted by Defendant Fitsnews as saying, “We found out through deposition that David (Voros) was good friends with the faculty members who wouldn’t sign off on my theses. So, the harassment extended to trying to derail my actual career.”
  12. The existence of Ms. Dunavant’s deposition testimony was readily available to Fitsnews in December 2020, and would have been discovered had any reasonable investigation been conducted.
  13. Further, Plaintiff Stasko was not a student at the time of Defendant Dunavant’s trip to Italy in 2016. She had already graduated with her Master of Fine Arts and had been appointed to USC’s adjunct faculty to teach a Ceramic class in 2015. The fact that she was a “recent graduate” is even correctly stated in Defendant Dunavant’s initial lawsuit. The misinformation that Plaintiff

Stasko was a student was shared by Defendant Dunavant and reported by Defendant Mandy Matney and is evidence of actual malice.

14. Further, the article also goes on to state that Jamie Misenheimer, a colleague of Professor Voros said in her lawsuit that Voros pressured her to give Dunavant a bad grade in her class in August of 2016. These allegations were demonstrably false, as Ms. Dunavant was never registered for any classes taught by Jamie Misenheimer.

15. Further, Fitsnews published the statement that “At the very least, they could recognize these three lawsuits and realize that David Voros is harmful to students and teachers.” This statement was published without any regard or competent investigation into the truth or veracity of the statements, which was also easily discoverable had any reasonable investigation been conducted.

16. On December 17<sup>th</sup>, 2020 Plaintiff Stasko emailed Defendant Matney and informed her that Defendant Dunvant “told her lies in her interview,” and inquired as to if she had “even read the depositions.” Plaintiff Stasko also emailed Will Folks, owner and founder of Fitsnews, stating she had been mentioned in their stories, was an eyewitness to the events, was interested in telling her side of the story, and inquired about being interviewed. Both emails went unanswered.

17. Thereafter, on March 4, 2021, in an article titled “USC Protester Demand Professor Be Fired” Defendant FitsNews wrote “Dunavant said Voros harassed, intimidated and isolated her during a horrific 2016 study abroad trip to Italy when she was a graduate student.”

18. On March 23, 2021, FitsNews published a story entitled “USC Student Accuses History Professor of Sexual Harassment and Abuse in New Lawsuit.” In this report, Defendant FitsNews repeated the long-recanted allegations that “Voros engaged in sexual acts in front of Dunavant, sexually harassed her, and then deprived her of food when she wouldn’t comply.”

19. It was well known in the USC community that these allegations that Voros engaged in sexual acts in front of Dunavant was directed at Professor Stasko.

20. In the same story, Fitsnews reported that a story of Voros and Misenheimer using a demonstrative optical device from a dark room and reported that “Misenheimer believed Voros was making a sexual advance toward her.” This statement is also contrary to the sworn testimony of Jamie Meisenheimer about those events. The reporting of stale unsworn allegations in civil cases where the party’s actual testimony taken under oath and on the record constitutes reckless and defamatory conduct, and evidence of actual malice in its reporting.

21. Upon information and belief, even though there was extensive reporting about these events, there was no reported attempt to even reach out to Professor Voros regarding his position on these allegations, all of which evidence a lack of fair reporting. Had a complete investigation been conducted, Fitsnews would have learned that the sworn testimony of these events differs greatly from their unsworn allegations it recklessly published.

22. Further, Defendant Dunavant has made numerous similar statements independent of the Fitsnews articles defaming the Plaintiffs.

23. These statements are patently false, defamatory, and portray the events in a false light. Further, upon information and belief, this reporting constitutes abuse of the fair reporting privilege due to its one-sided nature and the egregious failure to investigate or report on other exculpatory information readily available as part of that litigation.

24. As a result of these false and defamatory statements, the reputations of both Plaintiffs have been irreparably damaged, and have suffered embarrassment, humiliation, and mental suffering, along with pecuniary losses.

25. Further, Plaintiffs have made demand for retraction of these false and defamatory statements made by Fitsnews, but Defendant Fitsnews has refused to respond to Plaintiffs' demand for retraction.

**FOR A FIRST CAUSE OF ACTION (Against Both Defendants)**  
(Defamation)

26. Plaintiffs reassert and re-alleges the paragraphs above as if fully set forth herein verbatim.

27. The above-described statements made by Defendants were false, defamatory, and tend to impeach the honesty, integrity, virtue, and reputation of Plaintiffs and portray them in a false light.

28. Defendants published these false and defamatory statements to be viewed by an unlimited amount of people via digital media.

29. Upon information and belief, these false and defamatory statements were made by Defendant with actual or implied malice, and/or with recklessness, and ill will with a design to wantonly injure Plaintiffs without justifiable cause.

30. The false and defamatory statements made by Defendants concerned Plaintiffs.

31. As a direct and proximate result of Defendants false and defamatory statements, Plaintiffs have suffered damage and will suffer in the future damages, including, irreparable damage to their reputations, embarrassment, professional discipline, loss of employment opportunities, humiliation, mental suffering, along with substantial pecuniary losses.

32. Plaintiffs are entitled to an award of actual, consequential, and punitive damages in an amount to be proven at trial.

**FOR A SECOND CAUSE OF ACTION**  
(Civil Conspiracy)

33. Plaintiffs reassert and re-alleges the paragraphs above as if fully set forth herein verbatim.

34. Defendants Allison Dunavant, FitsNews, and other third parties are a combination of two or more persons/entities.

35. Defendants Allison Dunavant and FitsNews, including its employees, agents, etc., along with other third parties combined for the purpose of injuring the Plaintiffs.

36. The object of this conspiracy was to ruin or damage the professional reputations of the Plaintiffs.

37. The conduct of Defendants went well beyond legitimate business competition and included specific planning to expose and ridicule the Plaintiffs, and the injury was foreseen.

38. As a direct result of Defendants wrongful actions, the Plaintiffs have suffered damages including, embarrassment, professional discipline, loss of employment opportunities, humiliation, mental suffering, attorney's fees, along with substantial pecuniary losses.

39. Plaintiffs demands a jury trial as to all claims.

**WHEREFORE**, the Plaintiffs pray that the Court hold the Defendants liable for the conduct complained of herein; to enter judgment against the Defendants and in favor of the Plaintiffs; and to award actual damages, consequential damages, punitive damages, and for other such relief as this Court deems just and equitable.



March 17, 2022  
Columbia, South Carolina

Respectfully submitted,

s/ William R. Padget

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COURTESY OF  
LUNA SHARK MEDIA