

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.

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ATTORNEY FOR PLAINTIFFS

The Plaintiffs, above named, complaining of the Defendants above named, alleges and says the following:

Parties and Jurisdiction

4. Plaintiff Kelsey Manemeit is a citizen and resident of Horry County, South Carolina, and at all times relevant to this Complaint served as a police investigator with the Horry County Police Department.
5. Defendant Horry County is a political subdivision of the State of South Carolina.
6. Defendant Horry County Police Department ("HCPD") is a division of Horry County.
7. Defendant Randy Webster is a resident of Horry County and at all times relevant to this Complaint was either the active or former Deputy County Administrator for Horry County and Director of Public Safety for Horry County.
8. Defendant Kris Leonhardt is a resident of Horry County and at all times relevant this Complaint was the Chief of Police for the HCPD.
9. Jurisdiction and venue are proper pursuant to S.C. Code and because all events occurred in Horry County, South Carolina.

Facts

10. Plaintiffs repeats the prior allegations as if stated verbatim herein.
11. Plaintiff Manemeit is a 30 year-old female.
12. Defendant Webster is a 61 year-old male.
13. Prior to working for HCPD, Manemeit met Webster because they were neighbors.
14. Prior to working with HCPD, Manemeit worked as a police officer for the City of Conway.
15. In March of 2025, Manemeit separated from her husband, a Horry County Police Officer. Manemeit filed for divorce alleging that her husband cheated on her.
16. In May of 2025, Manemeit was recruited by Webster to work at a newly created Behavioral Services Department. Manemeit was given a substantial raise to work at the Behavioral Services Department. Manemeit worked with another young female in the Behavioral Services Department.

17. Upon information and belief, Webster recruited Manemeit to work in the Behavioral Services Department due to her physical appearance.
18. Upon information and belief, Webster decided that the ladies of the Behavioral Services Department should be housed in the Randall S. Webster Communications Center rather than in the HCPD offices.
19. Upon information and belief, the decision to house the Behavioral Services Department in the Randall S. Webster Communications Center was an attempt to gain additional access to Manemeit.
20. Over the next several months, Webster began a pattern of unwelcome and inappropriate conduct toward Manemeit.
21. Webster would make inappropriate statements related to Manemeit's appearance.
22. Webster engaged in a pattern of texting Manemeit both during and after work hours.
23. On multiple occasions, Webster told her about a dreams he had concerning Manemeit. In one of these dreams he implied that Manemeit was not fully clothed. Webster indicated that the dream was causing him to lose focus at work.
24. On at least one occasion, Webster asked Manemeit if she had heard rumors that the two were engaged in a sexual relationship. Manemeit responded that she had not and then indicated that she did not want to blur any lines or jeopardize their professional relationship. Webster continued by saying "Can you give me some sort of a response because I was up all night tossing and turning."
25. On multiple occasions, Webster would make unwanted physical contact with Manemeit. Webster would give Manemeit unwelcome kisses on the cheek.
26. When Webster hugged Manemeit, Manemeit would move her head to the side to avoid Webster attempts to kiss her.

27. Manemeit conveyed to Webster that she did not want to have a romantic relationship with him. Despite this Webster continued his inappropriate behavior toward Manemeit.
28. Others noticed that Webster seemed to be behaving inappropriately with Manemeit.
29. Former Public Information Director, Mikayla Moskov, made multiple statements to superiors at the County concerning Webster's behavior toward Manemeit and another female employee.
30. Upon information and belief County Administrator Barry Spivey was aware of Moskov's concerns and the inappropriate behavior of Webster.
31. Finally on October 16, 2025, Manemeit submitted a formal complaint concerning the sexual harassment to Horry County Human Resources.
32. Within four days of the Human Resources Complaint, Webster announced he would be retiring effective November 3, 2025.
33. After Webster's announced retirement, the media began inquiring concerning why Webster was retiring.
34. Upon information and belief, Chief Leonhardt, Barry Spivey, and others concerning the inquiries.
35. On October 27, 2025, Chief Leonhardt asked the HCPD's Office of Professional Standards (OPS) to open an investigation on Manemeit's relationship with HCPD officer Torrey Lewis.
36. The OPS investigation involved prying into Manemeit and Moskov's private and personal lives.
37. OPS Investigators demand that Manemeit and Moskov provide information concerning their private sex lives.

38. Upon information and belief, the OPS investigation was based in part on a desire to whitewash the allegations against Webster by discrediting Manemeit.
39. Upon information and belief, the OPS investigation was based in part on a desire to retaliate against Manemeit and Moskov for voicing their concerns about Webster.
40. On November 6, 2025, the OPS submitted a report to Chief Leonhardt concerning the investigation. (See Exhibit A).
41. Exhibit A contains false information concerning Moskov.
42. Exhibit A contained private information concerning the off-duty lives of Moskov and Manemeit. Exhibit A also contains private information concerning the off-duty lives of Officers Torry Lewis, Donald Kobithen and Misty Gore.
43. Upon information and belief after the report was completed, Manemeit, Moskov, Lewis, Kobithen and Gore were forced to resign.
44. Upon information and belief the forced resignation of Manemeit and Moskov were based on retaliation for voicing concerns about Webster's inappropriate behavior.
45. Upon information and belief, Officers Torry Lewis, Donald Kobithen and Misty Gore were collateral damage of the improper OPS investigation.
46. After their resignation, Chief Leonhardt released the OPS report to the press.
47. Plaintiff Moskov and Manemeit have suffered damages as a result of the actions of Defendants.

First Cause of Action

(Defendant Webster's Assault and Battery of Plaintiff Manemeit)

48. The foregoing paragraphs are referred to and incorporated as if set forth verbatim herein.
49. Webster made attempts to inappropriately touch and kiss Manemeit.
50. Webster would inappropriately touch and kiss Manemeit in a way that constitutes sexual harassment.

51. Webster's offers and/or attempts to inappropriately touch Manemeit were done by Webster when he had the present ability to complete the unwanted touching.
52. The times when Webster would offer and/or attempt to touch Manemeit would cause her reasonable fear that he would continue to touch her inappropriately. This conduct constitutes the tort of assault.
53. The times when Webster would touch Manemeit in an unwelcomed manner constitutes the tort of battery.
54. Webster's assault and battery of Manemeit was the proximate cause of Manemeit suffering emotional and financial harm.
55. Plaintiff Manemeit is informed and believes she is entitled to recover compensatory damages and punitive damages against Defendant Webster for the torts of assault and battery.

Second Cause of Action

(Sexual Harassment as to Defendant Webster, Defendant Horry County, and Defendant HCPD)

56. The foregoing paragraphs are referred to and incorporated as if set forth verbatim herein.
57. Defendant Webster engaged in unwelcome physical contact and inappropriate statements toward Manemeit constituting sexual harassment and a hostile work environment.
58. Horry County is liable under respondeat superior for the actions of Defendant Webster.
59. Manemeit is attempting to exhaust administrative remedies with the Equal Employment Opportunity Commission but is being delayed due to the U.S. Government shutdown.
60. Upon the exhaustion of administrative remedies, Manemeit will amend this Complaint to include a sexual harassment cause of action.

Third Cause of Action

(Plaintiff Moskov's Defamation and/or Defamation per se claim as to Defendant Leonhardt)

61. The foregoing paragraphs are referred to and incorporated as if set forth verbatim herein.

62. Defendant Leonhardt released Exhibit A to the media and caused it to be published.
63. S.C. Code § 30-4-40(a)(2) would have exempted the Exhibit A's disclosure under the Freedom of Information Act (FOIA) because the "information of a personal nature where the public disclosure thereof would constitute unreasonable invasion of personal privacy."
64. Exhibit A states, "[i]t was also found that Torry Lewis had also been involved in a sexual relationship with Misty Gore who is a current Spec Ops member and Makayla Moskov the county PIO both currently married." This statement is false and/or was made with reckless disregard for the truth.
65. Exhibit A mischaracterized a single encounter between Moskov and Lewis that did not result in intercourse as a "sexual relationship."
66. The above-mentioned statement contained in Exhibit A was false, malicious and defamatory.
67. As a direct and proximate result of the publication of this statement, Moskov's reputation and character have been harmed.
68. Plaintiff Moskov believes that the publication of Exhibit A was done maliciously by Defendant Leonhardt.
69. Plaintiff is informed and believes that she is entitled to an award of compensatory damages and punitive damages against Defendant Leonhardt for publishing Exhibit A.

Fourth Cause of Action

(Invasion of Privacy as to Defendants Horry County and Horry County Police Department)

70. The foregoing paragraphs are referred to and incorporated as if set forth verbatim herein.
71. Defendants Horry County and HCPD publicly released sensitive material concerning Plaintiffs' personal lives without consent.
72. This information was not subject to disclosure pursuant to the Freedom of Information Act.

73. Defendants Horry County and HCPD knew or should have known that this information was of a private in nature and sensitive in nature.
74. Defendants Horry County and HCPD, by and through their employee Chief Leondhardt, violated Plaintiffs' right to privacy by releasing Exhibit A.
75. Defendants Horry County and HCPD have made additional statements to the media concerning Plaintiffs which violate their right to privacy.
76. The release of this information has harmed Plaintiffs.
77. The Plaintiffs are informed and believe that they are entitled to a judgment against Defendants Horry County and HCPD for violation of Plaintiffs' right to privacy.

Fifth Cause of Action
(Wrongful Termination and Hostile Work Environment)

78. The foregoing paragraphs are referred to and incorporated as if set forth verbatim herein.
79. Defendant Webster engaged in unwelcome physical contact and inappropriate statements toward Manemeit constituting sexual harassment and a hostile work environment.
80. Manemeit and Moskov spoke out about this inappropriate behavior.
81. Upon information and belief, the OPS investigation was retaliation for speaking out against Webster's behavior.
82. The OPS investigation constituted a hostile work environment.
83. Manemeit and Moskov were forced to resign constituting a constructive termination.
84. Upon information and belief, the forced resignation of Manemeit and Moskov was retaliation for speaking out against Webster's behavior.
85. Manemeit is attempting to exhaust administrative remedies with the Equal Employment Opportunity Commission but is being delayed due to the U.S. Government Shutdown.
86. Moskov intends to exhaust administrative remedies as well.

87. Upon the exhaustion of administrative remedies, Plaintiffs will amend this Complaint to include a causes of action for Wrongful Termination and Hostile Work Environment.

Sixth Cause of Action

(Plaintiff Manemeit's Gross Negligence Claim against Defendant Horry County and Defendant HCPD)

88. The foregoing paragraphs are referred to and incorporated as if set forth verbatim herein.
89. Defendants Horry County and HCPD had a duty of care to ensure they provided a safe work environment that was free from sexual harassment and retaliation.
90. Defendants Horry County and HCPD had a duty of care to ensure they did not release sensitive and private information to the public.
91. Defendants Horry County and HCPD were grossly negligent in violating their duty of care in the following particulars:
- a. Failing to maintain a safe working environment;
 - b. Failing to properly train Webster concerning appropriate work behavior;
 - c. Failing to properly supervise Webster;
 - d. Failing to properly train the Human Resources Department to avoid retaliation against employees who disclosure inappropriate behavior;
 - e. Failing to properly supervise the human resources department to avoid retaliation in discharging an individual for disclosing inappropriate behavior;
 - f. Failing to properly supervise Chief Leonhardt;
 - g. Failing to properly train Chief Leonhardt concerning FOIA law;
 - h. Failing to properly train Chief Leonhardt to avoid disclosure of private information;
 - i. Failing to properly supervise the OPS;
 - j. Failing to properly supervise the OPS to avoid a hostile work environment;

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AROUND AND FIND OUT SPONSOR

- k. Failing to properly supervise the OPS to avoid retaliation against employees who disclose inappropriate behavior;
 - l. An such other ways the evidence at trial will show.
92. Plaintiff Mainmeit was harmed by the gross negligence of Defendants Horry County and HCPD.
93. Plaintiff Mainmeit is entitled to recover compensatory damages against Defendants Horry County and HCPD based on foregoing acts and/or omissions that constitute gross negligence.

Seventh Cause of Action

(Plaintiff Moskov's Gross Negligence Claim against Defendant Horry County and Defendant HCPD)

94. The foregoing paragraphs are referred to and incorporated as if set forth verbatim herein.
95. Defendants Horry County and HCPD had a duty of care to ensure they provided a safe work environment that was free from sexual harassment and retaliation.
96. Defendants Horry County and HCPD had a duty of care to ensure they did not release sensitive and private information to the public.
97. Defendants Horry County and HCPD were grossly negligent in violating their duty of care in the following particulars:
- a. Failing to properly train the human resources department to avoid retaliation against disclosures of inappropriate behavior;
 - b. Failing to properly supervise the human resources department to avoid retaliation in discharging an individual for disclosing inappropriate behavior;
 - c. Failing to properly supervise Chief Leonhardt;
 - d. Failing to properly train Chief Leonhardt concerning FOIA law;

- e. Failing to properly train Chief Leonhardt to avoid disclosure of private information;
 - f. Failing to properly supervise the OPS to avoid creating a hostile work environment;
 - g. Failing to properly supervise the OPS to avoid retaliation against employees who disclose inappropriate behavior;
 - h. An such other ways the evidence at trial will show.
98. Plaintiff Moskov was harmed by the gross negligence of Defendants Horry County and HCPD.
99. Plaintiff Moskov is entitled to recover compensatory damages against Defendants Horry County and HCPD based on foregoing acts and/or omissions that constitute gross negligence.

WHEREFORE, Plaintiffs prays for the following: trial by jury; judgment against defendants for compensatory damages in an amount to be determined by a jury; judgment against defendants listed above for punitive damages in an amount to be determined by a jury; the costs of this action; attorneys' fees and cost and such other and further relief as this Court may deem just and proper.

s/ Tristan Shaffer
Tristan M. Shaffer (SC Bar # 77565)

Jonathan "Jonny" McCoy (SC Bar 77540)

Stuart M. Axelrod (SC Bar # 14678)

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