

STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

IN THE COURT OF COMMON PLEAS
FOR THE NINTH JUDICIAL CIRCUIT

**MOTHER AND/OR FATHER DOES
1 THROUGH 7, individually and
respectively as parents of JOHN
DOES NUMBER 1 THROUGH 7,
minor children,**

CASE NO. 2019-CP-10 809

Plaintiffs,

COMPLAINT

v.

(Jury Trial Requested)

**NEWSPRING CHURCH, INC.,
NEWSPRING COMMUNITY
CHURCH; AND JACOP HAZLETT**

Defendants.

FILED
2019 FEB 19 PM 1:28
JULIE J. ARMSTRONG
CLERK OF COURT

(Please Print)
Submitted By: Joshua E. Slavin, Esquire
Address: The Law Offices of Joshua E. Slavin
746 Wakendaw Blvd
Mount Pleasant, SC 29464

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NOTE: The Coversheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for the use of the Clerk of Court for the purpose of docketing. It must be filled out completely, signed, and dated. A copy of this coversheet must be served on the defendant(s) along with the Summons and Complaint.

DOCKETING INFORMATION (Check all that apply)

**If Action is Judgment/Settlement do not complete*

- JURY TRIAL** demanded in complaint. **NON-JURY TRIAL** demanded in complaint.
- This case is subject to **ARBITRATION** pursuant to the Court Annexed Alternative Dispute Resolution Rules.
- This case is subject to **MEDIATION** pursuant to the Court Annexed Alternative Dispute Resolution Rules.
- This case is exempt from ADR. (Proof of ADR/Exemption Attached)

NATURE OF ACTION (Check One Box Below)

- | | | | |
|---|--|---|---|
| <p>Contracts</p> <ul style="list-style-type: none"> <input type="checkbox"/> Construction (100) <input type="checkbox"/> Debt Collection (110) <input type="checkbox"/> Employment (120) <input type="checkbox"/> General (130) <input type="checkbox"/> Breach of Contract (140) <input type="checkbox"/> Other (199) | <p>Torts-Professional Malpractice</p> <ul style="list-style-type: none"> <input type="checkbox"/> Dental Malpractice (200) <input type="checkbox"/> Legal Malpractice (210) <input type="checkbox"/> Medical Malpractice (220) Previous Notice of Intent Case #
20 <u>-NI-</u> - <input type="checkbox"/> Notice/File Med Mal (230) <input type="checkbox"/> Other (299) | <p>Torts-Personal Injury</p> <ul style="list-style-type: none"> <input type="checkbox"/> Assault/Slander/Libel (300) <input type="checkbox"/> Conversion (310) <input type="checkbox"/> Motor Vehicle Accident (320) <input type="checkbox"/> Premises Liability (330) <input type="checkbox"/> Products Liability (340) <input checked="" type="checkbox"/> Personal Injury (350) <input type="checkbox"/> Wrongful Death (360) <input type="checkbox"/> Other (399) | <p>Real Property</p> <ul style="list-style-type: none"> <input type="checkbox"/> Claim & Delivery (400) <input type="checkbox"/> Condemnation (410) <input type="checkbox"/> Foreclosure (420) <input type="checkbox"/> Mechanic's Lien (430) <input type="checkbox"/> Partition (440) <input type="checkbox"/> Possession (450) <input type="checkbox"/> Building Code Violation (460) <input type="checkbox"/> Other (499) |
| <p>Inmate Petitions</p> <ul style="list-style-type: none"> <input type="checkbox"/> PCR (500) <input type="checkbox"/> Mandamus (520) <input type="checkbox"/> Habeas Corpus (530) <input type="checkbox"/> Other (599) | <p>Administrative Law/Relief</p> <ul style="list-style-type: none"> <input type="checkbox"/> Reinstate Drv. License (800) <input type="checkbox"/> Judicial Review (810) <input type="checkbox"/> Relief (820) <input type="checkbox"/> Permanent Injunction (830) <input type="checkbox"/> Forfeiture-Petition (840) <input type="checkbox"/> Forfeiture-Consent Order (850) <input type="checkbox"/> Other (899) | <p>Judgments/Settlements</p> <ul style="list-style-type: none"> <input type="checkbox"/> Death Settlement (700) <input type="checkbox"/> Foreign Judgment (710) <input type="checkbox"/> Magistrate's Judgment (720) <input type="checkbox"/> Minor Settlement (730) <input type="checkbox"/> Transcript of Judgment (740) <input type="checkbox"/> Lis Pendens (750) <input type="checkbox"/> Transfer of Structured Settlement Payment Rights App. (760) <input type="checkbox"/> Confession of Judgment (770) <input type="checkbox"/> Petition for Workers Compensation Settlement Approval (780) <input type="checkbox"/> Other (799) | <p>Appeals</p> <ul style="list-style-type: none"> <input type="checkbox"/> Arbitration (900) <input type="checkbox"/> Magistrate-Civil (910) <input type="checkbox"/> Magistrate-Criminal (920) <input type="checkbox"/> Municipal (930) <input type="checkbox"/> Probate Court (940) <input type="checkbox"/> SCDOT (950) <input type="checkbox"/> Workers' Comp (960) <input type="checkbox"/> Zoning Board (970) <input type="checkbox"/> Public Service Comm. (990) <input type="checkbox"/> Employment Security Comm. (991) <input type="checkbox"/> Other (999) |
| <p>Special/Complex/Other</p> <ul style="list-style-type: none"> <input type="checkbox"/> Environmental (600) <input type="checkbox"/> Automobile Arb. (610) <input type="checkbox"/> Medical (620) <input type="checkbox"/> Other (699) <input type="checkbox"/> Pharmaceuticals (630) <input type="checkbox"/> Unfair Trade Practices (640) <input type="checkbox"/> Out-of-State Depositions (650) <input type="checkbox"/> Motion to Quash Subpoena In Out-of-County Action (660) <input type="checkbox"/> Sexual Predator (510) | | | |

Submitting Party Signature: Joshua E. Slavin Date: 2/19/2019

Note: Frivolous civil proceedings may be subject to sanctions pursuant to SCRPC, Rule 11, and the South Carolina Frivolous Civil Proceedings Sanctions Act, S.C. Code Ann. §15-36-10-et. seq

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CASE NO. 2019-CP-10- 809

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JULIE J. ARMSTRONG
CLERK OF COURT
BY _____

Plaintiffs,

SUMMONS

v.


**NEWSRING CHURCH, INC.,
NEWSRING COMMUNITY
CHURCH; AND JACOP HAZLETT**

Defendants.

TO THE ABOVE-NAMED DEFENDANTS:

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 upon the subscriber, at his office at 746 Wakendaw Blvd, Mount Pleasant, SC 29464, within thirty (30) days after service thereof, exclusive of the day 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.

THE LAW OFFICES OF JOSHUA E. SLAVIN, LLC



Joshua E. Slavin

746 Wakendaw Blvd
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Email: josh@attorneycarolina.com
SC Bar ID: 102912
Attorney for the Plaintiff

February 19, 2019
Mount Pleasant, SC

STATE OF SOUTH CAROLINA
COUNTY OF CHARLESTON

IN THE COURT OF COMMON PLEAS
FOR THE NINTH JUDICIAL CIRCUIT

CASE NO. 2019-CP-10- 809

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Defendants.

COMPLAINT

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CLERK OF COURT

TO THE ABOVE-NAMED DEFENDANTS:

NOW COME the Plaintiffs, individually and on behalf of their minor children, complaining, by and through their attorneys, Joshua Slavin, Esq., of the Law Offices of Joshua Slavin, and Benjamin D. Andreozzi, Esq. and Nathaniel L. Foote, Esq. of Andreozzi & Associates, P.C., of Defendants NewSpring Church, Inc. and NewSpring Community Church (collectively “NewSpring”) and Jacop Hazlett (“Hazlett”), and would allege and show this Honorable Court the following:

JURISDICTION AND VENUE

1. Plaintiffs are citizens and residents of South Carolina.
2. Defendants NewSpring Church, Inc. and NewSpring Community Church are non-profit corporations organized and existing under the laws of South Carolina.
3. NewSpring is a church, synagogue, mosque, or other congregation organized for the purpose of divine worship pursuant to South Carolina Solicitation of Charitable Funds Act.

4. NewSpring has a campus location at 101 Ashley Phosphate Rd #135, North Charleston, SC 29418, Dorchester County.

5. At the time Plaintiffs' causes of action arose, Defendant Hazlett was a citizen and resident of Charleston County, living at 2020 Proximity Dr., Apt 205, Charleston, SC 29414.

6. Hazlett is currently held at the Dorchester County Detention Center.

7. This Court has jurisdiction and venue over the parties to, and the subject matter of, this proceeding pursuant to S.C. Code § 15-7-30.

FACTUAL ALLEGATIONS

Jacop Hazlett's History of Sexually Abusing Children

8. Hazlett, now 28-years-old, grew up in Ohio.

9. Early in Hazlett's life, his sexual interest in young boys became apparent.

10. When Hazlett was 17-years-old he was charged in Columbiana County, Ohio with felony sexual assault of a child under 13-years-old.

11. Within a short time, Hazlett was again charged with a crime related to his sexual interest in children.

12. Specifically, Hazlett solicited a child to get into his car, although he was then precluded from contact with children due to his prior crimes.

13. In approximately 2010, Hazlett re-located to the Charlotte, North Carolina area.

14. While in North Carolina, Hazlett coached youth football and volunteered at two churches.

15. While in North Carolina, Hazlett volunteered at Cove Church and Elevation Church in Lake Norman.

16. Both Cove Church and Elevation Church are members of the Southern Baptist Convention, along with NewSpring Church.

17. Hazlett began volunteering at Cove Church in or around 2011.

18. One of Hazlett's fellow church volunteers voiced concerns to church leadership about Hazlett's interactions with youth.

19. Hazlett was asked to leave Cove Church in or around 2012 due to concerns about his behavior around children.

20. Hazlett began volunteering at Elevation Church in 2014.

21. In 2015, Elevation Church moved Hazlett to an administrative volunteer role with no direct contact or oversight of kids specifically because Elevation Church leadership had an "uneasy feeling with how he interacted with supervised kids."

22. Again, one of Hazlett's fellow church volunteers voiced concerns to Elevation Church leadership on several occasions about Hazlett's interactions with youth.

23. Eventually, Hazlett was dismissed from Elevation Church specifically because of the concerns about his interactions with children.

24. Upon information and belief, Hazlett molested at least one young boy while residing in North Carolina.

NewSpring Church

25. NewSpring Church operates at least fourteen campus locations throughout South Carolina, including a campus on Ashley Phosphate Road in North Charleston, South Carolina.

26. While NewSpring registered itself as a nonprofit entity with the Secretary of State, it collected over 40 million dollars in tithes and donations in 2017 alone, it owns

significant property throughout the state, it sells coffee and merchandise within its church campuses, and it has an online store that sells apparel, books, and other merchandise.

27. In 2017, NewSpring collected \$2,586,688.00 in tithes and offerings from its Charleston campus.

28. NewSpring relies on volunteers to run many of its operations, including childcare services and security at campus locations, including at the Charleston campus.

29. As part of its operations, NewSpring provides childcare to hundreds of children throughout the state while families participate in church services and give money to NewSpring.

30. Parents are required to put their children in childcare during Sunday services as children are not permitted in the main service.

31. NewSpring is familiar with the known risk that youth leaders can and do offend on young parishioners.

32. Indeed, in February and March of 2018, former NewSpring youth pastor and volunteer Caleb Lide Jordan was arrested and charged for soliciting sex with a minor and exploitation of a minor.

Hazlett moves to Charleston and NewSpring Church

33. In 2018, Hazlett moved to Charleston, SC.

34. Around March 2018, Hazlett began volunteering at NewSpring and specifically served in NewSpring's daycare.

35. Hazlett came to NewSpring around the time former youth pastor Caleb Jordan was charged for soliciting sex with a minor and exploitation of a minor.

36. Upon information and belief, when Hazlett arrived at NewSpring, the church did not contact Elevation Church or Cove Church for a reference.

37. Upon information and belief, had NewSpring contacted Elevation Church or Cove Church, NewSpring would have learned why Hazlett was reassigned and eventually asked to leave due to red-flags regarding Hazlett's behavior with kids.

38. Also, NewSpring did not request records regarding Hazlett, nor make any other inquiry, as to Hazlett's criminal record in Ohio, although Hazlett's Ohio criminal records can be obtained via a simple public records request.

39. In March 2018, NewSpring interviewed Hazlett and permitted him to begin working as a volunteer with children at the Charleston campus.

40. As a volunteer, Hazlett was placed in charge of a large number of young children while their parents worshiped on Sunday mornings.

41. Hazlett began to sexually abuse young children placed in his care shortly after he began volunteering at NewSpring.

42. NewSpring's Charleston location has security-cameras throughout the facility, including in the child day-care room for three-to-four-year-olds.

43. The security camera in the child day-care room for three-to-four-year-olds is positioned so that it captures footage of the entire room, including the children's bathroom in the back of the room.

44. The bathroom door is split into a lower and upper half, and the upper half stays open when children use the bathroom.

45. The security camera captures footage inside the bathroom, including the toilet, when the upper half of the door is open and the lower half is closed.

46. The live-feed of the security camera footage from approximately 40 surveillance cameras is monitored at the NewSpring Charleston location by a volunteer.

47. NewSpring did not adequately train its on-campus security volunteers.

48. NewSpring inadequately monitored the surveillance cameras, in that not all of the security camera feeds could be viewed simultaneously.

49. NewSpring Church stores ninety days of security camera footage.

50. On November 26, 2018, NewSpring Church became aware that Hazlett had sexually abused a three-or-four-year-old boy during Sunday services.

51. NewSpring reviewed its security camera footage going back ninety days and found fourteen separate incidents where Jacop Hazlett sexually abused boys in the three-to-four-year-old day care room bathroom.

52. It remains to be investigated just how far back Jacop Hazlett's sexual abuse of young boys at NewSpring Church goes, and how many victims Hazlett may have in addition to the minor-Plaintiffs.

53. The footage showed that on September 30, 2018, Jacop Hazlett sexually abused two of the minor-Plaintiffs.

54. The footage shows that on another occasion, Hazlett sexually abused at least one more of the minor-Plaintiffs.

55. The other minor-Plaintiffs were abused by Hazlett on occasions that are no longer reviewable on the available 90 days of security footage.

56. Jacop Hazlett took the minor-Plaintiffs into the bathroom alone and prevented them from leaving.

57. Jacop Hazlett sexually abused the minor-Plaintiffs, to including fondling, oral sex, and the creation of child pornography.

58. Upon information and belief, Hazlett knew of the security camera and its ability to see into the bathroom, meaning he was aware of the extraordinary risk he was taking had NewSpring simply been monitoring the video feed.

59. However, from March 2018 until November 26, 2018, no one at NewSpring noticed Hazlett was molesting children on a live camera feed, which was purportedly monitored in real time.

60. NewSpring either did not monitor the live feeds or ignored the abuse that was depicted on the live security feed.

61. Once arrested, Hazlett confessed to abusing children at NewSpring, and that he is sexually attracted to young boys.

62. Police discovered child pornography on Hazlett's phone of multiple children, including some of the minor-Plaintiffs.

63. Hazlett confessed to the police that he used images of minor-Plaintiff(s) and other children to masturbate.

64. Police are still investigating whether Hazlett uploaded any of the lewd images of the minor-Plaintiffs to the internet.

65. If Hazlett uploaded child pornography of the minor-Plaintiffs to the internet, the harm caused is irreparable, as those images can never be recaptured and will circulate so long as the internet exists.

66. As a result of the above-described abuse, minor-Plaintiffs have suffered, and upon information and belief, will continue to suffer, severe and ongoing psychological/psychiatric injury.

67. As a result of the above-described abuse to their children, the Plaintiffs have suffered, and upon information and belief will continue to suffer, severe and ongoing psychological/psychiatric injury.

COUNT I – ASSAULT AND BATTERY

Plaintiffs v. Jacop Hazlett and NewSpring Church

68. The allegations above and below are incorporated by reference into this cause of action to the extent they are not inconsistent with the following.

69. At all times relevant hereto, Hazlett was an agent of NewSpring who acted within the scope of his childcare authorization.

70. Hazlett subjected minor-Plaintiffs to unwanted sexual contact, as described above.

71. The sexual contact was intended to cause harmful and offensive contact with the minor-Plaintiffs' bodies.

72. The sexual contact did in fact cause harmful and offensive contact with the minor-Plaintiffs' bodies.

73. Hazlett was arrested for criminal sexual conduct with a minor.

74. As a direct and proximate cause of the battery, the minor-Plaintiffs suffered psychological/psychiatric injury and severe emotional distress, as set forth above.

75. The acts of Hazlett were willful, malicious, and in wanton disregard for the safety and well-being of John Doe, and as such justify an award of punitive damages.

76. NewSpring Church is vicariously liable for the acts and omissions of Hazlett.

77. As a direct and proximate cause of the Defendants' actions and omissions, and breach of the duties of reasonable care, the minor-Plaintiffs were sexually abused, resulting in the following damages:

- a. Physical pain;
- b. Suffering;
- c. Mental anguish;
- d. Emotional distress;

- e. Medical and psychiatric bills and other economic loss;
- f. Impairment of health and bodily efficiency;
- g. Increased susceptibility to future injury;
- h. Future medical and psychiatric expenses; and
- i. Other damages that will be shown at trial.

78. The minor-Plaintiffs are entitled to recover actual and punitive damages, as determined by a jury.

COUNT II – NEGLIGENCE, GROSS NEGLIGENCE, AND RECKLESSNESS

Plaintiffs v. NewSpring Church, Inc.

79. The allegations above and below are incorporated by reference into this cause of action to the extent they are not inconsistent with the following.

80. At all times relevant, Defendant NewSpring Church had a duty to protect the minor-Plaintiffs.

81. Defendant NewSpring Church knew or should have known of Hazlett's history of sexually abusing young children.

82. Defendant NewSpring Church knew or should have known of Hazlett's abuse of the minor-Plaintiffs on its property.

83. Defendant NewSpring Church had actual and constructive notice of Jacop Hazlett's ongoing sexual abuse of young boys via its live-feed and stored security footage.

84. NewSpring Church violated its duty of care and was negligent, grossly negligent, and/or reckless in the following particulars:

- a. by failing to properly screen, interview, hire, and train employees/volunteers/contractors/agents appropriately to interact with children;

- b. by failing to adopt, implement, and/or enforce adequate policies and procedures related to the supervision of employees/volunteers/contractors/agents;
- c. by failing to adopt, implement, and/or enforce adequate policies and procedures related to the monitoring of security footage;
- d. by failing to adequately train employees/volunteers/contractors/agents regarding child sexual abuse;
- e. by affirmatively choosing to give Jacop Hazlett access to young children associated with NewSpring Church, including Plaintiff John Doe;
- f. by failing to adequately investigate, screen, and interview Hazlett;
- g. by failing to supervise Jacop Hazlett and/or minor-Plaintiffs; and
- h. in other particulars that will be discovered prior to trial.

85. As a direct and proximate result of NewSpring's actions and omissions, and breach of the duties of reasonable care, the minor-Plaintiffs were sexually abused, resulting in damages as set forth above.

86. As a direct and proximate result of NewSpring's actions and omissions, and breach of the duties of reasonable care, the minor-Plaintiffs have suffered injuries, resulting in damages as set forth above.

87. As a direct and proximate result of NewSpring's actions and omissions, and breach of the duties of reasonable care, the parent-Plaintiffs have sustained and will sustain as damages the medical expenses for past and future treatment, goods, and services of their minor-Plaintiff children until they reach the age of eighteen.

88. Due to the willful, wanton, reckless, grossly negligent, and negligent acts of NewSpring Church, by and through their employees, agents, and legal representatives as set out above, Plaintiffs are entitled to recover actual and punitive damages, jointly and severally, as determined by a jury.

COUNT III – FALSE IMPRISONMENT

Plaintiffs v. Jacop Hazlett and NewSpring Church

89. The allegations above and below are incorporated by reference into this cause of action to the extent they are not inconsistent with the following.

90. At all times relevant hereto, Hazlett was an agent of NewSpring who acted within the scope of his childcare authorization.

91. On various occasions, Hazlett intentionally took the minor-Plaintiffs into the bathroom alone.

92. Hazlett intentionally confined the minor-Plaintiffs in the bathroom without their consent and restricted them from leaving.

93. Hazlett's conduct constituted false imprisonment of the minor-Plaintiffs.

94. As a result of the false imprisonment, Plaintiffs are entitled to both actual and punitive damages.

COUNT IV – INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

Plaintiffs v. Jacop Hazlett and NewSpring Church

95. The allegations above and below are incorporated by reference into this cause of action to the extent they are not inconsistent with the following.

96. At all times relevant hereto, Hazlett was an agent of NewSpring who acted within the scope of his childcare authorization.

97. Defendants intentionally or recklessly inflicted severe emotional distress on the minor-Plaintiffs and their parents.

98. Defendants' acts and omissions were so extreme and outrageous so as to exceed all possible bounds of decency, was atrocious, and was intolerable in a civilized society.

99. The emotional distress experienced by the parent-Plaintiffs was proximately caused by Defendants' acts and omissions.

100. The emotional distress suffered by the minor-Plaintiffs and their parents was so severe that no reasonable person should be expected to endure it.

WHEREFORE, Plaintiffs pray for a judgment against Defendants for actual damages, punitive damages, costs of this action, and such other and further relief as the court and jury shall deem just and proper.

Respectfully,

THE LAW OFFICES OF JOSHUA E. SLAVIN, LLC


Joshua E. Slavin

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Pro Hac Vice Pending

February 19, 2019
Mount Pleasant, SC