KLAYMAN LAW GROUP

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SOUTH CAROLINA ATTORNEY GENERAL ALAN WILSON AND SOLICITOR SCARLETT WILSON SUED OVER SEX ABUSE COVERUP!

(Charleston, South Carolina, September 9, 2025). Today, Larry Klayman, the founder of both Judicial Watch and Freedom Watch, and a former U.S. Senate candidate in Florida, as well as a federal prosecutor on the Department of Justice trial team that broke up the AT&T telecommunications monopoly, announced the filing of a lawsuit against South Carolina Attorney General Alan Wilson for withholding his public records over what is known to be his failure to prosecute sex abusers, particularly with regard to criminal acts against women and children.

A copy of the public records request served on Wilson on June 4, 2025 – over 3 months ago. Egregiously, Wilson did not only fail to produce the requested records, but he also outrageously failed to timely respond at all to the public records request.

Klayman's lawsuit, which was filed in his individual capacity, is styled *Klayman v. Alan Wilson and Scarlett Wilson*, 2025CP1005049 (Court of Common Pleas, Charleston, S.C.), the latter defendant, the solicitor of the state of South Carolina, a Wilson political crony, who also failed to produce any records, claiming falsely in all likelihood that she has none. The complaint is attached.

Klayman has this to say upon filing suit:

"It is shocking that a career politician and now attorney general and solicitor general of South Carolina would thumb their noses at legitimate public records requests which seek to get to the bottom of why the political legal establishment in this state has turned a blind eye and in fact appears to have covered up sex abuse cases, particularly against women and children. Wilson, who covets running for and becoming the governor of the state, is clearly hiding something and his disdain for even responding to a legitimate public records request speaks for itself. It is a testament to the corruption engrained not just in his attorneys general office, but of the South Carolina corrupt political legal establishment as a whole, where judges strangely appointed by the legislature frequently scratch the backs of and cow tow to this corrupt political legal establishment -- which has many judges in their hip pocket. I am committed to helping to clean

up this scandalous and dangerous mess, which harm women and children, in the great and beautiful state of South Carolina, as I am nationwide!"

For more information and/or an interview contact Mary Lewis at (703) 582-6890.

SOUTH CAROLINA COURT OF COMMON PLEAS CHARLESTON COUNTY

LARRY KLAYMAN 7050 W. Palmetto Park Rd Boca Raton, FL, 33433

Plaintiff,

v.

Case No.: 2025CP1005049

ALAN WILSON 1000 Assembly Street, Room 519 Columbia, S.C. 29201

And

SCARLETT WILSON 101 Meeting Street, 4th Floor Charleston, SC 29401

Defendants

AMENDED COMPLAINT

Plaintiff Larry Klayman ("Mr. Klayman") brings this action against Defendants Alan Wilson ("Mr. Wilson") and Scarlett Wilson ("Ms. Wilson") to compel compliance with the South Carolina Freedom of Information Act ("FOIA"), S.C. Code § 30-4-10 et seq.

PARTIES

1. Plaintiff Mr. Klayman is an individual and a citizen of United States. Plaintiff seeks to promote openness within the government and its actions. Plaintiff regularly requests records under FOIA to shed light on the operations of government and to educate the public about these operations. Plaintiff then analyzes the agency records and disseminates the results of its analysis with records to the public.

- 2. Defendant Mr. Wilson is the Attorney General of South Carolina.
- 3. Defendant Ms. Wilson is the Solicitor General of South Carolina.

STATEMENT OF FACTS

- 4. On June 4, 2025, Plaintiff sent a FOIA requests to Defendants using the South
- Carolina Department of Public Safety Freedom of Information Act Online Portal.
 - 5. Plaintiff's FOIA requests sought the following:
 - **Request #1**: Any and all documents and records that refer or relate to Representative Nancy Mace and her allegations that Patrick Bryant, John Osborne and/or Eric Bowman participated in and/or furthered directly or indirectly sexual abuse, rape and voyeurism against women.
 - Request #2: Any and all documents and records that refer or relate to a contemplated and/or actual investigation of allegations by Nancy Mace and/or anyone and/or any entity that Patrick Bryant, John Osborne and/or Eric Bowman participated in and/or furthered directly or indirectly sexual abuse, rape and voyeurism against women contrary to law.
 - Request #3: Any and all documents and records that refer or relate to statistics concerning the Attorney General and/or Solicitor General of South Carolina depicting the names and cases for the last five years of prosecutions against sexual predators, and details about the disposition, including dropped prosecutions and/or plea agreements, of any such cases.
 - Request # 4: Any and all documents and records that refer or relate to the political aspirations and/or plans by Attorney General Alan Wilson to run for Governor of South Carolina and any of his perceived competitors, such as Representative Nancy Mace, to also run for governor.
 - **<u>Request # 5</u>**: Any and all documents and records that refer or relate to Wesley Donahue.
 - <u>Request # 6</u>: Any and all documents and records that refer or relate to the Honorable Jessica Ann Salvini.
 - Request # 7: Any and all documents and records that refer or relate to a company owned by Patrick Bryant in whole or in part named GLT2 LLC and whether it is under investigation with regard to any matter.

- **Request # 8**: Any and all documents and records that refer, relate or constitute communications with Patrick Bryant, John Osborne and/ or Eric Bowman and/or any of their attorneys and agents.
- **Request # 9**: Any and all documents and records that refer or relate to any of the matters referred to in the attached complaint by Jane and John Doe. *See* Exhibit 1.
- Request # 10: Any and all documents and records that refer or relate to an actual or contemplated investigation by the South Carolina Law Enforcement Division and/or the Federal Bureau of Investigation of the allegations made by Representative Nancy Mace against Patrick Bryant, John Osborne and/or Eric Bowman or concerning their participation in directly and/or indirectly sexual abuse, rape and voyeurism against women.
- Request # 11: Any and all documents and records that refer or relate to collaboration with the South Carolina Law Enforcement Division of Investigation and/or the Federal Bureau concerning an investigation, contemplated and/or actual, over allegations made by Representative Nancy Mace against Patrick Bryant, John Osborne and/or Eric Bowman about their participation in directly and/or indirectly sexual abuse, rape and voyeurism against women.
- **Request # 12**: Any and all documents and records which refer or relate to allegations that Attorney General Alan Wilson and/or Solicitor General Scarlett Wilson have been involved in the cover-up of allegations of sexual abuse, rape and voyeurism against women.
- Request # 13: Any and all documents and records which refer or relate to any allegations that Attorney General Alan Wilson has been alleged to have sexually abused women or is insensitive to sexual abuse, voyeurism and rape against women and has ignored the request by Representative Mace to investigate the alleged criminal acts of Patrick Bryant, John Osborne and/or Eric Bowman.
- Request # 14: Any and all documents and records which refer or relate and/or constitute proposed legislation to increase and/or expand the laws of South Carolina to more strictly punish sexual offenders and predators against women and children.
- **Request #15**: Any and all documents and records which address transgenderism as it applies to hormone blockers and sex change operations for and on children.
- **Request # 16**: Any and all documents and records that refer or relate and/or which constitute the policies of the Attorney General of South Carolina and/or the Solicitor General of South Carolina in prosecuting, criminally and/or civilly, sexual abusers and predators against anyone, including women and children
- 6. A true and correct copy Plaintiff's FOIA Request is attached hereto as **Exhibit 1**.

- 7. Defendants were required to determine whether to comply with Plaintiff's FOIA Request within 10 days pursuant to S.C. Code § 30-4-30(C).
- 8. As of the date of this Complaint, Defendants have not produced any records responsive to Plaintiff's request. By failing to respond Defendants have forfeited and waived any possible claimed exemptions or privileges.
- 9. Defendant Scarlett Wilson has indicated that no responsive records exist, which is not credible.
- 10. Defendant Alan Wilson has failed to respond and has to date not indicated when any responsive records will be produced, or demonstrated that specific responsive records are exempt from production.
- 11. Plaintiff submits that the failure to respond timely as well as to produce one record, raises a strong presumption that there is a cover-up by the Defendants of evidence of their willful if not corrupt failure to prosecute sex crimes, particularly against women and children.

FIRST CAUSE OF ACTION Violation of South Carolina Freedom of Information Act

- 12. Plaintiff realleges paragraphs 1 through 8 as if fully stated herein.
- 13. Defendants are unlawfully withholding records requested by Plaintiff's FOIA Request pursuant S.C. Code § 30-4-10 et seq as set forth in Exhibit 1, which is incorporated herein by reference.
- 14. Plaintiff is being irreparably harmed by reason of Defendants' unlawful withholding of requested records, and Plaintiff will continue to be irreparably harmed unless Defendants are compelled to conform its conduct to the requirements of the law.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully request that the Court order that Defendants produce all responsive records to Plaintiff's FOIA Request and that Plaintiff be awarded attorneys fees and costs.

Dated: September 8, 2025

Respectfully submitted,

Larry Klayman, Esq.

KLAYMAN LAW GROUP P.A.

7050 W. Palmetto Park Rd

Boca Raton, FL, 33433

561-558-5336

<u>leklayman@gmail.com</u>

Plaintiff Pro Se

EXHIBIT 1

KLAYMAN LAW GROUP, P.A.

7050 W Palmetto Park Rd, Boca Raton, FL 33433 · Ph (561) 449-0898 · leklayman@gmail.com

June 4, 2025

Via South Carolina Department of Public Safety Freedom of Information Act Online Portal

FOIA Officer SC Department of Public Safety PO Box 1993 Blythewood, SC 29016

Mr. Alan Wilson Attorney General of South Carolina 1000 Assembly Street, Room 519 Columbia, S.C. 29201

Ms. Scarlett Wilson Solicitor General of South Carolina O.T. Wallace County Office Building 101 Meeting Street, 4th Floor Charleston, SC 29401

Re: Freedom of Information Act Requests

Dear Sirs/Madames:

Pursuant to the South Carolina Freedom of Information Act ("FOIA"), S.C. Code § 30-4-10 et seq., and regulations promulgated thereunder, we hereby request from the Mr. Alan Wilson ("Mr. Wilson") and Ms. Scarlett Wilson ("Ms. Wilson") all documents that refer or relate in any way to each of the specific requests stated below, with each request considered separately.

I request that you provide the requested documents within ten (10) days of receipt of this request pursuant to S.C. Code § 30-4-30(C).

FREEDOM OF INFORMATION REQUESTS

For the purpose of this Freedom of Information Act Request, you must consider each of the following requests independently and separately. Please note that a document that has been altered with the addition of handwritten notes or other information added is not the same document as the unaltered original.

Definitions

For the purpose of this Freedom of Information Act request the term "document" is hereby defined expansively to include any or all of the following, whether existing as electronic, digital, or computer data, in electronic or digital form, or in paper form: correspondence, letters, memoranda, recommendations, records, orders, plans, proposals, meeting agendas, minutes of meetings, briefing materials, progress reports, weekly reports, talking points, briefing papers, requests for action, telephone logs, telephone message books, notes of phone messages or visits, routing slips, buck slips, standard government forms containing information filled in on lines or blank spaces, slide presentations, "card decks" (for presentations at meetings), power-point presentations, facsimiles (faxes), notes, handwritten notes, notes to the file, requests for decision, requests for authorization, tape recordings, video recordings, electronic mail (email) messages, summaries, briefs, orders, written decisions, applications, , and/or other documents and things. In addition, with regard to payments to persons or vendors, documents also include all invoices, bills, contracting records, commitment of funds, obligation of funds, or disbursement records.

For the purposes of this FOIA request, you are to search and produce any responsive documents or records that are within the possession, custody, or control of Mr. Wilson and/or Ms. Wilson and their agents and those acting on their behalf regardless of who authored or created the document or record.

For the purposes of this FOIA request, the term "communication" includes any form of communication, such as by letter, by facsimile, by note, by telephone text message, by electronic mail (email), computer messaging service, or by any other means.

Requests

<u>Request #1</u>: Any and all documents and records that refer or relate to Representative Nancy Mace and her allegations that Patrick Bryant, John Osborne and/or Eric Bowman participated in and/or furthered - directly or indirectly - sexual abuse, rape and voyeurism against women.

Request #2: Any and all documents and records that refer or relate to a contemplated and/or actual investigation of allegations by Nancy Mace and/or anyone and/or any entity that Patrick Bryant, John Osborne and/or Eric Bowman participated in and/or furthered - directly or indirectly - sexual abuse, rape and voyeurism against women contrary to law.

Request #3: Any and all documents and records that refer or relate to statistics concerning the Attorney General and/or Solicitor General of South Carolina depicting the names and cases for the last five years of prosecutions against sexual predators, and details about the disposition, including dropped prosecutions and/or plea agreements, of any such cases.

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Request #8: Any and all documents and records that refer, relate or constitute communications with Patrick Bryant, John Osborne and/ or Eric Bowman and/or any of their attorneys and agents.

Request # 9: Any and all documents and records that refer or relate to any of the matters referred to in the attached complaint by Jane and John Doe. *See* Exhibit 1.

Request # 10: Any and all documents and records that refer or relate to an actual or contemplated investigation by the South Carolina Law Enforcement Division and/or the Federal Bureau of Investigation of the allegations made by Representative Nancy Mace against Patrick Bryant, John Osborne and/or Eric Bowman or concerning their participation in - directly and/or indirectly - sexual abuse, rape and voyeurism against women.

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Request # 12: Any and all documents and records which refer or relate to allegations that Attorney General Alan Wilson and/or Solicitor General Scarlett Wilson have been involved in the cover-up of allegations of sexual abuse, rape and voyeurism against women.

Request # 13: Any and all documents and records which refer or relate to any allegations that Attorney General Alan Wilson has been alleged to have sexually abused women or is insensitive to sexual abuse, voyeurism and rape against women and has ignored the request by Representative Mace to investigate the alleged criminal acts of Patrick Bryant, John Osborne and/or Eric Bowman.

Request # 14: Any and all documents and records which refer or relate and/or constitute proposed legislation to increase and/or expand the laws of South Carolina to more strictly punish sexual offenders and predators against women and children.

<u>Request # 15</u>: Any and all documents and records which address transgenderism as it applies to hormone blockers and sex change operations for and on children.

Request # 16: Any and all documents and records that refer or relate and/or which constitute the policies of the Attorney General of South Carolina and/or the Solicitor General of South Carolina in prosecuting, criminally and/or civilly, sexual abusers and predators against anyone, including women and children.

REQUEST FOR FEE WAIVER

The requesters also respectfully request a blanket fee waiver on behalf of the public interest, to which it is entitled under S.C. Code § 30-4-30(B).

Requester Larry Klayman is a public interest advocate has and will hold Republicans, Democrats, and Independents equally accountable to ethical and legal standards for honest and open government.

He has no commercial purpose and only seeks improve the ethical and legal standards in government, accountability of government officials to the rule of law, and public understanding of government operations.

Requested Larry Klayman will also use the requested material to promote accountable government as a representative of the news media and the public in accordance with 5 U.S.C. § 552(a)(4)(A)(ii)(II) and *National Sec. Archive v. U.S. Dept. of Defense*, 880 F.2d 1381, 1385-87 (D.C. Cir. 1989), by disseminating relevant information which may be uncovered. Information will benefit the public by identifying areas for future reform as well as deterring future abuses that could otherwise proliferate without scrutiny.

The subject of this request is information concerning the operations and activities of the government. Past experience of demonstrates the success of Larry Klayman in uncovering important facts about government activities, integrity and operations, of broad concern to the public. This request is likely to "contribute significantly" to the public's understanding of the operations of their government, satisfying the requirements of FOIA fee waiver provisions. Mr. Klayman has a website at www.klaymanlaw.com that disseminates information widely, and its founder and chairman, Mr. Klayman, hosts a weekly radio show and conducts frequent podcasts titled "Special Prosecutor with Larry Klayman" and frequently speaks at public events.

Immediate release of the requested information is in the public interest, including for promoting confidence in an honest democratic system, and furthering the integrity of government by deterring and/or sanctioning corrupt activities. The failure to do so will likely result in the further compromise of important interests of the people of South Carolina and the United States as a whole.

Sincerely,

Larry Klayman, Esq.

Klayman Law Group P.A. 7050 W. Palmetto Park Rd

Boca Raton, FL, 33433

leklayman@gmail.com

EXHIBIT 1

COUNTY OF CHARLESTON	IN COURT OF COMMON PLEAS IN THE 9TH JUDICIAL CIRCUIT
Jane Doe,) C/A No.: 2025-CP-10-
Plaintiff,)) SUMMONS
v.)
Patrick Bryant, John Osborne, Eric Bowman, and Pommer Group LLC.)))
Defendants.))

TO THE DEFENDANTS ABOVE NAMED

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 the Complaint to Plaintiff's attorney, Marybeth Mullaney, at the address below, within thirty (30) days after service hereof, exclusive of the day of such service, and if you fail to answer the Complaint within the time aforesaid, Plaintiff will apply to the Court for the relief demanded in the Complaint, including the rendering of judgment by default against you.

Respectfully submitted,

s/Marybeth Mullaney
Marybeth Mullaney (S.C. Bar #6685)
4900 O'Hear Ave Suite 100 & 200
North Charleston, South Carolina 29405
(843) 588-5587
marybeth@mullaneylaw.net
Attorney for Plaintiff

May 29, 2025 North Charleston, South Carolina