

IN THE STATE OF SOUTH CAROLINA)
COUNTY OF FLORENCE)

IN THE COURT OF COMMON PLEAS
FOR THE 12TH JUDICIAL CIRCUIT
CASE NO: 2026-CP-

Trayvon Turner,

Plaintiff,

v.

Neel Lands, LLC, d/b/a Percy and Willie's
Food & Spirits, William Hal Neel III,
Individually and as Owner of Percy and
Willie's Food & Spirits, Jeffrey Chamblee,
Individually and as Operating Partner of
Percy and Willie's Food & Spirits, Andrew
Davis, Individually and as General
Manager of Percy and Willie's Food &
Spirits, and Tracy Counts, Individually and
as Service Manager of Percy and Willie's
Food & Spirits,

Defendants.

SUMMONS
(Jury Trial Demanded)

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 said Complaint upon the Plaintiff or Plaintiff's attorneys, Carles' Anderson, at their offices at 32 Ann Street, Charleston, SC 29403, within (30) days after the 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.

Dated at Charleston, South Carolina on June 12, 2026.

Dated: June 12, 2026

Respectfully Submitted,

POULIN | WILLEY

/s/ Carles' Anderson

Carles' Anderson

S.C. Bar No.: 104926

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ATTORNEYS FOR THE PLAINTIFF

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Manager of Percy and Willie's Food &
Spirits, and Tracy Counts, Individually and
as Service Manager of Percy and Willie's
Food & Spirits,

Defendants.

**COMPLAINT
(Jury Trial Demanded)**

The Plaintiff, complaining of the Defendants, alleges and says as follows:

CASE SYNOPSIS

1. Defendants own and operate a dining establishment in Florence, SC.
2. On or about May 3, 2026, Percy and Willie's Food & Spirits' staff, welcomed professional food critic, comedian, and social media influencer Plaintiff Trayvon Turner into its establishment and greeted him cordially upon his arrival. Mr. Turner was filming his experience so that he could produce content for his followers on "Ben-A-Critic" YouTube Channel and "benacritic" on Instagram.
3. After Mr. Turner placed his order and was waiting to receive his food, Defendants' manager approached Mr. Turner and requested that he accompany Defendant Jeffrey Chamblee to the front of the restaurant. Mr. Turner complied. Defendant Jeffrey Chamblee then told Mr. Turner that he was being asked to leave the premises because videorecording was not allowed.

4. When Mr. Turner asked why the defendants did not simply ask him to stop recording, a heated verbal exchange ensued.
5. Defendants grabbed and pushed Mr. Turner out of the restaurant using their body weight, called law enforcement to falsely report that Mr. Turner assaulted Defendant William Hal Neel III, and then blocked Mr. Turner's vehicle in an attempt to prevent him from leaving the premises.
6. Mr. Turner suffered emotional distress and economic losses as a result of this incident.

PARTIES, JURISDICTION, AND VENUE

7. Plaintiff Trayvon Turner is a citizen and resident of Florence County, State of South Carolina.
8. On or about May 3, 2026, Plaintiff was lawfully present as a paying patron and invitee at Percy & Willie's | Food and Spirits.
9. Defendant Neel Lands LLC is a limited liability company organized and existing under the laws of the State of South Carolina, doing business and owning real property in Florence, South Carolina and whose registered agent for service of process is William Hal Neel III at 2536 Rainford Road Florence, SC 29501.
10. At all times relevant to this action, Neel Lands LLC owned, operated, managed, and controlled the restaurant known as Percy & Willie's | Food and Spirits, located at 130 Dunbarton Drive, Florence, South Carolina 29501 (hereinafter "the Restaurant").
11. Defendant William Hal Neel III is an individual and, upon information and belief, a resident of Florence County South Carolina who, at all times relevant to this action, served as an owner and/or manager of Percy & Willie's | Food and Spirits with power, authority, and responsibility to manage, direct, superintend, restrict, regulate, govern, administer,

and/or oversee the management of the Restaurant to ensure that it was safe and not dangerous to persons such as Plaintiff.

12. At all times relevant to the incident giving rise to this action, Defendant William Hal Neel III acted within the course and scope of his authority and employment with Percy & Willie's | Food and Spirits.

13. Defendant Jeffrey Chamblee is an individual and, upon information and belief, a resident of Florence County South Carolina who, at all times relevant to this action, served as an Operating Partner of Percy & Willie's | Food and Spirits with power, authority, and responsibility to manage, direct, superintend, restrict, regulate, govern, administer, and/or oversee the management of the Restaurant to ensure that it was safe and not dangerous to persons such as Plaintiff.

14. At all times relevant to the incident giving rise to this action, Defendant Jeffrey Chamblee acted within the course and scope of his authority and employment with Percy & Willie's | Food and Spirits.

15. Defendant Andrew Davis an individual and, upon information and belief, a resident of Florence County South Carolina who, at all times relevant to this action, served as an General Manager of Percy & Willie's | Food and Spirits with power, authority, and responsibility to manage, direct, superintend, restrict, regulate, govern, administer, and/or oversee the management of the Restaurant to ensure that it was safe and not dangerous to persons such as Plaintiff.

16. At all times relevant to the incident giving rise to this action, Defendant Andrew Davis acted within the course and scope of his authority and employment with Percy & Willie's | Food and Spirits.

17. Defendant Tracy Counts is an individual and, upon information and belief, a resident of Florence County South Carolina who, at all times relevant to this action, served as an Service Manager of Percy & Willie's | Food and Spirits with power, authority, and responsibility to manage, direct, superintend, restrict, regulate, govern, administer, and/or oversee the management of the Restaurant to ensure that it was safe and not dangerous to persons such as Plaintiff.
18. At all times relevant to the incident giving rise to this action, Defendant Tracy Counts acted within the course and scope of her authority and employment with Percy & Willie's | Food and Spirits
19. That all defendants are jointly and severally liable for Plaintiff's damages.
20. That this Court has jurisdiction over the parties and the subject matter of this action, and that venue is proper in Florence County.

FACTUAL ALLEGATIONS

21. Plaintiff Trayvon Turner is an African American food critic and professional vlogger whose livelihood, reputation, and public profile depend upon his ability to patronize, evaluate, and document his experiences at restaurants and dining establishments.
22. On or about May 3, 2026, Plaintiff entered Percy & Willie's | Food and Spirits as a paying patron. He was seated and engaged in dining in a lawful, peaceful, and orderly manner. At no point during his patronage did Plaintiff create a disturbance, harass other patrons or staff, or engage in conduct that would justify his removal from the premises.
23. During his visit, and with knowledge of the staff who greeted, sat, and served him, Plaintiff recorded video footage within the Restaurant, a common and ordinary practice among food

critics and patrons alike, and one that was not communicated to Plaintiff as prohibited prior to or upon his entry.

24. An owner and/or manager of the Restaurant, Defendant Jeffrey Chamblee encountered Plaintiff while Plaintiff was dining and offered him a cordial greeting, demonstrating that at that moment Plaintiff's presence was not objectionable and that no disturbance existed.
25. Shortly thereafter, without any intervening misconduct on Plaintiff's part, Defendant Jeffrey Chamblee approached Plaintiff and requested that he accompany him to the front of the establishment. Plaintiff complied peaceably and without resistance.
26. While being escorted toward the front of the Restaurant, Plaintiff asked Defendant Jeffrey Chamblee the reason for the request. Defendant Jeffrey Chamblee informed Plaintiff that he was being asked to leave. Plaintiff asked why. Defendant Jeffrey Chamblee stated that the Restaurant's policy prohibited video recording.
27. Plaintiff reasonably and calmly responded that he could have simply been asked to stop recording, rather than being ejected from the premises. Defendant Jeffrey Chamblee refused to consider this reasonable accommodation and reiterated that Plaintiff was required to leave.
28. The stated justification — a no-recording policy — was a pretext. Upon information and belief, the true motivation for Defendants' decision to remove Plaintiff from the premises was, at least in part, Plaintiff's race. Defendants' establishment is owned and operated by Caucasian men, and Defendants applied their purported policy in a racially discriminatory manner, targeting Plaintiff, an African American patron, while similarly situated non-Black patrons have been permitted to remain and record.

29. As Plaintiff and Defendant Jeffrey Chamblee moved toward the front and then to the exterior of the Restaurant, Defendant William Hal Neel III used his chest and body to physically push and press against Plaintiff, making unwanted and offensive physical contact with Plaintiff's person, and using that physical force to propel Plaintiff toward and ultimately off of the premises. Plaintiff had not consented to any physical contact by Defendant William Hal Neel III.
30. Throughout this physical confrontation, Plaintiff repeatedly demanded that Defendant William Hal Neel III cease touching him. Plaintiff, responding to the unlawful, racially charged, and physically threatening conduct directed at him, became understandably upset and defensive, as he was attempting to comply with leaving the Restaurant.
31. During this confrontation, Defendant William Hal Neel III acting in concert with Defendant Jeffrey Chamblee and within the scope of his authority as an owner and/or manager of the Restaurant, contacted law enforcement and falsely reported to police that Plaintiff had struck Defendant William Hal Neel III in the face. This representation was knowingly false and is directly contradicted by the video footage captured of the incident.
32. Police officers responded to the scene. Upon their investigation, no arrest was made, and no charges were filed against Plaintiff — a result fully consistent with the video evidence, which refutes Defendants' false report in its entirety.
33. Following Plaintiff's removal from the Restaurant, Defendant Jeffrey Chamblee positioned himself in front of and around Plaintiff's vehicle, physically blocking Plaintiff's automobile and preventing him from departing the premises. This conduct was intentional, unauthorized, and designed to restrain Plaintiff in place against his will.

34. Plaintiff publicly posted the video footage of the incident, and the incident received widespread attention from social and news media outlets. As a result of the incident — and specifically as a result of Defendants' unlawful conduct and their false and defamatory statements — Plaintiff has received death threats and suffered severe emotional distress, causing him to be unable to work for several weeks following the incident.
35. Plaintiff has suffered and continues to suffer harm to his professional reputation, career, earning capacity, and emotional and psychological well-being as a direct and proximate result of defendants' actions.

First Cause of Action
(Assault)

Against Defendants Jeffrey Chamblee, William Hal Neel III, and Neel Lands LLC

36. Plaintiff realleges and incorporates by reference all preceding paragraphs as though fully set forth herein.
37. Defendants Jeffrey Chamblee and William Hal Neel III, acting individually and within the course and scope of his authority as an owner and/or manager of the Restaurant, verbally threatened violence on Plaintiff or otherwise placed Plaintiff in reasonable apprehension of bodily harm.
38. That Plaintiff was placed in fear of Defendants because of the close proximity of both parties and because Defendants caused a number of employees to approach Plaintiff in an intimidating manner.
39. That Defendants had the present ability to, in fact, cause physical harm to Plaintiff.
40. That Defendants' physical conduct also placed Plaintiff in reasonable apprehension of bodily harm or offensive contact throughout the confrontation.

41. That as a direct and proximate result of Defendants' assault, Plaintiff has been injured.
42. Defendants' conduct was willful, wanton, and in reckless disregard of Plaintiff's rights, entitling Plaintiff to an award of actual and punitive damages.
43. That Plaintiff is entitled to an award of damages to be determined by a jury for Plaintiff's injuries sustained as alleged herein.

Second Cause of Action

(Battery)

Against Defendants Jeffrey Chamblee, William Hal Neel III, and Neel Lands LLC

44. Plaintiff realleges and incorporates by reference all preceding paragraphs as though fully set forth herein.
45. Defendant William Hal Neel III acting individually and within the course and scope of his authority as an owner and/or manager of the Restaurant, engaged in intentional, repeated, and unwanted physical contact with Plaintiff by using his chest and body to push and press against Plaintiff. This physical contact was harmful and offensive and was undertaken without Plaintiff's consent.
46. Defendants Jeffrey Chamblee and William Hal Neel III pushed and/or otherwise made an unlawful, unauthorized forcible contact with Plaintiff's person despite repeated refusal to be touched by Plaintiff.
47. That as a direct and proximate result of Defendants repeated battery upon his person, Plaintiff has been injured.
48. Defendants' conduct was willful, wanton, and in reckless disregard of Plaintiff's rights, entitling Plaintiff to an award of actual and punitive damages.
49. That Plaintiff is entitled to an award of damages to be determined by a jury for Plaintiff's injuries sustained as alleged herein.

Third Cause of Action
(Negligent Supervision)

Against Neel Lands, LLC, Andrew Davis, and Tracy Counts

50. Plaintiff realleges and incorporates by reference all preceding paragraphs as though fully set forth herein.
51. That Defendants Neel Lands, LLC, Andrew Davis, and Tracy Counts all had a duty to act with due care in supervising Percy & Willie's agents, Defendant Jeffrey Chamblee and Defendant William Hal Neel III.
52. That Defendants Neel Lands, LLC, Andrew Davis, and Tracy Counts had an opportunity to supervise its agents, Defendant Jeffrey Chamblee and Defendant William Hal Neel.
53. At all times relevant, that Defendants Neel Lands, LLC, Andrew Davis, and Tracy Counts failed and/or refused to supervise and intervene despite its awareness of the confrontation and their authority to do so.
54. Defendants are vicariously liable for the injuries committed against Plaintiff, by both Defendant Jeffrey Chamblee and Defendant William Hal Neel III, who acted at all relevant times within the course and scope of their employment and authority with the company.
55. That as a direct and proximate result of Defendants' failure and/or outright refusal to supervise its agents Defendants Jeffrey Chamblee and Defendant William Hal Neel, Plaintiff has been injured.
56. That Plaintiff is entitled to an award of damages to be determined by a jury for Plaintiff's injuries sustained as alleged herein.

Fourth Cause of Action
(Intentional Infliction of Emotional Distress)

Against Defendant Jeffrey Chamblee, Defendant William Hal Neel III, and Neel Lands LLC

57. Plaintiff realleges and incorporates by reference all preceding paragraphs as though fully set forth herein.
58. Defendants intentionally and/or recklessly inflicted severe emotional distress or were certain or substantially certain that such distress would result from their conduct toward Plaintiff. Defendants deliberately removed Plaintiff from the Restaurant without legal justification after initially welcoming him to the premises with knowledge of his plan to film, physically pushed him from the premises, made a false police report against him, blocked his vehicle to prevent his departure, and published false and defamatory statements about him to the police and in the presence of third parties— all of which were knowing and purposeful acts.
59. Defendants' conduct was extreme and outrageous and exceeded all possible bounds of decency in a civilized society. The totality of Defendants' actions — racially motivated ejection, physical contact, a false criminal accusation to law enforcement, and physical detention of Plaintiff in an open parking lot— goes beyond all possible bounds of decency and is of a nature that no reasonable person should be expected to endure.
60. Defendants knew, or should have known, that Plaintiff — a professional whose reputation and livelihood are tied to his public presence and standing — was particularly vulnerable to the consequences of false public accusations and humiliating ejection from a public establishment, and that their conduct would cause severe emotional harm.
61. As a direct and proximate result of Defendants' extreme and outrageous conduct, Plaintiff suffered severe emotional distress, including but not limited to anxiety, psychological trauma, sleeplessness, mental anguish, humiliation, shame, and an inability to perform his professional duties for several weeks following the incident.

62. The emotional distress suffered by plaintiff was severe so that no reasonable person could be expected to endure it.
63. Defendants are vicariously liable for the injuries committed against Plaintiff, by both Defendant Jeffrey Chamblee and Defendant William Hal Neel III, who acted at all relevant times within the course and scope of their employment and authority with the company.
64. Defendants' conduct was willful, wanton, and reckless, entitling Plaintiff to actual and punitive damages.

Fifth Cause of Action
(Defamation)

Against Defendant William Hal Neel III and Neel Lands LLC

65. Defendant William Hal Neel III, individually and on behalf of Neel Lands LLC, made a false statement to law enforcement officers that Plaintiff struck him in the face. Video footage of the incident directly contradicts this assertion. The statement was published to third parties, specifically law enforcement officers who responded to the scene, and upon information and belief, to additional persons including other Restaurant personnel, bystanders, and through subsequent social media activity.
66. The false statements communicated to law enforcement constitute defamation per se, as they falsely impute to Plaintiff the commission of a crime — specifically, physical assault — and/or they falsely impute conduct incompatible with Plaintiff's trade, profession, and livelihood as a food critic and public figure in the culinary community.
67. That Defendant made these statements with actual malice or with reckless disregard for their truth or falsity. Defendant knew or recklessly disregarded that his statements were false when they made them.

68. As a direct and proximate result of Defendant's defamatory statements, Plaintiff has suffered damage to his professional reputation, loss of business opportunities, loss of income, emotional distress, mental anguish, and public humiliation.
69. That Defendant's conduct was willful and malicious, entitling Plaintiff to actual and punitive damages.

Sixth Cause of Action
(False Imprisonment)

Against Defendant Jeffrey Chamblee

70. Plaintiff realleges and incorporates by reference all preceding paragraphs as though fully set forth herein.
71. Following Plaintiff's removal from the Restaurant, Defendant Jeffrey Chamblee, acting individually and on behalf of Neel Lands LLC, deliberately and intentionally positioned himself in front and around Plaintiff's vehicle in the parking area of the Restaurant, physically blocking Plaintiff's automobile and preventing him from driving away and departing the premises.
72. This conduct and resulting restraint were intentional. Defendant Jeffrey Chamblee undertook it specifically to detain Plaintiff against his will and to hold him in place until law enforcement arrived, thereby using the threat of physical obstruction to restrain Plaintiff's freedom of movement.
73. Plaintiff was aware that his freedom of movement was being restrained and was not free to leave. Plaintiff did not consent to this restraint.
74. Defendants had no legal authority to detain Plaintiff. No arrest had been effectuated, no citizen's arrest privilege attached under these circumstances, and Plaintiff had committed no criminal offense that would warrant such detention. Defendants' false report of an

assault does not, in law or in equity, provide retroactive justification for Defendants' deliberate decision to physically block Plaintiff's vehicle and deprive him of his liberty.

75. As a direct and proximate result of the false imprisonment, Plaintiff suffered fear, anxiety, emotional distress, humiliation, and deprivation of his right to freedom of movement.
76. Defendants' conduct was willful, wanton, and reckless, entitling Plaintiff to actual and punitive damages.

Seventh Cause of Action
(Negligent Training)

Against Neel Lands, LLC, Andrew Davis, and Tracy Counts

77. Plaintiff realleges and incorporates by reference all preceding paragraphs as though fully set forth herein.
78. That Defendants Neel Lands, LLC, Andrew Davis, and Tracy Counts all had a duty to act with due care in training Percy & Willie's employees, agents, and representatives acting on behalf of Percy & Willie's, including Defendant Jeffrey Chamblee and Defendant William Hal Neel III, and other restaurant personnel,
79. That Defendants knew or should have known that employees, agents, and representatives of Percy & Willie's would regularly interact with members of the public and would be required to address customers reviews, recording, and commentary activities.
80. That Defendants failed to adequately train their employees, agents, and representatives of Percy & Willie's, regarding lawful handling of customer reviews, the limits of their authority to detain patrons such as Plaintiff, the proper procedures for contacting law enforcement, deescalation strategies, and the rights of members of the public to provide commentary on their experience.

81. Upon information and belief, Defendants further failed to adequately train employees, agents, and representatives of Percy & Willie's concerning the Restaurant's policies regarding videorecording. Furthermore, Defendants failed to train employees, agents, and representatives to provide patrons with notice of any recording restrictions and reasonable alternatives to handle disagreements.
82. That Defendants knew or should have known that the failure to properly train employees, agents, and representatives of Percy & Willie's created a foreseeable risk that patrons would be subjected to unlawful detention, false accusations, emotional distress, and other injuries.
83. That as a direct and proximate result of Defendants' failure and/or outright refusal to train its agents Defendants Jeffrey Chamblee and Defendant William Hal Neel III, Plaintiff has been injured.
84. That Plaintiff is entitled to an award of damages to be determined by a jury for Plaintiff's injuries sustained as alleged herein.

Eighth Cause of Action
(Negligence)
Against all Defendants

85. Plaintiff realleges and incorporates by reference all preceding paragraphs as though fully set forth herein.
86. That Defendants Neel Lands, LLC, William Hal Neel III, Jeffrey Chamblee, Andrew Davis, and Tracy Counts owed Plaintiff a duty to act with reasonable care in their conduct towards patrons lawfully present at Percy & Willie's.
87. That Defendants breached that duty by, among other things:

- a. In failing to act reasonably in responding to Plaintiff's presence and activities in the Restaurant;
 - b. In failing to communicate any alleged restriction on video recording before initiating confrontation with the Plaintiff;
 - c. In failing to reasonably investigate the facts before making accusations against Plaintiff or contacting law enforcement;
 - d. In failing to prevent or intervene in conduct that prevented Plaintiff's freedom of movement;
 - e. In failing to train staff in the enforcement of recording restrictions;
 - f. In failing to exercise the degree of care and caution that a reasonable and prudent person would have exercised under the circumstances then and there prevailing;
 - g. In negligently and carelessly supervising, training, and otherwise operating their Restaurant in such a manner that caused harm and personal injuries;
 - h. In any other manner that represents a breach of the statutory or common laws of the State of South Carolina; and
 - i. In any other such manner that Plaintiff may become aware of through discovery and/ or trial.
88. That as a direct and proximate result of Defendants' failures, Plaintiff has been injured.
89. That Plaintiff is entitled to an award of damages to be determined by a jury for Plaintiff's injuries sustained as alleged herein.
90. That as a direct and proximate result of the assault, battery, intentional infliction of emotional distress, defamation, false imprisonment, negligence, gross negligence, carelessness, recklessness, willfulness, and wantonness of the Defendants, as is set forth

more fully above, Plaintiff has been damaged and injured in the following respects:

- a. Upon information and belief, the nature of the Plaintiff's injuries will require Plaintiff to expend a significant amount of money for future medical care, treatment and attendant services;
- b. pain and suffering, mental anguish, fear, emotional distress, and humiliation;
- c. Upon information and belief, the nature of Plaintiff's injuries will deprive Plaintiff of employment opportunities and income in the future; and
- d. The pain of Plaintiff's injuries has resulted in Plaintiff's loss of enjoyment of life and change in Plaintiff's personality, all to the permanent detriment of Plaintiff's health and physical well-being.

91. That Defendants' acts and omissions, as are set forth more fully above, show willful misconduct, malice, wantonness, and an entire want of care, raising a presumption of the Defendants' conscious indifference to the consequences of such acts and omissions.

92. That because of the Defendants' acts and omissions and the proximate harm resulting to Plaintiff, Plaintiff should be awarded punitive damages in an amount to be determined by the trier of fact, in order to punish and penalize the Defendants and to deter the Defendants and others from similar behavior.

93. That upon information and belief, Plaintiff is entitled to judgment against the Defendants for actual, compensatory, and exemplary or punitive damages for Plaintiff's personal injuries set forth here in an amount that is fair, just and reasonable under the circumstances, plus whatever costs, interest and attorney fees to which Plaintiff may be entitled to be determined by a jury.

WHEREFORE, the Plaintiff prays for judgment against the Defendants for an amount to

be ascertained by the jury at the trial of this action, for all damages, punitive and actual, for the cost and disbursements of this action, post judgment interest, and for such other and further relief, in law or in equity, as this court may deem just and proper.

Dated: June 12, 2026

Respectfully Submitted,

POULIN | WILLEY

/s/ Carles' Anderson
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