

STATE OF SOUTH CAROLINA	)	THE COURT OF COMMON PLEAS
	)	
COUNTY OF BEAUFORT	)	CIVIL ACTION NO.:2025-CP- 07-_____
	)	
Bridgette Alicia Frazier and Warren	)	
Anthony Patterson,	)	
	)	
Plaintiffs,	)	
	)	
	)	
vs.	)	SUMMONS
	)	
Bluffton Police Department, Town of	)	
Bluffton, Richard M. Ramirez, Chief of	)	
Police Joseph Babkiewicz and South	)	
Carolina Department of Motor Vehicles,	)	
	)	
Defendants.	)	
	)	

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, Tiffany R. Spann-Wilder, Esquire, Post Office Box 70488, N. Charleston, South Carolina 29415, 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,

SPANN WILDER LAW, LLC

s/ Tiffany R. Spann-Wilder, Esquire
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ATTORNEYS FOR PLAINTIFFS

THE WOODS LAW FIRM

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ATTORNEY FOR PLAINTIFFS

Beaufort, South Carolina

September 5, 2025

STATE OF SOUTH CAROLINA	)	THE COURT OF COMMON PLEAS
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COUNTY OF BEAUFORT	)	CIVIL ACTION NO.:2025-CP- 07-_____
Bridgette Alicia Frazier and Warren	)	
Anthony Patterson,	)	
	)	
Plaintiffs,	)	
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vs.	)	COMPLAINT
	)	
Bluffton Police Department, Town of	)	
Bluffton, Richard M. Ramirez, Chief of	)	
Police Joseph Babkiewicz and South	)	
Carolina Department of Motor Vehicles,	)	
	)	
Defendants.	)	
	)	

JURISDICTION AND VENUE

1. This Court has jurisdiction over the subject matter of this Complaint pursuant to the State of South Carolina's law.
2. Venue is proper in this Court because the events giving rise to this Complaint occurred in The Town of Bluffton, County of Beaufort, State of South Carolina, and the Defendants are located in The Town of Bluffton, County of Beaufort.

PARTIES

3. The Plaintiff Bridgette Alicia Frazier (hereinafter referred to as Plaintiff) is now and at all times mentioned in this Complaint an individual and a resident of the Town of Bluffton, County of Beaufort, State of South Carolina.
4. The Plaintiff Warren Anthony Patterson (hereinafter referred to as Plaintiff) is now and at all times mentioned in this Complaint an individual and a resident of the Town of Bluffton, County of Beaufort, State of South Carolina. At all times, Warren Anthony Patterson and Bridgette Alicia Frazier remained as husband and wife before, during and after this action.

5. The Defendant, Bluffton Police Department (hereinafter referred to as Defendant) is a municipal law enforcement agency in the Town of Bluffton, County of Beaufort, State of South Carolina.

6. The Defendant, Richard M. Ramirez (hereinafter referred to as Defendant) is and was an employee of Bluffton Police Department located in the Town of Bluffton, County of Beaufort, State of South Carolina.

7. The Defendant, Joseph Babkiewicz (hereinafter referred to as Defendant) is and was the Chief of Police for Bluffton Police Department located in the Town of Bluffton, County of Beaufort, State of South Carolina. Joseph Babkiewicz is a resident of Bluffton, South Carolina.

8. The Defendant, South Carolina Department of Motor Vehicles (SCDMV) (hereinafter referred to as Defendant) is a governmental agency located in the County of Beaufort, State of South Carolina and is responsible for managing driving records, vehicle registrations, as well as issuing driver's licenses in South Carolina.

FACTUAL ALLEGATIONS

9. On March 9, 2024, Plaintiff Bridgette Alicia Frazier was stopped by a police officer, Richard M. Ramirez who was employed by the Bluffton Police Department and acting in his capacity. After stopping Plaintiff, Bridgette Alicia Frazier, Defendant, Ramirez claimed that Plaintiff's actions or documents were in violation of South Carolina law section 56-1-460 (driving under suspension).

10. Despite Plaintiff providing proof that her driver's license was not suspended and valid, Defendant Ramirez decided to wrongfully and unlawfully detain, arrest and imprison Plaintiff Bridgette Alicia Frazier without legal justification. Thereby, depriving Plaintiff of her liberty for hours while she was held in the County Detention Center.

11. The arrest was made without a valid warrant, and Plaintiff was deprived of her liberty for a period of time, during which Plaintiff was subjected to mistreatment and conditions of confinement.

12. In taking Plaintiff Frazier into custody, at no point and time did Officer Richard M. Ramirez read Plaintiff Frazier her Miranda warnings in violation of her ***Fifth Amendment*** constitutional right.

13. Defendant, Ramirez failed to protect the rights, health, safety and well-being of Plaintiff while she was unlawfully confined, in that Defendant Ramirez compelled Plaintiff to be confined and detained in an unfit, unsafe, vile and filthy cell with drunken, diseased, unclean and mentally unstable people.

14. The arrest was based on inaccurate or misleading information provided by the South Carolina Department of Motor Vehicles regarding Plaintiff's driver's license status.

15. As a result of the false arrest, Plaintiff was unlawfully detained, humiliated, and caused emotional distress, along with financial losses, including but not limited to legal fees, time off work, and other damages.

FOR A FIRST CAUSE OF ACTION
(False Arrest Against the Bluffton Police Department)

16. Plaintiff repeats and realleges the preceding paragraphs as though fully set forth herein.

17. The arrest of Plaintiff by a Bluffton Police Department's officer was unlawful, as there was no probable cause or reasonable suspicion to justify the arrest.

18. Defendant, Ramirez committed the above-described acts and detained Plaintiff wrongfully, illegally and without reason or just cause.

19. Plaintiff is informed and believes that her arrest and confinement were made on request of the Chief of Police and that all Defendants conspired together for the false and unlawful arrest and

confinement in the County Detention Center as Plaintiff was unlawfully deprived of her liberty in an unlawful manner and on fictitious charges.

20. The arrest and imprisonment of Plaintiff was procured and caused by Defendants maliciously and without probable cause, Defendants well knowing that Plaintiff was guilty of no crime or misdemeanor and by reason of such false arrest and false imprisonment Plaintiff suffered severe bodily and mental pain as well as humiliation and embarrassment.

21. Defendant Ramirez failed to read Plaintiff Frazier her Miranda warnings in violation of her *Fifth Amendment* constitutional right.

22. As a result of the false arrest, Plaintiff suffered damages, including physical and emotional distress, reputational harm, and loss of income.

FOR A SECOND CAUSE OF ACTION
(False Imprisonment Against the Bluffton Police Department)

23. Plaintiff repeats and realleges the preceding paragraphs as though fully set forth herein.

24. Defendant, Richard M. Ramirez wrongfully detained and falsely imprisoned Plaintiff Frazier in the Town of Bluffton without any lawful justification. Despite Plaintiff Frazier's compliance and cooperation, Defendant Ramirez proceeded to hold her against her will, causing undue distress and harm.

25. Defendant Ramirez, wrongfully, without any legal authority or probable cause, arrested and forcibly handcuffed Plaintiff, compelled her to enter into the patrol wagon and delivered Plaintiff to the Beaufort County Detention Center located in Beaufort, South Carolina.

26. The actions of Defendant Ramirez constitute a violation of Plaintiff Frazier's constitutional rights and reflect a serious abuse of authority. This incident has not only caused significant emotional and psychological trauma to Plaintiff but also undermines public trust in the police force.

FOR A THIRD CAUSE OF ACTION
(Negligence by Defendant Richard M. Ramirez)

27. On March 9, 2024, Plaintiff Bridgette Alicia Frazier was stopped by Defendant Ramirez who was employed by the Bluffton Police Department. After stopping Plaintiff, Bridgette Alicia Frazier, Defendant Ramirez claimed that Plaintiff's actions or documents were in violation of South Carolina law section 56-1-460 (driving under suspension).

28. Despite Plaintiff providing proof that her driver's license was not suspended and valid, Defendant Ramirez decided to detain Plaintiff then arrest her without legal justification.

29. The arrest was made without a valid warrant, and Plaintiff was deprived of her liberty for a period of time, during which Plaintiff was subjected to mistreatment and conditions of confinement.

30. During the arrest, Defendant Ramirez failed to read the Plaintiff, Bridgette Alicia Frazier her Miranda Rights, which violated her constitutional rights.

31. Defendant Ramirez breached his duty to protect and serve while enforcing the law.

32. The detainment was done without probable cause or justification. The arresting officer's actions were based on incorrect information and did not meet the standards required for a lawful arrest.

33. As a result of the false arrest, Plaintiff Bridgette Alicia Frazier experienced significant emotional distress, to include anxiety and humiliation. Additionally, Plaintiff suffered financial losses, legal fees and missed work.

FOR A FOURTH CAUSE OF ACTION
(Negligent by Defendant Bluffton Police Department)

34. All allegations made in the preceding paragraphs are re-alleged as if fully set forth herein.

35. Defendant Richard M. Ramirez was negligent, careless, reckless, grossly negligent and wanton and proximately caused the arrest of the Plaintiff, Bridgette Alicia Frazier.

36. The arrest and the injuries of the Plaintiff are as a result of Defendant Richard M. Ramirez in any one or more of the following respects:

- A. Failed to direct Defendant Richard M. Ramirez to follow the law and Bluffton Police Department's policies.
- B. Failed to exercise the degree of care that a reasonable person would have exercised under the same or similar circumstances; and
- C. In such other and further particulars as the evidence and/or trial may show.

37. Defendant Bluffton Police Department was negligent, careless, reckless, grossly negligent and wanton and is liable for the arrest of the Plaintiff in any one or more of the following respects:

- A. Failed to direct Defendant Richard M. Ramirez to follow the law and Bluffton Police Department's policies;
- B. Failed to exercise the degree of care that a reasonable person would have exercised under the same or similar circumstances; and
- C. In such other and further particulars as the evidence and/or trial may show.

38. As a result of the Defendant's negligence, Plaintiff Bridgette Alicia Frazier experienced significant emotional distress, to include anxiety and humiliation. Additionally, Plaintiff suffered financial losses, legal fees and missed work.

FOR A FIFTH CAUSE OF ACTION
(Negligent by Defendant Town of Bluffton)

39. All allegations made in the preceding paragraphs are re-alleged as if fully set forth herein.

40. Defendant Richard M. Ramirez was negligent, careless, reckless, grossly negligent and wanton and proximately caused the arrest of the Plaintiff, Bridgette Alicia Frazier.

41. Defendant Town of Bluffton is vicariously liable for the negligent, careless, reckless, grossly negligent and wanton acts and omissions of Defendant Richard M. Ramirez.

42. Defendant, Town of Bluffton, by through the negligent, careless, reckless, grossly negligent and wanton acts and omissions of its employees, is liable for the injuries and of Plaintiff in any one or more of the following respects:

- A. Failed to exercise reasonable care in the communication of complete and accurate information to responding officers;
- B. Failed to exercise the degree of care that a reasonable person would have exercised under the same or similar circumstances; and
- C. In such other and further particulars as the evidence and/or trial may show.

43. Defendant Town of Bluffton is vicariously liable for the negligent, grossly negligent, and reckless conduct of the relevant and responsible Bluffton Police Department employees as alleged herein.

44. As a result of the Defendant's negligence, Plaintiff Bridgette Alicia Frazier experienced significant emotional distress, to include anxiety and humiliation. Additionally, Plaintiff suffered financial losses, legal fees and missed work.

FOR A SIXTH CAUSE OF ACTION
(Negligent Hiring & Retention)

45. All allegations made in the preceding paragraphs are re-alleged as if fully set forth herein.

46. Upon information and belief, the Bluffton Police Department owed a duty to hire, train, and retain Officers to ensure that those Officers do not create an unreasonable risk of harm to the public at large.

47. Upon information and belief, Bluffton Police Department knew, or reasonably should have known at the time of hiring, that Defendant Richard M. Ramirez did not have the proper disposition and/or temperament based on his history prior to being hired.

48. Upon information and belief, and based upon Defendant Richard M. Ramirez history, Bluffton Police Department knew or should have known that hiring and retaining Defendant

Richard M. Ramirez as a law enforcement officer presented a danger to the public at large, and it was foreseeable that he would harm or injure Plaintiff and fail to conduct himself in a reasonable manner consistent with South Carolina law and law enforcement policies. Officer Richard M. Ramirez' history of misconduct and questionable behavior should have been thoroughly reviewed and considered during the hiring process. The negligent hiring of Officer Richard Ramirez demonstrates a lack of due diligence and proper vetting, putting the community at risk.

49. As a result of the Defendant's negligence, Plaintiff Bridgette Alicia Frazier experienced significant emotional distress, to include anxiety and humiliation. Additionally, Plaintiff suffered financial losses, legal fees and missed work

FOR A SEVENTH CAUSE OF ACTION
(Negligent Supervision by Bluffton Police Department)

50. All allegations made in the preceding paragraphs are re-alleged as if fully set forth herein.

51. Defendant Bluffton Police Department owed a duty to exercise reasonable care to monitor, supervise, create and enforce policies, as well as investigate the wrong and unacceptable conduct of its Officers, to determine if these persons were safe and appropriate officers.

52. Despite the extensive history involving false arrest and brutality by Officers, the data captured by the Bluffton Police Department related to the officers' actions by each and every Officer that is known to exist by Bluffton Police Department and The Town of Bluffton, that is readily and easily accessible to same, lawsuits involving this very issue with ongoing litigation over the last two years, there has been a complete absence of the monitoring, supervision, disciplining and/or investigation of Officers and their behavior.

53. Specifically, as to Defendant, Richard M. Ramirez and Bluffton Police Department owed a duty to monitor and supervise him with even greater scrutiny.

54. Defendant Bluffton Police Department breached their duty by failing to supervise Defendant Richard M. Ramirez, who committed the acts and omissions described in this Complaint.

55. As a result of the Defendant's negligence, Plaintiff Bridgette Alicia Frazier experienced significant emotional distress, to include anxiety and humiliation. Additionally, Plaintiff suffered financial losses, legal fees and missed work.

FOR AN EIGHTH CAUSE OF ACTION
(Negligent Supervision by the Town of Bluffton)

56. All allegations made in the preceding paragraphs are re-alleged as if fully set forth herein.

57. Defendant, Town of Bluffton serves as a link between the Town government and the citizens, municipalities and agencies located within its boundaries, and also represents the area's concerns and interests, including as to the operations, acts and omissions of the Bluffton Police Department and its Officers as it affects Town's government and its citizens.

58. The Town of Bluffton and its Council also budgets for, purchases, owns, maintains, insures, entrusts and furnishes the patrol vehicles and equipment ("Town's Vehicles") used by the Bluffton Police Department and its Officers, as well as budgets for and provides funding for the entirety of the operations of the Bluffton Police Department, that includes all Officers' salaries, as well as owns and operates the Bluffton Police Department and employs all of the workers at the Bluffton Police Department.

59. Defendant Town of Bluffton certainly knew that Bluffton citizens and others on the roads in the Town of Bluffton experienced repeated and recurring violations of their 14th Amendment right of bodily integrity by Bluffton Police Department and its Officers through their often-unlawful behavior.

60. As such, Defendant Town of Bluffton owed a duty to exercise reasonable care to monitor, supervise, create and enforce policies, as well as investigate the use of its funds and equipment as

well as property misused by Bluffton Police Department and Officers given the extensive history of false arrest and abuse.

61. Defendant Town of Bluffton breached its duty by failing to supervise and/or investigate the Bluffton Police Department and its employees and Officers, including Defendant, Richard M. Ramirez, who committed the acts and omissions described in this Complaint.

62. As a result of the Defendant's negligence, Plaintiff Bridgette Alicia Frazier experienced significant emotional distress, to include anxiety and humiliation. Additionally, Plaintiff suffered financial losses, legal fees and missed work.

FOR A NINTH CAUSE OF ACTION
(Negligent Training)

63. All allegations made in the preceding paragraphs are re-alleged as if fully set forth herein.

64. Defendant Bluffton Police Department knew or should have known that its failure to provide adequate training and supervision of the employees of the Bluffton Police Department, including Defendant Richard M. Ramirez, would and could result in serious injury.

65. Defendants Bluffton Police Department and the Town of Bluffton breached their duties by failing to train the employees of the Bluffton Police Department and Defendant Richard M. Ramirez, who committed the acts and omissions described in this Complaint.

66. As a result of the Defendant's negligence, Plaintiff Bridgette Alicia Frazier experienced significant emotional distress, to include anxiety and humiliation. Additionally, Plaintiff suffered financial losses, legal fees and missed work.

FOR A TENTH CAUSE OF ACTION
(Negligence Infliction of Emotional Distress)

67. Plaintiff repeats and realleges the preceding paragraphs as though fully set forth herein.

68. Defendants owed a legal duty to protect and serve the community with professionalism, excellence, integrity, dignity and respect. This duty included preserving the peace, protecting life and property, promoting safety and enforcing the law.

69. Defendants breached the duty through negligent conduct by arresting Plaintiff Frazier without reading her Miranda Rights, which violated her constitutional rights.

70. As a direct and proximate result of the negligent conduct, Plaintiff Frazier was internally injured which has and will in the future cause Plaintiff, Frazier to undergo much emotional as well as mental pain and suffering, have and will in the future cause Plaintiffs, Bridgette Alicia Frazier to spend large amounts of money for medical treatment and services, have and will in the future cause Plaintiffs to suffer trauma, anxiety, annoyance, whole body impairment, inconvenience, and travel - all to Plaintiffs' general damage and detriment.

FOR A ELEVENTH CAUSE OF ACTION
(Negligence Against the South Carolina Department of Motor Vehicles)

71. Plaintiff repeats and realleges the preceding paragraphs as though fully set forth herein.

72. Defendant South Carolina Department of Motor Vehicles failed to constantly, consistently and accurately update data received and transmitted on South Carolina drivers.

73. The South Carolina Department of Motor Vehicles was negligent in providing incorrect information about Plaintiff's license status to Defendants Bluffton Police Department and Richard M. Ramirez.

74. The inaccurate information caused Bluffton Police Department to unlawfully arrest Plaintiff, resulting in damages.

75. As a result of the Defendant's negligence, Plaintiff Bridgette Alicia Frazier experienced significant emotional distress, to include anxiety and humiliation. Additionally, Plaintiff suffered financial losses, legal fees and missed work.

FOR A TWELFTH CAUSE OF ACTION
(Loss of Consortium)

76. Plaintiff repeats and realleges the preceding paragraphs as though fully set forth herein.
77. On March 9, 2024, and at all times mentioned in this complaint, Plaintiff, Bridgette Alicia Frazier and her spouse, Warren Anthony Patterson, were husband and wife.
78. On March 9, 2024, Plaintiff Bridgette Alicia Frazier was stopped by a Defendant, Richard M. Ramirez who was employed by the Bluffton Police Department. After stopping Plaintiff, Bridgette Alicia Frazier, Defendant Ramirez claimed that Plaintiff's actions or documents were in violation of South Carolina law section 56-1-460 (driving under suspension).
79. Despite Plaintiff providing proof that her driver's license was not suspended and valid, Officer Ramirez decided to detain and arrest Plaintiff without legal justification.
80. As a direct and proximate result of the arrest, Plaintiff Frazier was internally injured which has and will in the future cause Plaintiff, Frazier to undergo much mental pain and suffering, have and will in the future cause Plaintiffs, Bridgette Alicia Frazier and Anthony Patterson to spend large amounts of money for medical treatment and services, have and will in the future cause Plaintiffs to suffer trauma, anxiety, annoyance, whole body impairment, inconvenience, and travel - all to Plaintiffs' general damage and detriment.
81. Before suffering the above-described injuries, Plaintiff, Bridgette Alicia Frazier was able to perform all the duties of a wife and did perform all these duties, including assisting in maintaining the home and providing love, companionship, affection, sexual relations, moral support, and solace to Plaintiff, Anthony Patterson.
82. As a direct and proximate result of the above-described injuries, Plaintiff, Anthony Patterson's spouse, Bridgette Alicia Frazier has not been able to perform her duties as a wife which were referenced above.
83. As a result of the injuries described above, Plaintiff, Anthony Patterson's spouse,

Bridgette Alicia Frazier, will not be able to perform her duties in the future. Plaintiff, Anthony Patterson is therefore deprived and will be permanently deprived of his spouse's consortium, all to Plaintiff, Anthony Patterson's damage in a total amount to be established at trial.

WHEREFORE, Plaintiffs pray for judgment against Defendants in the following particulars:

- A. An award of damages for past, present and future medical expenses, lost wages, pain and suffering, and loss of enjoyment of life to be determined by this Honorable Court;
- B. An award of damages for loss of love, companionship, affection, sexual relations, moral support and solace;
- C. An award of punitive damages to Plaintiffs;
- D. An award of costs, expenses, reasonable attorney's fees, interest, and disbursement of the action; and
- E. An award of such other and further relief as the Court may deem just and proper.

Respectfully Submitted,

SPANN WILDER LAW, LLC

s/ Tiffany R. Spann-Wilder

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