

STATE OF NORTH CAROLINA
COUNTY OF MOORE

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
25-CVS-_____

C.T.,

Plaintiff,

v.

SURGEON & ASSOCIATES, INC.;
PREMIER HEALTHCARE SERVICES,
INC.; CORNERSTONE TREATMENT
FACILITY, INC.; CORNERSTONE
TREATMENT FACILITY PROGRAM,
INC. d/b/a JACKSON SPRINGS
TREATMENT CENTER; VISIONARY
MANAGEMENT GROUP, LLC;
FREDERICK SURGEON; and
THOMAS A. WILSON, M.D.,

Defendants.

COMPLAINT FOR DAMAGES AND
DEMAND FOR JURY TRIAL

COMPLAINT WITH JURY DEMAND

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

I. THE PARTIES.

a. The Plaintiff.

1. Plaintiff C.T. is currently an adult female, born in 2000. When she was 17 years old and residing in a psychiatric residential treatment facility (“PRTF”) for children and adolescents called Jackson Springs Treatment Center (“Jackson Springs”), she was sexually abused by a then-40-year-old staff member at the facility who was assigned to her safety and care, Kenneth Dwayne Locklear (“Locklear”). Locklear was a convicted, violent felon and armed bank robber sentenced to 14 years in federal prison. In addition, he was arrested and charged on multiple occasions for

assault on a female, among other serious crimes, all before Defendants hired him to care for and oversee vulnerable teenage girls, including Plaintiff.¹

2. Plaintiff is a current resident of the State of Virginia and is a former resident of the State of North Carolina.

3. Plaintiff endured a less-than-ideal childhood to be sure. From approximately age 10 until turning 18, she was under the care and custody of the New Hanover County Department of Social Services. Before that, her biological parents struggled to provide a safe and nurturing home – her father was imprisoned and her mother suffered from mental health issues, all of which led to DSS taking custody of Plaintiff. She was then sent to no fewer than 10 different foster or respite homes and the PRTF Jackson Springs.

b. The Defendants.

4. Defendant Surgeon & Associates, Inc. (“Surgeon & Associates”) is a North Carolina corporation with its principal place of business located at 1125 Pony Drive, Hope Mills, North Carolina. The business address of Surgeon & Associates is the same address as the personal residential address² of its owner, Defendant Frederick Surgeon (“Fred Surgeon”).

5. Defendant Surgeon & Associates is a parent corporation that owns and operates several North Carolina PRTFs³ including ones located in Wadesboro, Raeford, and West End, North Carolina.

¹ Locklear died on July 23, 2025. Following Plaintiff C.T.’s allegations, the Moore County Sheriff’s Office conducted an investigation, and, in an Incident/Investigation Report dated September 1, 2025, concluded that there was sufficient probable cause to charge Locklear with Sexual Activity by a Custodian, a Class E felony under N.C. Gen. Stat. § 14-27.31. The Sheriff’s Office closed the case solely because the alleged offender was deceased.

² 1125 Pony Dr., Hope Mills, NC 28348 (source: Realtor.com®).

³ See website at www.surgeonandassociates.com/our-companies (last visited Dec. 10, 2025).

6. Specifically, Defendant Surgeon & Associates is the parent company of Defendants Premier Healthcare Services, Inc., Cornerstone Treatment Facility, Inc., and Cornerstone Treatment Facility Program, Inc. (“CTFP, Inc.”) d/b/a Jackson Springs Treatment Center.⁴

7. Defendant Premier Healthcare Services, Inc. is a North Carolina corporation with its principal place of business at 2990 Sunnyside School Road, Fayetteville, North Carolina. The business address of Defendant Premier Healthcare Services, Inc. is the same address as another Surgeon & Associates entity, Sweet Valley Ranch.⁵

8. Defendant Cornerstone Treatment Facility, Inc. is a North Carolina corporation with its principal place of business at 2990 Sunnyside School Road, Fayetteville, North Carolina. The business address of Defendant Cornerstone Treatment Facility, Inc. is the same address as another Surgeon & Associates entity, Sweet Valley Ranch.⁶

9. Defendant CTFP, Inc. is a North Carolina corporation with its principal place of business at 2990 Sunnyside School Road, Fayetteville, North Carolina. The business address of CTFP, Inc. is the same address as another Surgeon & Associates entity, Sweet Valley Ranch.⁷

10. At all relevant times, Defendants Premier Healthcare Services, Inc., Cornerstone Treatment Facility, Inc., and CTFP, Inc. jointly advertised themselves as North Carolina PRTFs.

11. At all relevant times, Defendants Premier Healthcare Services, Inc., Cornerstone Treatment Facility, Inc., and CTFP, Inc. operated the Jackson Springs Treatment Center.⁸

12. Jackson Springs is a licensed mental health facility in the state of North Carolina under the N.C. Department of Health and Human Services. Jackson Springs is licensed under 10A

⁴ *Id.*; see also DHHS data.

⁵ See website at www.sweetvalleyranchnc.com (last visited Dec. 10, 2025).

⁶ *Id.*

⁷ *Id.*

⁸ See <https://www.surgeonandassociates.com/our-companies>.

N.C.A.C. 27G .1900 as a PRTF for children and adolescents and subject to the provisions of Chapter 122C of the North Carolina General Statutes.

13. CTFP, Inc. d/b/a Jackson Springs Treatment Center includes the following details as registered with the Department of Health and Human Services:

- License #: MHL-0630-100
- Licensee legal name: Cornerstone Treatment Facility Program, Inc.
- DBA name: Jackson Springs Treatment Center
- Owner: Fred Surgeon, President
- Site address: 778 Hoffman Road, West End, North Carolina 27376
- Facility address: 1125 Pony Drive, Hope Mills, North Carolina 28348
- County: Moore County
- License origination date: November 1, 2011
- Disability category: MI
- Facility type: residential
- Total bed count: 12
- Program code type: PRTF/Psychiatric Residential Treatment Facility for children and adolescents.

14. An image of Jackson Springs Treatment Center is available on Defendants' website, www.ncprtf.com, and reflects as follows:



Jackson Springs Treatment Center

778 Hoffman Rd.
West End, NC 27376
(910) 673-0833 (O)
(910) 673-0836 (F)

15. The listed facility business address of CTFP, Inc. d/b/a Jackson Springs Treatment Center is the same address as the personal residential address⁹ of its owner, Defendant Fred Surgeon.

16. Defendant Visionary Management Group, LLC is a North Carolina limited liability company with its principal place of business in Hope Mills, North Carolina, in Cumberland County, with Defendant Fred Surgeon listed as Managing Member on its North Carolina Secretary of State filings.

17. The executive director of Jackson Springs lists on his “LinkedIn”¹⁰ profile that he is executive director of Visionary Management Group, LLC:

Vernon Jiggetts Jr · 3rd

Executive Director at Jackson Springs Treatment Center

Fayetteville, North Carolina Metropolitan Area · [Contact info](#)

Experience



Executive Director

Visionary Management Group, LLC

Dec 2015 - Present · 10 yrs 1 mo

Jackson Springs Treatment Center

I continue to perform operational responsibilities for an adolescent and adult female populated psychiatric residential treatment center in West End, NC. I am responsible for staffing, budgeting, and the safety and security of clients. I am the direct supervisor for 20+ staff, and I interact daily with all the stakeholders involved in the services being received by the clients.

18. Defendants Premier Healthcare Services, Inc., Cornerstone Treatment Facility, Inc., CTFP, Inc. d/b/a Jackson Springs Treatment Center, Visionary Management Group, LLC and Surgeon & Associates, Inc. are all North Carolina companies that share common ownership and/or management.

⁹ 1125 Pony Dr., Hope Mills, NC 28348 (Source: Realtor.com®).

¹⁰ See <https://www.linkedin.com/in/vernon-jiggetts-jr-ab225755/> (last visited Dec. 10, 2025).

19. Defendant Fred Surgeon is a resident and citizen of Hope Mills, North Carolina, in Cumberland County.

20. Fred Surgeon is the registered agent, president, member and/or chief executive officer (CEO) of Defendants Premier Healthcare Services, Inc., Cornerstone Treatment Facility, Inc., CTFP, Inc. d/b/a Jackson Springs Treatment Center, Visionary Management Group, LLC, and Surgeon & Associates, Inc.

21. Fred Surgeon, at all times relevant, has served as an owner, officer, director, managing agent, and/or executive of all corporate defendants.

22. Upon information and belief, Defendant Surgeon exercised direct control over the policies, hiring, supervision, and/or safety protocols at Jackson Springs.

23. Defendant Thomas A. Wilson, M.D. is a citizen and resident of Sanford, North Carolina in Lee County.

24. Dr. Wilson is listed in the most recent Secretary of State filings as President and registered agent of CTFP, Inc. d/b/a Jackson Springs Treatment Center. Additionally, Dr. Wilson is a psychiatrist and to some degree was involved with Plaintiff's treatment, or lack thereof, during her residency at Jackson Springs.

25. Upon information and belief, Defendant Dr. Wilson exercised direct control over the policies, hiring, supervision, and/or safety protocols at Jackson Springs.

26. Defendants Surgeon & Associates, Inc., Premier Healthcare Services, Inc., Cornerstone Treatment Facility, Inc., CTFP, Inc. d/b/a Jackson Springs Treatment Center, Visionary Management Group, LLC, Fred Surgeon, and Dr. Thomas Wilson are hereinafter referred to collectively as "Defendants."

II. VENUE AND JURISDICTION.

27. The Court has subject matter jurisdiction over the parties as the amount in controversy exceeds the sum of \$25,000.00.

28. Venue is proper pursuant to N.C.G.S. § 1-82 as the acts or omissions giving rise to this action occurred in Moore County, North Carolina.

29. Jurisdiction is proper pursuant to N.C.G.S. § 1-75.4 because (1) all Defendants are domestic corporations and (2) all Defendants engage in substantial activity within this state.

30. The Court has both general and specific jurisdiction over each Defendant, in that they are located in and operate their principal places of business in this County and the injurious acts and omissions alleged herein occurred in this County.

III. FACTS PERTINENT TO ALL ALLEGATIONS.

a. Corporate History.

31. At all times relevant, CTFP, Inc. d/b/a Jackson Springs Treatment Center was a licensed psychiatric residential treatment facility for children and adolescents located at 778 Hoffman Road, Jackson Springs, North Carolina 27281.

32. Upon information and belief, Fred Surgeon owns Surgeon & Associates, Premier Healthcare Services, Inc., Cornerstone Treatment Facility, Inc., and CTFP, Inc. d/b/a Jackson Springs Treatment Center.

33. Fred Surgeon and Surgeon & Associates also own and operate a host of other business ventures, including businesses unrelated to mental health, minors, health care, and/or residential treatment facilities.

34. Owner Fred Surgeon purports to have intimate involvement in his businesses. To that end, the website for Defendant's PRTFs website stated, "Mr. Surgeon personally trains all staff before their employment begins."¹¹

35. Defendant Mr. Surgeon further touts "more than 17 years of experience working in behavioral healthcare, including in an administrative function." His website states he has "extensive experience working with youth that have been diagnosed with mental illness, developmental disabilities and substance abuse disorders," and "his leadership skills allowed him . . . to work in senior administrative positions."¹²

36. Defendants' Surgeon's website states or previously stated regarding its NC Psychiatric Residential Treatment Facilities:

Our mission is to enhance the emotional and behavioral well-being of clients via a youth guided, family driven program that integrates individualized, developmentally appropriate, trauma informed, and culturally responsive practices within a **safe, coercive free** residential environment leading towards independence and embracing natural supports within the community.¹³

(Emphasis added)

37. Preceding and following the incident harming Plaintiff, years of investigations¹⁴ reveal systemic issues of abuse, neglect, and other serious problems at the Jackson Springs facility, including:

- a. An inspection dated July 14, 2015, revealing that the facility failed to assure that two staff members demonstrated competency in the proper use of restrictive interventions as required by 10A N.C.A.C. 27E.0108. In an interview on July 9, the Director of Operations acknowledged that a client's arm broke during the administering of a restraint of a child. An administrative penalty of \$2,000 was imposed.

¹¹ This phrasing was recently removed from Mr. Surgeon's website. The archived website content can be found here: <https://web.archive.org/web/20250118080112/https://www.ncprtf.com/about-us>.

¹² *Id.*

¹³ *Id.*

¹⁴ See information available at <https://info.ncdhhs.gov/dhsr/mhcls/sods/facility.asp?fid=080669> (last visited Dec. 10, 2025).

- b. An inspection dated March 2, 2017, revealing that the facility failed to provide 24-hour on-site coverage by a Registered Nurse as required by 10A N.C.A.C. 27G.1902 and failed to develop and implement strategies to address the needs and behaviors of a client as required by 10A N.C.A.C. 27G.0205.
- c. An inspection dated February 15, 2018, revealing that the facility failed to ensure at least two direct care staff were present, failed to conduct fire drills, and failed to provide 24 on-site coverage by a Registered Nurse, as required by 10A N.C.A.C. 27G.1902 and 10A N.C.A.C. 27G.0207. In January of 2018, two clients eloped from the facility while under the supervision of only one staff member.
- d. An inspection dated July 24, 2018, revealing that the facility failed to report an incident in which two patients ran away from facility grounds.
- e. An inspection dated March 15, 2019, revealing that facility management failed to ensure that all paraprofessional staff demonstrated competence as required by 10A N.C.A.C. 27G.0204.
- f. An inspection dated June 23, 2020, revealing that facility staff used restrictive interventions in a manner that caused harm and abuse to the clients (NCDHHS report findings showed that a male staff member repeatedly punched a male resident in the face resulting in a broken eye socket, which was diagnosed by x-ray or CT scan. The staff member denied the allegations. He was suspended but not fired from the facility pending investigation. It was later discovered that the staff member had been previously convicted of second-degree murder).¹⁵
- g. An inspection dated May 3, 2022, revealing that the facility failed to provide supervision and interventions to ensure the safety of the facility clients.
- h. An inspection dated June 2, 2022, revealing that the facility failed to provide supervision and interventions to ensure the safety of the facility clients.
- i. An inspection dated June 2, 2022, revealing that the facility failed to provide 24-hour on-site coverage by a Registered Nurse as required by 10A N.C.A.C. 27G.1902.
- j. An inspection dated November 4, 2022, revealing that the facility failed to ensure that incidents were reported.
- k. An inspection dated July 2, 2024, revealing that some staff members were unable to demonstrate the knowledge, skills, and abilities required to serve the facility clients as required by 10A N.C.A.C. 27G.0204.

¹⁵ See Fred Clasen-Kelly et al., *Punching, Predators, Neglect. Traumatized NC Children Suffer Inside Dismal Psychiatric Centers*, The Fayetteville Observer (Nov. 9, 2021), <https://archive.fo/HQ72d>; DHHS Incident Report at Jackson Springs dated June 23, 2020, available at <https://info.ncdhhs.gov/dhsr/mhics/sods/2020/20200706-080669.pdf?ver=1>.

1. A 2021 Fayetteville *Observer* article entitled “Punching, Predators, Neglect. Traumatized NC Children Suffer Inside Dismal Psychiatric Centers,” featuring Jackson Springs for an incident in which a convicted murderer whom Jackson Springs hired repeatedly punched a minor patient in the face.¹⁶

38. In December 2022, Disability Rights of North Carolina sued Kody Kinsley in his official capacity as Secretary of the North Carolina Department of Health and Human Services, for discrimination against children with disabilities with respect to the abusive treatment they face in psychiatric residential treatment facilities. The complaint featured a scathing review of Jackson Springs:

At Jackson Springs Treatment Center in West End, some of the children did not have functioning, hygienic bathroom facilities, and all of the facilities were generally run-down and in need of repairs. Sinks did not have handles on faucets and/or were not in working order, showers and bathtubs did not have shower curtains or other options for privacy, the bathrooms smelled strongly of mold and mold was visible throughout. The PRTF advertises its ‘safe, coercive free residential environment.’ But according to DHSR reports staff restrained children by holding them with their faces ‘on the wall’; hurt them by pulling their arms too far back and continuing to do so after children said they were in pain; and, on one occasion, restrained a child with a cast on his arm. One child suffered an orbital bone fracture and black eye at the hands of PRTF staff (the child reported being punched in the face by staff while the staff member claimed the child fell after he failed to properly restrain the child). After the injury, the PRTF did not send the child to the hospital or coordinate medical treatment or, upon information and belief, train the staff on proper restraint procedures. Facility staff contacted law enforcement at least 42 times over the course of the year....¹⁷

39. Jackson Springs has also made it a habit of hiring convicted felons including Locklear and even including its current executive director Vernon Jiggetts, Jr., to work there and care for vulnerable children. This pattern and practice has yielded disastrous results even aside from Plaintiff’s injuries. In the spring of 2023, the state shut down Defendant’s Grace House Treatment Center located in Raeford, North Carolina, after the Raeford Police Department

¹⁶ *Id.*

¹⁷ Compl. ¶ 190, *B et al v. Kinsley*, No. 1:22-cv-1046, 2024 U.S. Dist. LEXIS 57276 (M.D.N.C. Dec. 6, 2022).

investigated the facility for a child abuse allegation that an employee fractured a child's skull, leading to the child's hospitalization and implementation of staples in his head.¹⁸ The employee faced charges for felony child abuse and misdemeanor assault inflicting serious injury.

40. As it turns out, the employee was already a convicted felon before he was charged with child abuse for fracturing a child's skull at Premier Healthcare Services Inc.'s facility in 2023. In 2018, he had posted his charge for possession of a firearm by a felon on Facebook. In August of 2022 he posted "I Stop Living By A Gun When Out My Hands More Deadlier Than A Gun No Flex" (emojicons omitted).

41. The North Carolina Division of Non-Public Education has listed Fred Surgeon as the chief administrator of a number of "Conventional Non-Public Special Schools" over the years, including Jackson Springs Treatment Facility and Grace House Treatment Center.¹⁹

42. When the state shut down Grace House Treatment Center following the allegations of child abuse in spring 2023, its address was 1892 Turnpike Road in Raeford.

43. The North Carolina Division of Non-Public Education listed Fred Surgeon as the chief administrator for Silver Linings Treatment Center at 1892 Turnpike Road for the 2023-2024 school year.

¹⁸ *State Closes Treatment Center in Raeford After Child Suffers Skull Fracture*, The News-Journal (May 10, 2023), <https://archive.is/M6biA#selection-467.61-467.90>.

¹⁹ *2011-2012 Conventional Non-Public Special Schools*, NC Division of Non-Public Education (June 5, 2012), <https://www.google.com/url?client=internal-element-cse&cx=f46417247676448ec&q=https://www.doe.nc.gov/documents/files/dnpe-special-private-schools-2011-12-pdf/open&sa=U&ved=2ahUKewikwOaIn6SRaxUsQjABHfAGD3YQFnoECAQQAg&usg=AOvVaw0OhYvOqBJEww43SezmexvX>; *NC Division of Non-Public Education - School Listing*, NC Division of Non-Public Education (last visited Dec. 4, 2025), <https://www.google.com/url?client=internal-element-cse&cx=f46417247676448ec&q=https://www.doe.nc.gov/dnpe-private-school-boarding-list-pdf/open&sa=U&ved=2ahUKewikwOaIn6SRaxUsQjABHfAGD3YQFnoECAEQAAQ&usg=AOvVaw0l7kFD-P-ebKQWgCAsYAAc>.

44. This means that, when the state closed Fred Surgeon and Premier Healthcare Services' Grace House Treatment Center for allegations of child abuse, they opened a new center in the exact same address the following school year that is still in existence today.

45. The website for NC Psychiatric Residential Treatment Facilities currently lists four facilities, including Jackson Springs Treatment Center in West End, NC, and Silver Linings Treatment Center in Raeford, NC.

46. A previous version of the website lists Allen Brooks as the Clinical Director for Silver Linings Treatment Center and Fred Surgeon as the CEO of the PRTFs. The current version of the website lists Allen Brooks as the CEO of the PRTFs.

b. Facts Pertinent to Plaintiff.

47. Upon information and belief, Jackson Springs Treatment Center had custody of Plaintiff and a duty to protect and care for Plaintiff from approximately December 14, 2017, until her 18th birthday, July 29, 2018.

48. As mentioned, Plaintiff suffered from a tragic upbringing with an incarcerated father, a mentally unwell mother, and an abusive stepfather, then bouncing from foster home to foster home from age 10 until 17. As a result, she arrived at Jackson Springs in December 2017 as a particularly vulnerable teenager – vulnerable to the advances and grooming of someone like Locklear and vulnerable to someone offering her unallowed things like cell phone usage and smoking.

49. Defendants hired convicted armed bank robber Kenneth Dwayne Locklear, age forty (40), in or about 2017 as a *caretaker of minor girls* at Jackson Springs. Locklear was employed in a direct-care role supervising adolescent residents, including female minors, including during overnight and evening shifts.

50. Upon information and belief, at all times relevant to the hiring of Locklear and the residency of Plaintiff, the executive director of Jackson Springs was Vernon Jiggetts, Jr. Like Locklear, Mr. Jiggetts is himself a convicted felon, having been sentenced to a suspended 8-month prison sentence and 24 months of probation in 1995 for felony larceny (Case No. 1994-CRS-051989). As part of his role as executive director and upon information and belief, Mr. Jiggetts was involved in the hiring of Locklear and had knowledge or should have had knowledge of Locklear's extensive criminal history and lengthy incarceration.

51. Locklear had a well-documented criminal history, available to any prospective employer who bothered to look, prior to Defendants hiring him at Jackson Springs that included all of the following:

<u>Offense Date</u>	<u>Crime Description</u>	<u>Severity</u>	<u>Case Number</u>	<u>Case Disposition</u>
4/22/1993	Felony Conspiracy	Felony	93CR02362-460	Dismissed
6/10/1993	Break/Enter a Motor Vehicle	Felony	93CR002356-460	Guilty – 4 yr prob.
6/10/1993	Felony Larceny	Felony	93CR002356-460	Guilty – 4 yr prob.
6/10/1993	Felony Conspiracy	Felony	93CR002356-460	Dismissed
10/18/1993	Communicating Threats	Class 1 Misdemeanor	93CR043381-250	Dismissed
2/23/1995	Felony Breaking/Entering	Felony	95CR001018-460	No True Bill Returned
2/23/1995	Felony Larceny After B/E	Felony	95CR001018-460	No True Bill Returned
11/11/1995	Assault on a Female	Class 1 Misdemeanor	95CR053074-250	Dismissed
11/11/1995	Assault on a Female	Class 1 Misdemeanor	95CR053075-250	Dismissed
1/25/1996	Marijuana Possession	Class 3 Misdemeanor	96CR005044-250	Dismissed
2/13/1996	Armed Bank Robbery and Aiding and Abetting	Felony	5:96-CR-44-BR	Guilty; 108 months
2/13/1996	Use of Firearm During Crime of Violence	Felony	5:96-CR-44-BR	Guilty; 60 months
11/24/2008	Assault with Deadly Weapon	Class 1 Misdemeanor	08CR067543-250	Dismissed due to incarceration in Virginia federal prison and unable to stand trial in NC
11/24/2008	Misdemeanor Stalking	Class 1 Misdemeanor	08CR067543-250	Dismissed due to incarceration in Virginia federal prison and unable to stand trial in NC

01/08/2009	Sent back to federal prison by Senior U.S. District Judge Earl Britt for violating supervised release (see 11/24/08 charges above)			
11/14/2010	Assault on a Female	Class 1 Misdemeanor	10CR063976-250	Dismissed
5/27/2016	Assault on a Female	Class 1 Misdemeanor	16CR057900-250	Dismissed
5/27/2016	Communicating Threats	Class 1 Misdemeanor	16CR057900-250	Dismissed
Summer 2017	<i>Jackson Springs hires Locklear as caretaker for vulnerable minors.</i>			

52. As to the November 24, 2008, charges and his return to prison on January 8, 2009, listed above, a review of the federal court and related state docket shows that Locklear was arrested November 24, 2008, for assault with a deadly weapon of a female and misdemeanor stalking of a female. As a result of these charges, U.S. District Judge W. Earl Britt revoked Locklear's supervised release sending him back to federal prison in Virginia. The basis for the charges, according to Judge Britt's order issuing an arrest warrant, was a notarized statement by the victim to the Senior U.S. Probation Officer "in which [the victim] reported Locklear held a knife to her neck and struck her several times in the head with a closed fist" and further "reported Locklear had been stalking her prior to this incident." *Id.* In addition to the victim's notarized statement, the victim likewise submitted photos of the injuries caused by Locklear's alleged assault.

53. State prosecutors then began pursuing their charges related to the November 24, 2008, crimes (Case No. 08-CR-067543-250). According to the docket for these charges, the State moved for a continuance due to Locklear serving an active federal prison sentence in Virginia, with no resources to transport him back to Cumberland County for trial. The Judge in that matter denied the State's motion to continue, dismissing the charges, according to the docket. In short, the charges were dismissed because he was already incarcerated, not because there was no merit to the charges.

54. Plaintiff is informed and believes and alleges that Defendants knew or should have known of Locklear's prior criminal record, making him particularly unsuitable and unfit for the care of such a vulnerable population as minor female psychiatric patients including Plaintiff.

55. Upon information and belief, Defendants failed to adequately consider Locklear's readily-available criminal history prior to hiring him. Doing so should have disqualified him from employment in any facility serving children – much less vulnerable teenage girls like Plaintiff – in violation of N.C.G.S. § 122C-80.

56. While Plaintiff was a resident at Jackson Springs, the facility organized its campus into single-gender pods, with each pod having a common room and three to four bedrooms that housed one to two residents.

57. A rotating schedule of one to two staff members supervised each pod.

58. Upon information and belief, Locklear frequently worked overnight shifts from 8 p.m. to 8 a.m., during which only one to two staff, including Locklear when working, supervised the female units.

59. Upon information and belief, Jackson Springs assigned Locklear to supervise Plaintiff's pod on several separate occasions, at times with no other staff supervision.

60. On separate occasions when Locklear supervised Plaintiff's pod, Locklear would violate policy and provide inappropriate benefits to Plaintiff in the form of offering access to his e-cigarette, cell phone, and unidentified pills.

61. Upon information and belief, Defendants failed to enforce basic supervision and monitoring policies, knowingly allowed unsupervised overnight access by male staff, including Locklear, to minor female residents, and permitted conduct such as smoking, sharing personal devices, and boundary violations without meaningful discipline.

62. On December 18, 2017, Locklear signed and filled out a sheet with type-written goals for Plaintiff's treatment, despite himself being wholly unqualified to participate in her psychiatric treatment. One goal states, "Over the next 12 months, I with [sic] be free of drug/alcohol use/abuse -Avoid people, places and situations where temptation might be overwhelming -Explore dynamics relating to being the child of an alcoholic/addict." Another goal states "Explore and resolve issues related to past traumatic events." On this sheet, Locklear handwrote a note that he "prompted client to avoid people, places, and situations where temptation might be overwhelming with alcohol and drug use" and "counseled client to explore and resolve residual stress from traumatic experiences." He also wrote that he "encouraged client to explore dynamics relating to being the child of an alcoholic and addict." In other words, he was well aware of Plaintiff's traumatic past and family history of drug use, potentially indicating for him that Plaintiff was emotionally vulnerable and especially vulnerable to manipulation by someone who was supposed to be in a caretaking role.

63. On December 30, 2017, another staff member wrote a note that this staff member "expressed to [Plaintiff] that she can always talk to staff about her personal problems."

64. Plaintiff alleges that, on or about January 1, 2018, Locklear began making sexual advances toward Plaintiff, as he began rubbing Plaintiff's body and requesting that Plaintiff lift her shirt and bra in exchange for his e-cigarette and pills.

65. On or about January 2, 2018, Plaintiff alleges that Defendant attempted to watch Plaintiff while she was taking a shower.

66. On or about January 8, 2018, Locklear allowed and invited Plaintiff to smoke his e-cigarette outside of Plaintiff's pod at night. Later that evening, Locklear forced his hands down Plaintiff's pants; Plaintiff was able to pull away before Locklear reached Plaintiff's genitals. When

Locklear spotted a nurse on duty, he made efforts to avert encountering her while with Plaintiff. Plaintiff recalls that Locklear said “that was close” upon narrowly avoiding the nurse on duty. Later that evening, Locklear entered Plaintiff’s room around 3-4 a.m. and engaged in intercourse after prior grooming behaviors and offering pills.

67. Also on January 8, 2018, Locklear signed a sheet with type-written text at the top, stating that one of Plaintiff’s goals for treatment was having “age appropriate [sic] conversations, not talking about high risk [sic] behaviors such as sex and drug use, at least 5 out of 7 days a week for the next consecutive 90 days.” Locklear wrote that he “processed with client toward having age appropriate [sic] conversations” and “monitored client every fifteen minutes while she slept throughout the night.”

68. These notes are facility records, showing that Plaintiff was in an extreme state of vulnerability with Locklear. Not only was Locklear’s access to these notes a potential indication to him that he might be able to ingratiate himself with Plaintiff and that she might be receptive to his late-night sharing of cigarettes, e-cigarettes, and unidentified pills; these notes also indicate the tragic irony that Defendants tasked Locklear, a convicted felon with charges for assaults and stalking of other women, with watching Plaintiff while she slept and counseling a young girl about avoiding discussions of sex and drug use, inappropriate topics for someone of her age. Locklear wrote that he was monitoring Plaintiff and helping her avoid people that offer her drugs, all while Locklear was a former and current sexual predator that was leveraging Plaintiff’s addiction and propensities as a vehicle to entice her into sexual acts.

69. On January 10, 2018, Locklear wrote that Plaintiff “struggled with refraining from talking about high risk [sic] behaviors such as sex and drug use.”

70. Again, on January 14, 2018, Locklear wrote that Plaintiff “struggled toward not talking about high risk [sic] behaviors such as sex and drug use.”

71. On or about January 18, 2018, Locklear entered Plaintiff’s room after everyone had gone to sleep. Locklear first asked Plaintiff to perform oral sex on him, but Plaintiff told him “no.” Locklear then became more aggressive and successfully coerced Plaintiff into doing so despite her lack of consent. Defendant then forced vaginal penetration, holding his hand over her mouth when she protested.

72. On January 18, 2018, Locklear wrote that he “praised [Plaintiff] for utilizing access to substance abuse therapy” and “suggested to [Plaintiff] to refrain from talking about high risk [sic] behaviors such as sex and drug use.”

73. Plaintiff’s then-custodian, the New Hanover Department of Social Services, reported the instances of sexual abuse to law enforcement on January 26, 2018.

74. Plaintiff is informed, believes, and based thereon alleges that Jackson Springs continued to employ Locklear after Plaintiff reported the sexual abuse.

75. The Moore County Sheriff’s Office Incident Report No. 2018-02438 (“Sheriff’s Report”) documents that, on January 26, 2018, a report was made that “a worker had sexual relations with a child at the center.” The worker was identified as Kenneth Dwayne Locklear, and the victim was identified as Plaintiff, a seventeen-year-old female resident of Jackson Springs, placed there by the New Hanover County Department of Social Services.

76. Law enforcement officers determined that Locklear engaged in multiple sexual acts with the resident while he was on duty during the nighttime shifts of January 8 and January 18, 2018, in violation of N.C.G.S. § 14-27.31 (sexual activity by a custodian) and believed there was

“sufficient probable cause to take out a felony warrant for Locklear’s arrest” but for his death on July 23, 2025.

77. Facility records provided to investigators by the facility director, Vernon Jiggetts, confirmed that Locklear was working on those nights.

78. The investigation revealed that Locklear provided the minor resident with controlled or scheduled substances, allowed her to smoke cigarettes, and permitted her to use his personal cell phone to access Snapchat, all in violation of facility policies.

79. During one of these unsupervised encounters, Locklear entered the resident’s room and engaged in sexual activity with her. On another occasion, after luring her outside to smoke and use his phone, he again engaged in sexual activity with her.

80. Defendants’ management staff, including “VP of administration” Hilary Rumppe and Jackson Springs Executive Director Vernon Jiggetts, admitted to law enforcement that they were aware of the allegations but merely suspended Locklear pending investigation and claimed they had “followed protocol.”

81. Even after DSS and law enforcement began investigating, Ms. Rumppe confirmed that Locklear was transferred to another youth facility in Raeford, stating that “they do not feel it is beneficial for him to return” but maintaining “no other concerns about Mr. Locklear working around youth,” according to the DSS investigation.

82. Rather than terminate or report Locklear following substantiated sexual abuse of a child, Defendants permitted him to continue employment with youth at another facility they owned or operated, demonstrating conscious and reckless disregard for the safety of other minors.

83. The report further noted rumors that Locklear had provided pills to other girls at the facility.

84. Following police investigation, the case was ultimately closed only because the minor victim declined to testify upon turning 18, not because the allegations were unfounded.

85. The Sheriff's Report and DSS documentation tell a story of Locklear routinely violating facility rules which facility management knew or should have known about.

86. On two occasions—approximately January 8 and January 18, 2018—while working alone overnight on the girls' unit, Locklear sexually abused a seventeen-year-old resident, identified as C.T., in her dormitory room after providing her pills and letting her use his phone. During these incidents, he placed his hands down her pants, compelled oral sex, and penetrated her without her consent.

87. The Sheriff's Report notes that a resident witness offered corroborating information, telling investigators that she personally witnessed Locklear "flirting and being handsy with [Plaintiff]" and that she "recalls [Plaintiff] confiding in her about the incidents between her and Locklear." This witness moreover told investigators that "she fully believes [Plaintiff] is being honest and she believes the incidents with Locklear did occur." *Id.*

88. The DSS narrative further establishes that camera footage at Jackson Springs was set to automatically overwrite after twenty-four hours, meaning crucial evidence was erased due to grossly deficient safety and monitoring systems. The lack of surveillance in sleeping quarters and hallways provided Locklear the opportunity for repeated contact without detection.

89. During the investigation, DSS investigators recorded that the VP of Administration, Hilary Rumppe, stated they followed protocol and have "no other concerns about Mr. Locklear working around youth." The investigation noted that "Ms. Rumppe stated that if the case is substantiated, they will fire him." Instead of termination, Locklear was relocated to another youth facility in Raeford affiliated with the same ownership group. Locklear's access to youth clients

continued following the allegations made by C.T.—conduct that shows a reckless disregard for the safety of minors in Defendants’ care.

90. The DSS file confirms that the facility had a history of prior regulatory citations related to inadequate staffing and training and was the subject of previous complaints to the Division of Health Service Regulation (DHSR) regarding the treatment of female residents and lack of supervision by male staff.

91. Following the abuse, C.T. underwent a Child Medical Evaluation (CME) by a psychiatrist in Fayetteville on February 22, 2018, on referral from DSS and law enforcement, which support the allegations.

92. The Sheriff’s Report shows that when the case was reopened, investigators from the Moore County Sheriff’s Office discovered a prior sexual-misconduct report from 2011 involving a 15-year-old girl in Cumberland County against the same perpetrator, Locklear, indicating a pattern of predatory behavior known or knowable to Defendants, had a proper background check been conducted.

93. At all times, Defendants had non-delegable duties imposed by N.C.G.S. §§ 122C-51, 122C-65, 122C-66 and 122C-80, and 10A N.C.A.C. 27D-27F to protect residents from harm, ensure qualified and screened personnel, provide adequate supervision, and report suspected abuse. Defendants’ violations of these duties constitute gross negligence and negligence per se, proximately causing Plaintiff’s injuries.

94. The final report (2025) concludes that, were it not for Locklear’s death in July 2025, there was probable cause to charge him with felony sexual activity by a custodian under N.C.G.S. § 14-27.31, supporting the validity of the abuse allegations.

95. At all relevant times, Defendants owed a non-delegable duty to the minor residents of Jackson Springs to protect them from abuse, neglect, and exploitation; to ensure that only competent and qualified personnel were hired; and to properly supervise staff members charged with the custody and care of vulnerable children.

96. Defendants breached these duties by failing to conduct adequate background checks, or by hiring Locklear regardless of his violent criminal background, by failing to monitor staff interactions with residents, by failing to maintain sufficient staffing and supervision during overnight shifts, and by failing to remove Locklear or notify authorities when misconduct was suspected or known.

97. The sexual abuse of Plaintiff occurred as a direct and foreseeable result of Defendants' grossly negligent hiring, retention, and supervision of Locklear and their reckless disregard for the safety and welfare of the children, including Plaintiff, entrusted to their care.

98. The above acts and omissions by Defendants constitute gross negligence and willful and wanton disregard for patient safety within the meaning of N.C.G.S. § 122C-210.1, such that Defendants are not entitled to statutory immunity for acts arising from their responsibilities in the operation of a licensed psychiatric residential treatment facility.

99. As a direct and proximate result of Defendants' conduct, the minor resident suffered sexual abuse, physical injury, severe emotional distress, humiliation, loss of dignity, and other damages to be proven at trial.

c. Regulatory framework.

100. Jackson Springs Treatment Center is licensed under 10A NCAC 27G .1900, Psychiatric Residential Treatment for Children and Adolescents, and as such, it is required to comply not only with that specific rule but with all applicable state and federal regulations

governing 24-hour mental health facilities in North Carolina. This includes the provisions of 10A NCAC 27D through 27F, which establish client rights, protections from harm and abuse, and living environment standards, as well as 10A NCAC 13O, which requires reporting of allegations against health care personnel to the Department of Health and Human Services within 24 hours.

101. In addition, the facility is bound by N.C.G.S. Chapter 122C, which governs the rights of clients receiving mental health services, and Chapter 131E, which mandates the reporting and investigation of abuse and neglect in licensed health facilities.

102. Because Jackson Springs provides psychiatric residential treatment services to minors and is licensed and regulated under the Division of Health Service Regulation (DHSR), it must also comply with the federal Conditions of Participation for Psychiatric Residential Treatment Facilities found in 42 C.F.R. § 483, Subpart G, including those addressing resident rights, freedom from abuse and restraint, staff training, and administrative standards.

103. Furthermore, the facility is subject to the Protection and Advocacy for Individuals with Mental Illness Act (42 U.S.C. §§ 10801-10851), which ensures that residents receive treatment in the least restrictive setting, are protected from harm, and retain all statutory and constitutional rights.

104. Any failure of Jackson Springs Treatment Center to comply with any of these above-discussed provisions constitutes a violation of its licensure obligations.

105. N.C.G.S. § 122C-210.1 provides limited immunity to facilities and individuals responsible for the custody, supervision, and treatment of mental health clients, shielding them from civil liability for acts or omissions arising from those responsibilities unless such acts or omissions constitute gross negligence or willful and wanton conduct.

106. By its terms, this statute requires that facilities licensed under Chapter 122C, such as Jackson Springs, exercise a level of care consistent with the serious responsibilities of managing and protecting a vulnerable residential population. While the statute limits liability for ordinary negligence, it does not immunize reckless, wanton, or grossly negligent conduct—including the failure to protect patients from foreseeable harm, the conscious disregard of known risks of abuse, or the reckless hiring and supervision of unqualified or dangerous employees.

107. The conduct alleged herein rises well above mere negligence. The facts and circumstances herein reflect that Defendants jointly and severally acted with gross negligence and willful disregard for the safety and well-being of minor residents by knowingly failing to staff adequately, to conduct proper background checks, to supervise employees, and to intervene despite clear indications of risk and prior incidents.

108. Accordingly, Defendants are jointly and severally not entitled to the statutory immunity provided under § 122C-210.1, as their conduct constituted gross negligence and recklessness under North Carolina law.

FIRST CAUSE OF ACTION
Negligence, Gross Negligence, and Reckless Disregard for Statutory
Duties to Protect Vulnerable Minors
(Against all Defendants)

109. The allegations contained in all of the foregoing paragraphs are realleged and are incorporated herein by reference as if fully set forth.

110. At all relevant times, Defendant Jackson Springs Treatment Center was licensed under 10A NCAC 27G .1900 as a Psychiatric Residential Treatment Facility for Children and Adolescents, and therefore subject to the statutory and regulatory duties imposed by Chapter 122C

of the North Carolina General Statutes, 10A N.C.A.C. 27D, 27E, and 27G, and applicable federal patient protection regulations.

111. These statutes and regulations collectively impose affirmative duties of care and supervision designed to prevent harm, abuse, neglect, and exploitation of minors in psychiatric facilities. Among these duties:

- a. N.C.G.S. § 122C-51 requires that all patients be treated with dignity, respect, and freedom from mental and physical abuse, neglect, and exploitation.
- b. N.C.G.S. § 122C-65 prohibits staff from engaging in, soliciting, or permitting any act that constitutes a sexual offense with a patient.
- c. N.C.G.S. § 122C-80 requires facilities to conduct state and national criminal background checks on all applicants prior to employment and prohibits the hiring of any person who refuses to consent or whose history indicates a risk to patient safety.
- d. 10A N.C.A.C. 27D .0304 and 27G .0202 require that all staff protect patients from harm and abuse, maintain proper training and that no employee with substantiated abuse or neglect findings be employed.
- e. 42 C.F.R. § 483.12 requires that facilities implement written policies prohibiting abuse, neglect, and exploitation and mandates immediate reporting and investigation of any allegations of abuse.

112. Defendants, through their ownership, operation, and management of Jackson Springs, jointly and severally recklessly and wantonly disregarded these statutory duties by:

- a. Hiring and retaining Locklear without proper consideration of his criminal background; and
- b. Failing to supervise and/or train staff to prevent sexual abuses of patients and to ensure patient protection.

113. Defendants' actions and omissions were done with conscious and reckless disregard for the safety and rights of vulnerable minors entrusted to their care and constitute gross negligence under North Carolina law.

114. As a direct and proximate result of Defendants' gross negligence, Plaintiff suffered sexual abuse, severe psychological injury, and emotional distress.

115. At all relevant times, Defendants employed Locklear.

116. At all relevant times, Defendants had common-law duties, by and through their authorized agents, servants, and/or employees, officers, and/or directors, including among them Locklear, to refrain from conduct exhibiting a reckless or intentional disregard for the safety of others, including Plaintiff, and to exhibit the highest level of care for the minor patients' safety and wellbeing, including a duty to supervise Locklear and to be aware of his activities with minor patients.

117. Defendants, by and through their authorized agents, servants, employees, officers and/or directors, including among them Locklear, breached their common-law duties of due care in that, among other things, they:

- i. Knew or reasonably should have known that Locklear was incompetent, unfit and a high-risk predator who posed a particular risk of criminal misconduct;
- ii. Knew or reasonably should have known of multiple reports of Locklear's previous incidents of violent criminal misconduct, including a 14-year federal prison sentence for armed bank robbery;
- iii. Failed to undertake a reasonable investigation to uncover additional information that was reasonably available to them;
- iv. Allowed Locklear to continue his position as a staff member within Jackson Springs with authority over mentally-ill, minor children and with complete autonomy even though they knew or should have known that Locklear was a dangerous convicted felon that was repeatedly accused of assaulting women;
- v. Failed to restrict Locklear's access to minor patients in any manner;
- vi. Allowed the conditions to persist whereby Locklear was able to meet with minor patients privately, which facilitated his sexual assault of Plaintiff;
- vii. Failed to terminate Locklear after Plaintiff reported his conduct to Defendants; and

- viii. Failed to warn the minor patients under their care or their respective custodians, including Plaintiff or her custodian, that Locklear was a dangerous criminal that enjoyed unfettered access to the minor patients including Plaintiff.

118. Defendants' acts and omissions constituted negligence and gross negligence, as well as recklessness and willful and wanton conduct, in that Defendants consciously and recklessly disregarded known and substantial risks of sexual abuse to minor residents by (a) hiring/retaining staff with red-flag backgrounds; (b) ignoring prior complaints and observable boundary violations; (c) chronically understaffing units despite foreseeability of harm; (d) failing to supervise and/or staff in mandatory-reporting, abuse-prevention, and one-to-one observation protocols; and (e) violating internal and statutory safety requirements.

119. Defendants' negligence in employing, investigating, supervising, and retaining Locklear was a substantial factor in causing harm to Plaintiff.

120. As a direct and proximate result of the negligence and gross negligence of Defendants, Plaintiff suffered harm, injury, severe emotional distress and mental anguish, including, but not limited to, thoughts of self-harm and depression.

121. As a direct and proximate result of the aforementioned deliberate or reckless behavior, Plaintiff is entitled to recover damages in excess of \$25,000 from Defendants, including, but not limited to, any and all expenses for the care and treatment incident to Plaintiff's injuries; compensation for the pain, suffering, and mental anguish of Plaintiff; and compensation for future lost earning capacity, among other relief.

SECOND CAUSE OF ACTION
Negligence Per Se - Violation of N.C.G.S. §§ 122C-51 and 122C-80
(Against All Defendants)

122. The allegations contained in all of the foregoing paragraphs are realleged and are incorporated herein by reference as if fully set forth.

123. N.C.G.S. § 122C-51 imposes an affirmative duty on facility owners and facility staff to assure patients in their care the right to dignity, privacy, human care, and freedom from mental and physical abuse, neglect, and exploitation.

124. N.C.G.S. § 122C-80 imposes an affirmative duty on facility operators to conduct criminal background checks on their employees and to refrain from hiring employees with criminal backgrounds that would jeopardize the children in facility care.

125. At all relevant times, Locklear was employed by Defendants as a staff member at Jackson Springs. During that time, it is alleged that Defendants knew or should have known of Locklear's violent criminal history prior to his employment at Jackson Springs.

126. Despite Locklear's criminal history, Defendants hired Locklear and retained Locklear as an employee prior to, during, and after Locklear's assaults on Plaintiff.

127. Defendants' retention of a violent criminal led to Locklear manipulating, exploiting, and abusing Plaintiff. Therefore, Defendants are negligent as a matter of law.

128. As a direct and proximate result of the actions of Defendants, Plaintiff suffered severe emotional distress and mental anguish, including, but not limited to, thoughts of self-harm and depression.

129. As a direct and proximate result of the aforementioned negligence per se, Plaintiff is entitled to recover damages in excess of \$25,000 from Defendants, including, but not limited to, any and all expenses for the care and treatment incident to Plaintiff's injuries; compensation for

the pain, suffering, and mental anguish of Plaintiff; and compensation for future lost earning capacity, among other relief.

THIRD CAUSE OF ACTION
Breach of Fiduciary Duty
(Against All Defendants)

130. The allegations contained in all of the foregoing paragraphs are realleged and are incorporated herein by reference as if fully set forth.

131. Plaintiff is informed and believes and therefore alleges that a fiduciary relationship, a special relationship of trust and confidence, existed between Plaintiff and Defendants and their agents, officers, directors, and/or medical staff.

132. Plaintiff is informed and believes and therefore alleges that Defendants, by and through their agents, officers, directors, and medical staff, breached the duty to act in good faith and with due regard for plaintiff's interests in hiring and assigning Locklear, a convicted felon with a history of sexual assault allegations, to provide for her care while a minor at Jackson Springs.

133. Plaintiff contends the breach of fiduciary duty by Defendants was to Plaintiff's detriment.

134. As a direct and proximate result of the actions of Defendants, Plaintiff suffered sexual abuse, severe emotional distress and mental anguish, including, but not limited to, thoughts of self-harm and depression.

135. As a direct and proximate result of the aforementioned breach of fiduciary duty, Plaintiff is entitled to recover damages in excess of \$25,000 from Defendants, including, but not limited to, any and all expenses for the care and treatment incident to Plaintiff's injuries;

compensation for the pain, suffering, and mental anguish of Plaintiff; and compensation for future lost earning capacity, among other relief.

FOURTH CAUSE OF ACTION
Negligent Infliction of Emotional Distress
(Against All Defendants)

136. The allegations contained in all of the foregoing paragraphs are realleged and are incorporated herein by reference as if fully set forth.

137. Plaintiff is informed and believes and therefore alleges that Defendants were negligent and grossly negligent as set forth above.

138. Plaintiff suffered and suffers severe emotional distress as a result of Defendants' negligence and gross negligence.

139. Defendants could reasonably foresee that their actions which led to or failed to prevent sexual abuse of Plaintiff would cause severe emotional distress to Plaintiff.

140. Locklear was only in the position to sexually abuse Plaintiff because of Defendants' negligently and grossly-negligently hiring and retaining Locklear, despite his known history as a convicted violent felon and armed bank robber as well as many-times alleged abuser of women, among other alleged and charged crimes. But for Defendants' hiring and retaining, and failure to supervise Locklear, Plaintiff would not have suffered sexual abuse and emotional distress.

141. As a direct and proximate result of the actions of Defendants, Plaintiff suffered sexual abuse, severe emotional distress and mental anguish, including, but not limited to, thoughts of self-harm, depression, and self-mutilation.

142. As a direct and proximate result of the aforementioned infliction of emotional distress, Plaintiff is entitled to recover damages in excess of \$25,000 from Defendants, including, but not limited to, any and all expenses for the care and treatment incident to Plaintiff's injuries;

compensation for the pain, suffering, and mental anguish of Plaintiff; and compensation for future lost earning capacity, among other relief.

REQUEST FOR JURY TRIAL

Plaintiff requests a jury trial for all claims herein that are so triable.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays that the Court enter its judgment finding and ordering as follows:

- A. Awarding Plaintiff all actual, consequential, and compensatory damages to which Plaintiff is entitled by law arising out of the above-alleged occurrences;
- B. For punitive damages as to all applicable causes of action, in an amount according to proof at trial, to the extent the evidence may show;
- C. Awarding any costs, fees, and expenses and pre-judgment and post-judgment interest as may be allowable by law; and
- D. Awarding such other and further relief as this Court may deem just and proper.

This the 12th day of December, 2025.

WALLACE AND GRAHAM, PA

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