

STATE OF SOUTH CAROLINA  
COUNTY OF DORCHESTER

**MOTHER AND FATHER DOE  
INDIVIDUALLY AND AS LEGAL  
GUARDIANS OF JOHN DOE, A  
MINOR CHILD,**

Plaintiffs,

v.

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

Defendants.

IN THE COURT OF COMMON PLEAS  
FOR THE 1<sup>st</sup> JUDICIAL CIRCUIT  
CASE NO: 2018-CP-\_\_\_\_\_

**SUMMONS**

TO THE ABOVE NAMED DEFENDANTS:

YOU ARE HEREBY SUMMONED and required to answer the Complaint in this action, a copy of which is herewith served upon you, and to serve a copy of your Answer upon the subscriber, at his office at 746 Wakendaw Blvd, Mount Pleasant, SC 29464, within thirty (30) days after service thereof, exclusive of the day of such service; and if you fail to answer the Complaint within the time aforesaid judgment by default will be rendered against you for the relief demanded in the Complaint.

**THE LAW OFFICES OF JOSHUA E. SLAVIN, LLC**

/s/ Joshua Slavin  
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November 28, 2018  
Mount Pleasant, SC

STATE OF SOUTH CAROLINA  
COUNTY OF DORCHESTER

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**COMPLAINT**  
(Jury Trial Requested)

**NOW COMES**, Mother and Father Doe, individually and on behalf of John Doe, a minor child, complaining, by and through their attorneys, Joshua Slavin, Esq., of the Law Offices of Joshua Slavin, and Benjamin D. Andreozzi, Esq. and Nathaniel L. Foote, Esq. of Andreozzi & Associates, P.C., of Defendant NewSpring Church, Inc. (hereafter “NewSpring Church”) and Defendant Jacop Hazlett, and would allege and show this Honorable Court the following:

**JURISDICTION AND VENUE**

1. Plaintiffs are citizens and residents of Dorchester County, South Carolina.
2. Defendant NewSpring Church is a non-profit corporation organized and existing under the laws of South Carolina. NewSpring Church’s designated registered agent is Adam R. Haskett located at 1 Linwa Boulevard, Anderson, South Carolina 29621. NewSpring Church has a campus location at 101 Ashley Phosphate Rd #135, North Charleston, SC in Dorchester County, South Carolina.
3. Upon information and belief, Defendant Jacop Hazlett is a citizen and resident of Dorchester County who is currently being held in the custody of Dorchester County Sheriff.
4. This Court has jurisdiction and venue over the parties to, and the subject matter of, this proceeding pursuant to S.C. Code § 15-7-30.

## FACTUAL ALLEGATIONS

5. NewSpring Church has fourteen campus locations throughout South Carolina.
6. In 2017, NewSpring Church collected more than \$40,000,000 in general tithes and donations.
7. In February and March of 2018, former NewSpring Church youth pastor and continuing volunteer Caleb Lide Jordan was arrested and charged for soliciting sex with a minor and exploitation of a minor.
8. Upon information and belief, in or around March 2018 Jacop Hazlett began volunteering at NewSpring Church as a chaperone or daycare provider.
9. NewSpring Church's Charleston location has a security cameras throughout the facility, including in the child day-care room for three-to-four-year-olds.
10. The security camera in the child day-care room for three-to-four-year-olds is positioned so that it captures footage of the entire room, including the children's bathroom in the back of the room.
11. The bathroom door is split into a lower and upper half, and the upper half stays open when children use the bathroom.
12. The security camera captures footage inside the bathroom, including the toilet, when the upper half of the door is open and the lower half is closed.
13. The live-feed of the security camera footage is monitored at the NewSpring Church Charleston location by a volunteer.
14. NewSpring Church only stores ninety days of security camera footage.
15. On November 26, 2018, NewSpring Church became aware that volunteer Jacop Hazlett had sexually abused a three-or-four-year-old boy during Sunday services.

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

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

18. The footage showed that on September 30, 2018, Jacop Hazlett sexually abused Plaintiff John Doe.

19. Jacop Hazlett told John Doe to go use the bathroom and followed him into the bathroom.

20. Jacop Hazlett took pictures of John Doe's exposed genitalia.

21. Jacop Hazlett touched and otherwise sexually assaulted and abused John Doe.

22. Jacop Hazlett's sexual abuse of John Doe lasted approximately three minutes.

23. Throughout the sexual abuse, Jacop Hazlett can be seen keeping a lookout for approaching adults and looking towards the security camera.

24. John Doe was three years old at the time.

25. Upon information and belief, the video footage of Jacop Hazlett's abuse of other boys is substantially similar.

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

27. Mother and Father Doe were informed of the sexual assault of their son, John Doe, on or about November 27, 2018.

28. Mother and Father Doe had noticed changes in John Doe's behavior, including him screaming that he did not want to go to NewSpring Church or its daycare.

29. The full extent of the consequences of the sexual abuse of John Doe is not yet known but will likely result in the psychological and psychiatric fall-out common to child sex abuse victims.

30. As a result of the above-described abuse, John Doe has suffered, and upon information and belief will continue to suffer, severe and ongoing psychological/psychiatric injury.

31. As a result of the above-described abuse to their son, Mother and Father Doe have suffered, and upon information and belief will continue to suffer, severe and ongoing psychological/psychiatric injury.

**COUNT I – ASSAULT AND BATTERY**

**Plaintiff John Doe v. Jacop Hazlett**

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

33. Defendant Jacop Hazlett subjected Plaintiff John Doe to unwanted sexual contact, as described above.

34. The sexual contact was intended to cause harmful and offensive contact with John Doe's body.

35. The sexual contact did in fact cause harmful and offensive contact with John Doe's body.

36. As a direct and proximate cause of the battery, John Doe suffered psychological/psychiatric injury and severe emotional distress, as set forth above.

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

38. As a direct and proximate cause of the Defendant's actions and omissions, and breach of the duties of reasonable care, John Doe was sexually abused, resulting in damages as set forth above.

**COUNT II – NEGLIGENCE, GROSS NEGLIGENCE, AND RECKLESSNESS**  
**Plaintiffs v. NewSpring Church, Inc.**

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

40. At all times relevant, Defendant NewSpring Church had a duty of care to protect John Doe.

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

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

- a. by failing to properly screen, interview, hire, and train employees/volunteers/contractors/agents appropriately to interact with children;
- b. by failing to adopt, implement, and/or enforce adequate policies and procedures related to the supervision of employees/volunteers/contractors/ agents;
- c. by failing to adopt, implement, and/or enforce adequate policies and procedures related to the monitoring of security footage;
- d. by failing to adequately train employees/volunteers/contractors/agents regarding child sexual abuse;
- e. by affirmatively choosing to give Jacop Hazlett access to young children associated with NewSpring Church, including Plaintiff John Doe;
- f. by failing to supervise Jacop Hazlett and/or John Doe.

43. As a direct and proximate cause of the Defendant's actions and omissions, and breach of the duties of reasonable care, John Doe was sexually abused, resulting in damages as set forth above.

44. As a direct and proximate cause of the Defendant's actions and omissions, and breach of the duties of reasonable care, Mother and Father Doe have suffered psychological/psychiatric injury, resulting in damages as set forth above.

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

**THE LAW OFFICES OF JOSHUA E. SLAVIN, LLC**

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*Pro Hac Vice Application Pending*

November 28, 2018  
Mount Pleasant, SC