

STATE OF SOUTH CAROLINA  
COUNTY OF YORK

IN THE COURT OF COMMON PLEAS  
FOR THE SIXTEENTH JUDICIAL CIRCUIT

CASE NO:

STEVEN MELVIN,

*Plaintiff.*

vs.

**SUMMONS**

YORK COUNTY SHERIFF'S OFFICE,  
DEPUTY KYLE BROGDEN,  
SERGEANT WYATT MELTON AND  
OFFICER IAN GRIFFITH, JOINTLY  
AND SEVERALLY

*Defendants.*

**TO THE DEFENDANTS ABOVE-NAMED:**

**YOU ARE HEREBY SUMMONED** and required to answer the Complaint in this action, a copy of which is herewith served upon you, and to serve a copy of your Answer to the said Complaint on the Plaintiff or their Attorney, Eduardo K. Curry, Esquire, at The Curry Law Firm, LLC P.O. Box 42270 North Charleston, SC 29423, within thirty (30) days after the service hereof, exclusive of the day of such service, and if you fail to answer the Complaint with the time aforesaid, the Plaintiff in this action will apply to the Court for the relief demanded in the Complaint.

**THE CURRY LAW FIRM, LLC  
EDUARDO K. CURRY, ESQUIRE**

s/Eduardo K. Curry

Attorney for Plaintiff  
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Date: June 29 2026

STATE OF SOUTH CAROLINA  
COUNTY OF YORK

IN THE COURT OF COMMON PLEAS  
FOR THE SIXTEENTH JUDICIAL CIRCUIT

STEVEN MELVIN,

CASE NO:

*Plaintiff.*

**COMPLAINT  
(JURY TRIAL REQUESTED)**

vs.

YORK COUNTY SHERIFF'S OFFICE,  
DEPUTY KYLE BROGDEN,  
SERGEANT WYATT MELTON AND  
OFFICER IAN GRIFFITH, JOINTLY  
AND SEVERALLY

*Defendant*

**TO: THE DEFENDANT ABOVE NAMED:**

The Plaintiff, **STEVEN MELVIN**, complaining of the Defendants, would respectfully show the Court as follows:

**PARTIES, JURISDICTION, AND VENUE**

1. That Plaintiff, Steven Melvin is a citizen, over the age of twenty-one, and resident of Berkeley, State of South Carolina (hereinafter "Plaintiff").
2. Defendant York County is a political subdivision of the State of South Carolina and may be served pursuant to Rule 4(d), SCRPC.
3. Defendant York County Sheriff's Office is a governmental entity operating within York County, South Carolina.
4. Defendant Deputy Kyle Brogden were at all relevant times employed by the York County Sheriff's Office and acting under color of state law.
5. Defendant Sergeant Wyatt Melton were at all relevant times employed by the York County Sheriff's Office and acting under color of state law.
6. Defendant Officer Ian Griffith was at all relevant times employed by the York County Sheriff's Office and acting under color of state law.

7. Jurisdiction is proper pursuant to the South Carolina Tort Claims Act, S.C. Code Ann. § 15-78-10 et seq., 42 U.S.C. § 1983, and applicable South Carolina law.
8. Venue is proper in York County because the acts and omissions giving rise to this action occurred within York County, South Carolina.

### **FACTUAL BACKGROUND**

9. On February 14, 2024, Plaintiff was returning home from work and entered the apartment complex where he resided. Plaintiff was lawfully operating his BMW vehicle and possessed valid registration and ownership documentation (**See Exhibit One**).
10. Defendant Deputy Brogden received information through a FLOCK camera alert that a vehicle believed to be stolen was traveling in the area. Without first adequately verifying ownership information, Deputy Brogden followed Plaintiff into his residential community.
11. After Plaintiff stopped near the community mailbox area, Defendant initiated a felony traffic stop. Defendant Deputy Brogden approached Plaintiff with a firearm drawn and pointed directly at him (**See Exhibit Two**).
12. Plaintiff immediately attempted to cooperate and made no threatening movements. Plaintiff was ordered out of his vehicle at gunpoint. Plaintiff was ordered to walk backward, kneel on the ground, and hold his arms above his head for an extended period.
13. Plaintiff repeatedly requested an explanation for the stop but received no meaningful explanation. Plaintiff informed Defendants that the vehicle belonged to him and that ownership documentation was available.
14. Plaintiff was handcuffed and detained despite readily available documentation proving ownership. Plaintiff feared for his life and reasonable believed he could be shot.
15. Sergeant Wyatt Melton arrived and continued the Detention. Plaintiff remained restrained

while officers continued to investigate. Defendants ultimately determined that Plaintiff's vehicle was not stolen. Plaintiff was released after being subjected to humiliation, fear, emotional trauma, and unlawful detention.

16. On February 19<sup>th</sup>, 2024, Plaintiff received a letter from the Office of the Sheriff's office from York County, South Carolina. In the letter it stated that the Office of Professional Standards received your complaint on Deputy Brogden and Sergeant Melton and his complaint will be fully investigated (**See Exhibit Three**).
17. On March 12, 2024, Plaintiff requested a FOIA request for dash cam footage and all incident reports for the traffic stop performed (**See Exhibit Four**).
18. On November 08, 2024, Plaintiff received the memorandum in which the Internal Affairs later acknowledged that the vehicle was not stolen and that the stop resulted from erroneous information associated with a FLOCK alert (**See Exhibit Five**).
19. A Tort Claim Form was sent via Certified Mail to York County Sheriff's Office, and it was received by the York County Sheriff's Office on August 07, 2025 (**See Exhibit Six**).
20. On January 14, 2026, a demand was drafted and sent with medical records and bills to York County Sheriff's Office via certified mail (**See Exhibit Seven**).
21. That Defendant's actions Plaintiff has suffered emotional distress and legal expenses.
22. That Plaintiff suffered such actual, compensatory, real, direct, and indirect harm as a trier of fact shall determine.
23. That Plaintiff suffered and is entitled to such actual, compensatory, punitive, real, direct, and indirect damage as a trier of fact shall determine.

**FOR A FIRST CAUSE OF ACTION**  
**(Negligence)**

24. That Plaintiff realleges to paragraph one (1) through twenty-three (23) as if asserted herein.

25. Defendants owed Plaintiff a duty of reasonable care. Defendants breached their duty by failing to properly investigate before initiating a felony stop.
26. Defendants failed to verify ownership information reasonably available to them.
27. Defendants failed to act as reasonably prudent law enforcement officers under similar circumstances.
28. That Plaintiff suffered such actual, compensatory, real, direct, and indirect harm as a trier of fact shall determine.
29. That Plaintiff suffered and is entitled to such actual, compensatory, punitive, real, direct, and indirect damage as a trier of fact shall determine.

**FOR A SECOND CAUSE OF ACTION**  
**(Gross Negligence)**

30. That Plaintiff realleges to paragraph one (1) through twenty-nine (29) as if asserted herein.
31. Defendants acted recklessly and with conscious disregard for Plaintiff's rights and safety.
32. Defendants escalated a routine investigatory stop into a high-risk felony encounter without adequate verification.
33. That Plaintiff suffered such actual, compensatory, real, direct, and indirect harm as a trier of fact shall determine.
34. That Plaintiff suffered and is entitled to such actual, compensatory, punitive, real, direct, and indirect damage as a trier of fact shall determine.

**FOR A THIRD CAUSE OF ACTION**  
**(False Imprisonment)**

35. That Plaintiff realleges to paragraph one (1) through thirty-four (34) as if asserted herein.
36. Defendants intentionally restrained Plaintiff against his will. The detention exceeded the scope of any lawful investigation.

37. That Plaintiff suffered such actual, compensatory, real, direct, and indirect harm as a trier of fact shall determine.

38. That Plaintiff suffered and is entitled to such actual, compensatory, punitive, real, direct, and indirect damage as a trier of fact shall determine.

**FOR A FOURTH CAUSE OF ACTION**  
**(Assault)**

39. That Plaintiff realleges to paragraph one (1) through thirty-nine (39) as if asserted herein.

40. Defendants intentionally placed Plaintiff in apprehension of imminent bodily harm.

41. Pointing firearms at Plaintiff caused him to reasonably fear death or serious bodily injury.

42. That Plaintiff suffered such actual, compensatory, real, direct, and indirect harm as a trier of fact shall determine.

43. That Plaintiff suffered and is entitled to such actual, compensatory, punitive, real, direct, and indirect damage as a trier of fact shall determine.

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

44. That Plaintiff realleges to paragraph one (1) through forty-three (43) as if asserted herein.

45. Defendants' conduct directly caused severe emotional trauma.

46. Plaintiff's injuries required professional treatment and counseling.

47. That Plaintiff suffered such actual, compensatory, real, direct, and indirect harm as a trier of fact shall determine.

48. That Plaintiff suffered and is entitled to such actual, compensatory, punitive, real, direct, and indirect damage as a trier of fact shall determine.

**FOR A SIXTH CAUSE OF ACTION**  
**(42 U.S.C. § 1983 – Unreasonable Seizure and Excessive Force)**

49. That Plaintiff realleges to paragraph one (1) through forty-eight (48) as if asserted herein.

50. Defendants acted under color of state law.

51. Defendants violated Plaintiff's rights under the Fourth and Fourteenth Amendments.

52. The seizure and use of force were objectively unreasonable.

53. That Plaintiff suffered such actual, compensatory, real, direct, and indirect harm as a trier of fact shall determine.

54. That Plaintiff suffered and is entitled to such actual, compensatory, punitive, real, direct, and indirect damage as a trier of fact shall determine.

**FOR A SEVENTH CAUSE OF ACTION**  
**(Punitive Damages)**

55. The Plaintiff realleges to paragraph one (1) through fifty-five (55) as if asserted herein.

56. That the Defendants conduct was willful, wanton and reckless in disregard of Plaintiff's rights.

57. As proximate result of Defendant's conduct the Plaintiff has been irreparably damaged and is entitled to actual, direct, compensatory, incidental and consequential damages as a trier of fact shall determine.

**PRAYER FOR RELIEF**

WHEREFORE, Plaintiff respectfully requests judgment against Defendants and seeks:

- a. Actual damage;
- b. Consequential damages;
- c. Special damages;
- d. Past and future medical expenses;
- e. Emotional distress damages;

- f. Pain and suffering damages;
- g. Punitive damage;
- h. Attorney's fees and costs where permitted by law;
- i. Pre-judgment and post-judgment interest;
- j. Such other relief as the Court deems just and proper.

**RESPECTFULLY SUBMITTED!**

**s/Eduardo K. Curry**

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South Carolina Bar Number: 62991  
Attorney for Plaintiff

Dated: June 21, 2026

