

STATE OF SOUTH CAROLINA )

COUNTY OF LAURENS )

MELODY HODGES DUNCAN )

IN THE FAMILY COURT  
EIGHTH JUDICIAL CIRCUIT

vs. )

JEFFREY DARREN DUNCAN )

K. MICHELLE SIMPSON ) **FAMILY COURT COVERSHEET**

2023 SEP 22 P 12:09 )

LAURENS COUNTY )  
CLERK OF COURT )

Docket No. 2023-DR-30- 520

**NOTE: The coversheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for docketing purposes for the Clerk of Court and must be signed and dated, and filled out completely. A copy of this coversheet must be served on the defendant(s) along with the Summons and Complaint.**

**Submitted by:** Susan R. Strom **SC Bar #** 69300  
Patricia W. Morr 104212  
**Address:** 6923 N. Trenholm Rd., Suite 201 **Telephone #** 803-988-9800  
Columbia, South Carolina 29206 **Fax #** 803-988-9810  
**Email:** susan@stromfamilylaw.com **Other:** sundai@stromfamilylaw.com  
patricia@stromfamilylaw.com

**DOCKETING INFORMATION (Check one box below if filing in a Mandatory Mediation County)**

- This case is subject to **MEDIATION** pursuant to the Family Court Alternative Dispute Resolution Rules.
- This case is exempt from **ADR** (certificate attached).

**Nature of Action Codes  
(Check One)**

**Marital Dissolution**

- Divorce (110)
- Annulment (120)
- Separate Support and Maintenance (130)
- Registration of Foreign Divorce Decree – without support/custody (190)
- Registration of Foreign Divorce Decree – with support/custody (191)
- Marital Dissolution – Other (199) \_\_\_\_\_

**Abuse and Neglect**

- Abuse and Neglect – Child (210)
- Abuse and Neglect – Adult (220)
- Abuse and Neglect – Other (299) \_\_\_\_\_

**Juvenile Delinquency**

- Truancy (311)
- Incurrable (312)
- Runaway (313)
- Criminal Offense (320)
- Juvenile Delinquency – Other (399) \_\_\_\_\_

**Protection from Domestic Abuse**

- Domestic Abuse – Intimate Partner (410)
- Domestic Abuse – Minor (420)
- Registration of Foreign Order of Protection (490)
- Domestic Abuse – Other (499) \_\_\_\_\_

**Support**

- Child Support – Private (501)
- Child Support – Administrative Process (502)
- Child Support – Judicial Process (503)
- Registration of Foreign Order of Support (504)
- UIFSA – Outgoing (505)
- UIFSA – Incoming (506)
- Modification of Child Support – Private (507)
- Modification of Child Support – DSS (508)
- Modification of Alimony (525)
- College Expenses (530)
- Support – Other (599) \_\_\_\_\_

**Custody/Visitation**

- Child Custody/Visitation (610)
- Modification of Custody/Visitation (615)
- Registration of Foreign Child Custody Order (690)
- Custody/Visitation – Other (699) \_\_\_\_\_

**Miscellaneous Actions**

- Name Change (710)
- Correction/Birth Record (720)
- Judicial Bypass (730)
- Adoption (740)
- Foreign Adoption (741)
- Post Dissolution Equitable Distribution (750)
- Paternity – Private (761)
- Paternity – DSS (762)
- Termination of Parental Rights – Private (771)
- Termination of Parental Rights – DSS (772)
- Miscellaneous Actions – Others (799) \_\_\_\_\_

**Submitting Party Signature:** Susan R. Strom **Date:** 9/22/2023

**Custodial Parent (if applicable):** \_\_\_\_\_

**Note:** Frivolous civil proceedings are subject to sanctions pursuant to Rule 11, SCRPC and the South Carolina Frivolous Civil Proceedings Sanctions Act, S.C. Code Ann. § 15-36-10 et seq.

## FOR MANDATED ADR COUNTIES ONLY

Aiken, Allendale, Anderson, Bamberg, Barnwell, Beaufort, Berkeley, Calhoun, Charleston, Cherokee, Clarendon, Colleton, Darlington, Dorchester, Florence, Georgetown, Greenville, Hampton, Horry, Jasper, Kershaw, Lee, Lexington, Marion, Oconee, Orangeburg, Pickens, Richland, Spartanburg, Sumter, Union, Williamsburg, and York Counties.

**SUPREME COURT RULES REQUIRE MEDIATION OF ALL CONTESTED DOMESTIC RELATIONS ACTIONS.** IF THE DOCKETING INFORMATION ON PAGE 1 OF THIS COVERSHEET INDICATES THAT THIS CASE IS SUBJECT TO **MEDIATION** YOU ARE NOTIFIED THAT MEDIATED SETTLEMENT CONFERENCES ARE REQUIRED IN THIS CASE, AND THAT THE COURT-ANNEXED ADR RULES SHALL APPLY TO ALL CASES IN WHICH MEDIATION IS REQUIRED. FOR ADDITIONAL INFORMATION CONCERNING THE PROCESS AND TIME FRAMES, PLEASE CONSULT THE ADR RULES. KEY SECTIONS OF THE RULES ARE IDENTIFIED BELOW.

### CONTESTED ACTIONS INVOLVING CUSTODY AND VISITATION

Rule 3	Actions Subject to ADR
Rule 4(d)(1)(3)(4) &(5)	Appointment of Mediator by Family Court
Rule 5(g)	Scheduling in Family Court
Rule 6(g)	Agreement in Family Court
Rule 7(f)	Reporting Results of Conference
Rule 9	Compensation of Neutral

### ALL OTHER CONTESTED ACTIONS

Rule 3	Actions Subject to ADR
Rule 4(d)(2)(3)(4) &(5)	Appointment of Mediator by Family Court
Rule 5(g)	Scheduling in Family Court
Rule 6(g)	Agreement in Family Court
Rule 7(f)	Reporting Results of Conference
Rule 9	Compensation of Neutral

**Indigent Cases:** Where a mediator has been appointed, a party may move before the Chief Judge for Administrative Purposes to be exempted from payment of neutral fees and expenses based upon indigency. Applications for indigency shall be filed no later than ten (10) days after the ADR conference has been concluded. Determination of indigency shall be in the sole discretion of the Chief Judge for Administrative Purposes.

**Please Note: Attendance at mediated settlement conferences is mandatory. You must comply with the Supreme Court rules regarding court-ordered mediation. Failure to do so may affect your case and may result in sanctions.**

**Note:** Frivolous civil proceedings are subject to sanctions pursuant to Rule 11, SCRCP and the South Carolina Frivolous Civil Proceedings Sanctions Act, S.C. Code Ann. § 15-36-10 et seq.

STATE OF SOUTH CAROLINA

COUNTY OF LAURENS

MELODY HODGES DUNCAN,

Plaintiff,

v.

JEFFREY DARREN DUNCAN,

Defendant.

K. MICHELLE SIMMONS

2023 SEP 22 P 12:09

LAURENS COUNTY  
CLERK OF COURT

IN THE FAMILY COURT  
EIGHTH JUDICIAL CIRCUIT

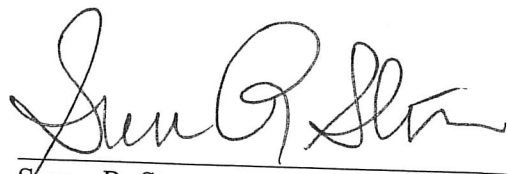
Case No. 2023-DR-30- 520

**CERTIFICATE OF EXEMPTION**

I certify that this action is exempt from mediation, because:

- This is a contempt action;
- This action involves issues of custody or visitation, but these issues were submitted to mediation with a certified mediator prior to filing this action; or
- Custody and visitation are not contested in this action;
- Other showing of exceptional circumstances:
- Custody and visitation are not an issue in this action because there are no children;
- Custody and visitation are not contested in this action because the parties have agreed that custody shall be with (Plaintiff/Defendant) and that agreed visitation rights are as follows:  
  
\_\_\_\_\_
- NOT exempt;

Date: 9/22/23

  
\_\_\_\_\_  
Susan R. Strom  
Signature of Attorney for Plaintiff

STATE OF SOUTH CAROLINA

COUNTY OF LAURENS

MELODY HODGES DUNCAN,

Plaintiff,

v.

JEFFREY DARREN DUNCAN,

Defendant.

IN THE FAMILY COURT OF THE  
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K. MICHELLE SIMMONS

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LAURENS COUNTY  
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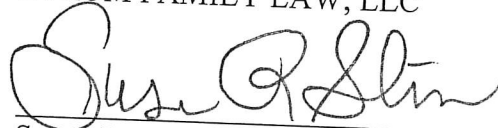
SUMMONS

TO: THE DEFENDANT ABOVE NAMED:

YOU ARE HEREBY SUMMONED and required to answer the Complaint in this action, a copy of which is hereby served upon you and to serve a copy of your Answer to the said Complaint on the Plaintiff or her attorney, Susan R. Strom, at her office, 6923 N. Trenholm Road, Suite 200, Columbia, South Carolina 29206, within thirty (30) days after the service hereof, exclusive of the day of such service, and if you fail to answer the Complaint within the time aforesaid, judgment by default will be rendered against you for the relief demanded in the Complaint.

STROM FAMILY LAW, LLC

BY:



Susan R. Strom, Esquire  
Patricia W. Morr, Esquire  
6923 N. Trenholm Road, Suite 201  
Columbia, South Carolina 29206  
Telephone: 803-988-9800  
Facsimile: 803-988-9810  
Attorneys for the Plaintiff

This 22<sup>nd</sup> day of September 2023.



STATE OF SOUTH CAROLINA  
COUNTY OF LAURENS

IN THE FAMILY COURT FOR THE  
EIGHTH JUDICIAL CIRCUIT

MELODY HODGES DUNCAN,

PLAINTIFF,

v.

JEFFREY DARREN DUNCAN,  
DEFENDANT.

K. MICHELLE SIMMONS  
2023 SEP 22 P 12:09  
LAURENS COUNTY CLERK OF COURT

CASE NO: 2023-DR-30-520

**COMPLAINT**

Plaintiff, complaining of Defendant, would respectfully allege as follows:

**GENERAL ALLEGATIONS**

1. That Plaintiff and Defendant are citizens and residents of Laurens County, South Carolina, and have been so for a period of more than one (1) year prior to the institution of this action.
2. That Plaintiff and Defendant are husband and wife, having been married to one another on December 3, 1988, and of this marriage three (3) children have been born, all of whom are emancipated. There are no minor children of this marriage, and none are expected.

**FOR A FIRST CAUSE OF ACTION**  
**(Divorce/Adultery)**

3. Defendant is a public figure, having served for thirteen (13) years as a United States Representative in Congress for the Third (3<sup>rd</sup>) District of South Carolina. Defendant has run for election, along with the support of his wife and sons, on a platform of family values.
4. Defendant recently left the marriage and has admitted to Plaintiff that he has an ongoing sexual relationship with a woman named Liz Williams. Additionally, Defendant has admitted this adulterous relationship to many other people, including the parties' sons and members of his staff.

5. As recently as August 28, 2023, Defendant hosted a "Faith and Freedom BBQ" where he spoke to the crowd, among other things, about his marriage to Plaintiff (calling her a supportive and loving wife) and portraying an image of himself as a dedicated, dutiful husband. Upon information and belief, Defendant then left the next day and went directly to the home of his paramour, Liz Williams, in the Washington, D.C. area, where Plaintiff is informed and believes he continues to reside. Plaintiff is informed and believes that Defendant's extramarital relationship(s) is/are widely known in political circles of South Carolina and Washington D.C.
6. Upon information and belief, Defendant is now presenting a false narrative of a loveless marriage to Plaintiff to justify the hypocrisy of his public statements and his private actions.
7. Upon information and belief, Plaintiff is informed and believes that Defendant has engaged in an extramarital relationship with at least one other woman during the parties' marriage.
8. Defendant's extramarital relationship(s) are ongoing, and Plaintiff is informed and believes that Defendant has committed adultery during the course of the parties' marriage with Liz Williams and at least one other woman. That Defendant has pursued these relationship(s) to the detriment of the family.
9. Plaintiff has not condoned this behavior of the Defendant.
10. That based upon these allegations, Plaintiff should be awarded a complete and final divorce, *a vinculo matrimonii*, as and from Defendant based upon the statutory grounds of adultery.

**FOR A SECOND CAUSE OF ACTION**  
**(Separate Maintenance and Support/Alimony)**

11. The allegations set forth in the foregoing paragraphs are re-alleged and incorporated herein as if set forth verbatim.
12. Plaintiff is informed and believes that Defendant is now residing with his paramour and the parties have not lived together since August 29, 2023. Plaintiff is informed and believes that she should be awarded exclusive use and possession of the former marital residence, *pendente lite* and permanently, as the parties' marriage has been irreparably broken due to Defendant's adulterous conduct.
13. Plaintiff has been a dutiful Wife and has contributed substantially to the maintenance of the parties' household and that Plaintiff has wholeheartedly supported Defendant in his career.
14. That Defendant is a well-educated male who is gainfully employed and earns a substantial living as a U.S. Representative of the Third (3<sup>rd</sup>) District of South Carolina. That Defendant is fully capable of and is earning a sufficient income with which to support himself, and to contribute to the support of Plaintiff, *pendente lite* and permanently.
15. Defendant should be denied spousal support as and from Plaintiff, now and in the future as a result of his adulterous conduct.
16. Plaintiff is entitled to an Order of this Court establishing the rights and responsibilities of the parties, each to the other, both *pendente lite* and permanently.
17. That Plaintiff is in need of and desires the exclusive use, possession, and ownership of the family residence, together with all of the personal property located therein, *pendente lite* and permanently.

18. That Defendant should be required to be solely responsible for all costs associated with the former marital residence, including but not limited to, mortgage payments, taxes, maintenance, repairs, and other expenses, to preserve the asset during this transitional period, *pendente lite* and permanently.
19. That Plaintiff is in need of and desires the exclusive use, possession and ownership of the family residence located in Montana, together with the contents therein, *pendente lite* and permanently.
20. That Defendant should be required to be solely responsible for all costs associated with the Montana residence, including but not limited to, mortgage payments, taxes, maintenance, and repairs, *pendente lite* and permanently.
21. That Defendant should be required to contribute to all outstanding obligations and debts incurred by the parties during their marriage, *pendente lite* and permanently.
22. Defendant presently maintains health and hospitalization insurance coverage for Plaintiff and the parties' children under the age of twenty-six (26). Plaintiff seeks an order requiring Defendant to continue to maintain the above-mentioned health and hospitalization insurance coverage *pendente lite* and permanently. Defendant should be solely responsible for both parties uncovered medical expenses, *pendente lite* and permanently.
23. That Defendant should be required to obtain and maintain life insurance upon himself with Plaintiff named as the irrevocable beneficiary, *pendente lite*, and permanently.

**FOR A THIRD CAUSE OF ACTION**  
**(Equitable Division)**

24. The allegations set forth in the foregoing paragraphs are re-alleged and incorporated herein as if set forth verbatim.



25. That Plaintiff is entitled to an equitable division of all property, both real and personal, taking into consideration any non-marital property or special equity interest, owned by the parties and/or acquired during the course of the marriage, with Plaintiff being awarded at least sixty percent (60%) of the marital estate, *pendente lite* and permanently, due to Defendant's adulterous conduct.

26. That Plaintiff is entitled to an equitable division of all debts incurred by the parties during their marriage, *pendente lite* and permanently.

**FOR A FOURTH CAUSE OF ACTION**  
**(Restraining Orders)**

27. The allegations contained in the foregoing paragraphs are re-asserted and incorporated by reference herein.

28. That Defendant should be restrained from disposing of, mortgaging, selling, transferring, encumbering, or otherwise alienating any assets of the marriage, however identified, *pendente lite* and permanently.

29. That Defendant should be restrained from incurring any additional debt for which Plaintiff could be held liable, *pendente lite* and permanently.

30. That Defendant should be restrained from contacting, bothering, harassing, or in any way interfering with the Plaintiff in person, by phone, internet/email, text messages, mail or through third parties at any place where the Plaintiff is, *pendente lite* and permanently.

**FOR A FIFTH CAUSE OF ACTION**  
**(Attorney's Fees and Costs)**

31. The allegations set forth in the foregoing paragraphs are re-alleged and incorporated herein as if set forth verbatim.

32. That Defendant should be required to provide the Plaintiff with attorney's fees, private investigative fees, costs, and suit money necessary for the prosecution and maintenance of this action, *pendente lite* and upon completion of this action.

33. That Plaintiff was left with no other recourse than to file this action due to Defendant's adulterous conduct.

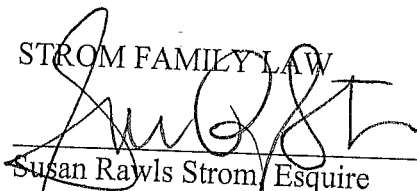
34. That there has been no collusion between the parties for the purposes of this action.

WHEREFORE, Plaintiff prays for the following relief:

- A. An Order of divorce, *a vinculo matrimonii*, as and from Defendant based upon the statutory grounds of adultery; or, in the alternative, that she be awarded an Order of Separate Maintenance and Support as and from Defendant;
- B. An Order requiring Defendant to pay a sum of permanent, periodic alimony to Plaintiff, *pendente lite* and permanently;
- C. An Order barring Defendant from receiving any alimony from Plaintiff, *pendente lite* and permanently;
- D. An Order granting Plaintiff exclusive use and possession of the former marital residence, together with all of the personal property located therein, and requiring Defendant to be solely responsible for the costs associated therewith, *pendente lite* and permanently, based upon fault grounds as listed hereinabove;
- E. An Order granting Plaintiff exclusive use and possession of the former family residence located in Montana, together with all of the personal property located therein, and requiring Defendant to be solely responsible for the costs associated therewith, *pendente lite* and permanently;
- F. An Order requiring Defendant to be solely responsible for the outstanding debts and obligations of the parties, *pendente lite* and permanently;

- G. An Order requiring Defendant be required to maintain health insurance on the Plaintiff and the parties' children so long as the children and Plaintiff are legally allowed to remain on Defendant's coverage, *pendente lite* and permanently;
- H. An Order requiring Defendant to be solely responsible for both parties' uncovered medical expenses, *pendente lite* and permanently;
- I. An Order requiring Defendant to obtain and maintain a life insurance policy upon himself with Plaintiff named as the irrevocable beneficiary, *pendente lite* and permanently;
- J. An Order of equitable division of all property and debts, with Plaintiff receiving at least sixty percent (60%) for the marital estate due to the Defendant's adulterous conduct;
- K. Restraining Orders as follows:
  - a. Restraining Defendant from disposing of, mortgaging, selling, transferring, encumbering, or otherwise alienating any assets of the marriage;
  - b. Restraining Defendant from incurring any additional debt for which Plaintiff can be held liable;
  - c. Restraining Defendant from contacting, bothering, harassing, or in any way interfering with the Plaintiff in person, by phone, internet/email, text messages, mail or through third parties at any place where the Plaintiff is, unless otherwise invited by Plaintiff, *pendente lite* and permanently;
- L. An Award of attorney's fees, private investigative fees, accountant fees, and costs as a result of this action; *pendente lite* and permanently; and
- M. For such other and further relief as this Court may deem just and proper.

STROM FAMILY LAW



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Susan Rawls Strom, Esquire

Patricia W. Morr, Esquire

6923 N. Trenholm Rd. Ste. 201

Columbia, South Carolina 29206

Telephone: 803-980-9800

Facsimile: 803-980-9810

Attorneys for the Plaintiff

September 22<sup>nd</sup>, 2023

STATE OF SOUTH CAROLINA  
COUNTY OF LAURENS

MELODY HODGES DUNCAN,

Plaintiff,

v.

JEFFREY DARREN DUNCAN,

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Case No. 2023-DR-30-520

K. MICHELLE SIMMONS

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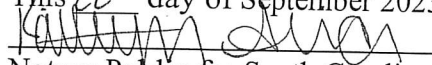
VERIFICATION

PERSONALLY appeared before me, Melody Duncan, who being duly sworn, deposes and says: that she is the Plaintiff in the foregoing action; that she has read the within Summons and Complaint, and the statements contained therein are true of her own knowledge, information, and belief.

  
MELODY DUNCAN

SWORN TO before me

This 22<sup>nd</sup> day of September 2023

  
Notary Public for South Carolina

My commission expires: 10/1/2025