

NORTH CAROLINA

FILED THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION

BRUNSWICK COUNTY

2015 DEC 10 PM 1:02 15 CVS 2207

The Estate of KEITH ANTHONY VIDAL, BRUNSWICK COUNTY, C.S.C.

by and through his Personal Representative,)

MARY ERRIGO WILSEY, BY)

COMPLAINT

(Jury Trial Demanded)

Plaintiff,)

v.)

BRYON VASSEY, in his official and)

individual capacity, CITY OF)

SOUTHPORT, CITY OF BOILING)

SPRING LAKES and JOHN W. INGRAM,)

V, in his Official Capacity as SHERIFF of)

BRUNSWICK COUNTY,)

Defendants.)

COMES NOW, the Plaintiff, by and through counsel, complaining of the Defendants, jointly and severally, alleging the following:

1. This is an action seeking legal and equitable relief under the common law of North Carolina and 42 USC § 1983 from the wrongful acts and omissions of the Defendants that proximately caused the death of Keith Anthony Vidal on January 5, 2014.
2. Jurisdiction is proper in this Court as the cause of action arose in Brunswick County, North Carolina and the Plaintiff, as the Personal Representative of the Estate of Keith Anthony Vidal, seeks damages in excess of Twenty Five Thousand dollars (\$25,000.00) on each of her claim. Jurisdiction is also properly invoked pursuant to N.C. Const. Art. IV, §12 and N.C. Gen. Stat §§ 7A-3, 7A-240, and 7A-243. The Superior Court has jurisdiction over the constitutional claim.

PARTIES

3. Keith Anthony Vidal (herein referred to as "Mr. Vidal"), was an 18 year-old citizen and resident of Brunswick County, North Carolina who was well-loved, close to and affectionate toward his family and enjoyed listening to and playing music.
4. The Plaintiff, Mary Errigo Wilsey, is the mother of Keith Anthony Vidal, who died on January 5, 2014. Mrs. Wilsey is the Personal Representative of the Estate of Keith Anthony Vidal and is a citizen and resident of Brunswick County, North Carolina. She loved and was extremely close to her son, Keith Anthony Vidal, before his untimely death.

5. The Defendant, Bryon Vance Vassey (hereinafter referred to as "Defendant Vassey") is, upon information and belief, a citizen and resident of Brunswick County. At the times alleged herein, Defendant Vassey was a duly sworn law enforcement officer and public official employed by the City of Southport Police Department and was acting within the course and scope of his employment.
6. Defendant Vassey is sued in both his individual and official capacities. The City of Southport has waived immunity as to the official capacity claim. On the individual capacity claim, Defendant Vassey's actions described herein were grossly negligent, malicious, wanton, willful, and/or done with reckless disregard for the rights and safety of others.
7. The Defendant, City of Southport, is a municipal corporation or city as defined by N.C.G.S. § 160-A-1(2) and/or N.C.G.S. § 160-A-11. At the time of the events alleged herein, the City of Southport maintained and was legally responsible for the administration of the Southport Police Department. The Defendant, City of Southport, has waived its governmental immunity from the tort claims of this suit by purchase of liability insurance as provided by N.C.G.S. § 160-A-485 and/or N.C. Gen. Stat. §153A-435, and/or its participation in local governmental risk pools or the functional and substantive equivalent thereof, at all times applicable to the events that are the subject of this action, and is liable under the doctrine of *respondeat superior* as to each of the state common law claims against Defendant Vassey.
8. The Defendant, City of Boiling Spring Lakes, is a municipal corporation or city as defined by N.C.G.S. § 160-A-1(2) and/or N.C.G.S. § 160-A-11. At the time of the events alleged herein, the City of Boiling Spring Lakes maintained and was legally responsible for the administration of the Boiling Spring Lakes Police Department. The Defendant, Boiling Spring Lakes, has waived its governmental immunity from the tort claims of this suit by purchase of liability insurance as provided by N.C.G.S. § 160-A-485 and/or N.C. Gen. Stat. §153A-435 and/or its participation in local governmental risk pools or the functional and substantive equivalent thereof, at all times applicable to the events that are the subject of this action, is liable under the doctrine of *respondeat superior* as to each of the state common law claims against Defendant Vassey through its Mutual Aid Agreement with Defendant Vassey's employer, the City of Southport.
9. The Defendant, John W. Ingram, V, in his Official capacity as Sheriff of Brunswick County, North Carolina, is and was the duly elected Sheriff of Brunswick Country, as defined by N.C. Const. art. VII, § 2 and vested with general law enforcement powers and rights as specified throughout Brunswick County, North Carolina. The Defendant Ingram has waived governmental immunity from the tort claims of this suit by purchase of liability insurance as provided by N.C.G.S. § 160-A-485 and/or N.C. Gen. Stat. §153A-435 and/or its participation in local governmental risk pools or the functional and substantive equivalent thereof, at all times applicable to the events that are the subject of this action, is liable under the doctrine of *respondeat superior* as to each of the state common law claims against Defendant Vassey through its Mutual Aid Agreement with Defendant Vassey's employer, the City of Southport.

10. Pursuant to Law Enforcement Mutual Aid Agreements, law enforcement personnel from all three jurisdictions were dispatched to the home of Mr. Vidal on the subject date, and as such, each requesting agency was responsible and liable for the actions of the responding agency's law enforcement officers, as joint venturers acting in concert. All agencies and their officers were dispatched in response to a call for medical/psychiatric assistance not regarding any alleged criminal activity.

FACTS

11. On January 5, 2014, Keith Anthony Vidal, resided at 1130 President Drive, Southport, North Carolina with his Mother, Mary Errigo Wilsey, and Step-Father, Mark Wilsey.
12. Mr. Vidal suffered from mental health conditions, including schizophrenia, was eighteen years old and weighed approximately 150 pounds.
13. On January 5, 2014, sometime shortly after 12:00 p.m., a family member called 911 for medical assistance and possible transportation of Keith Anthony Vidal to a medical facility for psychiatric evaluation if required.
14. Officer John Thomas of the Boiling Spring Lakes Police Department responded to the "10-73" Call and was the first law enforcement responder to arrive at 1130 President Drive, Southport, North Carolina (hereinafter referred to as "the scene").
15. Officer Thomas immediately observed Mr. Vidal sweeping the floor in the hall way with no weapons in his hands.
16. After Officer Thomas engaged Mr. Vidal in conversation, he then observed Mr. Vidal with a small screw driver in his hand along with the broom, standing some distance away from Officer Thomas.
17. Officer John Thomas had been to Mr. Vidal's home at 1130 President Drive, Southport, North Carolina on at least two prior occasions, neither of which involved any violence or threats by Mr. Vidal.
18. On January 5, 2014, Officer Thomas specifically requested backup from Defendant Byron Vassey of the City of Southport Police Department, having worked with Defendant Vassey on at least two prior occasions.
19. On January 5, 2014, Deputy Samantha Lewis of the Brunswick County Sheriff's Department was the second to arrive on the scene, having heard the Call for assistance on the Police radio.

20. Officer Thomas and Deputy Lewis were engaging in conversation with Mr. Vidal for several minutes with no violence occurring prior to the arrival of Defendant Vassey.
21. Defendant Vassey was the third law enforcement officer to arrive on the scene.
22. As Defendant Vassey was entering the residence he commented to EMT Personnel who were present that he was going to "kick ass and take names" or words to that effect.
23. Defendant Vassey, upon entering the residence, immediately commented to the two officers that "we do not have all day to stand here just Taze him" or words to that effect.
24. Defendant Vassey did not engage Mr. Vidal in any conversation upon his arrival on the scene nor did he utilize any Crisis Intervention Techniques during the encounter.
25. Defendant Vassey, the Senior Officer on the scene, immediately directed the other two law enforcement officers, Officer Thomas and Deputy Lewis, to use their Tasers on Mr. Vidal, without giving Mr. Vidal any warnings or commands.
26. In response to Defendant Vassey's command, Deputy Lewis deployed her Taser on Mr. Vidal, causing Mr. Vidal to fall to the floor in the hallway of his home and become incapacitated.
27. Officer Thomas and Deputy Lewis then physically restrained Mr. Vidal on the floor while he was incapacitated by the Taser.
28. While Mr. Vidal was on the floor, incapacitated and being restrained by Officer Thomas and Deputy Lewis, Defendant Vassey drew his firearm, placed his gun next to Deputy Lewis's ear, and fired a single gunshot into Mr. Vidal, without giving any warnings or commands to those present, including Mr. Vidal.
29. Mr. Vidal died on January 5, 2014 as a result of being shot by Defendant Vassey. Deputy Lewis suffered an ear injury from Defendant Vassey's discharge of his firearm.
30. At or near the time of the shooting, Defendant Vassey made a statement that he shot Mr. Vidal to protect himself.
31. On or about January 6, 2014, the Medical Examiner confirmed that the cause of Mr. Vidal's death was the direct result of the gunshot wound inflicted by Defendant Vassey.

32. All of the acts of Defendant Vassey described herein were performed while Defendant Vassey was in the course and scope of his employment with the Southport Police Department, acting on behalf of the City of Southport, and while acting on behalf of the City of Boiling Spring Lakes and the County of Brunswick pursuant to Mutual Aide Agreements in effect among the three governmental Defendants.
33. As a direct, proximate, and foreseeable result of the negligent, reckless, careless, willful and wanton, malicious and unlawful acts and omissions of Defendant Vassey, Mr. Vidal suffered physical, mental and emotional injuries prior to his death, and was wrongfully killed by Defendant Vassey while he was acting on behalf of all Defendants.

FIRST CLAIM FOR RELIEF

Negligence, Gross Negligence, and Wrongful Death Against All Defendants

34. Plaintiff re-alleges and incorporates by reference all preceding paragraphs of this Complaint.
35. Mr. Vidal suffered from mental disability, and therefore, was protected under Federal Law and State law.
36. Defendants owed Mr. Vidal a duty to:
 - A. Use no more force than reasonable and necessary;
 - B. Protect him from harm because of his mental illness; and
 - C. Use Crisis Intervention Techniques when necessary and appropriate with due regard for public safety, including Mr. Vidal's.
37. Defendant Vassey, while acting on behalf of all Defendants, violated these duties owed to Mr. Vidal by: using excessive and unnecessary deadly force; failing to protect Mr. Vidal from harm because of his mental illness; and by failing to use appropriate, accepted Crisis Intervention Techniques.
38. Mr. Vidal's death was caused by the negligent actions of Defendant Vassey while acting on behalf of all Defendants.
39. The actions of the Defendant Vassey, while acting on behalf of all Defendants, in causing Mr. Vidal's death were grossly negligent, malicious, wanton, willful, and/or done with

careless and reckless disregard for the rights and safety of others.

40. The actions of Defendant Vassey occurred in the course and scope of his employment and are imputed to his employer, the Southport Police Department, under the doctrine of *respondeat superior*.
41. The actions of Defendant Vassey are imputed to Defendants, City of Boiling Spring Lakes and Brunswick County North Carolina, pursuant to Law Enforcement Mutual Aid Agreements entered into by the all Defendants and in effect at the time of the fatal shooting.
42. The violations of generally accepted law enforcement custom and practice in this situation and the wrongful death of Mr. Vidal were a direct and foreseeable result of negligent hiring and retention, grossly inadequate supervisory and training policies and practices on the part of the City of Southport, whose negligence is imputable to Defendants, City of Boiling Spring Lakes and Ingram as the Sheriff of Brunswick County pursuant Law Enforcement Mutual Aid Agreements, regarding interactions with persons suffering from mental health conditions and use of force, including deadly force.
43. Defendant, City of Southport, whose negligence is imputable to Defendants, City of Boiling Spring Lakes and Ingram as the Sheriff of Brunswick County pursuant Law Enforcement Mutual Aid Agreements, failed to adequately train their employees, including Defendant Vassey, on Crisis Intervention Techniques relating to interactions with persons suffering from mental health conditions, the use of force, including deadly force, and various other restraint and mental health commitment techniques.
44. The negligence, gross negligence, malicious, willful, wanton, careless and reckless conduct was performed with reckless disregard for the rights and safety of others and entitle the Plaintiff to recover, in her capacity as Administratrix of the Estate of Keith Anthony Vidal, compensatory damages for the pain and suffering incurred by the decedent Mr. Vidal prior to his death.
45. Plaintiff, in her capacity as Administratrix of the Estate of Keith Anthony Vidal, is entitled to recover from the Defendants all damages allowed by N.C.G.S. § 28A-18-2 including but not limited to medical and funeral expenses, pain and suffering, loss of services, protection, care, assistance, society, companionship, comfort, guidance, kindly offices and advice, among other things. Keith Anthony Vidal is survived by his Mother, Mary Errigo Wilsey, and his Father, Joseph Vidal.
46. The Defendants acted with malicious, deliberate, willful, wanton and reckless disregard of the rights and safety of Mr. Vidal, entitling the Plaintiff to recover punitive damages.

SECOND CLAIM FOR RELIEF

Action Pursuant to 42 USC § 1983 as against Defendant Vassey: Excessive Force

47. Plaintiff re-alleges and incorporates by reference all preceding paragraphs of this Complaint.
48. As Specifically alleged above, Defendant Vassey, used an excessive, unreasonable, and unnecessarily high or dangerous level of force, including deadly force, to subdue and/or control Mr. Vidal, and in using more or improperly dangerous force than was reasonably necessary, acted in contravention of accepted law enforcement standards related to the use of force in gaining control over persons suffering from a mental health condition.
49. In inflicting a greater degree of force than was reasonably necessary to control or subdue Mr. Vidal, Defendant Vassey acted with deliberate indifference to Mr. Vidal's Fourth Amendment Right to be free from unreasonable seizure of his person, and his Fourteenth Amendment right to substantive due process precedent to the imposition of punishment or death in response to suspected criminal activity. These rights will collectively be referred to as "Fourth and Fourteenth Amendment Rights."
50. Defendant Vassey is not entitled to qualified immunity for the constitutional violations alleged herein, due to the fact that no reasonable officer acting in the circumstances and with the knowledge or lack of knowledge of Defendant Vassey as set forth above, would have inflicted the same type, quantity and/or level of force upon Mr. Vidal as was inflicted on Mr. Vidal by Defendant Vassey.
51. Defendant Vassey's excessive use of force and corresponding deliberate indifference to Mr. Vidal's Fourth and Fourteenth Amendment Rights, proximately caused Mr. Vidal's death and Plaintiff's damages.
52. Accordingly, Plaintiff, in her capacity as Administratrix of the Estate of Keith Anthony Vidal, is entitled to recover compensatory damages, punitive damages, and all other damages allowed for Defendant Vassey's violation of Mr. Vidal's Federal Civil Rights, including his rights under the Fourth and Fourteenth Amendments to the U.S. Constitution, in an amount in excess of \$25,000.00.

THIRD CLAIM FOR RELIEF

Deprivation of Life Outside the Law of the Land N.C. Const., Art. I, §§1,19 Against all Defendants

53. Plaintiff re-alleges and incorporates by reference all preceding paragraphs of this Complaint.
54. The Defendants acted in violation of N.C. Const., Art. I, §§1,19 by depriving Mr. Vidal of his life and liberty outside the law of the land.
55. To the extent, if at all, that the Court finds Defendant Vassey is entitled to immunity from state law claims of wrongful death, the Plaintiff will not have an adequate remedy at law against these Defendants. Thus, the Plaintiff brings this claim, in the alternative, under the North Carolina Constitution against Defendants in their respective official capacities.
56. The acts of Defendant Vassey, as a governmental actor, were negligent and unlawful in:
 - A. Recklessly, wantonly, and needlessly violating standard police protocols;
 - B. Recklessly, wantonly, and needlessly violating rules of engagement concerning interactions with persons suffering from mental health conditions by creating an unnecessary, yet highly dangerous, exigency; and
 - C. Recklessly, wantonly, and needlessly placing Mr. Vidal at risk of serious physical injury and/or death, in conscious and deliberate disregard of known and obvious risks and the safety of others.
57. These negligent acts were so egregious that they exceeded the bounds of conduct tolerated by civilized society for state actors. By such wholly unjustified conduct, the Defendants took Mr. Vidal's life in a manner that was outside the law of the land, in violation of N.C. Const., Art. I, §§1,19.
58. The Plaintiff seeks and is entitled to compensatory damages in excess of Twenty Five thousand (\$25,000) dollars, and appropriate equitable relief, on the constitutional claim.
59. To the extent, if any, that the doctrine of governmental immunity applies, the City of Southport, City of Boiling Spring Lakes and Ingram as the Sheriff of Brunswick County are liable for the constitutional violations of its agents acting in the course and scope of their employment and pursuant to the Law Enforcement Mutual Aid Agreements in effect among the Defendants.

FOURTH CLAIM FOR RELIEF

Action Pursuant to 42 USC § 1983 as against Defendant City of Southport: Failure to Properly Supervise and Train

60. Plaintiff re-alleges and incorporates by reference all preceding paragraphs of this Complaint.
61. The City of Southport, by and through the Southport Police Department, which is part of the City, was negligent, grossly negligent, careless, and recklessly indifferent in disregarding the Civil Rights and safety of others despite a pattern of prior interactions with persons suffering from mental health conditions, in that it failed to establish reasonable policies and procedures, including with respect to the supervision and training of officers, regarding appropriate and safe methods, techniques, and approaches designed to prevent the excessive use of force in responding to situations involving persons suffering from mental health conditions, commonly known as Crisis Intervention Techniques, as well as to prevent the unnecessary arrest of persons suffering from mental health conditions.
62. Moreover, the violations of generally accepted law enforcement customs and practices in this situation and the wrongful death of Mr. Vidal were the direct and foreseeable result of the grossly inadequate supervisory and training policies and practices on the part of the City of Southport Police Department.
63. Defendant City of Southport, through the acts and omissions of its employees and Defendant Vassey, acted with deliberate indifference to persons suffering from mental health conditions ("Impaired Persons"), including Mr. Vidal.
64. The act and omissions of the Defendant City of Southport were pursuant to a municipal policy and custom and police policy and procedure and were calculated to and did deprive Mr. Vidal of rights and privileges protected by state and federal law, including 42 USC § 1983.
65. Defendant City of Southport acted with deliberate indifference to Impaired Persons' Fourth and Fourteenth Amendment Rights, despite a pattern of prior interactions with persons suffering from mental health conditions, by failing to supervise and train police officers in the following ways:
 - A. Failing to adequately hire, supervise and retain its police officers;
 - B. Failing to adequately supervise and train its police officers to employ safe,

reasonable and necessary techniques designed to prevent encounters with Impaired Persons from becoming volatile or dangerous to the officers, the Impaired Persons and/or persons in the vicinity of the encounter;

- C. Failing to adequately supervise and train its police officers in the safe, reasonable, effective, and appropriate use of force to be used upon Impaired Persons.
 - D. Failing to have reasonable and adequate policies, practices and procedures Defendant City of Southport
 - E. Failing to adequately enforce its policies, practices and procedures Defendant City of Southport.
66. Defendant City of Southport acted with deliberate indifference to the Fourth and Fourteenth Amendment Rights of Impaired Persons, including Mr. Vidal, in its failure to adequately supervise and train as alleged above.
67. Defendant City of Southport's deliberate indifference to the Fourth and Fourteenth Amendment Rights of Impaired Persons through its failure or failures to train as alleged above are failures of policy, widespread practice, and/or custom.
68. Defendant City of Southport's systematic supervision and training failures as alleged above proximately caused Keith Vidal's death in that they proximately, directly and foreseeably caused Defendant Vassey to use excessive force on Mr. Vidal.
69. Upon Information and belief, the Defendant City of Southport knew of, ratified and/or condoned the conduct described herein.
70. Due to the systematic, unconstitutional supervision and training procedures, practices and/or policies alleged herein, the Defendant City of Southport is liable for the Plaintiff's death and damages.
72. Defendant City of Southport's actions were undertaken negligently, grossly negligently, carelessly, willfully, wantonly and with reckless disregard for the Civil Rights and safety of others, including Mr. Vidal, entitling the Plaintiff to compensatory and punitive damages in excess of \$25,000.00.

FIFTH CLAIM FOR RELIEF

Action against Defendant City of Boiling Spring Lakes and Defendant Ingram as Sheriff of Brunswick County: Mutual Aid Agreements

73. Plaintiff re-alleges and incorporates by reference all preceding paragraphs of this Complaint..
74. Prior to January 5, 2014, the City of Boiling Spring Lakes, Sheriff Ingram of Brunswick County and the City of Southport entered into Law Enforcement Mutual Aid Agreements, permitting each entity to share personnel resources with neighboring jurisdictions, including law enforcement resources.
75. On or about January 5, 2014, Defendant Vassey was employed as a City of Southport Police Detective. The subject incident occurred at Mr. Vidal's residence within the City of Boiling Spring Lakes located within Brunswick County.
76. Pursuant to the Law Enforcement Mutual Aid Agreements, law enforcement personnel from all three jurisdictions were dispatched to the home of Mr. Vidal on the subject date, and as such, each requesting agency was responsible and liable for the actions of the responding agency's law enforcement officers.
77. Prior to January 5, 2014, Defendants City of Southport, City of Boiling Spring Lakes and the Sheriff of Brunswick County had a duty to familiarize themselves with the policies, practices and procedures of the agencies participating in the Law Enforcement Mutual Aid Agreements, including with respect to the use of force and interactions with persons suffering from mental health conditions.
78. As a direct and proximate result of the aforesaid negligence of Defendant Vassey, whose negligence is imputable to Defendants, City of Southport, City of Boiling Spring Lakes and Ingram as Sheriff of Brunswick County, under theories of *respondeat superior* and pursuant to the Law Enforcement Mutual Aid Agreements, the Plaintiff has sustained damages, both compensatory and punitive, in an amount greater than Twenty-Five Thousand and no/100 Dollars (\$25,000.00) to be determined at the trial of this matter.

SIXTH CLAIM FOR RELIEF

Action against Defendant City of Southport: Respondeat Superior

79. Plaintiff re-alleges and incorporates by reference all preceding paragraphs of this Complaint..
80. The incident described herein above and the resultant damages sustained by Plaintiff are a direct and proximate cause of the wrongful acts of Defendant Vassey as described above.
81. The incident described herein was proximately caused by the careless, reckless, negligent,

grossly negligent, wilfull and wanton, and unlawful conduct of Defendant Vassey, whose acts, errors and omissions are imputed to Defendant, City of Southport, pursuant to the doctrine of *respondeat superior* since Defendant Vassey was employed and acting within the course and scope of said employment for Defendant, City of Southport, at all times material hereto, such that said Defendants Vassey and City of Southport are jointly and severally liable.

82. That liability of Defendant Vassey, should be, and is hereby, imputed to Defendant, City of Southport, including, upon information and belief, being imputed under the doctrine of *respondeat superior*.

SEVENTH CLAIM FOR RELIEF

Punitive Damages

83. The preceding paragraphs are incorporated by reference as if fully set forth herein.
84. As a direct and proximate result of the grossly negligent, reckless, careless and wilful and wanton conduct of Defendant Vassey, as well as Defendant Vassey's conscious disregard for the health and safety of others, including Mr. Vidal, Plaintiff, on behalf of the Estate of Keith Vidal, is entitled to recover punitive and exemplary damages as forth in N.C. Gen. Stat. § 28A-18-2(b)(5) to punish Defendant Vassey for his illegal, egregiously wrongful, reckless and wilful misconduct and to deter such conduct by others. Defendants' actions as alleged herein above, constitute willful and wanton conduct, as defined in N.C. Gen. Stat. §1 D.
85. Pursuant to N.C. Gen. Stat. §1D, Plaintiff is entitled to recover punitive damages from Defendants, jointly and severally, in an amount to be determined by a jury, but not less than Twenty-Five Thousand Dollars (\$25,000.00).

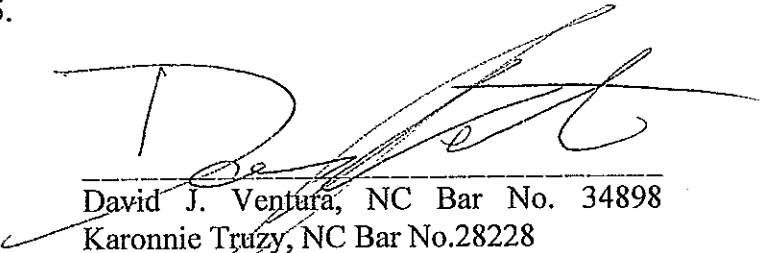
WHEREFORE, the Plaintiff respectfully prays the Court enter an order and judgment:

1. That the Plaintiff have and recover judgment against the Defendants, individually and in the alternative, joint and severally, for an amount in excess of Twenty-Five Thousand Dollars (\$25,000.00) in compensatory damages, together with interest as provided by law;
2. That all costs of this action, including attorneys fees, be taxed against the Defendants;
3. That Plaintiff be awarded punitive damages against the Defendants in their individual capacities;
4. That interest on any compensatory award from the date of the institution of this action as

provided by N.C.G.S. § 24-1, and 24-5;

5. That a jury trial be granted; and
6. For such other and further relief as shall be deemed just and proper.

This the 8th day of December, 2015.



David J. Ventura, NC Bar No. 34898
Karonnie Truzy, NC Bar No. 28228
CRUMLEY ROBERTS, LLP
1051 East Morehead St., Suite 100
Charlotte, NC 20204
Telephone: (704) 567-4529
Facsimile: (704) 334-2269



Bonner L. Stiller, NC Bar No. 20158
Stiller Law Group
801 N. Howe Street, Suite 7
Southport, North Carolina 28461
Telephone: (910) 457-5076
Facsimile: (910) 457-4980