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Alcohol Liability in South Carolina: A Host of Legal Issues

Kevin R. Eberle, *Charleston School of Law*



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Alcohol Liability in South Carolina

A HOST OF LEGAL ISSUES

By Kevin R. Eberle

South Carolina was one of the early states to recognize the liability of one who provides alcohol in violation of state law to those injured by the unlawful conduct. *See Harrison v. Berkley*, 32 S.C.L. (1 Strob.) 525 (1847).

During the last century and a half, the support of the South Carolina courts for such actions has varied. In some cases, the courts have approved liability against those who violated state alcohol laws, while in others the plaintiffs have been denied recovery as a matter of law. In each case, the courts have recognized the viability of a negligence action in theory, but have either permitted or denied relief based on the characterization of the plaintiffs (social or commercial hosts) and defendants (first-party or third-party victims). In a recent pair of cases involving the liability of those who gratuitously provide alcohol to minors, the South Carolina Supreme Court has introduced a new and important distinction into the resulting matrix.

Negligence *per se*

South Carolina has never recognized a general common law duty to avoid the provision of intoxicating drinks to either incompetent adults or children. The justification has been given that it is the drinking of the alcohol and not its supply that is the intoxication. *See Tobias v. Sports Club, Inc.*, 323 S.C. 345, 348, 474 S.E.2d 450, 451 (Ct. App. 1996) (citing 45 Am. Jur. 2d *Intoxicating Liquors* § 553 (1969)) (subsequent history omitted). Nevertheless, there have been several cases imposing liability for just such conduct. The courts in those cases have relied upon the doctrine of negligence *per se*.

In a traditional negligence action, the plaintiff has the burden of proving the following: (1) a duty on the part of the defendant, (2) breach of that duty by an act or omission or commission and (3) that such breach of duty was the proximate cause of the plaintiff's injuries. *Sherrill v. Southern Bell Telephone & Telegraph Co.*, 260 S.C. 494, 197 S.E.2d 283 (1973). A negligence *per se* action is simply a subset of traditional negli-

gence suits. The plaintiff still has the burden of proving the three essential elements, but the existence of a statute establishes a duty apart from any common law support for the duty. *See Freeman v. Colwell Mortgage Corp.*, 297 S.C. 335, 342, 377 S.E.2d 108, 110-11 (Ct. App. 1989).

The statutes that are most likely to be cited govern provision of alcohol either freely or as a sale. First, it is against the law to sell alcoholic beverages to persons "in an intoxicated condition." S.C. Code Ann. § 61-6-2220 (West Supp. 2004) ("No person or establishment licensed to sell alcoholic beverages ... may sell these beverages to persons in an intoxicated condition ..."); *see also* S.C. Code Ann. § 61-4-580(2) (West Supp. 2004). Second, despite the fact that the general age of majority is 18, it is unlawful in South Carolina to provide alcoholic beverages to those persons under the age of 21. S.C. Code Ann. § 61-4-90 (West Supp. 2004) ("It is unlawful for a person to transfer or give to a person under the age of twenty-one years for the purpose of consump-

tion beer or wine at any place in the State."); S.C. Code Ann. § 61-6-4070 (West Supp. 2004) (same prohibition as to "alcoholic liquors"). These related statutes cover slightly different scenarios. The former are generally cited in those cases involving commercial establishments that sell alcohol to minors whether or not the minors are intoxicated at the time of sale, and the latter are generally relied upon in those cases involving social hosts who gratuitously provide alcohol to minors.

Of course, simply identifying a relevant statute does not create liability. There remain other issues including, for example, proving that the individual served alcohol in violation of § 61-6-2220 was truly intoxicated at the time of service. *See Steele v. Rogers*, 306 S.C., 546, 413 S.E.2d 329 (Ct. App. 1992) (explaining that one is under the influence of alcohol when its ingestion results in the impairment of the person's faculties and that proof of intoxication may be by either eyewitness testimony as to a person's appearance or admission of

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the person ingesting the alcohol that he felt its effects).

Similarly, in every negligence case, proximate causation remains a critical element of the case. The violation can result in civil liability only if "the injury is the natural and probable consequence of the unlawful sale." *Christiansen v. Campbell*, 285 S.C. 164, 170, 328 S.E.2d 351, 355 (Ct. App. 1985) (citation omitted), *overruled on other grounds by Tobias v. Sports Club, Inc.*, 332 S.C. 90, 504 S.E.2d 318 (1998). This is a question for the jury unless the evidence shows that reasonable persons could not disagree. *Id.* at 170, 328 S.E.2d at 355 (citation omitted).

The question of duty: commercial providers

Although *Harrison* was brought as a negligence suit for injury to a third-party, in the modern era the notion that third parties can recover for injuries caused by the violation of alcohol laws has been recognized. In *Daley v. Ward*, 303 S.C. 81, 399 S.E.2d 13 (Ct. App. 1990), the S.C. Court of Appeals discussed whether a civil action could be maintained by a third party who was injured by the one served alcohol by a defendant. In that case, an intoxicated patron was served alcohol by the defendants at their bar. After having left the bar, the patron rear-ended the plaintiff.

The plaintiff's ensuing action was based on the defendants' having violated the state statute which prohibited the sale of beer or wine to intoxicated persons. The defendant asserted that there could be no liability to a third person injured by such a patron. The court, however, disagreed and wrote, "[w]e find no reason for which the class of persons protected by the statute should not include third parties injured by the actions of an intoxicated person served in violation of the statutes." *Daley*, 303 S.C. at 84, 399 S.E.2d at 14.

The exposure of commercial suppliers is not without limits, though. For more than 10 years, South Carolina permitted drunk patrons to recover for their own injuries from the taverns that served them. For example, in *Christiansen v. Campbell*, 285 S.C. 164, 328 S.E.2d 351 (Ct.

App. 1985), a patron of a North Charleston bar was served alcohol for approximately two hours, even past the point of visible intoxication. When the patron left the bar, he walked into the road and was hit by a car. His lawsuit against the bar claimed that the bar had violated the state law against selling alcohol to an intoxicated person and that he fell within the class of persons to be protected by the statute. The court agreed that the patron was protected by the statute. The court relied on out-of-state authority for its conclusion that "[S]ection 61-9-410 clearly promotes public safety. One reason the statute exists is to protect intoxicated persons from their own incompetence and helplessness. The statute represents the legislature's judgment that an intoxicated person is a menace to himself. Indeed, a purpose in prohibiting a vendor from selling beer to one who is already intoxicat-

ed is to prevent the person from becoming even more intoxicated so that he is not a greater risk when he leaves the bar." *Id.* at 168, 328 S.E.2d at 354 (citations omitted); *see also Tobias v. Sports Club, Inc.*, 332 S.C. 345, 474 S.E.2d 450 (Ct. App. 1996).

In 1997, however, the S.C. Supreme Court agreed to hear a case involving a first-party suit by one who had been served alcohol past the point of intoxication. The Court of Appeals had, in the view of the S.C. Supreme Court, properly recognized that the statutes against such conduct were meant to protect the public in general. The Court of Appeals, though, had gone further and held that another purpose was to protect the intoxicated person from his own incompetence and helplessness. The Supreme Court disagreed and held "that public policy is not served by allowing the intoxicated adult patron to main-



tain a suit for injuries which result from his own conduct." *Tobias v. Sports Club, Inc.*, 332 S.C. 90, 92, 504 S.E.2d 318, 320 (1998). The Court expressly reversed the decision of the Court of Appeals in that case and in *Christensen* as to first-party suits and limited the exposure of bars for negligence *per se*.

The question of duty: gratuitous providers

Social host liability is a different matter. In social host liability, the supplier of the alcohol is not a bar or other such establishment, but is instead a private person who offers alcohol to his or her guests other than in expectation of payment, often at parties.

The S.C. Court of Appeals has ruled that a social host has no statutory liability to third parties injured as a result of an adult guest's intoxication. *Garren v. Cummings & McCrady, Inc.*, 289 S.C. 348, 345 S.E.2d 508 (Ct. App. 1986). Under South Carolina common law, the driver had no cause of action in

negligence against a social host who served alcohol to an intoxicated adult guest who subsequently caused an automobile collision, injuring the driver, even if host knew or ought to have known the guest intended to drive motor vehicle. In that case, the employer, Cummings & McCrady, had hosted a party where it served alcohol to a guest after he was intoxicated. The guest then collided with

the plaintiff's automobile and injured the plaintiff.

Judge Bell wrote that South Carolina would adhere to the common law view of non-liability of social hosts when third parties are injured when a social host serves alcohol to an adult guest. The proper remedy for the injured third party is to sue the guest who injured

serve the same individual. The judge's analysis presents the perfect distinction between social host liability and commercial provider liability. *But see Cravens v. Inman*, 586 N.E.2d 367 (Ill. App. Ct. 1991) (rejecting the rule of *Garren* and stating "social host is liable in negligence for automobile accident caused by intoxicated minor driver

where social host has knowingly served liquor and permits liquor to be served to youths under 18 at social host's residence, social host permits minor's consumption to continue to point of intoxication, and social host allowed inebriated minors to depart from his residence in a motor vehicle").

There is some superficially inconsistent authority in South Carolina. One South Carolina case held a social host liable for injuries to a first-party adult plaintiff, but the social host was a fraternity and the guest was pledging the fraternity. *Ballou v. Sigma Nu General*

Fraternity, 291 S.C. 140, 352 S.E.2d 488 (Ct. App. 1986). The decedent had been pledging Sigma Nu fraternity, and the pledging had culminated in one night of excessive drinking deemed "Hell Night." During Hell Night, the decedent had been given massive quantities of alcohol and forced to drink it or be ridiculed by members of the fraternity. At several times during the evening, the dece-

Does liability exist for injuries proximately caused by the provision of alcohol in violation of state law?	If the suit is brought by the inebriated guest himself for his own injuries:	If the suit is brought by a third-party who has been injured by the inebriated guest:
"Commercial Host" Defendant	No: <i>Tobias v. Sports Club, Inc.</i>	Yes: <i>Daley v. Ward</i>
"Social Host" Defendant	If the guest was a minor, then Yes: <i>Marcum v. Bowden</i>	If the guest was a minor, then Yes: <i>Barnes v. Cohen Drywall, Inc.</i>
	If the guest was an adult, then No: <i>Garren v. Cummings & McCrady, Inc.</i>	If the guest was an adult, then No: <i>Carson v. Adgar</i>

him. Judge Bell specifically recognized that there was precedent in South Carolina for imposing liability on one who serves liquor to another who is already drunk. However, the state had imposed that liability only when the service of the alcohol was in violation of a state statute. Although it is unlawful to sell alcohol to an intoxicated person, it is not illegal to gratuitously

dent had thrown up because he had consumed so much. Finally, the decedent passed out on a couch in the fraternity lounge. Some brothers checked on him and were concerned about his pale color and lack of responsiveness, but they did nothing to help him. The following morning the decedent was found dead. He had drowned in his own vomit.

Testimony showed that, had the brothers taken him to the infirmary that night when they found him, he would have survived.

Sigma Nu owed its guest a duty but only because the Supreme Court of South Carolina had determined that a fraternal organization owes a common law and not statutory duty of care to its initiates not to cause them injury. See *Easler v. Hejaz Temple of Greenville*, 285 S.C. 348, 329 S.E.2d 753 (1985). The case, technically, was not a case of liquor liability. Rather, the duty involved was the duty not to endanger pledges during an initiation ceremony. In other words, had the pledge injured himself doing stunts not involving alcohol, the case for liability would have been the same. In a later case, discussed below, the S.C. Supreme Court also noted this apparently inconsistent case but distinguished it, not with any reference to the underlying legal theory, but instead on the less satisfying factual basis that the case had involved one who had been "pressured to consume an excessive amount of alcohol" and later abandoned. *Marcum v. Bowden*, Op. No. 26035, n.4 (S.C. S.Ct., filed Aug. 29, 2005) (Shearouse Adv. Sheet No. 34 at 28).

In dicta, the Supreme Court of South Carolina seems to have closed the door on third-party claims brought by adult victims based on the provision of alcohol to other adult consumers in a social setting. In *Carson v. Adgar*, 326 S.C. 212, 214, 486 S.E.2d 3, 6 (1997), the respondent and friend worked together in a landscaping business. The friend was 33 years old, and his father had asked the respondent to serve alcohol to the friend. The co-workers drank many beers while they went fishing and then later in a pool hall. The respondent brought his friend more beers even after he realized his friend was



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"drinking pretty good." The friend grew angry when told him he did not need to drink anymore and demanded to be let out of the respondent's car. The respondent told police he had put the guest out of his vehicle knowing he was "over his limit" in alcohol consumption. The friend was then struck by an oncoming car as he attempted to cross the street.

The respondent could not be held liable for injuries sustained by his friend, even though he kept supplying him with beer after he was intoxicated, because he owed no duty of care to his friend. The respondent had not bought all the beer and had not forced his guest to drink. It was argued that the respondent had assumed the care of his friend at various stages of the evening, but the Court disagreed and ruled that the respondent had not undertaken to care for his friend at any time. In a footnote, the Court added that there could otherwise not be liability since the state does not recognize social host liability. *Carson*, 326 S.C. at 219 n.4, 486 S.E.2d at 10 n.4 ("[A] social host

incurs no common law liability to third parties when he serves alcohol to his adult guests.") (citing *Garren v. Cummings & McCrady, Inc.*, 289 S.C. 384, 345 S.E.2d 508 (Ct. App. 1986)).

Social hosts and minors: a new wrinkle

Until a pair of recent cases were heard by the S.C. Supreme Court, the only reported authority in South Carolina on a social host's liability involved guests over the legal age of 21. In those cases, the rule was that no liability existed against the social host for his or her guest's later conduct. However, on August 29, 2005, the S.C. Supreme Court issued a pair of opinions that have added a new layer to the field of alcohol liability.

In *Marcum, supra.*, Justin Parks was 19 years old when he attended a cookout at the home of Donald and Gloria Bowden. Parks told another guest that he was purposefully "just trying to get a buzz" at the event. Even after leaving the party, he continued to drink alcohol from mini-bottles he had stashed in his pockets. Still later, he drove himself away

and was fatally injured in a one-car accident. His personal representative sued the hosts of the cookout for wrongful death, but the trial court granted summary judgment to the defendants. On appeal to the S.C. Supreme Court, the Court reversed.

The Court surveyed the laws in other jurisdictions on social host liability but was unable to discern a majority rule. Instead, the Court relied on public policy rationales. First, the Court recognized a public interest in deterring the consumption of alcohol by underage persons. The imposition of liability could be expected to prompt social hosts to be "more vigilant about who is consuming alcohol at their social gatherings. A vigilant host would greatly decrease the ability of an underage person to consume alcohol at a social party." *Id.* In addition, because minors are legally incompetent to care for themselves, the imposition of liability would properly shift responsibility for their actions to others. The Court also found support for its ruling in simple negligence *per*

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Alcohol Liability

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se law. The Court noted that the essential purpose of the statute against the sale of alcohol to minors (viz., S.C. Code § 61-4-90 and § 61-6-4070) is "to protect the underage person from harm, including injuries sustained or death, after imbibing alcohol provided by such person." *Id.*

The ruling in *Marcum* left the door open for further disputes in the area. Unanswered, for instance, was the significance of the age of the plaintiff. What would be the outcome if, for instance, an inebriated minor killed an adult pedestrian? In the first party suit involving a minor who injured himself, the Court had justified the imposition of liability based in large part on negligence *per se*, explaining that the state laws against providing alcohol to minors were meant to protect minors from injuries to *themselves*. A savvy lawyer for the plaintiff could have argued that the Court was simply addressing the facts at hand and did not intend to eliminate all other "essential purposes" of the law, while the defense might have equally argued that there can only be one "essential purpose" and it is not to prevent injury to unknown third parties.

In a companion opinion to *Marcum*, the S.C. Supreme Court resolved that issue. In *Barnes v. Cohen Dry Wall Inc.*, Op. No. 26036 (S.C. S.Ct., filed Aug. 29, 2005) (Shearouse Adv. Sheet No. 34 at 42), Orin Feagin was 19 years old when he attended his employer's Christmas party where he became drunk. Later that night he was driving away from his girlfriend's place of employment when he was involved in a two-car accident that killed him and the passenger in the other car. The estate of the minor sued the employer, and the third party's estate sued both the employer and the minor. The jury returned a verdict in favor of the company on the claims brought by the minor and in favor of the third-party victim against both the company and the minor.

On appeal, the question was raised about the scope of possible plaintiffs in a suit involving the ille-

gal provision of alcohol to minors. The S.C. Supreme Court recognized its ruling in *Marcum* as authority for social host liability to minor guests who suffer alcohol-related injuries after consuming alcohol knowingly and intentionally provided by the host based on public policy as well as negligence *per se*. In *Marcum*, the Court had specifically held that the statutes prohibiting the transfer or giving of alcoholic beverages to minors were enacted for the benefit of *those minors*, but the Court has also ruled in *Whitlaw v. Kroger Co.*, 306 S.C. 51, 410 S.E.2d 251 (1991), that the purpose of laws prohibiting the sale of alcohol to minors (i.e., the laws relied upon in commercial provider litigation) was to protect the minors themselves *and* the public at large. The Court squared the two purposes of the different alcohol-related laws by announcing an even broader purpose of laws against providing alcohol to minors. The Court wrote that the purpose of such laws was also "the protection of members of the public from harm done by persons under twenty-one who have consumed alcohol in violation of the statutes." *Barnes, supra*. Given that broader purpose, the Court then easily ruled that a third-party adult could sue the social host of an underaged drinker.

Conclusion

Until the release of two opinions involving negligence *per se*, social hosts in South Carolina were able to serve alcohol with little reason to be concerned about the possibility of even very serious injuries caused by their underage guests. The S.C. Supreme Court, though, recently recognized "a natural progression of our case law" despite the conflicting outcomes in other situations based on specific facts. Whether the track record for such suits constitutes a "natural progression" or a "slippery slope," the law is now settled that social hosts face new liability for permitting underage drinking.

Kevin Eberle is an attorney with Rosen, Rosen & Hagood, LLC in Charleston and teaches Legal Writing at the Charleston School of Law.

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