

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH
CAROLINA, BEAUFORT DIVISION

**Cheryl A. Munday and Margaret Devine, on behalf of themselves and
others similarly situated v. Beaufort County**

Munday v. Beaufort County, No. 9:20-cv-02144-DCN (D.S.C. Mar. 31, 2026) · No. No. 9:20-cv-02144-DCN ·
Decided March 31, 2026

SUMMARY

This document contains findings of fact and conclusions of law from a bench trial in a putative class action involving Beaufort County’s practice of strip-searching female pre-classification detainees at the Beaufort County Detention Center while not subjecting similarly situated male detainees to the same practice. The court addresses whether Beaufort County may be held municipally liable under 42 U.S.C. § 1983 pursuant to Monell. The court concludes that the detention center’s director possessed final policymaking authority and that the county may therefore be subject to municipal liability.

CASE DETAILS

COURT	United States District Court for the District of South Carolina, Beaufort Division
WRITING FOR THE COURT	David C. Norton
JURISDICTION	United States District Court for the District of South Carolina, Beaufort Division
DECIDED	March 31, 2026
DOCKET	No. 9:20-cv-02144-DCN
DISPOSITION	other
PROCEDURAL POSTURE	Following a two-day bench trial on the threshold issue of municipal liability, the district court issued findings of fact and conclusions of law under Federal Rule of Civil Procedure 52(a) concerning plaintiffs' remaining 42 U.S.C. § 1983 equal-protection claim against Beaufort County.
STANDARD OF REVIEW	The court applied a preponderance-of-the-evidence standard to its findings of fact and determined municipal liability under the legal standards governing 42 U.S.C. § 1983 and Monell.

PRECEDENTIAL VALUE

Unknown; federal district court findings of fact and conclusions of law with no reporter citation.

TOPICS

section 1983 municipal liability equal protection civil rights civil procedure

PRACTICE AREAS

civil rights constitutional law municipal liability prisoners rights civil procedure

QUESTIONS PRESENTED

1. Whether Director Grant possessed final policymaking authority for Beaufort County concerning the policies and procedures of the Beaufort County Detention Center.
2. Whether Beaufort County may be subject to municipal liability under 42 U.S.C. § 1983 for the strip-search policy that allegedly violated the Equal Protection Clause by subjecting female pre-classification detainees to strip searches while not subjecting male pre-classification detainees to the same practice.

HOLDINGS

1. Director Grant was the final policymaker for Beaufort County concerning the policies and procedures of BCDC because she exercised authority-in-fact to create and implement final policy, and her decisions were not subject to meaningful review by the County Council or County Administrator.
2. Beaufort County may be subject to municipal liability under 42 U.S.C. § 1983 because the challenged strip-search policy was adopted by Director Grant, who possessed final policymaking authority for Beaufort County concerning BCDC.

KEY QUOTATIONS

“municipal liability under § 1983 attaches where—and only where—a deliberate choice to follow a course of action is made from among various alternatives by the official or officials responsible for establishing final policy with respect to the subject matter in question.” (Conclusions of Law)

“the court rules for plaintiffs, finding that Beaufort County may be subject to municipal liability under § 1983 because the strip-search policy giving rise to the alleged constitutional violations was the decision of Director Grant who possessed final policymaking authority for Beaufort County concerning BCDC.” (Conclusion)

FACTUAL BACKGROUND

Beaufort County operated the Beaufort County Detention Center under a structure in which Director Quandara Grant exercised authority to establish, approve, and implement the facility's policies and procedures, without meaningful review by the County Council or County Administrator. From February 27, 2015, through May 5, 2020, a written strip-search policy resulted in female pre-classification detainees being strip-searched at booking, while male pre-classification detainees were not subjected to the same practice. The County had longstanding notice that female pre-classification detainees were not being separately housed and that the facility

failed to comply with applicable minimum standards, yet did not restructure the facility or alter the relevant policies.

PROCEDURAL HISTORY

Plaintiffs filed the action in South Carolina state court on March 6, 2020, and Beaufort County removed it to federal court on June 5, 2020. The district court certified a class of female pre-classification detainees and later granted summary judgment to the individual defendants and on many claims against the County, but allowed the equal-protection claim against Beaufort County and the attorney-fee request to proceed. After a two-day bench trial beginning August 14, 2025, the court found for plaintiffs on the threshold Monell-liability issue.

DISPOSITION

other

CASES CITED

- Monell v. Department of Social Services of the City of New York, 436 U.S. 658 (1978)
- Connick v. Thompson, 563 U.S. 51 (2011)
- Board of County Commissioners v. Brown, 520 U.S. 397 (1997)
- City of Canton v. Harris, 489 U.S. 378 (1989)
- Lytle v. Doyle, 326 F.3d 463 (4th Cir. 2003)
- Carter v. Morris, 164 F.3d 215 (4th Cir. 1999)
- Walker v. Prince George's County, 575 F.3d 426 (4th Cir. 2009)
- Semple v. City of Moundsville, 195 F.3d 708 (4th Cir. 1999)
- Spell v. McDaniel, 824 F.2d 1380 (4th Cir. 1987)
- Riddick v. School Board of Portsmouth, 238 F.3d 518 (4th Cir. 2001)
- Pembaur v. City of Cincinnati, 475 U.S. 469 (1986)
- City of St. Louis v. Praprotnik, 485 U.S. 112 (1988)
- Polk County v. Dodson, 454 U.S. 312 (1981)
- McMillian v. Monroe County, 520 U.S. 781 (1997)
- Hunter v. Town of Mocksville, 897 F.3d 538 (4th Cir. 2018)
- Valentino v. Village of South Chicago Heights, 575 F.3d 664 (7th Cir. 2009)
- Greensboro Professional Fire Fighters Association, Local 3157 v. City of Greensboro, 64 F.3d 962 (4th Cir. 1995)
- Dotson v. Chester, 937 F.2d 920 (4th Cir. 1991)
- Payne v. CCOH, 2012 WL 6801387 (D.S.C. Nov. 28, 2012)
- Grayson v. Peed, 195 F.3d 692 (4th Cir. 1999)
- Florence v. Board of Chosen Freeholders of the County of Burlington, 566 U.S. 318 (2012)

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