

IN THE CIRCUIT COURT OF HUMPHREYS COUNTY, TENNESSEE

P. M., a minor, by her mother and
next friend, Cheyanne Towry

Plaintiff,

v.

AAC Investments, LLC

Defendant.

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JURY DEMAND

Case No. 10600

FILED

OCT 16 2025

Eddie Stainforth
Circuit Court Clerk

COMPLAINT

Comes now the Plaintiff by counsel, and bring this action against the Defendant and for their cause of action respectfully show unto this Honorable Court as follows:

PARTIES

1. Plaintiff P.M. is a minor child nine (9) years of age. This wrongful death action is brought on her behalf by her Mother and Next Friend, Cheyanne Towry, as a result of the tragic death of P.M.'s father, Jeremy Moore, who was killed in an explosion on October 10, 2025, pursuant to T.C.A. 20-5-107(a). Plaintiff resides in Dickson County, Tennessee with her mother.

2. Defendant AAC Investments, LLC ("AAC") is a Tennessee limited liability company with its principal office address located in McEwen, Humphreys County, Tennessee. Defendant may be served through its registered agent, John J. Sunday, 5891 Highway 230 West, McEwen, Tennessee, 37101.

JURISDICTION AND VENUE

3. Plaintiff's causes of action arise in tort under and by virtue of the laws of the State of Tennessee for the damages sustained as a result of the wrongful death of Jeremy Moore which occurred on October 10, 2025 at the Accurate Energetic Systems facility located in Humphreys, County, TN.

4. Subject matter jurisdiction over this action is proper pursuant to T.C.A. § 16-10-101.

5. Venue for a trial on the merits of this matter is proper in Humphreys County, Tennessee, pursuant to T.C.A. § 20-4-101 et seq.

FACTUAL ALLEGATIONS

6. On October 10, 2025, Jeremy Moore (“Decedent”) was working at Defendant’s factory which is located at 5891 Highway 230 West, McEwen, Tennessee, 37101, when Defendant’s factory exploded, killing Decedent. The explosion was so powerful that at least fifteen (15) other people in Defendant’s factory died and the shock from the explosion was felt miles away. There are no known survivors of the explosion.

7. The explosion occurred because Defendant AAC failed to maintain a reasonably safe factory for the fabrication, storage and handling of explosives and explosive materials.

8. At all relevant times, Defendant AAC was in control of, and was the owner, operator, and manager of the subject factory.

9. No facts suggest that anything Decedent did or failed to do in any way caused or contributed to the explosion.

10. Plaintiff, as a minor, is pursuing this action through her parent and next friend, Cheyanne Towry.

DEFENDANT’S ACTIONS OF NEGLIGENCE

11. Defendant was negligent generally and committed acts of omission and commission which collectively and severally constitute negligence. Defendant had a duty to exercise ordinary care, meaning that degree of care that would be used by a company of ordinary

prudence under the same or similar circumstances and Defendant breached that duty. Specifically, Defendant breached its duty in one or more of the following ways:

- a. Failing to create and/or enforce safety rules and guidelines;
- b. Failing to provide a safe premises;
- c. Failing to recognize and remediate hazards;
- d. Failing to provide timely assistance or ensure other protections were in place;
- e. Failing to warn of a known hazard;
- f. Failing to provide adequate equipment and competent personnel;
- g. Failing to institute precautionary measures to protect individuals present on the premises; and
- h. Other acts deemed negligent.

12. These breaches, among others, constitute negligence. Such negligence was a proximate cause of the occurrence in question, the death of the Decedent, and the damages sustained by the Plaintiff herein.

GROSS NEGLIGENCE

13. Plaintiff alleges that all acts, conduct, and omissions on the part of the Defendant, taken singularly or in combination, constitute gross negligence and were the proximate cause of the Decedent's death and the Plaintiff's damages. Defendant's acts and/or omissions, when viewed objectively from the Defendant's standpoint at the time such acts and/or omissions occurred, involved an extreme degree of risk, considering the probability and magnitude of potential harm to others. Defendant had actual, subjective awareness of the risk, but proceeded with conscious indifference to the rights, safety and welfare of the Decedent.

14. Plaintiff further states that the Defendant's negligence in violating the following statutes of the State of Tennessee, which were in full force and effect at the time and place of the explosion, constitute negligence per se.

CAUSATION, INJURIES AND DAMAGES

15. The negligence of the Defendant as set forth above, directly and proximately caused the explosion which resulted in the death of Plaintiff's father, Jeremy Moore, and at least fifteen (15) other people.

16. As a direct and proximate result and the negligence of the Defendant herein, the Plaintiff, by and through her Mother and Next Friend Cheyanne Towry, seeks compensatory damages, economic and noneconomic damages, based upon the wrongful death of her father Jeremy Moore, and in addition thereto seeks punitive damages and would state that the negligence/gross negligence of the Defendant in this case was willful, wanton, and would justify an award of punitive damages in that it knew or should have known of the substantial risk of harm to Jeremy Moore and others and failed to prevent or correct the dangerous situation referenced herein. Those damages include, but are not limited to:

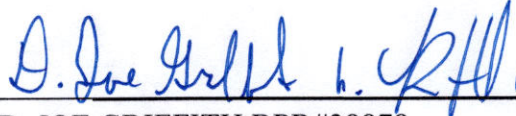
- a. physical pain and suffering;
- b. emotional suffering;
- c. loss of consortium;
- d. loss of enjoyment of life;
- e. lost earnings and earning capacity;
- f. costs of this cause; and
- h. all other general and special damages and other relief allowed under the laws of the State of Tennessee to which Plaintiff may be entitled.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for the following relief:

- a. For process to issue and be served upon Defendant requiring Defendant to answer the allegations herein;
- b. For a jury to be impaneled to try this cause;
- c. For a judgment in favor of Plaintiff against Defendant for compensatory damages in an amount to be determined by the jury, but not to exceed \$3,000,000;
- d. For a judgment in favor of Plaintiff against Defendant for punitive damages in an amount to be determined by the jury, but not to exceed \$9,000,000;
- e. For costs of this action, to be taxed to the Defendants; and
- f. For any such other relief as the Court deems just and proper.

Respectfully submitted this 16th day of October, 2025.


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***Pro hac vice pending**