

COURT OF COMMON PLEAS
ADAMS COUNTY, OHIO

2023 SEP 22 AM 9:44

SHAWN D. COOLEY, et al.
Plaintiffs,

v.

JOSEPH EDGAR FOREMAN, et al.
Defendants.

CASE NO.: CVH-20230069

Assigned Judge: Jerry McBride

PLAINTIFFS' SUPPLEMENTAL
MEMORANDUM IN OPPOSITION
TO DEFENDANTS' AMENDED
JOINT MOTION TO DISMISS AND
MOTION TO STRIKE PLAINTIFFS'
AMENDED AND SUPPLEMENTAL
COMPLAINT

I. INTRODUCTION AND RECENT BACKGROUND

Plaintiffs filed their Memorandum in Opposition to Defendants' Amended Joint Motion to Dismiss and Motion to Strike Plaintiffs' Amended and Supplemental Complaint on June 7, 2023. Since then, Defendants have doubled-down on their unlawful and defamatory publications, continuing to post ever-more and scurrilous and offensive lies about the plaintiffs. Defendants' recent and continuing actions are a clear effort to punish plaintiffs for filing this action, and, it appears, to dare this Court to do something about it. Plaintiffs file this Supplemental Memorandum to bring to the Court's attention the full range of Defendants' past and continuing conduct.

II. RECENT DEFAMATORY AND SCURRILOUS PUBLICATIONS

The following links to various social media posts are further examples of the illegal and defamatory publications included in the Amended and Supplemental Complaint. The following links include untrue and defamatory allegations of pedophilia and other criminal activity being continuously spewed by the defendants. The text below the links is the printed caption on some posts and photos, but the links must be opened to observe the accompanying videos and additional defamatory language.

<https://www.instagram.com/p/Cwio5XQMei4/?hl=en>

"This is an Adams County Deputy. Her name is

LT. LICC'EM LOW LISA FULL OF SHIT FEEL LIPS (Philips) 🤔🤔🤔 Most police officers, serve and protect, but her job is to not serve but disconnect. This is the camouflaged criminal operating inside of law-enforcement that illegally tampered with evidence disconnected my video cameras, so there would be no evidence of her and the other criminals disguised as law-enforcement stealing, money, CDs, clothes, and other memorabilia they could sell on eBay. After she was an accomplice to the fictitious warrant fake raid/burglary. She had the audacity to file a lawsuit against me. This is another single from the upcoming album. THE LAW SUIT. The name of this song is called.

"LICC'EM LOW LISA" I hope this song does not bring any ridicule, humiliation, mental stress and loss of whatever reputation she has like the day, her and the other criminals camouflage, as law-enforcement humiliated me, gave me mental stress. accuse me of a lie from thieving unconfidential informant and falsely labeled me a kidnapper in front of the music industry, and the world from a fake fictitious warrant, signed by judge Roy droopy Gabbert, a practice that happens quite frequently in Adams County. I found a look alike for the Randy Walters is a son of a bitch video. Now I need to look alike for the licc'em lol Lisa video please DM me a picture or let me know if you know someone who could play this role really good thank you. Enjoy."

<https://www.facebook.com/afromanmusic/posts/pfbid02MAkh6yqEyvR79fr4SMzv8CraJSNxyE v6KkhDGUS2PiTbQb8z92Ry6msyummgGvtUl>

"Good Morning Baby Making Brian Child Molesting New Baby 🤔👶 Moma New Born Newland ! (Brian Newland) . If you pay me bacc the money you stole from me I won't tell the world about your pedophile, pilgrim family. You knowlike your brotherthat's named "Will You Stop 🤔 Sending Dicc Picc Williams" aka (William Newland) if you get arrested in Adams county all you got to do is lie on me and Brian will let you go. just like they let the unconfidential informant Tasty Tasha Chamblin go after she attempted murder by lying to the police and sending them to my house. Looking for a fake dungeon and fake kidnap victims. Tell these uneducated, no counting douche bags anything and they will grab their guns kicc down your doors and try to kill you in front of your kids. Oh yeah, no charges against her / or you by the way for giving false information to the police and attempting to have me murdered. Brian wants me in jail so I don't expose his stealing pedophilia family. Bring me my money, Brian and this can all go away. You wanna be Eminem whacc ass rapper !"

<https://www.facebook.com/afromanmusic/posts/pfbid02CwPzJMXSvG8eVJifDojomVCCLLeUp PK2tpiL4gjaUPsyFKWdMDVoK8zKYXDUVBpC1l>

"This is the uneducated, can't count, pedophile police officer that stole my money his name is Baby Making Brian Child Molesting New Baby Moma Newborn Newland (Dicc-ective Brian Newland)

I have a song coming out about him the chorus goes like this. I pledge allegiance to the flag. Brian Newland is a flag he used to play with little toys now he plays with little boys. Watch your little boys around Brian Newland he's very bold he will fondle little boys testicles and butt cheeks right in front of you in broad daylight. This is a public service announcement. Stay safe."

<https://www.instagram.com/reel/Ctm8KK3xmfR/?igshid=NzgyYTk0Y2YyNg%3D%3D>

New album coming about the Adams County Sheriff Department call the lawsuit writing by being in Canada playing the single called Brian Newland www.ogafroman.com is bacc up and going order your lemon pound cake LICC'EM Low Lisa merchandise now !!!! Rochester New York Syracuse New York Ithaca New York New York get ready I haven't been to New York in almost 20 years everybody Tag anybody you know from New York State or any of those three cities

<https://www.facebook.com/afromanmusic/posts/pfbid0y5Pg5XYRW6LEESMxKg3aLqWRUBWxSAHUo49MXrmeCqrvGN1VXX4wZApCc2ZPm1SI>

“New album coming soon called THE LAWSUIT”

<https://www.facebook.com/afromanmusic/posts/pfbid02RV4fvjKneM5eNtYHyKnppmMwRY4fiD9QGxeiNWLTTvp5njek2RiNCjSBCqAM7KB7l>

“This is the Adams County Sheriff that laughed at me, and sarcastically told me with a smirk he was not putting my door bacc up on the hinges . His name is Ranger, Randy Beetle, Bailey, Private Pyle Walters

I just wrote a song about this sarcastic evidence, tampering, Vandalizer

The name of this song is called ...

RANDY WALTERS IS A SON OF A BITCH

The new single from my upcoming album called the lawsuit. I am looking for a. Ranger, Randy Beetle, Bailey, Private Pyle Walters Look alike for the video DM pictures.

@alwaysfilmthepolice”

<https://www.facebook.com/afromanmusic/posts/pfbid0335F6t7vuvRYwAKuwoxC9jgtmsT32EnAHGRKo5YgneG8P7hyfyWorWgmU9L6SnrZhl>

“1. A sheriff department excuse me , the Adams county, sheriff department, taking false information from a unconfidential informant (LYING snitch rat). Judge Roy droopy Gabbert signing. Fictitious fake bogus warrants on me today tomorrow it will be anybody he doesn't like and he has access to. Especially in Adams County. 3. Adams county prosecutor, David Kelley issuing the fictitious, fake bogus warrant that judge Roy droopy Gabbard signed. After video surveillance of the criminals camouflaged as law-enforcement officers of the Adams county sheriffs department was exposed the Adams county prosecutor, David Kelley resigned as Adams county prosecutor, and has now fled to Arizona. He did this to keep from turning over the communications of the case to a superior court. 4.Dicc-tective Baby Making Brian Newborn Newland stealing money. Not only did he steal money from my house. He stole money out of the evidence room at the Adams county, sheriff department away from my house, making the Adams County Sheriff Department, the new crime scene. 5. Ranger Randy Beetle Bailey, Private Pyle Walters vandalizing property, stealing CDs and DVDs before and after Lt Licc'em Low Lisa committed the crime of tampering with evidence (a felony I believe idk) and disconnected my

security cameras. all of these criminals and more camouflaged as law-enforcement have the audacity to sue me ...the victorious victim everybody get ready for my new album. THE LAW SUIT coming soon !”

III. ARGUMENT

Plaintiffs have set forth their arguments against defendants’ Motion to Dismiss in their previous memorandum in opposition, and will not repeat those arguments here, but incorporate them by reference as if fully rewritten herein. The publications set forth above are further and, in some instances, even more egregious examples of the illegal and defamatory statements that defendants continue to publish about plaintiffs. It would be appropriate for the Court to issue a restraining order against defendants prohibiting them from further defamation and violation of plaintiffs’ rights, and the plaintiffs are preparing to file such a motion.

III. CONCLUSION

For the foregoing reasons, plaintiffs ask the Court to deny Defendants’ Amended Joint Motion To Dismiss And Motion To Strike Plaintiffs’ Amended And Supplemental Complaint.

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Supplemental Memoranda In Opposition To Defendants’ Amended Joint Motion To Dismiss And Motion To Strike Plaintiffs’ Amended And

Supplemental Complaint was served on September 21, 2023 by ordinary mail or electronic mail upon the following:

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