

IN THE COURT OF COMMON PLEAS
JEFFERSON COUNTY, OHIO

FILED
COMMON PLEAS COURT

2012 NOV 19 P 3:03

CORRIGAN
COURTS
JEFFERSON COUNTY OH

CODY SALTSMAN, a minor child, by)
his natural parents and legal guardians)
JAMES AND JOHNA SALTSMAN)
P.O. Box 216)
Steubenville, Ohio 43952)

FIRST AMENDED COMPLAINT
IN DEFAMATION AND FOR
INJUNCTIVE RELIEF AND FOR
MONETARY JUDGMENT

And)

2012-CV-00544

JAMES SALTSMAN)
P.O. Box 216)
Steubenville, Ohio 43952)

JUDGE DAVID E. HENDERSON

And)

JOHNA SALTSMAN)
P.O. Box 216)
Steubenville, Ohio 43952)

PLAINTIFFS)

-vs-)

ALEXANDRIA GODDARD aka "prinnie")
68210 Blaine-Chermont Rd.)
Bridgeport, Ohio 43912)

And)

JOHN DOE #1, aka "mammabear," an)
individual whose name is presently unknown)
Address Unknown)

And)

JOHN DOE #2, aka "3AngelsMommy," an)
individual whose name is presently unknown)
Address Unknown)

And)

JOHN DOE #3, aka "concernedmom123," an)
individual whose name is presently unknown)
Address Unknown)

And)

)
JOHN DOE #4, aka)
"completelyunbelievable," an individual)
whose name is presently unknown)
Address Unknown)

And)

)
JOHN DOE #5, aka *"AbbyLane," an*)
individual whose name is presently unknown)
Address Unknown)

And)

)
JOHN DOE #6, aka *"DM," an individual*)
whose name is presently unknown)
Address Unknown)

And)

)
JOHN DOE #7, aka *"Elliot N," an*)
individual whose name is presently unknown)
Address Unknown)

And)

)
JOHN DOE #8, aka *"lakindo," an*)
individual whose name is presently unknown)
Address Unknown)

And)

)
JOHN DOE #9, aka *"disheartening," an*)
individual whose name is presently unknown)
Address Unknown)

And)

)
JOHN DOE #10, aka *"truth be told," an*)
individual whose name is presently unknown)
Address Unknown)

And)

JOHN DOE #11, aka "*Pete Basil*," an)
individual whose name is presently unknown)
Address Unknown)
))
And)
))
JOHN DOE #12, aka "*madgrandma*," an)
individual whose name is presently unknown)
Address Unknown)
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And)
))
JOHN DOE #13, aka "*Needanswers*," an)
individual whose name is presently unknown)
Address Unknown)
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And)
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JOHN DOE #14, aka "*HEARTSICK*," an)
individual whose name is presently unknown)
Address Unknown)
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And)
))
JOHN DOE #15, aka "*Scott*," an)
individual whose name is presently unknown)
Address Unknown)
))
And)
))
JOHN DOES #16-25, individuals,)
corporations, organizations, or other legal)
entities whose names are presently unknown)
Addresses Unknown)
))
DEFENDANTS)

Now comes PLAINTIFFS, CODY SALTSMAN, a minor child, by his natural parents and legal guardians, JAMES and JOHNA SALTSMAN; JAMES SALTSMAN; and, JOHNA SALTSMAN, by and through their attorneys, Shawn M. Blake and Whitney C. Gibson, and as for their Complaint against DEFENDANTS, herewith avers and states as follows:

THE PARTIES

1. PLAINTIFF, CODY SALTSMAN, is a minor child, who resides in Jefferson County, Ohio.

2. PLAINTIFF, JAMES SALTSMAN, resides in Jefferson County, Ohio, and is the biological father of PLAINTIFF, CODY SALTSMAN.

3. PLAINTIFF, JOHNA SALTSMAN, resides in Jefferson County, Ohio, and is the biological mother of PLAINTIFF, CODY SALTSMAN.

4. DEFENDANT, ALEXANDRIA GODDARD *aka "prinnie"*, resides in Belmont County, Ohio, and maintains and controls a website known as "prinniefied.com," wherein she utilizes the username "prinnie" on said website.

5. The true names of the following DEFENDANTS are unknown to PLAINTIFFS, who therefore sue these DEFENDANTS under such fictitious names:

- JOHN DOE #1, *aka "mammabear"*
- JOHN DOE #2, *aka "3AngelsMommy"*
- JOHN DOE #3, *aka "concernedmom123"*
- JOHN DOE #4, *aka "completelyunbelievable"*
- JOHN DOE #5, *aka "AbbyLane"*
- JOHN DOE #6, *aka "DM"*
- JOHN DOE #7, *aka "Elliot N"*
- JOHN DOE #8, *aka "lakindo"*
- JOHN DOE #9, *aka "disheartening"*
- JOHN DOE #10, *aka "truth be told"*
- JOHN DOE #11, *aka "Pete Basil"*
- JOHN DOE #12, *aka "madgrandma"*
- JOHN DOE #13, *aka "Needanswers"*
- JOHN DOE #14, *aka "HEARTSICK"*
- JOHN DOE #15, *aka "Scott"*
- JOHN DOES #16-25

PLAINTIFFS believe, and on such information and belief allege, that each of the aforementioned DEFENDANTS published false and defamatory statements concerning PLAINTIFFS on the website known as "prinniefied.com." PLAINTIFFS will seek leave of court to amend this Complaint and insert their true names in place of their fictitious names when the same have become known to PLAINTIFFS.

JURISDICTION AND VENUE

6. This Court has original jurisdiction over this civil case pursuant to Ohio Revised Code § 2305.01.

7. Venue in this action is proper according to Ohio Rule of Civil Procedure 3(B)(3) and 3(B)(6).

8. DEFENDANTS are subject to the personal jurisdiction in the State of Ohio, Jefferson County, as the offending statements were specifically aimed at the State of Ohio, Jefferson County, in particular, the PLAINTIFFS and citizens of the State of Ohio, Jefferson County.

DEFENDANT ALEXANDRIA GODDARD'S WEBSITE FALSELY ACCUSES INDIVIDUALS OF CRIMES

9. DEFENDANT, ALEXANDRIA GODDARD *aka* "prinnie", operates a website known as "prinniefied.com" on which she, among other things, accuses individuals of committing crimes.

10. On her website, DEFENDANT, ALEXANDRIA GODDARD *aka* "prinnie" creates web pages where she writes posts regarding alleged crimes that she states occurred, and then encourages others to comment on her statements.

11. DEFENDANT, ALEXANDRIA GODDARD's *aka* "prinnie's" website contains offensive, and defamatory content. In particular, she accuses innocent people of heinous crimes, such as rape, without any basis or evidence. She has even admitted that she makes such accusations without an understanding of all the facts. Nonetheless, DEFENDANT, ALEXANDRIA GODDARD *aka* "prinnie" falsely accuses individuals of crimes they never committed, and then encourages others to make similar comments based on her published (false) accusations.

12. DEFENDANT, ALEXANDRIA GODDARD *aka* "prinnie" is responsible for the false and defamatory statements on her website made by herself, as well as other posters. Indeed, by publishing false accusations that individuals committed crimes without any supporting evidence, and then asking others for comments, she specifically encourages others to make defamatory comments concerning the individuals that DEFENDANT, ALEXANDRIA GODDARD *aka* "prinnie" attacks.

13. DEFENDANT, ALEXANDRIA GODDARD *aka* "prinnie" is also responsible for the offensive and defamatory content on her website because she selects which comments to publish on her website. As she expressly states on her website "**it is I who get to decide who I want to read in my comment section.**" Accordingly, DEFENDANT, ALEXANDRIA GODDARD *aka* "prinnie" moderates the comments that individuals submit for the website and decides which ones to post on the Internet. She publishes certain comments she deems appropriate, while refusing to post other comments that she does not prefer. She also bans

certain individuals from commenting on her website that question or challenge statements on the website in a way that she does not deem appropriate.

DEFENDANTS FALSELY ACCUSE PLAINTIFF ON THE INTERNET OF RAPE

14. Starting in August 2012, DEFENDANT, ALEXANDRIA GODDARD *aka* “*prinnie*” created multiple web pages concerning an alleged rape of a minor child that occurred in Steubenville, Ohio, to wit:

- “Big Red Players Accused of Rape & Kidnapping”
- “Dear Mrs. Richmond”
- “It’s time to be a true parent”
- “Message Board”
- “Some people deserve to be peed on #whoareyou”
- “Steubenville Big Red Rape Accusations: The Other Perpetrators”
- “Steubenville High Case”
- “We didn’t know or think that what we were doing was wrong.”
- “What Happened in April?”

15. On these web pages, DEFENDANT GODDARD *aka* “*prinnie*” did not limit her comments or accusations to the two juveniles who have been criminally charged (who are not parties to this instant action). Instead, she falsely accused a host of other individuals of participating in the rape, including PLAINTIFF, CODY SALTSMAN.

16. DEFENDANT, ALEXANDRIA GODDARD *aka* “*prinnie*” did not present her statements as speculation, or opinion. Rather, she represented as if she had conducted an on-line investigation, and found, among other things, that PLAINTIFF, CODY SALTSMAN had committed rape. Below is one example of a statement that DEFENDANT, ALEXANDRIA GODDARD *aka* “*prinnie*” made on her website accusing PLAINTIFF, CODY SALTSMAN of participating in the rape:

- **CODY SALTSMAN**, Mark Cole and Evan Westlake are playing tonight. Reno, **SHAME ON YOU!**”, which was in response to “Students by day . . . **gang rape participants by night . . .**

17. DEFENDANT, ALEXANDRIA GODDARD *aka* “*prinnie*” repeatedly made comments that PLAINTIFF, CODY SALTSMAN should be charged for the rape:

- “Then these three need to roll on their pal Cody Manson.”
- “They are not going to sit by and watch their bud walk out of a shitstorm with none on him. Give it a few days. Their parents will be gunning for Cody Manson’s head.”
- “Perhaps when scumbag is finally arrested I will post a picture of him for his mother that says ‘How do you like your scumbag son now?’ . . . Tell Cody not to feel too bad. He is not the lone asshole in all this.”
- “The father should go file a charge against Cody Manson for telephone harassment – maybe that would force their hand.”

18. DEFENDANT, ALEXANDRIA GODDARD *aka* “*prinnie*” even went so far as to repeatedly describe PLAINTIFF, CODY SALTSMAN on her website as Cody “Manson,” – referring to the serial killer Charles Manson.

19. Furthermore, ostensibly referencing the individuals that she identified on her website, including PLAINTIFF, CODY SALTSMAN, DEFENDANT, ALEXANDRIA GODDARD *aka* “*prinnie*” stated “these boys KNEW KNEW KNEW rape was committed,” “THEY RAPED A GIRL!!,” “why aren’t more kids in jail. They all knew.”

20. DEFENDANT, ALEXANDRIA GODDARD *aka* “*prinnie*” had actual knowledge she did not have any evidence to support the above statements regarding PLAINTIFF, CODY SALTSMAN. She has even admitted that “I do not have all the facts.”

21. DEFENDANT, ALEXANDRIA GODDARD’s *aka* “*prinnie’s*” website and false statements regarding PLAINTIFF, CODY SALTSMAN specifically encouraged others to make similar defamatory statements regarding PLAINTIFF, CODY SALTSMAN.

22. For instance, after DEFENDANT, ALEXANDRIA GODDARD *aka* “*prinnie*” starting using the serial criminal Charles Manson’s last name when referring to PLAINTIFF, CODY SALTSMAN several other posters started using the criminal’s name to describe the PLAINTIFF CODY SALTSMAN: mammabear, Oct. 15 (“Anyway lets talk about CODY **Manson**.”), AbbyLane October 15, 2012 (“But not **CODY Manson**.”), and disheartening, October 15, 2012 (the “photo **CODY Manson** sent to the father.”).

23. Additionally, following DEFENDANT, ALEXANDRIA GODDARD’s *aka* “*prinnie’s*” statement that the PLAINTIFF, CODY SALTSMAN is a “Student[] by day . . . gang rape participant by night . . .” other individuals submitted similarly false posts regarding the PLAINTIFF, CODY SALTSMAN (which DEFENDANT, ALEXANDRIA GODDARD *aka* “*prinnie*” then published on the Internet):

	<u>False & Defamatory Statement</u>	<u>Username</u>	<u>Internet Blog</u>
A	"...Cody's dad said they were offering him immunity..."	mammabear (9/18/2012)	Big Red Players Accused of Rape and Kidnapping
B	"...my mind went nuts to the thought of Cody possibly walking after everything he has done."	mammabear (9/18/2012)	Big Red Players Accused of Rape and Kidnapping
C	"CS is in my opinion the worst one of the whole bunch. He needs mental help. ... His parents have got to know their son was involved in some way and their lack of action shows exactly why they did this to begin with."	3AngelsMommy (9/19/2012)	Big Red Players Accused of Rape and Kidnapping
D	"Get CS and his possy off the field and problem solved."	concernedmom123 (9/22/2012)	Big Red Players Accused of Rape and Kidnapping
E	"Cody Saltsman her exboyfirend who played a major role in this on top of sending the victims father a picture of her being carried unconscious by her wrists and ankles that said 'look at your whore daughter now.'"	mammabear (9/12/2012)	Steubenville Big Red Rape Accusations: The Other Perpetrators
F	"She WAS dating Cody Saltsman and dumped his ass because he was a pig, very verbally and physically abusive, when she broke up with him he said 'Nobody breaks up with Cody Saltsman, I will ruin that bitch'. YES that is a QUOTE."	completelyunbelievable (9/5/2012)	Steubenville Big Red Rape Accusations: The Other Perpetrators
G	"BECAUSE THEY WERE THERE!!!" – <i>responding to why Cody Saltsman's name is being mentioned on the Internet blog</i>	mammabear (9/12/2012)	Steubenville Big Red Rape Accusations: The Other Perpetrators
H	"...two despicable psychopaths on the loose...Saltsman and Nodianos. Do you know where your daughters are tonight?"	AbbyLane (9/6/2012)	Steubenville Big Red Rape Accusations: The Other Perpetrators

I	"...but this year CS saw a way to turn it into personal revenge and in the process turned it into a violent crime?"	DM (9/13/2012)	Some people deserve to be peed on #whoareyou
J	"...the only crime photo I have ever seen is the original that was sent to her father by Cody..."	mammabear (9/13/2012)	Some people deserve to be peed on #whoareyou
K	"Yet amazingly STILL Cody S has NOT been charged even with the very very obvious charge of 'Telephone Harrassment.'"	Elliot N (9/13/2012)	Some people deserve to be peed on #whoareyou
L	"The rumor I heard regarding CS, and I stress rumor is that his local business owner dad brought in a lawyer from New York that cost somewhere in the vicinity of \$10,000."	lakindo (9/13/2012)	Some people deserve to be peed on #whoareyou
M	"CS father owns Fort Steuben Plumbing/Maintenance" – <i>responding to:</i> "What is this business because I never want to spend my money there"	disheartening (9/14/2012) truth be told (9/13/2012)	Some people deserve to be peed on #whoareyou
N	"What would you think if Charles Manson was allowed to walk free, while his followers who did the dirty work were the only ones rotting in prison?.....I feel the same way about CS walking free today."	concernedmom123 (10/11/2012)	What Happened in April?
O	"The kid who masterminded (CS) this crime is not only running free but has 'lost' his cell phone."	concernedmom123 (10/10/2012)	What Happened in April?
P	"...CS the mastermind, orchestrator of the entire incident still walks free amongst his peers as if he is invincible!!"	Pete Basil (10/15/2012)	We didn't know or think that what we were doing was wrong.
Q	"...Cody Saltsman needs to be benched too!!! How convenient that he was the MASTERMIND and wasn't there when this girl was RAPED! He needs in Jail with his 2 Monster Buddies!!!"	madgrandma (10/15/2012)	We didn't know or think that what we were doing was wrong.

R	<p>“Anyway lets talk about Cody Manson for a second. First, planned revenge and got his friends involved. When said plan was being carried out he sent a picture to victims father that said friends sent him so he knew his plan was being carried out.....When word starts to get out mom tries to clear all phones of data, even considers getting him a new phone, Then police get involved, AND (what I am about to write I heard on here I do not know if its true) phone mysteriously disappears????? Aside from the picture he sent her dad....the picture is GROSS and horrible when you know the context of it (made me hurle when I first saw it) BUT she is clothed.....nothing sexual is happening in it. THEY HAVE NOTHING ON HIM! Then there is word of a lunch between parents...hmmmm The only way they would get this SON OF A BITCH is by one of the others rolling on him...and I would bet my ASS that meeting was all about making sure that didn't happen!!!!!!!!!!!! I KNEW THAT PIECE OF SHIT WAS GOING TO FIND A WAY OUT OF THIS WITH HIS HANDS CLEAN. I FREAKIN KNEW IT!!!!!!!!!!!!!!!!!!!!!!!!!!!! I am so mad right now I could spit fire. If they are not going to prosecute based on Twitter and You Tube THEY HAVE NOTHING ON HIM. I hate him...then end”</p>	mammabear (10/15/2012)	We didn't know or think that what we were doing was wrong.
S	<p>“They have no choice but to suspend them now. But not Cody Manson.... such the little master mind of this entire drama. I hope his mother reads this blog or that someone has the guts to let his family know what a pig he really is... at least the rest of the town knows now. You can run Cody, but you can never hide. This will haunt you forever.”</p>	AbbyLane (10/15/2012)	We didn't know or think that what we were doing was wrong.

T	<p>“a few things i would like to ask of everyone on here, first can we please quit calling him Cody Manson (although this name suits him to a tee) However, I would like everyone to speak this sick monsters real name....Cody Saltsman.....over and over and over. His name and his parents names and all the others names should spoken and written very clearly for the entire world to know. The family deserves justice. This ass put her through hell for the entire relationship not just after they broke up. He has a black heart/soul. As far as how Cody Saltsman’s parents feel about their sons acts...well, they decided that the best form of punishment for their son was to go out and get his pretty little car a new tint job.....That’s their “that a boy” pat on the back for not getting busted mantallity. On to the next request, Please please please tweete, facebook, email, whatever it takes to get as many people to boycott all businesses that are owned, operated, or even employees the parents of these sicko’s. The family shouldnt have to look at these faces for the rest of their lives. The parents of the vic shouldnt have to work with the mother of Cody Saltsman. I wouldn’t let that dumb woman touch one of my loved ones. They need to be run out of town. Let them know they have no place here anymore. That we don’t want a bunch of rapist running our streets because mommy and daddy’s pocket book was deep enough to cover the bill to keep them out of prisson.”</p>	<p>completelyunbelievable (10/18/12)</p>	<p>We didn’t know or think that what we were doing was wrong.</p>
U	<p>“CS does need to pay for what he has done, no doubt about that.”</p>	<p>Needanswers (10/16/2012)</p>	<p>We didn’t know or think that what we were doing was wrong</p>
V	<p>“Cody needs to suffr some consequences too!”</p>	<p>madgrandma (10/16/2012)</p>	<p>We didn’t know or think that what we were doing was wrong</p>

AA	"The only justice that young lady and her family will ever get is when a pissed off law-abiding citizen hands down some street justice on these rapists, also to include Saltsman..."	Scott (10/12/2012)	Message Board
BB	"...they need to bench THE MASTERMIND CODY SALTSMAN!"	madgrandma (10/15/2012)	Message Board

24. Each of the above statements is false, and defamatory per se.

25. DEFENDANT, ALEXANDRIA GODDARD *aka* "prinnie" encouraged and positively commented on the above false statements regarding PLAINTIFF, CODY SALTSMAN. For instance, when one poster stated that "CS was the Charles Manson of this crime If CS ends up being charged with anything, that a psychological is in order," DEFENDANT, ALEXANDRIA GODDARD *aka* "prinnie" responded "Couldn't agree more with the psych eval." Prinnie, 10/9/2012, Message Board.

26. DEFENDANT, ALEXANDRIA GODDARD moderated the posts submitted regarding PLAINTIFF, CODY SALTSMAN. She refused to post certain comments challenging her statements, and even banned certain individuals from posting who attempted to submit statements disputing the defamatory statements regarding PLAINTIFF, CODY SALTSMAN.

27. DEFENDANT, ALEXANDRIA GODDARD's *aka* "prinnie's" statements, as well as those made by the other DEFENDANTS above, are unequivocally false and constitute defamatory per se.

COUNT ONE
DEFAMATION

28. PLAINTIFFS restate and reaver each and every allegation contained in the preceding paragraphs of this Complaint as if fully set forth herein.

29. DEFENDANTS' statements posted on the aforementioned blogs contained on "prinniefied.com" are defamatory per se.

30. DEFENDANTS published or caused these defamatory statements to be published by posting said statements on the aforementioned blogs contained on "prinniefied.com."

31. DEFENDANTS' false and defamatory statements were of and concerning PLAINTIFFS, and contained the false statements that PLAINTIFF, CODY SALTSMAN, orchestrated and was the mastermind of the crime of rape and/or participated in said rape.

32. DEFENDANTS' false and defamatory statements were published with the intent to harm PLAINTIFFS' good names and reputations by falsely accusing PLAINTIFFS of criminal acts.

33. DEFENDANTS published these false and defamatory statements with actual malice and knowledge that the statements were false, or with reckless disregard of whether they were false or not.

34. DEFENDANTS continue to engage in the publication of further defamatory statements of PLAINTIFFS.

35. Since their posting, the false and defamatory statements published by DEFENDANTS regarding PLAINTIFFS have remained available to millions of Internet users, many of whom may have made copies of the false and defamatory statements and/or distributed them by electronic mail or other means and/or re-posted them to other blogs, Internet forums, and message boards, and PLAINTIFFS have no means of removing these false and defamatory statements from the Internet.

36. In carrying out the aforementioned conduct, DEFENDANTS acted negligently, willfully, maliciously, and/or with reckless indifference to the consequences of their actions against PLAINTIFFS.

37. As a direct and proximate result of DEFENDANTS' intentional and malicious publication of false and defamatory statements, PLAINTIFFS have been and will continue to be damaged and injured in their respective character and reputation.

COUNT TWO
FALSE LIGHT

38. PLAINTIFFS restate and reaver each and every allegation contained in the preceding paragraphs of this Complaint as if fully set forth herein.

39. DEFENDANTS' statements posted on the aforementioned blogs placed the PLAINTIFFS before the public in a false light.

40. DEFENDANTS' statements posted on the aforementioned blogs are "highly offensive to a reasonable person."

41. DEFENDANTS are at fault and knew or were in reckless as to the falsehood of their statements above.

42. As a direct and proximate result of DEFENDANTS' statements above, PLAINTIFFS have been and will continue to be damaged and injured in their respective characters and reputations.

COUNT THREE
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

43. PLAINTIFFS restate and reaver each and every allegation contained in the preceding paragraphs of this Complaint as if fully set forth herein.

44. DEFENDANTS, by and through the making of such false, defamatory, and libelous statements, behaved intentional and/or recklessly.

45. DEFENDANTS, by and through the making of such false, defamatory, and libelous statements, intended to cause emotional distress upon PLAINTIFFS.

46. The making of such false, defamatory, and libelous statements, by DEFENDANTS, was so outrageous in character, and so extreme in degree, as to go beyond all possible bounds of decency, and to be regarded as atrocious, and utterly intolerable in a civilized community.

47. PLAINTIFFS have suffered and continue to suffer severe emotional distress and emotional injury.

48. DEFENDANTS' aforementioned actions were the direct and proximate cause of such severe emotional distress and emotional injury to PLAINTIFFS.

49. PLAINTIFFS suffered and continue to suffer mental anguish as a result of being defamed and libeled by DEFENDANTS, and said mental anguish is of a nature that no reasonable person could be expected to endure.

COUNT FOUR
SPOILIATION OF EVIDENCE

50. PLAINTIFFS restate and reaver each and every allegation contained in the preceding paragraphs of this Complaint as if fully set forth herein.

51. Following the filing of the original Complaint in the instant matter, the local media, *to wit*: WTOV-9 and The Herald-Star, began to broadcast and publish stories on the filing of said original Complaint.

52. Following the filing of the original Complaint in the instant matter, DEFENDANT, ALEXANDRIA GODDARD *aka* "prinnie", began to discuss the original Complaint on her website, prinniefied.com.

53. On or about October 30, 2012, DEFENDANT, ALEXANDRIA GODDARD *aka* "prinnie", issued a written statement to WTOV-9 as a response to the news broadcast related to the filing of the original Complaint.

54. DEFENDANT, ALEXANDRIA GODDARD *aka "prinnie"*, knowing that the original Complaint was filed and pending against her, began to evade service of the Summons of the original Complaint, as well as, other legal pleadings.

55. At the commencement of the lawsuit, DEFENDANT, ALEXANDRIA GODDARD *aka "prinnie"*, had her website, prinniefied.com, hosted at a hosting server known as Hostgator.com, LLC, which is located in Houston, Texas.

56. On or about November 1, 2012 and following the filing of the original Complaint and the media broadcasts and publishing of the filing of the original Complaint, DEFENDANT, ALEXANDRIA GODDARD *aka "prinnie"*, deleted the blogs contained on her website, prinniefied.com, and hosted at "Hostgator.com, LLC" in Houston, Texas.

57. On or about November 1, 2012 and following the filing of the original Complaint and the media broadcasts and publishing of the filing of the original Complaint, DEFENDANT, ALEXANDRIA GODDARD *aka "prinnie"*, relocated the blogs contained on her website, prinniefied.com, to "Koddos.com," an offshore hosting server, located in Hong Kong, China.

58. DEFENDANT, ALEXANDRIA GODDARD *aka "prinnie"*, willfully, wrongfully, and intentionally, with conscious disregard of the probable serious harm to PLAINTIFFS, and with malice and reckless indifference for the injurious consequences of her acts, concealed, lost, destroyed, or otherwise disposed of the data by removing the data to an offshore hosting server in order to disrupt PLAINTIFFS' ability to prove its claims against DEFENDANTS.

59. DEFENDANT, ALEXANDRIA GODDARD *aka "prinnie"*, acted with conscious disregard and with reckless indifference of the probable injurious consequences of her acts by moving the data to an offshore hosting server, that caused DEFENDANT, ALEXANDRIA GODDARD *aka "prinnie"*, to know, or in the exercise of reasonable care should have caused DEFENDANT, ALEXANDRIA GODDARD *aka "prinnie"*, to know, that the data was critical, material, and highly relevant in PLAINTIFFS' original Complaint. The failure to heed this information proximately caused the destruction, concealment, loss, or other disposition of the data.

60. The removal of the data to an offshore hosting server by DEFENDANT, ALEXANDRIA GODDARD *aka "prinnie"*, has eliminated the best evidence of DEFENDANTS' identities and their defamatory statements, thereby damaging PLAINTIFFS' ability to prove its claims.

61. PLAINTIFFS are therefore entitled to a presumption that the removal of the data to an offshore hosting server would have revealed evidence harmful to DEFENDANTS regarding the claims in the instant lawsuit.

62. By reason of the above-described willful, wrongful, intentional, conscious, and reckless acts of DEFENDANT, ALEXANDRIA GODDARD *aka "prinnie"*, PLAINTIFFS have

been injured, in that PLAINTIFFS' opportunity to obtain compensation for their grievous injuries from the responsible persons has been significantly prejudiced.

63. As a direct and proximate result of the willful and wrongful acts of DEFENDANT, ALEXANDRIA GODDARD *aka "prinnie"*, PLAINTIFFS have suffered damages in excess of the minimum jurisdictional limits of the court. By reason of the above-described willful, wrongful, intentional, conscious, and reckless acts of DEFENDANT, ALEXANDRIA GODDARD *aka "prinnie"*, PLAINTIFFS are also entitled to punitive damages.

COUNT FIVE **PRELIMINARY AND PERMANENT INJUNCTION**

64. PLAINTIFFS restate and reaver each and every allegation contained in the preceding paragraphs of this Complaint as if fully set forth herein.

65. Upon information and belief, some or all of the improper and unlawful conduct of DEFENDANTS alleged above is continuing and will continue in the future absent injunctive relief from the Court, and PLAINTIFFS will continue to be damaged by the same.

66. In the absence of the entry of a preliminary and permanent injunction by the court, PLAINTIFFS will suffer serious and irreparable harm and injury, including but not limited to damage of their respective reputations.

67. The entry of a preliminary and permanent injunction will not unduly harm or burden DEFENDANTS because they are required as a matter of law to refrain from disseminating defamatory statements regarding PLAINTIFFS.

68. Public policy favors the entry of a preliminary and permanent injunction because, *inter alia*, such relief will prevent unlawful conduct and will preserve and protect PLAINTIFFS' respective reputations.

COUNT SIX **PUNITIVE DAMAGES**

69. PLAINTIFFS restate and reaver each and every allegation contained in the preceding paragraphs of this Complaint as if fully set forth herein.

70. DEFENDANTS' aforementioned conduct was conscious, deliberate, intentional, and/or reckless in nature.

71. DEFENDANTS' aforementioned conduct was undertaken in a state of mind, which evidences hatred, ill will, or a spirit of revenge.

72. DEFENDANTS' aforementioned conduct evidences a conscious disregard for the rights of other persons and has a great probability of causing substantial harm.

73. As a result, PLAINTIFFS are entitled to punitive damages and attorneys' fees.

WHEREFORE, PLAINTIFFS demand judgment from DEFENDANT, ALEXANDRIA GODDARD *aka "prinnie"*, and the other, as yet, unknown DEFENDANTS as follows:


- A. For entry of a Preliminary and Permanent Injunction preventing DEFENDANT, ALEXANDRIA GODDARD *aka "prinnie"*, and the other, as yet, unknown DEFENDANTS from disseminating any false and defamatory statements regarding PLAINTIFFS;
- B. For an entry requiring DEFENDANT, ALEXANDRIA GODDARD *aka "prinnie"*, and the other, as yet, unknown DEFENDANTS to remove the false and defamatory statements regarding PLAINTIFFS published by DEFENDANT, ALEXANDRIA GODDARD *aka "prinnie"*, and the other, as yet, unknown DEFENDANTS from the Internet;
- C. For an entry requiring DEFENDANT, ALEXANDRIA GODDARD *aka "prinnie"*, and the other, as yet, unknown DEFENDANTS to post a retraction of all of the false and defamatory statements published by DEFENDANT, ALEXANDRIA GODDARD *aka "prinnie"*, and the other, as yet, unknown DEFENDANTS, as well as, a written apology to be published in the Herald Star Newspaper and to be televised on WTOV-9;
- D. For compensatory damages in excess of \$25,000.00;

E. For punitive damages;

F. For costs, interest and attorney's fees; and,

G. For any other relief that this court deems just and appropriate.

Respectfully Submitted,



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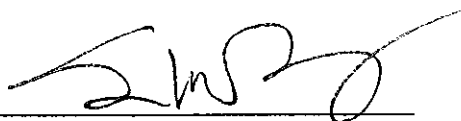
Attorneys for PLAINTIFFS

CERTIFICATE OF SERVICE

I hereby certify that I served a copy of the foregoing First Amended Complaint by regular U.S. mail, postage prepaid, as well as, electronic mail, this 19th day of November, 2012 on the following named persons:

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