

COMPLAINT

Date: 18 July 2013

Name: DONNELLY vs. "DELISH" 07172013-2

Complainant: George Donnelly george.donnelly@shieldmutual.com (215) 360-3513. Advocate: Brad Spangler bradspangler@gmail.com

Respondant: Liz "Delish" liz@adamvstheman.com

Complaint For: Defamation of Character (Slander)

On Wednesday, 17 July 2013, Respondant appeared in a video on Adam Kokesh's YouTube channel at <http://www.youtube.com/watch?v=J8Yga-2Sk0Q> which includes at 02:40 the claim that Complainant "never released to Adam [Kokesh]" legal defense funds that Complainant raised for the Adam Kokesh Legal Defense Fund on 21 May 2013, and that the funds "are still missing." Complainant contends that this is a reference to the combined USD, bitcoin and litecoin proceeds of Adam Kokesh's Legal Defense Fund fundraiser that Complainant conducted on 21 May 2013. This video was published to Kokesh's more than 77,000 subscribers and has been viewed more than 2,400 times.

Complainant contends that this is a provably false accusation and has issued a documented statement at <http://shieldmutual.com/2013/07/adam-kokesh-legal-defense-fund-update/> that shows that the bitcoin and litecoin proceeds were transferred to Adam Kokesh on 21 June 2013 and that a check for the USD proceeds was issued that same day to an address of Kokesh's choosing. Complainant contends that the USD proceeds check was returned by the US Postal Service as undeliverable at the address provided by Kokesh business manager Jewell on 12 July 2013 and was reissued by Complainant on 15 July 2013 under the strict direction of new Kokesh business manager Phillips.

Complainant is suffering tangible negative publicity as a direct result of Respondant's statements. Complainant contends that Respondant's false spoken statements adversely impact his personal reputation and that of his business, Shield Mutual, resulting in immediate financial harm. Complainant contends that Respondant's statements constitute defamation of his character.

Complainant seeks the following remedy:

(a) a public retraction of Respondant's statements against Complainant in every location where they were published, including <http://youtube.com/adamkokesh>, <http://adamvstheman.com> and anywhere else that Respondant published the aforementioned statements or where a third party re-published the aforementioned statements.

(b) a public apology for issuing the statements in the first place. The public apology to be published in all the same locations referenced in (a) as well as specifically in a video that clearly shows Respondant's face to be published at <http://youtube.com/adamkokesh> .

(c) a photo of the Respondant with the USD check in question, when it arrives, in which the text of the check and Respondant's face are both clearly visible and identifiable to also be published in all the same locations referenced in (b).

(d) (a), (b) and (c) to be accompanied by a prominent link to <http://shieldmutual.com/2013/07/adam-kokesh-legal-defense-fund-update/> .

(e) (a), (b), (c) and (d) to be published on a day of the week and not a weekend.

Complainant seeks to reach mutual agreement regarding this matter in an amicable fashion as soon as possible.

Complainant requests that Respondant confirm her acceptance of the suggested remedies via email to Complainant's Advocate, Brad Spangler bradspangler@gmail.com no later than 8AM Eastern, Monday 22 July 2013.

Complainant offers to keep this complaint private until 8AM Eastern, Monday 22 July 2013 in order to give Respondant time to remedy the complaint.

If these remedies are unacceptable to Respondant, Complainant invites Respondant to submit a counter-proposal.

If Complainant and Respondant are unable to agree on a remedy, Complainant offers cooperative mediation with a mediator that is mutually acceptable to both parties, the cost of said mediator to be borne equally by both parties.

If mediation fails, Complainant will seek adversarial arbitration of this dispute.

Signed,

George Donnelly