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8 **MONTANA ELEVENTH JUDICIAL DISTRICT COURT**  
**FLATHEAD COUNTY**

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9 **GEOFF REYNOLDS,** ) Cause No. DV-10- **316 B**  
10 )  
Plaintiff, )  
11 )  
vs. ) **COMPLAINT AND DEMAND**  
12 ) **FOR TRIAL BY JURY**  
**JOHN WATSON,** )  
13 )  
Defendant. )  
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15 Plaintiff alleges:

16 **Allegation Common to All Counts**

17 1. Beginning in the summer of 2002 and continuing to this  
18 date, Defendant has stated, published, communicated, and  
19 transmitted through word of mouth, via internet sites, electronic  
20 data disks, and e-mails, as well as by letters and pamphlets,  
21 numerous incidents of ridicule, and of false, disparaging,  
22 defamatory, and derogatory words or posts charging Plaintiff with  
23 criminal and other unlawful conduct, association with cults, and  
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1 professional improprieties. The wrongful conduct is likely to  
2 continue until Defendant is enjoined by this Court.

3 **Count One**

4 2. Defendant has wrongfully interfered with Plaintiff's daily  
5 life and professional life. Defendant's actions, statements and  
6 communications have placed Plaintiff in a false light before the  
7 public and before colleagues and clients, and such statements and  
8 communications have been highly offensive and embarrassing to  
9 Plaintiff.

10 3. As a proximate result of Defendant's actions, statements  
11 and communications placing Plaintiff in a false light in the public  
12 view, Plaintiff has suffered lost income, humiliation, embarrassment,  
13 severe mental and emotional distress and discomfort, as well as  
14 forcing Plaintiff to incur attorney's fees and costs and certain other  
15 incidental damages, all in an amount to be proven at trial and to be  
16 set forth in a separate pleading as directed by law.

17 4. The actions, statements and communications made by  
18 Defendant were published and transmitted because of Defendant's  
19 feelings of hatred and ill-will toward Plaintiff and with willful and  
20 conscious disregard for the rights of Plaintiff and his privacy,  
21 thereby justifying an award of punitive damages against Defendant in  
22 an appropriate amount to punish Defendant for his wrongful conduct  
23 and to deter further engagement in such conduct, all as further  
24 alleged in Paragraph 10, which is incorporated hereat.

1 **Count Two**

2 5. Plaintiff adopts and incorporates by reference, not only  
3 Paragraph 1, but Paragraphs 2 through 4, inclusive, of the Complaint  
4 and makes them a part of this second cause of action as though fully  
5 set forth here.

6 6. As stated above, Defendant's actions, statements and  
7 communications and portrayals were false and were published to the  
8 general public by Defendant in order to defame by way of libel and  
9 slander, by use of the libelous and slanderous e-mails, false internet  
10 website posts, and defamatory transmittals, for the purpose of  
11 damaging Plaintiff's reputation in his professional field and in his  
12 relationships among colleagues and people in his community.

13 7. The offending actions, statements and communications  
14 and portrayals are reasonably acceptable of a defamatory meaning.

15 8. The offending actions, statements and communications  
16 and portrayals were published with knowledge that they were false  
17 or with a reckless disregard for the truth or falsity of what was  
18 stated, including, but not limited to, the following ways: (a)  
19 Defendant was aware the offending actions, statements and  
20 communications and portrayals were false, misleading, and reckless;  
21 and Defendant had no reason to believe the offending actions,  
22 statements and communications and portrayals were true; (b)  
23 Defendant deliberately intended to convey the impression that  
24 Plaintiff was mentally unstable, was involved in criminal and unlawful

1 conduct, was acting unreasonably and wrongfully in his relationships  
2 with other people, was under investigation for or charged with  
3 unlawful or criminal acts, and that people should not be associated  
4 with and should shun Plaintiff, and (c) Defendant has not corrected  
5 or retracted the offending actions, statements or communications or  
6 portrayals from the internet sites or otherwise.

7 9. As a proximate result of the wrongful conduct, in  
8 addition to the matters set forth in Paragraph 3, Plaintiff suffered a  
9 loss of reputation and other harm, including, but not limited to,  
10 emotional distress, humiliation, powerlessness, frustration and  
11 anger. Plaintiff has suffered discredit in his chosen profession  
12 impacting his employment and future advancement.

13 10. In addition to the matters set forth in Paragraph 4,  
14 Defendant's conduct was done with a conscious disregard of the  
15 rights of Plaintiff, and was done with the intent to injure Plaintiff's  
16 reputation. Defendant's acts constitute oppression, fraud, and/or  
17 malice, entitling Plaintiff to an award of punitive damages in an  
18 amount appropriate to punish or set an example of Defendant, for an  
19 amount to be determined at trial and to be pled by separate  
20 document as required by law.

21 **Count Three**

22 11. Plaintiff adopts and incorporates by reference, not only  
23 Paragraph 1, but Paragraphs 2 through 10, inclusive, of the  
24 Complaint and makes them a part of this third cause of action as

1 though fully set forth here.

2 12. The Defendant's conduct was intentional and malicious  
3 and was done for the purpose of causing Plaintiff to suffer emotional  
4 distress.

5 13. As a proximate result of Defendant's acts and conduct,  
6 Plaintiff suffered severe emotional distress and mental suffering, and  
7 has been injured in an amount to be proven at trial and to be alleged  
8 by separate pleading as required by law.

9 **Count Four**

10 14. Plaintiff adopts and incorporates by reference, not only  
11 Paragraph 1, but Paragraphs 2 through 13, inclusive, of the  
12 Complaint and makes them a part of this fourth cause of action as  
13 though fully set forth here.

14 15. When Defendant acted as described above, it was  
15 foreseeable that his actions would cause serious emotional distress  
16 to Plaintiff. Notwithstanding his knowledge that his actions would  
17 cause serious emotional distress to Plaintiff, or the fact that he  
18 should have known that such a result would probably occur,  
19 Defendant continued in his course of wrongful conduct.

20 16. The Defendant's actions constituted a negligent  
21 infliction of emotional distress on Plaintiff. Plaintiff suffered and  
22 continues to suffer severe mental and emotional distress and upset.  
23 As a result of such severe mental and emotional distress and upset,  
24 Plaintiff has been injured, as stated above, in an amount to be proven

1 at trial, and as to be set forth in a separate pleading as required by  
2 law.

3 **Count Five**

4 17. Plaintiff adopts and incorporates by reference, not only  
5 Paragraph 1, but Paragraphs 2 through 16, inclusive, of the  
6 Complaint and makes them a part of this fifth cause of action as  
7 though fully set forth here.

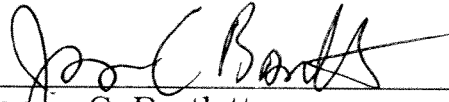
8 18. Plaintiff has no adequate remedy at law to prevent future  
9 acts of tort directed against him by Defendant; and therefore, equity  
10 must intervene to afford preventive relief by prohibiting Defendant  
11 by injunction, provisional and final, from actions, statements,  
12 communication and portrayals directed against Plaintiff as presently  
13 appears on Defendant's blogs or websites or internet sites or  
14 otherwise. Pecuniary compensation for future torts would not afford  
15 adequate relief to Plaintiff.

16 Wherefore, Plaintiff requests judgment against Defendant for  
17 general damages, for special damages, for emotional suffering  
18 damages, for punitive damages, for attorney's fees, for costs of suit  
19 incurred, and for such other relief as the Court may deem just and  
20 proper, as will be shown by proof at trial or as is stated in separate  
21 pleadings as directed by law. Further, Plaintiff seeks a provisional  
22 injunction to shut down Defendant's blogs, websites, and internet  
23 sites and to prevent any action, statement, communication or  
24 portrayal by Defendant against Plaintiff in any way whatsoever, and to

1 then have such injunction made final.

2 DATED this 4<sup>th</sup> day of March, 2010.

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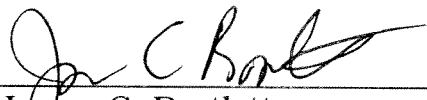
  
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James C. Bartlett  
Attorney for the Plaintiff

7 **DEMAND FOR TRIAL BY JURY**

8 Comes now the Plaintiff and demands trial by jury.

9 DATED this 4<sup>th</sup> day of March, 2010.

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James C. Bartlett  
Attorney for the Plaintiff