

**UNITED STATES DISTRICT COURT OF TEXAS
SOUTHERN DISTRICT HOUSTON**

JAN 21 2009

Michael N. Milby, Clerk

DEBORAH R. DOLEN, AKA Author

"MABEL WHITE"

Plaintiff

Court File No. **H – 08-3708**

COMPLAINT

vs

JURY TRIAL DEMANDED

JULIE RYALS, AKA The Design Shoppe,
Also known as "Sweet Chef, Curious & Sweet Lady"

Jane Doe Libel Cyberstalker, **know known as**

MARY JOANNE KIDD, also known as alias(s)

JOANNE BALCH, JOANNE MARY HARVEY, MARY JOANNE KIDD,
MARY JOANNE GODWIN, MARY GODWIN,

JEFFERY A. KIDD, and MARY HARVEY who all live at

1849 Cornell Road Jacksonville, FL 32207-[with the exception
of Julie Ryals who lives at 10601 Brian Lane, New Port Richey,
FL, 34654,] and Cornell Rd residents named here are also known as
"Sage" and 'Arden_1 and Jane Doe User Name"

Defendant(s.)

INJUNCTION REQUESTED

**1st AMENDED FEDERAL COMPLAINT FOR CYBERSTALKING,
STALKING, LIBEL, DEFAMATION, VIOLATIONS OF THE
LANDHAM ACT, 15 USC §1125, F.S. 784.048 & 836 and 42 USC 1983**

COMES NOW the Plaintiffs, **Plaintiff, Proper Personom,** Deborah R. Dolen for her complaint against the above-named Defendants, and moves this Honorable court to order judgments separately and jointly against all defendants, jointly and severally, for these reasons as set forth below:

JURISDICTION

1. This court has **Jurisdiction** by and through **15 USC §1125, Federal Communications Law** which provides, in a defamation action, a plaintiff may bring suit in any state in which the plaintiff can prove that someone received the defamatory message, as well as other Federal provisions actionable in the Federal 2nd Restatement of Torts, Constitutional of the United States. This court also has jurisdiction under **Anti-Phishing Act, 18 U.S.C. 875, Cyberstalking and TX Business * & Commerce Code § 48.101-2.**
2. Damages well exceed the amount of \$75,000.00 and diversity of citizenship exists pursuant to **28 U.S.C. Â§ 1332.**

3. Plaintiff demands this Court issue judgments and order criminal prosecutions against each defendant for their purposefully malicious, planned schemes to threaten, coerce, intimidate and retaliate against all Plaintiffs, but specifically against Plaintiffs as well as cybertstalk and use her right to publicity, copyright, and acts of libel against Plaintiff.
4. Plaintiff further seek all other equitable relief, punitive damages in the amount of treble damages, and all other civil relief against defendants as the law provides and/or allows under these criminal and civil laws, jointly and severally.

PARTIES

5. Deborah Dolen is a resident of the State of Texas, county of Brazoria. Dolen is also highly regarded and well known publicly as an author of 25 "Do It Yourself" Craft Books under the trade name "**Mabel White**," which sells film footage, books, supplies, web site design, and other sole web "Do It Yourself" related services and products. At all times the allegations herein have taken place in Brazoria County, TX. Julie Ryals Does business in the State of Texas. Both names **Deborah** and **Mabel** will be hereinafter known as "**Plaintiff**." <http://www.mabelwhite.com>

6. Julie Ryals is a resident of the State of Florida, New Port Richey, County of Pasco whose sole occupation is conducting business over the internet via DBA **The Design Shoppe.com** as well as OWNER of a series of web sites, one being a new "Do It Yourself" venture that directly competes on the internet with the good name of Mabel White, where Ryals course of conduct presents legally actionable information as discussed herein- in every state as well as every country, to include the State of Texas. <http://www.diyshoppes.com/> and Ryals is the owner the libelous site www.BustedScammers.com which is the focal issue in this action in collusion with all other named Defendants.

7. As will be shown, **Ryals** went beyond the veil of immunity that 2006 CDA normally affords her as a web host, by **creating, entering, linking, and or copy/pasting offensive, hateful, irrelevant and libelous content against Plaintiff** causing the worst harm imaginable on the internet at www.BustedScammers.com and Ryals is directly responsible for all actionable entries onto the internet as well as graphic design creator and owner of the offending web site(s) described herein and any and all damages suffered by Plaintiff in direct consequence. Plaintiff has multiple proof Ryals is direct content creator of actionable material-and has contacted legitimate agencies to play "victim" of Plaintiff-who have ascertained Ryals is not a victim and is site owner and Plaintiff is the victim. Post First complaint Plaintiff has proof that Ryals does own the site although she disputes the other Defendants really own it. Not to mention all Defendants put the site at issue in a fake name-that Plaintiff can prove was fake and is a crime in and of itself.

8. Jane Doe Libel Cyberstalker Since Ryals claims she is not the site owner, per Plaintiffs "Cease and Desist" letters, Ryals answers at the offending site-a hypothetical "Jane Doe" has been added to this document. Discovery will reveal the status although Ryals has still lost the cloak of a 2006 Communications Decency Act as content entry and creation person as well as having sole control over actionable content. Ryals will be hereafter known as "**Defendant Ryals**." [EXHIBIT "C" & "D"] are Plaintiffs Cease and Desist attempts-upon seeing

“EXHIBIT B”-a hateful e-mail sent to the plaintiff in the County of Brazoria, state of Texas on November 4th, 2008.

9. **NEW DEFENDANTS:** Known as **“CORNELL ROAD”** Since the filing of this **the actionable causes have escalated** and the identity of the initial Jane Doe Cyber Stalker became more than obvious to a reasonable man. Therefore the parties **Mary Joanne Kidd**, a web designer and site owner, **Mary Harvey**, and **Jeffery A. Kidd** who all live and web at the same address of **Cornell Road** in Jacksonville, FL were amended, included, added to this complaint and are being served. All are residents of Duval County, State of Florida and all do business on the internet and in the State of Texas. Additionally it appears Jeffery A Kidd, former real estate agent is now a detective for Law Enforcement and has been using Duval counties, Florida NCIC to which only he could have access-to harm Plaintiff and pull up data only privy to Law Enforcement only-pervert, pull like names of Plaintiff who have criminal records and hand to all Defendants to make public on the internet and associate with Plaintiff. Mary Jo Kidd is the **co-owner** of **BustedScammers.com** the site at issue here, although not on paper, and **Ryals** and **“Cornell Road”** are partners, although owner on internet record is a fake name and a person who never existed. Mary Jo Kidd has been the **“silent”** partner ins this case, and husband Jeff and Mother of Joanne all further the libel on the net via chat room activity and conspire and agree with Julie Ryals as to what to post on www.bustedscammers.com. These Defendants will be known as **“Defendants Cornell Road”** because any one of them could have and did and did exchange user id’s to conceal their illegal work in an conspiracy to harm Plaintiff with malice and to cause Plaintiff great harm.

SUMMARY OF COUNTS

- I Internet Fraud
- II Cyber-Stalking and Lanham Violations
- III Libel and Defamation
- IV Cyber stalking, Impersonating Law Enforcement
- V Trade Libel & Libel
- VI Copyright Infringement
- VII Conspiracy
- VIII Internet Fraud
- IX Cyberstalking via PC

**COUNT I
INTERNET FRAUD**

**15 USC § 1125 & Anti-Phishing Act &
Chapter 28 of the Texas Commerce Code
§ 48.001-2 & The Lanham ACT F.S. 784.048**

Plaintiff restates and realleges each allegation set forth in paragraphs 1 through 9 as if set forth verbatim herein.

10. Plaintiff has owned DeborahDolen.com, her personal site, and MabelWhite.com a commerce site for years which and well branded and established DIY site. Dolen has many degrees, awards and is an upstanding member of both communities where she resides

11. On or about September 29th 2008 and to the present date, the Defendant(s) created web page(s) using the Plaintiffs good Trade names, [Mabel White] and good personal name for fraudulent purposes, without plaintiff permission to use plaintiffs name likeness or image, to engage in conduct involving the fraudulent use or possession of Plaintiff Trade name of good value where Defendant(s) hold themselves out as a legitimate on line business and did so without authorization of the Plaintiff(s) for the purpose of luring, soliciting, inducing Plaintiff(s) good will [web hits of great monetary value] by putting alarming content and Plaintiffs name in key words- and creating web pages with Plaintiff(s) names to then be re-directed to Defendant(s) site which appears to be legitimate when in fact Defendant(s) own a new DIY "Do It Yourself" competing site that would not attract web business. To wit:

http://www.bustedscammers.com/mabel_white.htm
http://www.bustedscammers.com/deborah_dolen.htm

12. Defendant Ryals has sole control over:

<http://www.diyshoppes.com/>
<http://www.thedesignshoppe.com/>
<http://www.mompack.com/>

All Defendants share control, jointly or severally over:

<http://www.bustedscammers.com/>

Which are very linked together as a unit-and link to countless others also. Aware of this action, on or about January 10th, 2009 Defendant Ryals removed all links to her DIY and other sites to avoid accountability in this court and conceal critical information to this court. [EXHIBIT H] Show changes on December 20th, 2008. Ryals DIY web site front page-linked to offending pages she created on her sever re Plaintiff were removed on December 20th, 2008. Defendants deliberately attempted to destroy evidence to conceal unlawful acts before this court which is a Federal Crime in and of itself.

13. Plaintiff has given TWO maybe three Cease and Desist requests to the Defendant Ryals to remove the libel and untrue information and all Ryals did was ADD more libelous material in conjunction with "Defendants Cornell" as well as more disclaimers that she is not liable as a web host. **For this reason the illegal practice and abuse of her cloak of web host will continue unless stopped by this court.** Not to mention recent alterations to remove links to her other sites off the actionable pages on December 19th, 2008 and removing over 50% of the www.bustedscammers.com web site by January 10th, 2009 long after the commencement of this action-to conceal acts from this court.

14. Regarding the actual libel and defamation, Plaintiff made it VERY clear to Defendant(s) truth is not a defense when they rely on one news reporter who said untrue things. **A news article from years ago is NOT a mere evidence of ANY fact.** In addition, malice was an extreme motive, as well as "context" being irrelevant and of no

legitimate business value to the public other than to seriously harm Plaintiff and PROFIT off of her name being Deborah R. Dolen and Mabel White.

WHEREFORE, Plaintiff hereby requests all relief as outlined in TX § 48.005 CIVIL RELIEF of the TX BCC to include, but not limited to **immediate temporary injunctive relief**, of both servers the offending material is being generated or pointed or controlled from NS.HMDNSGROUP.COM and NS2.NMDNSGROUP.COM IP ID 63.247.139.203 or whatever IP is www.BustedScammers.com is on at the time of the order be shut down, as well as \$100,000 in damages per incident, jointly and/or severally, as well as any applicable state law. Under TX § 48.005 this section Plaintiff is also allowed reasonable attorneys fees from the Defendant(s) and demands trial by jury and any relief, jointly and/or severally, this court deem appropriate including remedies in. 15 USC §1125.

**COUNT II
CYBERSTALKING**

**18 U.S.C. 875(c) & F.S. § 784.048 & T.S. § 42.07
15 USC § 1125 & The Lanham ACT F.S. 784.048 & 836**

Plaintiff restates and realleges each allegation set forth in paragraphs 1 through 14 as if set forth verbatim herein and also incorporates paragraphs 16 - 18 below.

15. On or about September 2008 the Defendant(s) engaged in internet activity to annoy abuse, harass, defame libel, terrorize and humiliate the Plaintiff using the web sites and link to the web sites as listed above. The content is “on its face” horrific and designed to cause ridicule, hatred and for the Plaintiff to be generally despised by the general public. The threat to injure the Plaintiff is perfected by successfully inuring the income, good name and over all societal accomplishments by the Plaintiff. In addition Defendants have created a chat room to encourage others to join them and do the same and others have done so and Plaintiff is getting hate mail such as “we are coming to get you...” and “now we know where you are so we can lock you up.” [EXHIBIT “A”] **Graphics alone surrounding Plaintiff’s name(s) and photo on Defendants site are malicious.** [Damaging slurs in COUNT III and in part EXHIBIT” B”.]

16. The Defendants clearly engaged in a course of conduct directed at specifically the Plaintiff(s) that did cause substantial emotional distress and extreme loss of business to the Plaintiff(s) and continues to do so. There never was a legitimate purpose or even legitimate business purpose for Defendants to engage in such a pattern other than to be malicious to the Plaintiff and profit off her good trade names by securing “hits” from customers searching for the Plaintiff’s name on the internet which is theft of Plaintiff’s property and is of value.

17. The Defendants have on several occasions added more hurtful and libelous content to the aforesaid web pages to secure the pattern necessary for harassment. Oddly these updates were performed after EVERY Cease and Desist request from the Plaintiff.

18. The actions of the Defendant(s) caused credible threat to the Plaintiffs in the form of e-mails “We know where you are, now we are coming to get you...” and “we are going

to come and lock you up” to name a few-as if the Defendants had authority to arrest a person.

18 U.S.C. 875(c), it is a federal crime, punishable by up to five years in prison and a fine of up to \$250,000, to transmit any communication in interstate or foreign commerce containing a threat to injure the person of another.

Per F.S. § 775.082 or s. **775.083**, person commits the offense of stalking, a misdemeanor of the first degree.

Per T.S. § 42.07 An offense under this section is a felony of the third degree, except that the offense is a felony of the second degree if the actor has previously been convicted under this section.

WHEREFORE, Plaintiff hereby requests all relief as outlined in **18 U.S.C. 875**, as well as any applicable state law. Under **18 U.S.C. 875** Plaintiff is also allowed reasonable attorneys fees from the Defendant(s) jointly and/or severally and demands trial by jury and any relief this court deem appropriate, as well as referral for criminal proceedings against the Defendants over to the Department of Justice, jointly and/or severally.

COUNT III
LIBEL, DEFAMATION & DISPARAGEMENT
CONSTITUTIONAL VIOLATIONS AND FEDERAL 2nd RESTATEMENT of
TORTS as well as F.S. § 836.01-836.04 & Texas & The Lanham ACT

Plaintiff restates and realleges each allegation set forth in paragraphs 1 through 23 as if set forth verbatim herein.

19. The Defendant(s) made endless statements and continue to do so that are not true, subjects the Plaintiff to hatred, ridicule, distrust, disgrace and injured her profession dramatically as well as all those who are new to her that she wishes to do business with, not counting any new personal relationships-and these multitude of statements were published deliberately and maliciously in the internet for no legitimate reason or than malice and to gain profit from Plaintiffs name recognition and gain far more hits than they accomplish on their own.

20. Example of the libelous and untrue information plastered all over Defendant(s) site includes that Plaintiff was an admitted prostitute, and that Plaintiff was convicted of Grand Theft and/or arrested in 1990 which was not true. Even if true has **no legitimate reason for being published** but for malice and shock value to gain hits some 19 years later-and “unfavorable light” would factor in. Anymore comments that are not true, or twisted for shock value and effect, [and there are 33] would be requested to be under court seal so such libel cannot continue to be spread via this request for relief.

21. **[EXHIBIT “B”]** says it all-this and is hereby **made part of this complaint**, was an e-mail sent to Ryals entire database of women, one of them forwarding the Plaintiff the assaulting information in Brazoria county, TX via e-mail with obvious intent to cause her great emotional harm-which it did. None of the statements are true and what they are

discussing about FTC shutting Plaintiff down was not true either. They refer to a bare civil suit that did have a temp injunctive order-and FTC never won that case. This is the type of content post on the site WITH the good name Mabel White thrown in-to attract the DIY customers who highly esteem Mabel White-if nothing else to wonder what that is all about?

22. [Exhibit "E"] Shows the libel comes up on the first page of a Google engine search for Mabel White which never had anything to do with any false news article or otherwise.

23. [Exhibit "F"] Shows general malice of Julie Ryals and willingness to break Federal Laws. In this exhibit connected to the Plaintiffs character assassination-Julie admittedly is posting and displaying BILLS a customer OWES her. In this exhibit Julie admits who she is and that the Blossom Farm owes her money..\$8.95 a month and a total of \$53.70. As well as copies of the bills on the internet for all to see around the world. That is flagrant bullying, and a violation of several state and Federal laws to collect a debt.

24. [Exhibit "G"] Is the first publication of the assault on the plaintiff where all allegations were not true or twisted to put Deborah Dolen and Mabel White in an "unfavorable light" which is mildly putting it.

WHEREFORE, Plaintiff hereby requests all relief as outlined in 2nd Restatement of Torts as well as Texas Law for each and every count of Libel and defamation in each and every publication attached and within this complaint, jointly and/or severally, as well as under any applicable state law. Under this section Plaintiff is also allowed reasonable attorneys fees from the Defendant(s) jointly and/or severally and demands trial by jury and any relief this court deem appropriate, as well as referral for criminal proceedings against the Defendants over to the Department of Justice, jointly and/or severally.

**Post Service of Lawsuit Counts – Escalation of Actionable Offenses
December 22, 2008**

History NEW Counts IV-VI

25. After **Defendant Ryals** and new **Defendants Cornell** became aware of the Federal Lawsuit in this action, on or about Decemeber 22nd, 2008 their libel and legally actionable activity complained herein escalated in a public forum chat room known as "TOPIX" and Defendants known as "**Defendants at Cornell St.**" did engage with Ryals and support and add to many libelous public comments and had been engaging in this room since September 2008-unbenowst to Plaintiff, libeling Plaintiff there to date. In this entire room, "**Mother Does Not Know Where Caylee Is**" printed by EXHIBIT with double characters such as AA, BB, and discussed by EXHIBIT attachment.

<http://www.topix.com/forum/city/orlando-fl/T05QKB7VTUV7MBH61/p3406>

Topix.com will comply with subpoenas in this action.

Cast of Characters in Topix

Which can be any Defendant interchangeable as discovery will show. They all use each other's accounts to create confusion.

SweetChef is Julie Ryals
SweetLady is Julie Ryals
Sweet LadyChef is Julie Ryals
Curious is Julie Ryals
Arden_1 is Mary Joanne Kidd
JustSayNo TBA
Sage is the Defendants at Cornell Street
Andres is Questionable
Gideon is Plaintiff Dolen

26. The first thing notable act **Defendant Ryals** as **CHEF** post this action was a "warning to all" there is s a lawsuit and to watch what they say. She incites fear and makes other uses think they could be sued. Essentially this is **witness tampering** because by this date, she knows there is a Federal Lawsuit against her as she was personally served December 31th, 2008 in this action. **Post 71497 Page 3,404 Topix**. This essentially also **admits** she is Julie Ryals because she admits she has been sued with a Jane Doe. **[EXHIBIT AA] Adren_1 Joins [EXHIBIT BB] Topix December 27th, 2008** for the sole purpose of concealing her as "Sage" and Mary Joanne Kidd and to trash Plaintiff regarding this lawsuit and support Defendant Ryals. Also **[EXHIBIT BB2] SweetLadyChef [Julie Ryals]** with the infamous Busted Scammers dot com logo.

COUNT IV
CYBERSTALKING & IMPERSONATING LAW ENFORCEMENT
18 U.S.C. 875(c) & F.S. § 784.048 & T.S. § 42.07
15 USC § 1125 & The Lanham ACT
CyberStalking & Physical Stalking to Relay Message

Plaintiff restates and realleges each allegation set forth in paragraphs 1 through 26 as if set forth verbatim herein and also adds actionable acts to include but, not limited too:

27. **Stalking Post Lawsuit** Defendant Ryals pursuing Plaintiffs Mother in Law of Plaintiffs late husband, for no legitimate reason, to **appear to be an "investigator for law enforcement" in Pasco County** and to tell the elderly mother in law her son may not have died of cancer, but that plaintiff may have poisoned him. This caused obvious distress to Plaintiff and her three daughters who are close to the Grand Mother of Plaintiff's late husband. Plaintiffs husband died in 1994 at age 42 of cancer, plaintiff was 31 at the time and left to raise 3 young daughters alone.

28. **Stalking Post Lawsuit & Libel** Defendant Ryals as "Curious" on December 30th, 2008 admits she did locate Plaintiffs mother in law on the public forum and enters hearsay that the mother in law is "afraid" of plaintiff and other useless facts only designed to cause ridicule, contempt and hatred for the Plaintiff in a pubic forum. **66721 Page 3189 CURIOUS**. **[EXHIBIT CC]** She also goes on to say libel and untrue things

“Deborah runs scams off the internet” and more obvious and numerous libel statements just in this exhibit. Malice is obvious to any reasonable man.

29. Supporting this count Defendant Ryals announces to Plaintiff “I WILL GET YOU and turn you in!” which is a baseless physical threat against Plaintiff posted in a public forum. Post 64721 Page 3095 CHEF. [EXHIBIT DD]

WHEREFORE, Plaintiff hereby requests all relief as outlined in **18 U.S.C. 875**. as well as any applicable state law. Under **18 U.S.C. 875** Plaintiff is also allowed reasonable attorneys fees from the Defendant(s) jointly and/or severally and demands trial by jury and any relief this court deem appropriate, as well as referral for criminal proceedings against the Defendants over to the Department of Justice, jointly and/or severally.

COUNT V
LIBEL, DEFAMATION & DISPARAGEMENT
CONSTITUTIONAL VIOLATIONS AND FEDERAL 2nd RESTATEMENT of
TORTS as well as F.S. § 836.01-836.04 & Texas & The Lanham ACT

Plaintiff restates and realleges each allegation set forth in paragraphs 1 through 29 as if set forth verbatim herein and also adds actionable acts to include but, not limited too:

30. Defendant Ryals announcing on TOPIX, a pub forum Deborah Dolen has stolen MILLIONS from the people in the State of Florida when such was never true, as well as announcing Dolen was a Prostitute and WHORE, and is not to be trusted. Post 66722 Page 3,189 by Curious & Sweet Chef [Ryal and Ryals or Ryals and a Cornell Defendant] extending conspiracy to harm Plaintiff if more than one. [EXHIBIT EE]

31. Post 65588 Page 3,137 Arden-1 Defendants Cornell Street December 27th, repeating Plaintiff is a Whore and many other untrue things. [EXHIBIT FF]

WHEREFORE, Plaintiff hereby requests all relief as outlined in 2nd Restatement of Torts as well as Texas Law for each and every count of Libel and defamation in each and every publication attached and within this complaint, jointly and/or severally, as well as under any applicable state law this activity violates. Under this section Plaintiff is also allowed reasonable attorneys fees from the Defendant(s) jointly and/or severally and demands trial by jury and any relief this court deem appropriate, as well as referral for criminal proceedings against the Defendants over to the Department of Justice, jointly and/or severally.

COUNT VI
Copyright Infringement
Lanham Act

Plaintiff restates and realleges each allegation set forth in paragraphs 1 through 31 as if set forth verbatim herein and also adds actionable acts to include but, not limited too:

32. Defendant Julie Ryals as “Sweet Chef” or “Curious” Posting complete Mabel White articles on the Topix Room without the consent of the copyright holder in an attempt to ridicule and mock Deborah Dolen, known as author Mabel White. Post **67148 Page 3,210 Curious [Julie Ryals], [Exhibit GG]**. This was taken from Mabel White’s New Years edition in whole form without permission and with malice by the defendants. **[Exhibit HH]** Is “Curious,” Julie Ryals copying and pastings Plaintiffs experience with IKE. **Post 67161 Page 3,211**, Note this was not a reply to a post. It was just an outright copy/paste of Plaintiffs copy written work without her permission for Defendant to promote ridicule.

WHEREFORE, Plaintiff hereby requests all relief as outlined in TX § 48.005 CIVIL RELIEF of the TX BCC \$100,000 in damages per incident, jointly and/or severally, as well as any applicable remedies under state law. Under TX § 48.005 this section Plaintiff is also allowed reasonable attorneys fees from the Defendant(s) and demands trial by jury and any relief, jointly and/or severally, this court deem appropriate including remedies in to include 15 USC §1125.

COUNT VII
CONSPIRACY
42 USC 1983 and/or 18 U.S.C., Section 241

Plaintiff restates and realleges each allegation set forth in paragraphs 1 through 32 as if set forth verbatim herein and also adds actionable acts to include but, not limited too:

33. Two or three of the Defendants have outright said or alluded they were law enforcement in attachments to this complaint. If true all actions in this complaint operate under 42 USC 1983 against those individuals. Otherwise 18 USC operates to common individuals. Plaintiff understands if Defendant Jeffery A. Kidd is a Detective with Duval County or any law enforcement Plaintiff must give the state six months notice intent to sue-to that law enforcement agency, and will do so to protect this count.

34. On or about September 1st, 2008 ALL named defendants engaged in a conspiracy to harm the Plaintiff, by and through TOPIX.com in any and all means whether legal or illegal with the goal of harming her industry and trade, to do so with great malice, and to deliberately cause intentional infliction of emotional distress, be subject to public ridicule for no legitimate purpose at all upon the Plaintiff which did happen and caused the Plaintiff great damages financially, socially, career wise, image wise and emotionally. The dispute began on TOPIX and Plaintiff known then as “Gideon” and the Defendants

determined they did not like her and did work, operate in a concerted effort to post libelous and defamatory information about the Plaintiff on their private web sites using telecommunications such as web site, chat rooms, and telephonic devices to spur the hatred, ridicule and contempt of Plaintiff. **[EXHIBIT II] is a full blue print on what is a fact to date**, offending site, sever name and server location as well as where the site is being "pointed to" in Jacksonville, Florida under the direct control of the Cornell Street Defendants and also Julie Ryals-using a person or entity who does not exist and never did exist as owner of the site.

Each and every allegation in this entire case alone or collectively, did cause great harm to Plaintiff and damages to every aspect of her life, financial damages being only one of many. AS a direct result of the Defendants actions, Plaintiff tried to slit her wrist over this matter, in front of witnesses who stopped her, feeling in total despair on or about November 3, 2008 and was on the phone with Houston suicide hotlines. Plaintiff has also lost about \$7,200 in holiday business net profits for the last quarter of 2008-her busiest time in the craft DIY Market.

WHEREFORE, Plaintiff hereby requests all relief as outlined in **42 USC 1983** and/or **18 U.S.C., Section 241**, jointly and/or severally, as well as any applicable remedies under state law for conspiracy to harm a state resident. Under TX § **48.005** this section Plaintiff is also allowed reasonable attorneys fees from the Defendant(s) and demands trial by jury and any relief, jointly and/or severally, this court deem appropriate including remedies in to include **15 USC §1125**, if any.

COUNT VIII INTERNET FRAUD

Plaintiff restates and realleges each allegation set forth in paragraphs 1 through 34 as if set forth verbatim herein and also adds actionable acts to include but, not limited to:

35. Defendants jointly and/or severally created www.BustedScammer.com on August 17th, 2006 and on June 6th 2008 deliberately placed ownership and all contacts in the false name of a Larry Anderson who did not exist. **[EXHIBIT JJ.]** And updated the file for reasons unknown on **September 26th, 2008** circa the time Defendants began to attack Plaintiff herein. **[EXHIBIT KK.]** The address was listed as 389 Creek Road, Crossville, TN 38572 and phone number of 423-881-3219 which was actually 90% information gathered from a client of Defendant Ryals who Ryals knew was moving and phone number would be disconnected. This person is mortified and has nothing to do with this case other than Defendant Ryals identify theft to promote her internet fraud which was to secure a domain name in the name of a fake person. As not to harm the witness/victim in which this information was stolen by Ryals-it is marked as an Exhibit herein. **[EXHIBIT LL.]** Ryals is NOT to contact this person or harm her in any way because this person is a witness to a Federal and state crime and Defendant Ryals is still her host. This whole situation is shocking to the persons who information was unlawfully used.

36. Defendants deliberately created an illegal name as owner of offending www.BustedScammer.com site to further all of their illegal and civil torts against the Plaintiff, with malice as outlined in this entire complaint, which did cause the Plaintiff great damages of every kind.

WHEREFORE, Plaintiff hereby requests all relief as outlined in TX § 48.005 CIVIL RELIEF of the TX BCC to include, but not limited to **immediate temporary injunctive relief**, of both servers the offending material is being generated or pointed or controlled from NS.HMDNSGROUP.COM and NS2.NMDNSGROUP.COM IP ID 63.247.139.203 or whatever IP is www.BustedScammers.com is on at the time of the order be shut down, as well as \$100,000 in damages per incident, jointly and/or severally, as well as any applicable state law. Under TX § 48.005 this section Plaintiff is also allowed reasonable attorneys fees from the Defendant(s) and demands trial by jury and any relief, jointly and/or severally, this court deem appropriate including remedies in. 15 USC §1125.

**COUNT IX
CYBERSTALKING PC**

**15 USC § 1125 & Anti-Phishing Act &
Chapter 28 of the Texas Commerce Code
18 U.S.C. 875(c) & F.S. § 784.048 & T.S. § 42.07**

Plaintiff restates and realleges each allegation set forth in paragraphs 1 through 36 as if set forth verbatim herein and also adds actionable acts to include but, not limited too:

37. Plaintiff was lured to the Defendants web site www.bustedscammers.com and malware was attempted to be placed on the Plaintiffs personal computer. **[EXHIBIT MM]** is a report from the Plaintiffs firewall Black Ice warning of the intrusion and nature of the intrusion. Plaintiff, hereby swears under the penalty of Federal perjury the entire exhibit MM is from her PC and generated by impartial Black Ice.
38. Incidentally and out of order-the www.BustedScammers.com site was taken down on December 24th, 2008 when Julie Ryals received, but refused, the initial certified letter in this case. At which point she called the Plaintiff, essentially a stalker on the site-although the site itself was taken down. **[EXHIBIT NN.]**
39. Also Incidental the site www.BustedScammers.com displayed her as web host and that has been taken down and concealed after **[EXHIBIT OO.]**
40. **[EXHIBIT PP]** is essentially proof Plaintiffs private name and author name were in key words on www.bustedscammers.com as of December 31, 2008 and that plaintiffs personal name came up first on a Google search being the BS site. Plaintiffs author name came up 3rd which was more devastating. Plaintiff also swears under the penalty of perjury those 12 pages were taken from the offending site www.bustedscammers.com.

WHEREFORE, Plaintiff hereby requests all relief as outlined in **18 U.S.C. 875**. as well as any applicable state law for Cyberstalking, harassment and using Plaintiff's name without permission or consent, more over to present Plaintiff in a false light as well as cause her great personal injury. Under **18 U.S.C. 875** Plaintiff is also allowed reasonable attorneys fees from the Defendant(s) jointly and/or severally and demands trial by jury and any relief this court deem appropriate, as well as referral for criminal proceedings against the Defendants over to the Department of Justice, jointly and/or severally.

**COUNT X
DESTRUCTION OF EVIDENCE PERTINENT TO CASE
& INJUNCTION REQUEST**

Plaintiff restates and realleges each allegation set forth in paragraphs 1 through 40 as if set forth verbatim herein and also adds actionable acts to include but, not limited to:

41. Defendants Cornell in conjunction with Ryals worked tirelessly to delete all of the offending TOPIX.com comments listed herein, and they had to be retrieved from cache. By law all sites such as TOPIX has to keep a cache for situations such as this.

42. Additionally they have worked tirelessly to make the BS site looked legitimate to the courts and also conceal actionable offenses-instead of just taking the site down in good faith.

WHEREFORE, Plaintiff hereby requests all relief as outlined in **18 U.S.C. 875**. as well as any applicable state law for destruction of documents and evidence, any and all relief this court deem appropriate, as well as referral for criminal proceedings against the Defendants over to the Department of Justice, jointly and/or severally.



Deborah R. Dolen
3114 Chappelwood Drive
Pearland, TX 77584
281-489-6068

EXHIBIT LIST

- A** Malicious graphics that constituted the BS site pre 12/31/2008
- B** First hateful e-mail from Defendants e-mail blast to their customers.
- C** Plaintiff's Cease and Desist attempts to BS answered by **Ryals**.
- D** Plaintiff's 2nd Cease and Desist to BS answered by **Ryals**.
- E** Google search result on Mabel White pre 12/31/2008
- F** Ryals posting private e-mails and bills owed by a customer – pattern.
- G** The very first publication full of libel devised by the Defendants.
- H** Ryals DYI website

TOPIX ESCALATION

- AA** Ryals warning to everyone re this action.
- BB** Cornell Road creates a new name as Arden_1
- CC** "Curious" committing patent libel.
- DD** Physical threat Ryals will "Get Plaintiff and turn her in."
- EE** Defendants saying Plaintiff stole millions from the people in Florida.
- FF** Defendants calling plaintiff a WHORE on Topixs.
- GG** Defendants copy and paste of a Mabel White article on Topix.
- HH** Defendants copy and paste of Deborah Dolen's IKE experience " ".
- II** Basic proof Julie Ryals started the B.S. site & updated over years.
- JJ** False web owner & contact info of a Larry Anderson for the BS site.
- KK** Proof this ownership was altered September 26th, 2008.
- LL** Person whose identity defendants stole to claim was owner of BS.
- MM** Evidence Plaintiffs PC was attempted to be attacked on BS.
- NN** Proof BS site was taken down December 24th, 2008.
- OO** Proof The Design Shoppe was host for www.BustedScammers.com
- PP** Keyword and Google Search on Deborah Dolen pre 12/31/2008