

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

ANIKA WILSON,)
Plaintiff,)
v.)
TARA MCCOLLUM,)
Defendants.)

Civil Action Number:

C 200901283

FILED IN OFFICE

SUMMONS

APR 28 2009

Notice to:
TARA MCCLLUM
2497 Old Rocky Ridge Road
Birmingham, AL 35216-5374

ANNE-MARIE ADAMS
Clerk

The Complaint which is attached to this summons is important and you must take immediate action to protect your rights. You or your attorney are required to mail or hand deliver a copy of a written answer, either admitting or denying allegation in the complaint to the plaintiffs' attorney C. Jackson Perkins, whose address is 205 North 20th Street, Suite 718, Birmingham, Alabama 35203.

This answer must be mailed or delivered within thirty (30) days after this summons and complaint were delivered to you or a judgment by default may be entered against you for the money or other things demanded in the complaint. You must also file the original of your answer with the Clerk of this Court.

TO AND SHERIFF OR ANY PERSON AUTHORIZED by either rules 4.1(b)(2) or 4.2(b)(2) or 4.4(b)(2) of the Alabama Rules of Civil Procedure: You are hereby commanded to serve this summons and a copy of the complaint in this action upon defendant Tara McCollum.

Date **APR 28 2009**

Anne-Marie Adams
Clerk

Return on Service:

I certify that I personally delivered a copy of the Summons and Complaint to Tara McCollum, in Jefferson County, Alabama, on (date) _____.

Printed name and address of server:

Signature of server

Type of server

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

ANIKA WILSON,)
 Plaintiff,)
 vs.)
 TARA MCCOLLUM;)
 "ABC" whose name)
 is otherwise unknown to the)
 plaintiff but is that individual)
 who used the name "tphorse")
 on the internet al.com forum to)
 publish defamatory matter about)
 the plaintiff and whose true)
 name will be supplied by)
 amendment when ascertained;)
 "DEF" whose name)
 is otherwise unknown to the)
 plaintiff but is that individual)
 who used the name "zjones16")
 on the internet al.com forum to)
 publish defamatory matter about)
 the plaintiff and whose true)
 name will be supplied by)
 amendment when ascertained;)
 Defendants.)

Civil Action No.:

200901283

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ANNE-MARIE ADAMS
Clerk

COMPLAINT

COUNT I

Comes now the plaintiff, Anika Wilson, and respectfully shows as follows:

1. Plaintiff is a resident citizen of Madison, Alabama. She is a duly licensed, certified General Psychiatrist and a practicing Child and Adolescent Psychiatrist.

2. The defendant, Tara McCollum, is a resident of Jefferson County, Alabama. The other defendants may be other names for Tara McCollum or they may be separate individuals: "ABC" whose name is otherwise unknown to the plaintiff but is that individual who used the name "tphorse" on the internet al.com forum to publish defamatory matter about the plaintiff and whose true name will be supplied by amendment when ascertained; "DEF" whose name is otherwise unknown to the plaintiff but is that individual who used the name "zjones16" on the internet al.com forum to publish defamatory matter about the plaintiff and whose true name will be supplied by amendment when ascertained.

3. The defendant Tara McCollum defamed plaintiff in an email to Lanier Brown on November 21, 2008. A copy of said email is attached hereto as "Exhibit A" and incorporated herein. In said email, McCollum wrote:

- "Please tell crazy Anika Wilson to stop calling my parents phone like she has been doing all week."

Plaintiff is not crazy and she had not been calling McCollum's parents all week.

-“Please tell Anika Wilson to stop sending people . . . to lie to my parents. . .”

Plaintiff had not sent people to lie to McCollum's parents.

-“Please tell Anika Wilson to stop stalking me.”

Plaintiff had not stalked McCollum.

-“Please tell Anika Wilson to stop trying to send her nasty male friends . . . to date me.”

Plaintiff had not sent anyone to try to date McCollum.

-“I am not innocent Joi Perdue who Anika Wilson tried to had beaten and her car burned down.”

Plaintiff did not try to have Perdue beaten or her car burned down.

-“Please tell jealous and crazy Anika Wilson to stop trying to manipulate me with slander . . . stop trying to slander me in the community.”

Plaintiff had not slandered or tried to slander McCollum.

4. Defendant "ABC", using the name of "tphorse" posted the following defamatory matters on al.com:

-On February 24, 2009: "Pettway's mistress Wilson would change Cooper's schedule in order for him to miss appointments while campaign and she trashed his phone messages and voter reg forms. She is also responsible for all of that taxpayer money getting stolen from his campaign. . . Bham call girls and hookers and spies like Anika . . . stop spreading STD's to these married men . . . those girls have herpes and genital warts."

-On February 26, 2009: "She needs to go to jail . . . Anika Wilson for stealing taxpayer's money."

-On March 3, 2009: "Jonathan Austin's obsessed/stalker girlfriend, Anika Wilson."

-On March 3, 2009: "Just check their medical files at UAB where Anika Psych doctor works and where she steals meds for Smoot."

These disgusting and defamatory allegations, as posted by "tphorse," are not true.

5. Defendant "DEF", using the name of 'zjones16" posted the following defamatory matters on al.com:

-On March 10, 2009: "Hey-Ms. Wilson . . . How much do they pay you to stalk people and sleep with them to mess campaign during election time? Has you finally stopped stalking Patrick Cooper and his peeps? . . . You are diseased and crazy and sleeping with every married man around him. There is the IRS issue with the unreported income you are getting . . ."

-On March 12, 2009: "Cooper has a stalker named Ms. Wilson who will ot leave him alone. She tried to attach and have some of his loved ones assaulted and/or raped by males again. She is trying to use Forestdale males to help commit her crimes this time."

-On March 12, 2009: "What's dangerous is Ms. Wilson having sexually intercourse with different males in the area. And that is

while is is infected by a STD. Did you the Jefferson County Health Department? How many of you Forestdale males have slept with her and attend her pay the rent party's downtown at the Wine Loft?"

-On March 17, 2009: "I need to know which male from the local Obama campaign is Ms. Wilson going to send next to try to sexually assault girls."

These disgusting and defamatory allegations, as posted by "zjones16," are not true.

6. Other screen names or other defendants may have defamed the plaintiff on internet forums, emails, message boards, blogs, or other computer based communications. Plaintiff will amend to add additional defendants and specific defamatory matter when discovered.

7. As the proximate consequence of the foregoing, plaintiff has been wrongfully and falsely accused of committing felonies, of participating in immoral acts, of spreading sexually transmitted diseases, and stealing meds to which she had access as a physician.

Her reputation has been damaged. She has suffered and will continue to suffer great mental and emotional distress. Her standing as a psychiatrist has been damaged.

8. As the result of the foregoing, plaintiff claims compensatory and punitive damages from the defendants is a sum to be determined by the jury and which is expected to exceed \$50,000.

COUNT II

9. Incorporated herein, the same as if set out in full, are the allegations of paragraphs 1 through 8.

10. The defendants libeled the plaintiff by communicating to third persons a false and malicious imputation of a crime or moral delinquency of and concerning the plaintiff which subjected the plaintiff to disgrace, ridicule, odium, or contempt in the estimation of her friends and acquaintances, or the public, with resulting damage to plaintiff's reputation.

COUNT III

11. Incorporated herein, the same as if set out in full, are the allegations of paragraphs 1 through 8.

12. The defendants violated plaintiff's right of privacy. By committing the foregoing, defendants gave unwarranted publicity to the plaintiff, made an unwarranted exploitation of her personality, publicized plaintiff's private affairs with which the public had no legitimate concern, and wrongfully intruded into her private affairs in such a manner as to cause mental suffering, shame or humiliation to a person of ordinary sensibilities.

COUNT IV

13. Incorporated herein, the same as if set out in full, are the allegations of paragraphs 1 through 8.

14. The defendants committed the tort of outrage. They intended to inflict emotional distress or should have known that their actions would cause the plaintiff emotional distress. The conduct of the defendants was

extreme and outrageous. The plaintiff was caused distress and the distress was severe.

COUNT V


15. Incorporated herein, the same as if set out in full, are the allegations of paragraphs 1 through 8.

16. The defendants wantonly committed the foregoing acts. With reckless indifference to the consequences, the defendants either consciously or intentionally did wrongful acts which produced injuries to the plaintiff.

COUNT VI

17. Incorporated herein, the same as if set out in full, are the allegations of paragraphs 1 through 8.

18. The defendants negligently failed to do what a reasonably prudent person would have done. They performed the foregoing acts which a reasonably prudent person would not have done under the same or similar circumstances, causing damages to the plaintiff.


C. Jackson Perkins (PER002)
Attorney for the Plaintiff

205 North 20th Street, #718
Birmingham, AL 35203
Phone: 205/328-7375

Plaintiff demands a trial by struck jury.


C. Jackson Perkins

Parties names and addresses:

Plaintiff:

Anika Wilson
c/o C. Jackson Perkins
205 North 20th Street, #718
Birmingham, AL 35203

Defendant:

Tara McCollum
2497 Old Rocky Ridge Road
Birmingham, AL 35216-5374