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IN THE COURT OF COMMON PLEAS
JEFFERSON COUNTY, OHIO

CODY SALTSMAN, a minor child, by
his natural parents and legal guardians
JAMES AND JOHNA SALTSMAN
[REDACTED]

and

JAMES SALTSMAN
[REDACTED]

And

JOHNA SALTSMAN
[REDACTED]

PLAINTIFFS

-vs-

ALEXANDRIA GODDARD aka "prinnie"
[REDACTED]

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

)
) COMPLAINT IN DEFAMATION AND
) FOR INJUNCTIVE RELIEF
) AND FOR MONETARY JUDGMENT

) 2012-CV- 544

) JUDGE *David H. Johnson*

FILED
COMMON PLEAS COURT
2012 OCT 25 P 1:48
JOHN A. DRISCOLL
CLERK OF COURTS
JEFFERSON COUNTY, OH

LAW OFFICES
BLAKE, HERSHEY
AND
BEDNAR
4110 SUNSET BLVD.
STEUBENVILLE, OHIO 43082
(740) 284-1451

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)
)
)

and)
)

JOHN DOE #14, aka "HEARTSICK," an individual whose name is presently unknown
Address Unknown)
)
)

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 attorney, Shawn M. Blake, 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 Franklin 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.

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NAR
SET BLVD.
OHIO 43952
14-1651

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.

FACTUAL ALLEGATIONS

9. An alleged rape of a minor child occurred on or about August 12, 2012.
10. Two juveniles, who are not parties to this instant action, have been criminally charged in the Juvenile Division of the Court of Common Pleas of Jefferson County with Rape, a violation of Ohio Revised Code § 2907.02.
11. DEFENDANT, ALEXANDRIA GODDARD *aka* "prinnie", created a website known as "prinniefied.com."
12. On the website, "prinniefied.com," DEFENDANT, ALEXANDRIA GODDARD *aka* "prinnie", created several Internet blogs regarding the aforementioned alleged rape, to wit:
 - A. "Big Red Players Accused of Rape & Kidnapping"
 - B. "Dear Mrs. Richmond"
 - C. "It's time to be a true parent"
 - D. "Message Board"
 - E. "Some people deserve to be peed on #whoareyou"
 - F. "Steubenville Big Red Rape Accusations: The Other Perpetrators"
 - G. "Steubenville High Case"
 - H. "We didn't know or think that what we were doing was wrong."
 - I. "What Happened in April?"
13. DEFENDANT, ALEXANDRIA GODDARD *aka* "prinnie", has control over the Internet blogs on her website, "prinniefied.com".
14. Any person, who visits the website known as "prinniefied.com", can register with said website, create a username, and post comments on the aforementioned Internet blogs.
15. DEFENDANT, ALEXANDRIA GODDARD *aka* "prinnie", through her control over the Internet blogs on her website, prinniefied.com, can publish or remove any comments posted by registered users.
16. DEFENDANT, ALEXANDRIA GODDARD *aka* "prinnie", through her control over the Internet blogs on her website, prinniefied.com, has knowledge of the registered users' Internet Protocol Addresses, as well as, their respective e-mail addresses.
17. DEFENDANT, ALEXANDRIA GODDARD *aka* "prinnie", through her control over the Internet blogs on her website, prinniefied.com, as well as, her knowledge of the registered

users' respective Internet Protocol Addresses, can ban registered users as DEFENDANT, ALEXANDRIA GODDARD aka "prinnie", deems appropriate.

18. DEFENDANT, ALEXANDRIA GODDARD'S aka "prinnie", Internet blogs contained on her website, prinniefied.com, contain false and defamatory statements against PLAINTIFFS, to wit (quotes are copied verbatim with misspellings and grammatical errors):

	False & Defamatory Statement	Username	Internet Blog
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 possey 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	"Cody Saltsman, Mark Cole and Evan Westlake are playing tonight. Reno, SHAME ON YOU!" - immediately following and in response to "Students by day...gang rape participants by night."	prinnie (8/31/2012)	Steubenville Big Red Rape Accusations: The Other Perpetrators

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H	"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
I	"...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
J	"...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
K	"...the only crime photo I have ever seen is the original that was sent to her father by Cody..."	mammabear (9/12/2012)	Some people deserve to be peed on #whoareyou
L	"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
M	"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
N	"CS father owns Fort Steuben Plumbing/Maintenance" - <i>responding to: "What is this business because I never want to spend my money there"</i>	disheartening (9/14/2012) truth be told (9/13/2012)	Some people deserve to be peed on #whoareyou
O	"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?
P	"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?
Q	"...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.

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R	"...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.
S	"Then these three need to roll on their pal Cody Manson."	prinnie (10/15/2012)	We didn't know or think that what we were doing was wrong.
T	"Give it a few days. Their parents will be gunning for Cody Manson's head."	prinnie (10/15/2012)	We didn't know or think that what we were doing was wrong.
U	"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"	mammabear (10/15/2012)	We didn't know or think that what we were doing was wrong.

<p>V "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>	<p>AbbyLane (10/15/2012)</p>	<p>We didn't know or think that what we were doing was wrong.</p>
<p>W "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>

CC	"Tell Cody not to feel too bad. He is not the lone asshole in all this."	prinnie (10/9/2012)	Message Board
DD	"Couldn't agree more with the psych eval ..." – responding to "...CS was the Charles Manson of this crime If CS ends up being charged with anything, that a psychological is in order."	prinnie (10/9/2012) concernedmom123 (10/9/2012)	Message Board
EE	"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
FF	"...they need to bench THE MASTERMIND CODY SALTSMAN!"	madgrandma (10/15/2012)	Message Board

COUNT ONE
DEFAMATION

19. PLAINTIFFS restate and reaver each and every allegation contained in the preceding paragraphs of this Complaint as if fully set forth herein.
20. DEFENDANTS' statements posted on the aforementioned blogs contained on "prinniefied.com" are defamatory per se.
21. DEFENDANTS published or caused these defamatory statements to be published by posting said statements on the aforementioned blogs contained on "prinniefied.com."
22. 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.
23. DEFENDANTS' false and defamatory statements were published with the intent to harm PLAINTIFFS' good names and reputations by falsely accusing PLAINTIFFS of criminal acts.
24. 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.
25. DEFENDANTS continue to engage in the publication of further defamatory statements of PLAINTIFFS.
26. 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.

27. In carrying out the aforementioned conduct, DEFENDANTS acted negligently, willfully, maliciously, and/or with reckless indifference to the consequences of their actions against PLAINTIFFS.
28. 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
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

29. PLAINTIFFS restate and reaver each and every allegation contained in the preceding paragraphs of this Complaint as if fully set forth herein.
30. DEFENDANTS, by and through the making of such false, defamatory, and libelous statements, behaved intentional and/or recklessly.
31. DEFENDANTS, by and through the making of such false, defamatory, and libelous statements, intended to cause emotional distress upon PLAINTIFFS.
32. 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.
33. PLAINTIFFS have suffered and continue to suffer severe emotional distress and emotional injury.
34. DEFENDANTS' aforementioned actions were the direct and proximate cause of such severe emotional distress and emotional injury to PLAINTIFFS.
35. 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
PRELIMINARY AND PERMANENT INJUNCTION

36. PLAINTIFFS restate and reaver each and every allegation contained in the preceding paragraphs of this Complaint as if fully set forth herein.
37. 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.

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;

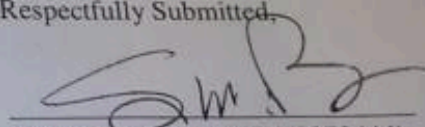
D. For compensatory damages in excess of \$25,000.00;

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,



SHAWN M. BLAKE (#0070444)
Attorney for PLAINTIFFS
4110 Sunset Blvd.
Steubenville, Ohio 43952
740-264-1651 (telephone)
740-264-6720 (fax)

FILED
COMMON PLEAS COURT
2012 OCT 25 P 1:49
JUDICIAL CENTER
STEARNS COUNTY OH

INSTRUCTIONS TO CLERK:

Please issue service of the Summons and Complaint via personal service, in accordance with Civil Rule 4.1(B) of the Ohio Rules of Civil Procedure, upon DEFENDANT, ALEXANDRIA GODDARD aka "prinnie", at the address identified in the caption of this Complaint.



SHAWN M. BLAKE (#0070444)
Attorney for PLAINTIFFS

LAW OFFICES
BLAKE, HERSHEY
AND
BEDNAR
4110 SUNSET BLVD.
STEUDEVILLE, OHIO 43952
(740) 264-1651