

STATE OF WISCONSIN : CIRCUIT COURT MILWAUKEE COUNTY

GRANT E. STORMS,
P.O. Box 793
Metairie, Louisiana 70004,

Plaintiff,

SUMMONS

vs.

Case No.:

✓ ACTION WISCONSIN, INC.
1202 Williamson St.
Madison, Wisconsin 53703,

Code No.: 30106

HON. JEFFREY A. KREMERS, D.J.

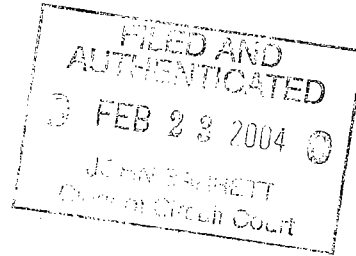
Defendant.

CIVIL F

and

CHRISTOPHER OTT
Address Unknown

Defendant.



THE STATE OF WISCONSIN:

To the party named above as defendants:

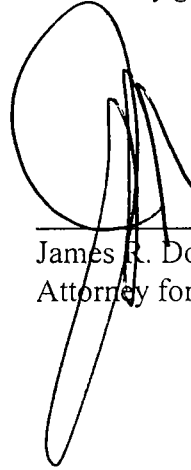
You are hereby notified that the plaintiff named above has filed a lawsuit or other legal action against you. The Complaint, which is attached, states the nature and basis of the legal action.

Within forty-five (45) days of receiving this Summons, you must respond with a written answer, as that term is used in Chapter 802 of the Wisconsin Statutes, to the Complaint. The Court may reject or disregard an answer that does not follow the requirements of these statutes. The answer must be sent or delivered to the Court, whose address is Clerk of Circuit Court, Milwaukee County Courthouse, 901 North Ninth Street, Courthouse - Room 104, Milwaukee, Wisconsin 53233. and to plaintiff's attorney, James R. Donohoo, whose address is 6525 W. Bluemound Road,

Milwaukee, Wisconsin 53213. You may have an attorney help or represent you.

If you do not provide a proper answer within forty-five (45) days, the Court may grant judgment against you for the award of money or other legal action requested in the Complaint, and you may lose your right to object to anything that is incorrect in the Complaint. A judgment may be enforced as provided by law. A judgment awarding money may become a lien against any real estate you own now or in the future, and may also be enforced by garnishment or seizure of property.

Dated this 23rd day of February, 2004.



James R. Donohoo
Attorney for Plaintiff Grant E. Storms

P.O. ADDRESS:
6525 W. Bluemound Road
Milwaukee, WI 53213
(414) 258-5989
SBN: 1015370

GRANT E. STORMS,
P.O. Box 793
Metairie, Louisiana 70004,

Plaintiff,

COMPLAINT

vs.

Case No.:

ACTION WISCONSIN, INC.
1202 Williamson St.
Madison, Wisconsin 53703,

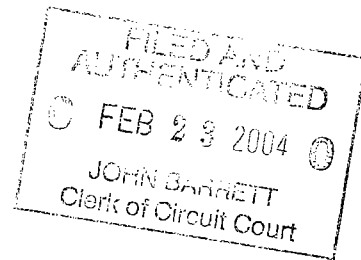
Case Code: 30106

Defendant,

and

CHRISTOPHER OTT
Address Unknown

Defendant.



Now comes the above-named plaintiff, GRANT E. STORMS, by his attorney, Attorney James R. Donohoo, and as and for a Complaint and Cause of Action against the defendants, ACTION WISCONSIN, INC. and CHRISTOPHER OTT, alleges and shows to the Court as follows:

1. That the plaintiff is an adult resident of Jefferson Parrish, State of Louisiana. His current mailing address is P.O. Box 793, Metairie, Louisiana 70004.
2. That the defendant, ACTION WISCONSIN, INC., is a corporation incorporated under the laws of the State of Wisconsin, with its principal address located at 1202 Williamson St., Madison, Wisconsin 53703.
3. That the defendant, CHRISTOPHER OTT, is an adult, whose current address is unknown.

4. That on December 8, 2003, a document entitled press release was disseminated by means of posting said press release on the internet. A copy of said press release is attached hereto and marked as exhibit 1.

5. That in addition to being posted on the internet, upon information and belief exhibit 1 was also faxed to numerous news organizations, some in the City of Milwaukee, and some in other cities in the State of Wisconsin.

6. Said exhibit 1 contained the following statements of fact:

A. "Another speaker made sounds like gunfire as if he were shooting gay people, saying, 'God has delivered them into our hands...Boom boom boom...there's twenty! Ca-ching! Glory, glory to God.' Excerpts of the speeches are attached."

B. "We trust that Senator Panzer will be as appalled as we were to find one of her colleagues in the audience for a speech apparently advocating the murder of his own constituents" said Ott.

7. The defendants attributed the statements set forth in paragraph 6 to the plaintiff, as shown by the portion of exhibit 1 entitled "Quotes from Speakers at the October 10, 2003 International Conference on Homo-fascism in Milwaukee - Grant Storms - Christian Conservatives for Reform - Louisiana."

8. The statements contained in paragraph 6 were made and published by the defendants.

9. That the statements contained in paragraph 6 were and are false in that the statements contained in paragraph 6, subparagraph A, although spoken by the plaintiff, were not made in reference to shooting gay people as stated by the defendants.

10. The statements contained in paragraph 6, subparagraph B were and are false in that the plaintiff did not make any statements on October 10, 2003 or at any other time advocating the murder of any of the constituents of any state senator from the State of Wisconsin.

11. Upon information and belief, that the statements contained in paragraph 6 were disseminated to third persons, namely representatives of the Journal/Sentinel, Inc among others.

12. Upon information and belief, that the statements contained in paragraph 6 were disseminated to at least one additional third party, as evidenced by exhibit 2 attached hereto and incorporated herein by reference. Exhibit 2 is a poster, which was affixed to a telephone pole in Louisiana. The actual size of exhibit 2 is seventeen by eleven inches, but said poster has been reduced in size for purposes of meeting filing requirements with the Circuit Court of Milwaukee, Wisconsin.

13. The statements contained in paragraph 6 tended and do tend to harm the reputation of the plaintiff so as to lower the plaintiff in the estimation of the community, and to deter others from associating or dealing with the plaintiff.

14. That on January 8, 2004, requests for retraction of the defamatory statements contained in paragraph 6 were sent to the defendants. Copies of said requests for retraction are attached hereto and marked as exhibits 3 and 4.

15. On February 4, 2004, correspondence was sent to both of the defendants regarding the fact that no responses had been received to exhibits 3 and 4. and no response has been received to date to this correspondence of February 4, 2004. Copies of said correspondence are attached hereto and marked as exhibits 5 and 6.

16. Neither of the defendants have retracted the defamatory statements contained in paragraph 6 and in fact the press release remains posted to this day on the website for Action Wisconsin, Inc.

17. In making and publishing the statements contained in paragraph 6 the defendants acted from motives of ill-will, bad intent, hatred, and revenge.

18. In making and publishing the statements contained in paragraph 6, the defendants knew that the statements were false.

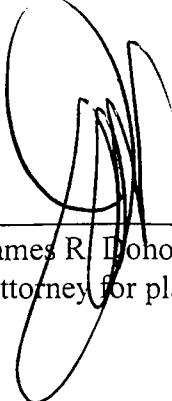
19. If the defendants in making and publishing the statements contained in paragraph 6 did not know that the statements were false, then in the alternative, in making and publishing the statements contained in paragraph 6, the defendants acted with reckless disregard of whether the statements contained were false or not.

20. As a result of the libelous actions of the defendants as set forth in this Complaint, the plaintiff has suffered damages, including but not limited to humiliation, mental anguish, potential economic loss, and damages to his reputation.

WHEREFORE, the plaintiff demands judgment against the defendants as follows:

1. For compensatory damages.
2. For punitive damages.
3. For the plaintiff's statutory costs, disbursements, and attorney's fees in this action.

Dated this 23rd day of February, 2004.



James R. Donohoo
Attorney for plaintiff, Grant E. Storms

P.O. ADDRESS:
6525 W. Bluemound Road
Milwaukee, WI 53213
(414) 258-5989
SBN: 1015370

PLAINTIFF DOES HEREBY DEMAND A TRIAL BY A JURY OF TWELVE.



press release

■ ■

State Senator Attends “Homo-Fascism” Conference, Action Wisconsin Asks Majority Leader Panzer to Investigate

For Immediate Release: December 8, 2003
Contact: Joshua Freker, 608.441.0143

Madison – Today Action Wisconsin sent a letter to Senate Majority Leader Mary Panzer, calling on her to investigate, identify, and discipline the state senator who attended the “International Conference on Homo-Fascism” in Milwaukee on October 10, 2003.

The conference was sponsored by Wisconsin Christians United (WCU), a group dedicated to stopping “the advance of sodomite tyranny and brutality.” The group recently announced on its website that a state senator had attended the conference.

“The attendance of a state senator at this conference is similar to a senator attending a Ku Klux Klan rally or neo-Nazi conference, and should receive tremendous scrutiny—especially at a time when legislators are advocating a constitutional amendment targeted at gay people,” said Christopher Ott, executive director of Action Wisconsin. “Anyone has the right to attend such a conference, but the people of Wisconsin deserve to know if their legislators are aligned with extreme hate-group activity.”

In a speech at the “Homo-Fascism” conference, a WCU representative said, “The sodomites are the devil’s special forces...they’re the advanced guard.” Another speaker made sounds like gunfire as if he were shooting gay people, saying, “God has delivered them into our hands... Boom boom boom...there’s twenty! Ca-ching! Glory, glory to God.” Excerpts of the speeches are attached.

“We are deeply concerned that a state senator would feel comfortable attending a conference that espoused such frenzied, hysterical hatred,” said Action Wisconsin President Tim O’Brien. “While conference participants are a clear threat to the security and freedom of the lesbian and gay communities, so too is a state constitutional amendment that would codify us as second-class citizens. They are both branches from the same tree of intolerance.”

When the Assembly failed to override Gov. Doyle’s veto of AB475, Rep. Mark

Gundrum (R-New Berlin) accused the governor of being “obsessed with the gay agenda,” a charge often leveled by hate groups against anyone who supports tolerance. Recently, Rep. Gundrum and Senator Scott Fitzgerald announced their intention to introduce yet more anti-gay legislation, this time a proposal to enshrine discrimination in the state constitution.

“We trust that Senator Panzer will be as appalled as we were to find one of her colleagues in the audience for a speech apparently advocating the murder of his own constituents,” said Ott. “We also hope that every legislator will think twice before supporting any more hate-inspired legislation.”

WCU, the sponsor of the conference, advocates the eradication of civil rights laws and the criminalization of intimate conduct between same-sex couples. One WCU brochure, “A Little Discrimination Can Be a Good Thing,” openly advocates workplace discrimination, saying that in some cases discrimination is “not only right, but is also essential for obedience to God...”

■ ■

Quotes from speakers at the October 10, 2003 International Conference on Homo-Fascism in Milwaukee

Grant Storms — Christians Conservatives for Reform - Louisiana

24:40 “They [gays] want to kill you.”

25:00 “They have contempt for the things of God.... They are a scornful people.”

26:35 “It’s us or them. There is no in between. There is no having this peaceful co-existence. They have to eliminate us and the word of God if they want to succeed. It’s almost like capitalism and communism—it is going to be one or the other. You can’t have both.... Either they’re right, or we’re right. Either we’re going to succeed, or they’re going to succeed. Either it’s going to be a homosexual, anti-God nation, or it’s going to be a nation that stands for God and says that thing is sin. Can’t be both, won’t be both. Something is going to happen. Either they’ll crush us and...silence us and kill the ones that won’t be silent or imprison the ones that won’t be silent. Or the church of the Lord Jesus Christ will rise up and say this is a Christian nation: this is the way it will remain. Go back in the closet.”

31:20 “There is a philistine army out there. It’s called the homosexual movement, whether you can see it or not, understand it or not, they want to eliminate us.”

43:40 “For 20 years we have been begging bad legislators and bad judges to try to do the good thing. Enough is enough my good friends: let’s start taking it to the streets.”

59:00 “God has delivered them into our hands. Hallelujah – Boom, boom.

boom, boom, boom [like gun fire] – There's twenty! Ca-ching, glory, glory to God, let's go drive through the McDonalds and come back and get the rest."

Peter Hammond — Frontline Fellowship and African Christian Action – South Africa

16:50 "These people [gays & lesbians] aren't producing anything except new disease."

56:25 "He was found dead murdered by his live-in lover in an apartment. This is the standard norm. This is the way it works in the homosexual community. Why are those involved in homosexuality 10 times to 20 times more likely to sexually molest a child than so-called straights?"

56:55 "Lesbians tend to be selfish people."

65:02 "Deceived. Diseased. Dead—the three 'D's' of homosexuality"

70:02 "This is the battlefield. Just like the Muslims—we didn't want to fight them, but when they are attacking you, you have no choice but to fight back...."

72:00 "Bring them to repentance or bring them to judgment."

Peter LaBarbera — Illinois Family Institute

6:30 "Yes, I am anti gay because what gay is in the culture ... it is the ideological basis for a whole propaganda movement. Hitler would be proud how they used that word."

7:30 "They hate us, they hate Christians, they hate Jesus Christ, and they hate the word of God."

60:40 "Of course pedophilia is next."

Ralph Ovadal — Wisconsin Christians United

10:30 "The sodomites are the devil's specials forces, the brown shirts; they're the advanced guard."

13:08 "It's [homosexuality] about lawlessness. It's about brutality. It's about rebellion. It's about control. It's about crushing anyone who stands in the way of their satanic vision."

44:14 "This is a war."

59:14 "We need to draw blood on the devil."

David Crowter — Christian Watch U.K. Europe

12:27 "Its [homosexuality] origin is satanic"

Note: Action Wisconsin transcribed the above excerpts from a recording of the conference provided by Wisconsin Christians United. The numbers represent the time on the CD's that the comments were made.

■ ■

[home](#) | [about](#) | [contact](#) | [join](#)

**WHY DOES PASTOR
GRANT E.
STORMS OF
CHRISTIAN
CONSERVATIVES FOR
REFORM ADVOCATE
THE MURDER OF
GAYS?**



“God has delivered them (gay people)

into our hands, Hallelujia!

boom, boom, boom, boom, boom—

There goes twenty! ca-ching! glory

glory to God! Lets go drive through

the McDonald’s and come back and get

the rest!”

**Grant E. Storms 10/10/03 International Conference
on Homo-Facism**

To learn more, visit:

Exhibit 2

JAMES R. DONOHOO
ATTORNEY AT LAW
6525 W. BLUEMOUND ROAD SUITE 21
MILWAUKEE, WI 53213-4073

(414) 258-5989
FAX: (414) 475-6333

January 8, 2004

Action Wisconsin
Attn: Timothy O'Brien, President
1202 Williamson Street
Madison, WI 53703

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Dear Mr. O'Brien:

I have been retained by Pastor Grant Storms regarding a press release of Action Wisconsin dated December 8, 2003. The contact person shown on the press release was Joshua Freker. I have enclosed herein a copy of the four-page press release.

Pastor Storms believes two portions of that press release are false and defamatory. The first portion would be as follows:

"Another speaker made sounds like gunfire as if he were shooting gay people, saying, "God has delivered them into our hands . . . Boom boom boom . . . there's twenty! Ca-ching! Glory, glory to God." Excerpts of the speeches are attached.

The second false and defamatory portion of said press release is as follows:

"We trust that Senator Panzer will be as appalled as we were to find one of her colleagues in the audience for a speech apparently advocating the murder of his own constituents." said Ott.

These two statements obviously referred to Pastor Storms' speech, since you excerpted his speech at Pages 2 and 3 of the enclosed press release of December 8, 2003. You stated that Pastor Storms made sounds like gunfire as if he were shooting gay people, and you also stated that Pastor Storms was advocating the murder of gays. These statements were false and defamatory.

Action Wisconsin
January 8, 2004
Page Two

The true facts are that in his speech on October 10, 2003, Pastor Storms when he made the boom, boom, boom sound was re-enacting the Biblical story of Jonathan and his armor bearer, and that Biblical story and re-enactment had no connection whatsoever to the shooting of gay people. The re-enactment and the Biblical story of Jonathan and his armor bearer referenced by Pastor Storms on October 10, 2003, related to continuing the battle for Biblical precepts with faith in God no matter what the obstacles or odds. These are the true facts regarding Pastor Storms' statements. Therefore the statements that Pastor Storms made sounds as if he were shooting gay people, and that he was advocating the murder of gay people, were false and defamatory.

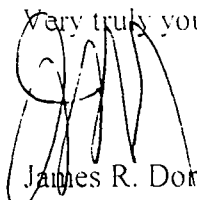
This press release was posted on your website, and was also posted on WisPolitics.com. This posting continues to this day.

Pastor Storms would request an immediate retraction of these libelous statements. He would request that you immediately remove the press release of December 8, 2003, from your website. He would also request that you immediately send a retraction press release to all individuals who received the initial press release of December 8, 2003. That retraction press release should state the true facts, and instruct the recipients to immediately remove the press release of December 8, 2003, from their websites, post the retraction press release, and request that the recipient send a letter with the accompanying retraction press release to any persons who may have received the initial press release of December 8, 2003.

Carbon copies of the retraction press release and cover letters and other actions taken by Action Wisconsin related to retraction should be sent to my office immediately upon issuance.

These true facts can be ascertained by reviewing the audiotapes of Pastor Storms' comments of October 10, 2003, not just your excerpts.

Very truly yours,



James R. Donohoo
JRD/ljb

Enclosure

cc: Pastor Grant Storms

JAMES R. DONOHOO
ATTORNEY AT LAW
6525 W. BLUEMOUND ROAD SUITE 21
MILWAUKEE, WI 53213-4073

(414) 258-5989
FAX: (414) 475-6333

January 8, 2004

Action Wisconsin
Attn: Christopher Ott, Executive Director
1202 Williamson Street
Madison, WI 53703

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Dear Mr. Ott:

I have been retained by Pastor Grant Storms regarding a press release of Action Wisconsin dated December 8, 2003. The contact person shown on the press release was Joshua Freker. I have enclosed herein a copy of the four-page press release.

Pastor Storms believes two portions of that press release are false and defamatory. The first portion would be as follows:

“Another speaker made sounds like gunfire as if he were shooting gay people, saying, “God has delivered them into our hands . . . Boom boom boom . . . there’s twenty! Ca-ching! Glory, glory to God.” Excerpts of the speeches are attached.

The second false and defamatory portion of said press release is as follows:

“We trust that Senator Panzer will be as appalled as we were to find one of her colleagues in the audience for a speech apparently advocating the murder of his own constituents,” said Ott.

These two statements obviously referred to Pastor Storms’ speech, since you excerpted his speech at Pages 2 and 3 of the enclosed press release of December 8, 2003. You stated that Pastor Storms made sounds like gunfire as if he were shooting gay people, and you also stated that Pastor Storms was advocating the murder of gays. These statements were false and defamatory.

Exhibit 4

Action Wisconsin
January 8, 2004
Page Two

The true facts are that in his speech on October 10, 2003, Pastor Storms when he made the boom, boom, boom sound was re-enacting the Biblical story of Jonathan and his armor bearer, and that Biblical story and re-enactment had no connection whatsoever to the shooting of gay people. The re-enactment and the Biblical story of Jonathan and his armor bearer referenced by Pastor Storms on October 10, 2003, related to continuing the battle for Biblical precepts with faith in God no matter what the obstacles or odds. These are the true facts regarding Pastor Storms' statements. Therefore the statements that Pastor Storms made sounds as if he were shooting gay people, and that he was advocating the murder of gay people, were false and defamatory.

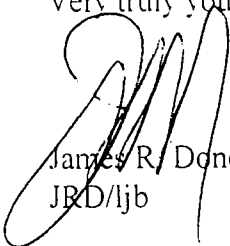
This press release was posted on your website, and was also posted on WisPolitics.com. This posting continues to this day.

Pastor Storms would request an immediate retraction of these libelous statements. He would request that you immediately remove the press release of December 8, 2003, from your website. He would also request that you immediately send a retraction press release to all individuals who received the initial press release of December 8, 2003. That retraction press release should state the true facts, and instruct the recipients to immediately remove the press release of December 8, 2003, from their websites, post the retraction press release, and request that the recipient send a letter with the accompanying retraction press release to any persons who may have received the initial press release of December 8, 2003.

Carbon copies of the retraction press release and cover letters and other actions taken by Action Wisconsin related to retraction should be sent to my office immediately upon issuance.

These true facts can be ascertained by reviewing the audiotapes of Pastor Storms' comments of October 10, 2003, not just your excerpts.

Very truly yours,



James R. Donohoo
JRD/ljb

Enclosure

cc: Pastor Grant Storms

JAMES R. DONOHOO
ATTORNEY AT LAW
6525 W. BLUEMOUND ROAD SUITE 21
MILWAUKEE, WI 53213-4073

(414) 258-5989
FAX: (414) 475-6333

February 4, 2004

Action Wisconsin
Attn: Timothy O'Brien, President
1202 Williamson Street
Madison, WI 53703

Dear Mr. O'Brien:

I had previously sent you a letter dated January 8, 2004, regarding the press release of Action Wisconsin dated December 8, 2003, and requested an immediate retraction of the libelous statements contained in that press release regarding my client, Pastor Grant Storms. I had requested that carbon copies of any retraction press releases and cover letters and other actions taken by Action Wisconsin related to retraction should be sent to my office immediately upon issuance.

I have received no response to this letter. The posting is still on your website.

My client has authorized me to commence legal action for defamation against Action Wisconsin and any individuals responsible for these libelous statements. A Summons and Complaint for defamation will be filed.

For your information, I have enclosed herein two documents. One is an e-mail which was sent by Kallen@uwalumni.com to a radio station in New Orleans which carries a radio show hosted by Pastor Storms. The information obviously came from your website.

I have also enclosed herein a poster which was posted on a telephone pole in New Orleans. This was just one of many identical posters that were on telephone poles in New Orleans. Pastor Storms saw this poster, and ripped it off and sent it to me.

Therefore it is obvious that your refusal to retract your libelous statements against Pastor Storms is having a dramatic impact in his community and elsewhere.

Very truly yours,

James R. Donohoo

JRD/jb

Enclosures

cc: Pastor Grant Storms

Exhibit 5

JAMES R. DONOHOO
ATTORNEY AT LAW
6525 W. BLUEMOUND ROAD SUITE 21
MILWAUKEE, WI 53213-4073

(414) 258-5989
FAX: (414) 475-6333

February 4, 2004

Action Wisconsin
Attn: Christopher Ott, Executive Director
1202 Williamson Street
Madison, WI 53703

Dear Mr. Ott:

I had previously sent you a letter dated January 8, 2004, regarding the press release of Action Wisconsin dated December 8, 2003, and requested an immediate retraction of the libelous statements contained in that press release regarding my client, Pastor Grant Storms. I had requested that carbon copies of any retraction press releases and cover letters and other actions taken by Action Wisconsin related to retraction should be sent to my office immediately upon issuance.

I have received no response to this letter. The posting is still on your website.

My client has authorized me to commence legal action for defamation against Action Wisconsin and any individuals responsible for these libelous statements. A Summons and Complaint for defamation will be filed.

For your information, I have enclosed herein two documents. One is an e-mail which was sent by Kallen@uwalumni.com to a radio station in New Orleans which carries a radio show hosted by Pastor Storms. The information obviously came from your website.

I have also enclosed herein a poster which was posted on a telephone pole in New Orleans. This was just one of many identical posters that were on telephone poles in New Orleans. Pastor Storms saw this poster, and ripped it off and sent it to me.

Therefore it is obvious that your refusal to retract your libelous statements against Pastor Storms is having a dramatic impact in his community and elsewhere.

Very truly yours,

James R. Donohoo

JRD/ljb

Enclosures

cc: Pastor Grant Storms

Exhibit 6