

IN THE SUPERIOR COURT OF FLOYD COUNTY

STATE OF GEORGIA

ED HAMMITT and
BRENDA HAMMITT,

Plaintiff,

vs.

TERESA WATSON, Individually and
ROMENEWSBYWATSON.COM, INC.

Defendants

CIVIL ACTION FILE

NO. 07-CV-04954-JJ 2001

FILED IN OFFICE

415
SEC 9-1-00

H. Black and

COMPLAINT

1. The Defendants herein are Teresa Watson, Individually, and romenewsbywatson.com, Inc., a Georgia Corporation.
2. Defendant Teresa Watson is a bona fide resident of Floyd County, Georgia, and may be served with a copy of this Complaint and Summons at 6 Vassar Drive, Rome, GA 30161.
3. Romenewsbywatson.com, Inc. may be served with a copy of the Complaint and Summons by serving its registered agent, Teresa Watson, at the aforesaid address.
4. The Plaintiffs in this action are Ed Hammitt and Brenda Hammitt who are residents of Chattooga County, Georgia.
5. For at least the last several months, the Defendants have published a web site that purports to be a newsletter available to the general public by internet service, whereas in truth and fact it has been utilized and continues to be utilized for the express

purposes of libeling and defaming literally scores of people in Chattooga and Floyd County and surrounding areas.

6. One method that the Defendants utilize in committing libel is to invite persons to respond to its web site publication and when a response is made the Defendants then publish such a response under a false name, such as “dirtyboy” in this case.

7. On December 3, 2007 at 8:49 a.m. someone using the name “dirtyboy” and failing to disclose his or her true name sent a communication by internet to Defendants’ web site and after receiving the same, the Defendants published on their web site the item attached hereto and made a part hereof as Exhibit A, all of which was of and concerning both Plaintiffs.

8. The Defendants have intentionally and maliciously published Exhibit A. charging the Plaintiffs with a criminal felony all of which was false, scandalous and done for no other purposes than to harm and malign innocent persons.

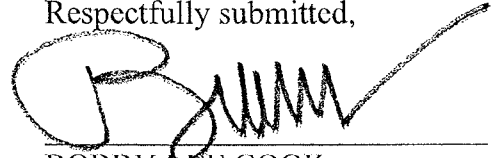
9. The aforesaid publication charges the Plaintiffs with serious crimes under the laws of Georgia, and this imputation was libelous per se and caused damage to Plaintiffs.

10. Plaintiffs show that the Defendant Teresa Watson is sick, malicious and obviously demented to engage in the ongoing libels on her website, affecting the lives of innocent people who are seriously afflicted by her ongoing, unabated tirade of invectives, such as theses Plaintiffs.

11. Plaintiffs sue the Defendants for the sum of \$1,000,000.00.

WHEREFORE, Plaintiffs pray that they be awarded a Verdict and Judgment in the sums sued for, together with the costs of this action.

Respectfully submitted,



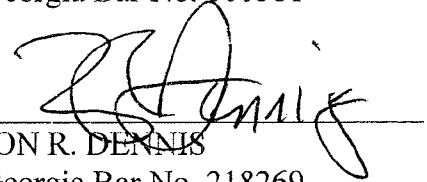
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Comments (32)

I knew Jon Dennis was crooked and in with that bunch...what a joke of a legal system we have and what a shame our county has to put up with it...
I can remember when this man was flipping hamburgers, and having affairs with students (all rumor of course) now he walks around town with is arrogant, better than though attitude.....like he has forgotten those humble hamburger days...this just proves what many have thought, than he is headed to take over as "king pin" on crooks in the county...watch out BLC, Albert... he might just out do you

overwhelmed

December 3rd, 2007 at 6:22 am

I think that soon, there will be more things come out about Mr. Dennis. I have been told that he has actually told clients to lie and to do some illegal things. I can't go into details, don't want to harm the investigations into him. I've read that Ed and Brenda Hammitt are involved in this. Now there's a couple. Some one told me that as there house was being built off of Ridgeview Dr. that there were marijuana plants found on his property, and Mr. Hammit and his wife told the workers not to pull them up. because they were gong to sell them to a certain Trion City councilman. But that was thwarted when Mark Schrader and Brian Tucker came and pulled them up. He also had a Ga. Power employee Wire his house, an it was told that he wired the house while his was on the clock with Ga. Power. Materials meant for Ga. Power was used in the house. Matter of fact, when the front porch was being poured, they used "ground rods" for reenforcement instead of rebar. Rebar is a steal that is used to strengthen the concrete.

dirtyboy

December 3rd, 2007 at 8:49 am

come on guys everyone in chattooga county knows ben is joke for a lawyer

Dear Redneck -

Actually, Ben is respected down here in Floyd County. I have so many e-mails to one of my personal e-mail accounts, who are stunned at this secret, immediate, move by Dennis. I had no idea so many lawyers down here were reading and watching this website.

I have also already gotten several other stories from VERY respected attorneys from elsewhere in Georgia, NOT BEN, and from up in Chattannoga, Tennessee, all with similar stories, so, LET the GAMES BEGIN. This will carry us through in to the new year. Now that other attorneys keep seeing the same names of opposing counsel/judges pop up in decisions which made them scartch their heads and go, "Hmmm", they are beginning to speak out. The names John Dennis, Arch Farrar, Albert Palmour, Carlton Vines, Jerry Westbrook, Kristina Cook Connelly, Bobby Lee Cook - over and over in really bad law, bad decisions from the bench, illegal and questionable practices.

<http://www.romenewsbywatson.com/?p=1301>

Exhibit A

12/4/2007

NOTE B:

When used hereinafter, the terms "Defendant" and "you," and any synonym or plural thereof, and derivatives therefrom, are intended to and shall embrace and include the above-named Defendant and, in addition, all agents, masters, servants, associates, employees, representatives, private investigators, insurers, attorney(s) (excluding trial preparation materials and the limited "work product" privilege), and others who are or have been in possession of, or may have obtained information for or on behalf of said Defendant.

NOTE C:

As used in the following Interrogatories, the term "DOCUMENT" or "DOCUMENTS," or both, are defined in the broadest sense permitted by Section 1 et seq. of the Georgia Civil Practice Act (Official Code of Ga. Ann. Section 9-11-1 et seq.) and shall embrace and include, but shall not be limited to any and all of the following: Any and all written, printed or typed documents, records, photographs, books, letters, memoranda, reports, bulletins, papers, logs, agreements, contracts, worksheets, bills, invoices, lists, printed forms, notes, and all other writings or correspondence of any kind, relating to or pertaining in any way to the subject matter of this action, and further shall include, without limitation, file copies or other copies, no matter how or by whom prepared, and all drafts prepared in conjunction with any and all such writings or documents, whether said drafts were used or not, and shall include all of said documents, originals, copies, reproductions or revisions set out above, whether typewritten, handwritten, printed, mimeographed, Photostatted, or otherwise reproduced and shall

include all copies or photocopies of such documents (specifically including all information in computers, in computer readable form or on microfilm, as well as all such documents or information on audio or video tape, even if not yet typed or made into any statement, affidavit or other document.

NOTE D:

When used in the following Interrogatories, with reference to a contract, instruments or other DOCUMENT, the term "IDENTIFY" means to

- (a) state the type of DOCUMENT (e.g., letter, assignment, memorandum, books, telegram, notes, etc.);
- (b) state the date of the DOCUMENT;
- (c) state the name of the originator of the DOCUMENT;
- (d) state the name of each signatory and
- (e) the full name, complete address, zip code and telephone number (including the area code) of the present custodian of the DOCUMENT.

NOTE E:

It will be sufficient to answer an Interrogatory calling for the IDENTIFICATION of a DOCUMENT or DOCUMENTS to state that such DOCUMENT, or a copy thereof, will be produced in accordance with "Plaintiff's Notice to Produce and Request for Production of Documents," filed concurrently herewith, if such DOCUMENTS are so produced; but any DOCUMENTS herein specified which cannot or will not be so produced must be herein IDENTIFIED as requested, to the extent possible, whether or not they are in your possession, custody or control.

NOTE F:

These Interrogatories are continuing, and if at any time, after you have responded to these Interrogatories, any other, further, conflicting, or additional information or document(s) relevant to these Interrogatories, but not previously set forth in your response(s) to said Interrogatories, comes to your knowledge, or comes into your possession or control, then you are requested to further respond and to supplement your response(s) to said Interrogatory(ies) within thirty (30) days from your knowledge or the receipt by you of such additional information or document(s) and, in any event, prior to any pre-trial conference, trial, hearing or deposition of any Party or witness to this action, and from day to day, and from time to time, and from term to term thereafter, until the cause is finally disposed of.

NOTE G:

Herein, the singular includes the plural, and vice versa, and the disjunctive includes the conjunctive, and vice versa.

INTERROGATORIES

1. Reveal and disclose in detail any evidence or information that you possess or know that Plaintiffs grew marijuana on their property, other than the allegations made by 'dirtyboy.'
2. Disclose the true name of dirtyboy.
3. Have you ever met or spoken to dirtyboy by phone, and if so reveal and disclose the complete conversation.

4. If you reply that you do not know the true name of "dirtyboy," disclose the reason that you would publish Exhibit A attached to the Complaint filed and served herewith.

5. Disclose in detail why you published an article on your website that Plaintiffs grew marijuana as set forth in Exhibit A attached to the Complaint filed and served herewith.

6. Disclose in detail the correct addresses of any and all places in which you have resided for the past ten (10) years.

7. Disclose in detail the names and places of any and all lawsuits or civil actions in which you have ever been involved as a Plaintiff or Defendant.

8. Disclose any and all facts that you possess or have knowledge of that Bobby Lee Cook was involved in an election fraud in Chattooga County.

9. Disclose any and all facts, that you possess or have knowledge of, that Bobby Lee Cook was involved in an insurance fraud with the City of Summerville.

10. Disclose any and all facts, that you possess or have knowledge of, that Branch Connelly's death was in any way connected with a child porno ring.

11. What attorney, if any, has given you any legal advice as to the publications made on your website? (I am not requesting what that advice may have been.)

12. Disclose the names and addresses of all officers and their positions with Romenebywatson.com, Inc.

13. Has romenebywatson.com, Inc. ever filed a Federal Income Tax Return?

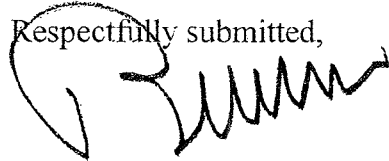
14. Is romenebywatson.com, Inc. a for-profit corporation?

15. If anyone other than yourself has a financial interest in romenewsbywatson.com, Inc., disclose their names, addresses and the full nature of their interest.

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Respectfully submitted,



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