

STATE OF TENNESSEE 21ST JUDICIAL DISTRICT
WILLIAMSON COUNTY, FRANKLIN, TENNESSEE 37064
CIRCUIT COURT

COP

Gwen SHAMBLIN

PLAINTIFF

TEDD ANGER

VERSUS

CIVIL ACTION NO. 09476

RAFAEL MARTINEZ

DEFENDANT

SUMMONS

To the above named Defendant:

You are summoned to appear and defend a civil action (Complaint of Divorce) filed against you in Circuit Court, Williamson County, Tennessee, and your defense must be made within thirty (30) days from the date this summons is served upon you. You are further directed to file your defense with the Clerk of the Court and send a copy to the Plaintiff's attorney at the address listed below:

ATTORNEY FOR PLAINTIFF

SAMUEL J. HARRIS

Phone No. _____

320 E. BRID ST.

COOKEVILLE, TN

In case of your failure to defend this action by the above date, judgment by default will be rendered against you for the relief demanded in the complaint.

ISSUED: 8-12, 2009

DEBBIE McMILLAN BARRETT

Circuit Court Clerk, Williamson County

By:

Deputy Clerk

Anna Riden Dr

TO THE SHERIFF:

Please execute this summons and make your return hereon as provided by law.

DEBBIE McMILLAN BARRETT

Circuit Court Clerk, Williamson County

Received this summons for service this 26th day of August, 2009.

SHERIFF

COPY

IN THE CIRCUIT COURT OF WILLIAMSON COUNTY, TENNESSEE

Gwen Shamblin and Tedd Anger,
Plaintiffs

Vs.

Rafael Martinez,
Defendant

Case # 09476

FILED

AUG 12 2009

Debbie McMillan Barrett
Circuit Court

COMPLAINT

1. The Plaintiffs are looking for remedy from the Court for the malicious actions of the Defendant who has published to the whole world via the internet extremely outrageous, discriminatory, defamatory, and false accusations that has caused damage to the Plaintiffs' reputation and emotions. The statements further cause damage to the Plaintiffs' right to privacy because it places them in a false light and subject to ridicule by the public.
2. The Plaintiffs, Gwen Shamblin and Tedd Anger, are residents of Williamson County, Tennessee.
3. The Defendant, Rafael Martinez, is a resident of the State of Tennessee.
4. This is an action based on defamation that occurred on August 13, 2008, and was subsequently published on other websites repeatedly.
5. On August 13, 2008, the Defendant, Rafael Martinez, responded to an article on celebgalz.com with the following statement (hereinafter referred to as "the Statement") which is demonstrably false:

An equally dangerous cult called Remnant Fellowship found itself under scrutiny when two of its members were arrested, tried and convicted of murdering one of their children when they followed the child-rearing directions of the cult's leadership, self-anointed "prophetess" Gwen Shamblin and her sycophant lieutenant Tedd Anger. When the members, Joseph and Sonya Smith went to trial, however, Remnant was able to cop a deal with the prosecutors and avoid getting dragged into the murder trial.

As the Church Lady would say "How conVEEEEenient."

So that twisted woman Gwen Shamblin to this day strolls around from coterie to coterie in her little Southern cult hothouse, blindly followed by about 1100 or so people, many of whom are children who are just as vulnerable to the practical

lifestyle excesses Shamblin advances as "God's Way" .. and who likely have endured abuses that would make you swallow hard.

Sad that it's only when children die in the horrific ways that cults set up for them that this issue EVER pierces the national conscience.

After all, Britney Spears lack of underwear and the premiere of the next action flick installment at the metroplex are far more important.

Murderous ministries are afoot everywhere. They are as American and home grown as mom, apple pie and McDonalds. The problem is everyone forgets about them when they drop off the front page - except the victims of these cults and those very few activists and ministers who can't let this evil be forgotten and who do what we can to get people out of these groups and aid them in getting a firm foundation on reality again.

Count 1 – Invasion of Privacy

6. The Defendant gave publicity to matters concerning Plaintiffs that places Plaintiffs before the public in a false light. The false accusations by Defendant publishing this statement on various websites invade the privacy of the above-mentioned Plaintiffs and are highly offensive to any reasonable person.
7. The Defendant had knowledge of or acted in reckless disregard as to the falsity of the publicized matter on the blog/website and the false light in which the Plaintiffs would be placed.
8. The Defendant, Rafael Martinez, has written numerous false and hateful statements regarding the Plaintiffs and their religious beliefs.
9. The Plaintiffs have suffered damages including, but not limited to, loss of reputation, humiliation, public ridicule, mental distress, and loss of privacy as a result of the aforementioned actions which invaded Plaintiffs' privacy and defamed the Plaintiffs.

Count 2 – Defamation

10. Plaintiffs hereby incorporate paragraphs 1 through 9 within this count as if fully set forth herein.

11. The Defendant published one or more written false statements that were intended to impeach Plaintiffs' honesty, integrity, virtue, and/or reputation. The false statements expose the Plaintiffs to hatred, contempt, and ridicule.
12. The Defendant published the Statement with malice and reckless disregard of the truth.
13. The Statement, *inter alia*, directly and indirectly state that the Plaintiffs directed actions leading to the death of a child and further that the Plaintiffs negotiated a deal with prosecutors to escape justice. This statement is libelous and completely false.
14. The defamatory statements made by this Defendant were made willfully, intentionally, and maliciously, and were clearly calculated to harm the Plaintiffs.
15. As a result of the Defendant's malicious, defamatory statements, the Plaintiffs have suffered damages to their reputations and potential incomes.

WHEREFORE, the Plaintiffs pray for judgment against Defendants for actual, special, and compensatory damages in an amount deemed at time of trial to be just, fair, and appropriate by a jury of their peers, but said damages are in excess of \$100,000.00 for each and further, the Plaintiffs seek punitive damages in the amount of \$500,000.00.

Respectfully submitted,

Samuel J. Harris

Samuel J. Harris, BPR #017392
320 East Broad Street #200
Cookeville, TN 38501
931-854-0237

By Permission
TA

I agree to stand as surety for costs up to \$1,000.00.

Samuel J. Harris
Samuel J. Harris

By Permission
TA