

STATE OF OHIO
CLERMONT COUNTY
COURT OF COMMON PLEAS
DIVISION _____

MICHAEL WIGGINS
2825 POND RUN ROAD
NEW RICHMOND

AND

LISA WIGGINS
2825 POND RUN ROAD
NEW RICHMOND

Plaintiffs

v.

JENNIFER TAYLOR
2849 POND RUN ROAD
PIERCE TOWNSHIP, OH 45157

AND

LINDA FRANKLIN
2908 POND RUN LANE
PIERCE TOWNSHIP, OH 45157

AND

ROBIN WILLIS
2904 POND RUN ROAD
NEW RICHMOND, OH 45157

AND

RODNEY HENRY
840 OLD US 52
NEW RICHMOND, OH 45157

AND

JEREMIAH BADELL
2646 BEECHMAR DRIVE
CINCINNATI, OH 45230

CASE NO. 201CVH 1547

JUDGE
JUDGE BROCK

BARBARA A. HEDENBEN
CLERK OF COURT
CLERMONT COUNTY, OH

2024 NOV - 1 AM 10:08

FILED

AND

**PETE KAMBELOS
2855 POND RUN ROAD
PIERCE TOWNSHIP, OH 45157**

AND

UNKNOWN CONSPIRATORS 1-10

Defendants.

COMPLAINT WITH JURY DEMAND

Comes now Plaintiffs, Michael and Lisa Wiggins, by and through counsel, and for their Complaint with Jury Demand against Defendants states as follows:

PARTIES

1. Michael Wiggins is a resident and holds a legal domicile in Clermont County, Ohio.
2. Lisa Wiggins is a resident and holds a legal domicile in Clermont County, Ohio.
3. Jennifer Taylor is a resident and holds a legal domicile in Clermont County, Ohio.
4. Linda Franklin is a resident and holds a legal domicile in Clermont County, Ohio.
5. Robin Willis is a resident and holds a legal domicile in Clermont County, Ohio.
6. Rodney Henry is a resident and holds a legal domicile in Clermont County, Ohio.
7. Jeremiah Badell is a resident and holds a legal domicile in Clermont County, Ohio.
8. Pete Kambelos is a resident and holds a legal domicile in Clermont County, Ohio.
9. Unknown Conspirators 1-10 are also residents and hold a legal domicile in Clermont County, Ohio.

JURISDICTION & VENUE

10. All the facts arising out of this matter not only involve all the Plaintiffs and Defendants living in Clermont County, Ohio, but all the actions giving rise to the claims also occurred in Clermont County, Ohio.
11. Each claim against each Defendant exceeds in value the jurisdictional amount of this Court.

FACTS & ALLEGATIONS AGAINST EACH DEFENDANT

JENNIFER TAYLOR

12. From 2022 to the present, Jennifer Taylor communicated in writing and/or orally to third persons including law enforcement officers the following false statements:
- A. That both Wiggins were “frightening persons.”
 - B. That both Wiggins operated a business improperly out of their home which would be a crime.
 - C. That Mike Wiggins hunted on Taylor’s property which would be a crime.
 - D. That both Wiggins shot guns on Taylor’s property which would be a crime.
 - E. That Mike Wiggins used a PVC pipe to cause sewage to run into a creek which would be a crime.
 - F. That both Wiggins failed to obtain a building permit for a storage unit which would be a crime.
 - G. That Mike Wiggins placed “smelly” telephone poles near Taylor’s property which would be a nuisance.
 - H. That both Wiggins have trespassed on Taylor’s property which would be a crime.
 - I. That Mike Wiggins shot a coyote on her property which would be a crime.

- J. That the Wiggins made excessive noise on their property which would be a nuisance.
- K. That Mike Wiggins is a “terrorist.”
- L. That Mike Wiggins pulled up property line pins which would be a crime.
- M. That bullets fired by the Wiggins “whizzed” by her head which would be a crime.
- N. That the Wiggins stalked her to her work which would be a crime.
- O. That Mike Wiggins shot her dog which would be a crime.
- P. That Mike Wiggins used a bulldozer to dig up a creek without proper authorization which would be a crime.
- Q. That Mike Wiggins stole trees off her father’s property which would be a crime.
- R. That Mike Wiggins pointed a cannon at her home which would be a crime.

LINDA FRANKLIN

13. In an email from Linda Franklin on November 23, 2023 to Peter Kambelos, Linda Franklin communicated in writing the following false statements:

- A. That the Wiggins failed to obtain proper permits which would be a crime.
- B. That the Wiggins improperly placed signs on their property which would be a crime.
- C. That the Wiggins shoot over her property which would be a crime.
- D. That Mike Wiggins shot coyotes to protect deer in an illegal fashion which would be a crime.
- E. That the Wiggins do “excessive shooting” which would be a crime.
- F. That the Wiggins have a “history of other shady activities.”

G. That the Wiggins “degraded” their property and turned the “beautiful historical home to an eyesore.”

H. Implied the Wiggins are not law abiding or honest.

I. That the Wiggins give “honest hunters a bad name.”

ROBIN WILLIS

14. In a November 3, 2022 email, Willis claimed the Wiggins did not obtain proper permits and shot guns improperly on their property- which would be crimes.

RODNEY HENRY

15. In a January 10, 2024 public meeting, Henry stated Mike Wiggins is a nuisance and is “mental” and fired guns improperly on their property which would be a crime.

JEREMIAH BADELL

16. From 2022 to the present, Jeremiah Badell communicated in writing and/or orally to third persons including law enforcement officers the following false statements:

A. Mike Wiggins is always drunk and stoned.

B. Mike Wiggins shoots his gun over Badell’s head which would be a crime.

C. Mike Wiggins shot and put two dead squirrels in a pond which would be a crime.

D. The Wiggins failed to obtain a permit for their storage cabin which would be a crime.

PETE KAMBELOS

17. In a January 10, 2023 public meeting Kambelos called Mike Wiggins wicked, menacing and deranged.

18. On October 12, 2023, Kambelos read a letter at a public meeting accusing Mike Wiggins of illegal firing of guns which would be a crime.

UNKNOWN CONSPIRATORS 1-10

19. These Unknown Conspirators 1-10 not only repeated and stated the above referenced false statements, they did so to cause the harm described that follows.

HARM CAUSED BY DEFENDANTS' ACTIONS

20. The Defendants' false statements caused the Plaintiffs to be held up to the public in ridicule.
21. The Defendants' false statements caused Mike Wiggins to be charged with 4th Degree Trespassing in Clermont County, a charge which was dropped.
22. The Defendants' false statements caused Mike Wiggins to be charged with a second degree misdemeanor.
23. The Defendants' false statements caused Pierce Township law enforcement to repeatedly investigate and question Plaintiffs.
24. The Defendants' false statements caused Pierce Township zoning officials to investigate and question Plaintiffs.
25. The Defendants' false statements caused the harassment of Plaintiffs by third parties including neighbors.

COUNT I- DEFAMATION/LIBEL AND SLANDER

26. Plaintiffs adopt and incorporate by reference each and every allegation in the prior paragraphs:
27. Defendants' words and actions constitute defamation in that their words were false, were pertaining to Plaintiffs, were communicated to third parties and caused harm to Plaintiffs.

COUNT II- FALSE LIGHT

28. Plaintiffs adopt and incorporate by reference each and every allegation in the prior paragraphs:

29. Defendants' actions gave publicity to a matter concerning Plaintiffs that places Plaintiffs before the public in a false light and caused harm to Plaintiffs.

COUNT III- INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

30. Plaintiffs adopt and incorporate by reference each and every allegation in the prior paragraphs:

31. Defendants conduct as described was intentional and reckless.

32. The conduct is outrageous and offends generally accepted standards of morality.

33. It was the proximate and actual cause of Plaintiffs' psychological injuries, emotional injuries, mental anguish, suffering, and distress.

34. Plaintiffs suffered severe distress and anguish so serious and of a nature that no reasonable man or woman would be expected to endure.

COUNT IV- NUISANCE (Jennifer Taylor Only)

35. Plaintiffs adopt and incorporate by reference each and every allegation in the prior paragraphs:

36. Jennifer Taylor's placement of cameras on the edge of her property facing the Plaintiffs' property is a nuisance under ORC 3767.

COUNT V- MALICIOUS PROSECUTION

37. Plaintiffs incorporate by reference every paragraph contained in this Complaint, as if fully restated herein.

38. Defendants caused with malice to have filed criminal charges against Mike Wiggins without probable cause or reasonable grounds and those charges were dropped and terminated in Mike Wiggins' favor.

COUNT VI- ABUSE OF PROCESS

39. Plaintiffs incorporate by reference every paragraph contained in this Complaint, as if fully restated herein.

40. Defendants with malice used the criminal justice system against Defendants in an abusive manner and improper purpose by filing criminal charges against Mike Wiggins.

COUNT VII- CIVIL CONSPIRACY

41. Plaintiffs incorporate by reference every paragraph contained in this Complaint, as if fully restated herein.

42. Defendants did together, plan, prepare, and defame Plaintiffs for ulterior purposes to cause harm to Plaintiffs.

43. Defendants did form such conspiracy with a conscious disregard for the rights of the Plaintiffs.

44. They formed such conspiracy knowing its objects had a great probability of causing substantial harm to Plaintiffs and in fact, the harm to plaintiffs was their goal including pushing them to move, having constant law enforcement harassment and having criminal charges filed against them.

45. Plaintiffs have suffered harm as a result of the conspiracy.

COUNT VIII- LOSS OF CONSORTIUM

46. As a result of the wrongful acts and omissions of Defendants, Plaintiffs were caused to suffer, and will continue to suffer in the future, loss of consortium, loss of society, loss of

affection, loss of assistance, and loss of conjugal fellowship, all to the detriment of Plaintiffs' marital relationship.

47. All the aforesaid injuries and damages were caused proximately by the acts and omissions of Defendants.

PRAYER FOR RELIEF

Wherefore, Plaintiff requests all compensatory and punitive damages, attorney fees, court costs, costs and all other relief which they are entitled.

Respectfully submitted,

/s/ Alan Statman

Alan Statman (#12045)

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