

IN THE CIRCUIT COURT OF THE 12TH JUDICIAL CIRCUIT
WILL COUNTY, ILLINOIS

CYNTHIA BRZANA AND)
MICHAEL ESPOSITO)
) Case 18 L 718
Plaintiffs,)
v.)
)
KATHLEEN KENNEDY, DONALD)
NORTON, JOHN NORTON AND)
SARAH NORTON,)
)
Defendants)

MOTION FOR LEAVE TO FILE AMENDED COMPLAINT INSTANTER

NOW COME the Plaintiffs CYNTHIA BRZANA AND MICHAEL ESPOSITO, by and through their counsel, Law Offices of Robert T. Hanlon and Associates and moves this Court for leave to file a First Amended Complaint instanter and in support thereof, states as follows:

1. Defendant Kathleen Kennedy recently filed an appearance with this court.
2. A copy of Plaintiffs Amended Complaint is attached hereto as Exhibit A.
3. The scope of the allegations is significantly greater and additional

defendants need to be served in connection with this complaint.

WHEREFORE, the Plaintiffs pray that this honorable Court grant the following relief:

- A. For leave to File **PLAINTIFFS' 1st AMENDED COMPLAINT** instanter;
- B. Leave to issue a summons to the new defendants named in the attached complaint;
- C. For such other and further relief as the court deems just and equitable.

Respectfully submitted,

By: /s/ Robert T. Hanlon
Robert Hanlon,
One of Plaintiffs' Attorneys

Robert T. Hanlon, ARDC #6286331
Law Offices of Robert T. Hanlon & Assoc., P.C.
131 East Calhoun Street
Woodstock, IL 60098
(815) 206-2200
Attorney for Plaintiffs

CERTIFICATE OF SERVICE

I, Robert T. Hanlon, an attorney, state that I have served the attached **MOTION FOR LEAVE TO FILE AMENDED COMPLAINT INSTANTER** in the above-captioned case on each of the parties listed below by electronic mail on the date listed below and by means of the I-2 file system utilized by the Circuit Court of Will County.

SCOTT PYLES
RATHBUN, CSERVENYAK & KOZOL, LLC
3260 EXECUTIVE DRIVE
JOLIET, IL 60431

RATHBUN CSERVENYAK & KOZOL LLC
RATHBUN CSERVENYAK & KOZOL LLC
15409 S. ROUTE 59
PLAINFIELD, IL 60544

Dated: November 28, 2018

Exhibit A

(Proposed Amended Complaint)

IN THE CIRCUIT COURT OF THE 12TH JUDICIAL CIRCUIT
WILL COUNTY, ILLINOIS

CYNTHIA BRZANA AND)
MICHAEL ESPOSITO ,)

)
Plaintiffs,)

v.)

Case No. 18 L 718

)
KATHLEEN KENNEDY, DONALD)
NORTON, JOHN NORTON, AND)
SARAH NORTON,)

)
Defendants.)

FIRST AMENDED COMPLAINT

NOW COMES Plaintiffs, CYNTHIA BRZANA AND MICHAEL
ESPOSITO, by and through their attorney, LAW OFFICES OF ROBERT T.
HANLON & ASSOCIATES, P.C., and for their First Amended Complaint against
Defendants, KATHLEEN KENNEDY, DONALD NORTON, JOHN NORTON,
AND SARAH NORTON, for False Light Invasion of Privacy, Slander Per Se,
Libel Per Se, and Civil Conspiracy and in support thereof, state as follows:

PARTIES AND VENUE.

1. Defendant, KATHLEEN KENNEDY, is a resident of Will County,
Illinois, residing at 34780 South Wurtz Road, Wilmington, Illinois 60481.

2. Defendants, DONALD NORTON, JOHN NORTON AND SARAH NORTON (hereinafter “DONALD”, “JOHN” and “SARAH” respectively), each reside in Will County, Illinois, at 1834 Roberts, Wilmington, Illinois 60481.

3. Both Plaintiffs reside in Will County, Illinois.

4. The claims in this case arose in Will County, Illinois.

5. Venue is proper in this Court because each party is a resident of this county and the claims arose here in Will County, Illinois.

FACTS COMMON TO EACH COUNT

6. On or about July 13, 2018, Defendant, KATHLEEN KENNEDY (hereinafter “KENNEDY”), began warning various persons that Plaintiff, CYNTHIA BRZANA (hereinafter “BRZANA”) was a “park harasser”.

7. On or about August 8, 2018, KENNEDY publically accused BRZANA of being a pedophile. Specifically, KENNEDY began warning individuals about a woman taking pictures of children at the park without permission and alleging that taking pictures of children under sixteen (16) was illegal. KENNEDY also stated, “Oh yes, after all, now days, you just never know who could be a pedophile”. Contemporaneously, with making the aforementioned statement, KENNEDY distributed a flyer naming “Cynthia Brzana” as a “park harasser” and even provided her license plate number on the flyer with the implication that BRZANA was a pedophile. KENNEDY, then requested that she

be called if BRZANA is seen in the park. A copy of the flyer distributed by KENNEDY is attached hereto and incorporated herein as Exhibit A.

8. On or about August 14, 2018 at about 10:17 a.m., Cynthia Adams memorialized her encounter with KENNEDY and stated as follows:

i. “Cindy there is one other thing I wanted to tell you about my encounter with Kathy Kennedy at the park, when she was telling me about the woman taking pictures at the park she said it was illegal to take pictures of kids under 16 without permission, I said I was not aware of that and she said oh yes after all now days you just never know who could be a pediphile, I said well maybe this lady just likes to take pictures and she said oh no this is a totally different situation then went in the back of her vehicle and got the paper with you and Fritz's name on it and told me to let her know if I saw either of you there. Pediphile is not a word you toss around lightly even in inference, when we camp down there I am always taking pictures so none of this makes sense to me.”

9. The aforementioned acts and statements of KENNEDY were designed to smear the reputation of BRZANA as a pedophile.

10. Upon information and belief, Defendants have undertaken a campaign to disparage BRZANA to further the idea that BRZANA is a pedophile when in fact she is not a pedophile.

11. Upon Information and belief all named Defendants have met and agreed to further the idea that BRZANA is both a whore and a pedophile.

12. JOHN stated to a local newspaper: “KENNEDY never called BRZANA a pedophile, that idea was brought up in an irrelevant conversation”.

13. JOHN is one of the administrators of the “Guardians of Wesley Township” Facebook page that has published numerous statements imputing BRZANA as being a pedophile.

14. JOHN acknowledged being one of the administrators of the “Guardians of Wesley Township” Facebook page in the hearing of *Norton v Brzana* on November 16, 2018 before the Honorable Frederick v. Harvey.

15. Upon information and belief, other administrators of the “Guardians of Wesley Township” Facebook page are: SARAH, DONALD and KENNEDY.

16. Attached hereto and incorporated herein as are various publications of the “Guardians of Wesley Township” Facebook page authored by Defendants that label BRZANA as a pedophile. The statements on the ‘Guardians of Wesley Township’ Facebook Page include but are not limited to the following:

- a. “WARNING to PARENTS: If you see this woman with any device capable of taking photos or videos when children are nearby, clear the area immediately.” See Exhibit B attached hereto and incorporated herein.
- b. “Cynthia (aka Charlotte Tenn) attempting to curry favor from her heroes, the Edgar County Group. Had she worn her golden knee pads and properly worshiped them, they may have granted

her wish.” See Exhibit C attached hereto and incorporated herein.

c. “Its like playing whack-a-mole with these attention whores.”

See Exhibit D attached hereto and incorporated herein.

d. “She was down at the park again today taking pictures of kids.

She now uses a black Ford FX4 pick-up truck to stalk people.”

See Exhibit E attached hereto and incorporated herein.

17. The statements published on the “Guardians of Wesley Township” Facebook page referenced in paragraph 16 were of and concerning BRZANA, one of the Plaintiffs in this case.

18. The statements published on the “Guardians of Wesley Township” Facebook page concerning BRZAJA as being a pedophile are false.

19. On or about August 15, 2018 at or about 3:03 a.m., Defendants using IP address “24.12.245.122, c-24-12-245-122.hsd1.il.comcast.net” published to Kirk Allen, John Kraft and the Edgar County Watchdogs under the assumed name of “Bla Bla” the statement:

i. “Did you know Cynthia Brzana aka Charlotte Tenn is a pedophile and post pics of other peoples kids on Facebook? Do you condone and promote this type of actions?” See Exhibit F attached hereto and incorporated herein.

Upon information and belief the IP address referenced in this paragraph is associated with the computers located at the home of DONALD, JOHN and SARAH.

20. JOHN and SARAH both associate BRZANA as Charlotte Tenn.

21. The statement published on August 15, 2018, referenced in paragraph 19 above, is false and published with the intent to defame BRZANA and to seek wider publication of the allegation that BRZANA is a pedophile when in fact she is not a pedophile.

22. Defendants agreed in conspiracy to malign and defame the good name and character of BRZANA by labeling her a pedophile and a whore. On numerous occasions at each of the preceding six months of Wesley Township meetings, JOHN called BRZANA a “whore”, and a “dirty whore” in the presence of third persons.

23. Defendants in furthering the objective of maligning the reputation of BRZANA agreed to a campaign to label BRZANA an unchaste woman using the words “whore” and “dirty whore” and “pedophile” to describe BRZANA in publications to third parties.

24. The statements by Defendants accusing BRZANA of being a pedophile are false and wholly without any merit whatsoever.

25. On November 16, 2018 when asked what JOHN understood the term pedophile to mean, JOHN stated:

i. “A person over the age of 18 conducting sexual activity with or illicit activity with a person under the age of 18 depending on the state. I believe nationwide it's 18. Some states it's 17, some are 13. So it would imply illegal sexual activity.”

26. The term “pedophile” is defined as a person having a psychiatric disorder in which they have an exclusive sexual attraction to children.

27. The term “Pedophile” was used by Defendants to insinuate that BRZANA had sexual contact with minors.

28. KENNEDY’S publication of the statements in a public park was wantonly conducted to infer that BRZANA was prowling about public parks to engage children in sexual acts.

29. The statements of KENNEDY when said in context of delivering a flyer labeling BRZANA of being a “park harasser” was done to infer that BRZANA, was in fact a pedophile, when, in reality, the inference is false.

30. Upon information and belief, each of the Defendants either directly or indirectly used social media to spread the idea that BRZANA was a pedophile and a whore when, in fact, BRZANA is not a pedophile, nor a whore.

31. All named Defendants published the following statement to the Edgar County Watchdogs via an IP address associated with DONALD’S home as follows:

i. “Cynthia Brzana a/k/a Charlotte Tenn, is a pedophile and posts pictures of other people’s kids on Facebook.” See Exhibit F attached hereto and incorporated herein.

32. On November 16, 2018, JOHN made the following statement in open court in reference to BRZANA in the matter of *Norton v. Brzana* :

i. “What it was, that she was never referred to as a pedophile, but her acts were what we deemed in layman terms and from very we put it on the same level as a pedophile. In other words, as low as that. We treat pedophiles extremely low, but somebody who would exploit an underage child for their own personal benefit is on the same level socially as that, your Honor.”

33. On or about August 16, 2018 while present in the Wesley Township building, JOHN announced, in the presence of at least two other persons, that Plaintiff, MICHAEL ESPOSITO (hereinafter “ESPOSITO”), was a pedophile. More specifically, JOHN stated to ESPOSITO, in the presence of at least two other persons, “You’re a pedophile”.

34. SARAH on November 16, 2018, in open court, upon the solicitation of JOHN stated that JOHN called ESPOSITO a pedophile. See Group Exhibit G (select testimony from transcript of proceedings in open court) attached hereto and incorporated herein.

35. ESPOSITO is not a pedophile and the statement by JOHN calling him a pedophile was and is false.

36. JOHN’S use of the term pedophile was knowingly and wantonly used to smear the reputation of ESPOSITO.

37. The statement by JOHN to ESPOSITO, in the presence of others, was made with actual malice and New York Times malice, that is with the knowledge of the falsity of the statement.

38. Posted on the “Guardians of Wesley Township” Facebook page were the following statements of and concerning ESPOSITO:

i. “Conspiracy to commit attempted murder might also be a good reason, right, Mick??”; and

ii. “Mick’s blade is like his brain → DULL←”. See Exhibit J attached hereto and incorporated herein.

39. The statements made by Defendants on the “Guardians of Wesley Township” Facebook page were designed to harm the good reputation and credit of each Plaintiff.

40. Both Plaintiffs are persons of good credit and good character. Malice is the gist of the Complaint.

41. The false statements of Defendants referenced herein above cast each Plaintiff in a false light.

42. The statements claiming that ESPOSITO was engaged in conspiracy to commit murder on the “Guardians of Wesley Township” Facebook page are false.

43. The statements of Defendants of and concerning both Plaintiffs as being pedophiles are false and not privileged.

44. At a point in time unknown, but believed to be within six months prior to the date of the filing of this Amended Complaint, SARAH published the following statement:

i. Here is Cindy Brzana's number 815-953-6593 if anyone would like to harass her as she likes to terrorize women and small children with obscene gestures and stalking them..Now she can understand how it feels to be stalked and terrorized by people..” See Exhibit H which is attached hereto and incorporated herein.

45. During the period of the publication of the numerous statements accusing BRZANA as being a pedophile and a whore on or about September 18, 2018, Defendants JOHN, SARAH, and KENNEDY appeared at BRZANA'S place of employment, took photographs of the interior work spaces of her employer's boardroom and began posting comments related to BRZANA finding it necessary to seek new employment. Upon information and belief, Defendants at or around this same time orally articulated to non-parties in this case that BRZANA was a pedophile and a whore.

46. Defendants using the “Guardians of Wesley Township” Facebook page posted the following comments of and concerning BRZANA and BRZANA'S place of employment.

- a. “I miss having the vending machines across the hall from the board meeting room”.
- b. “Catered Board Meeting s are a nice touch”.

- c. “You have made several new enemies today! How’s that new job search coming?”

See Group Exhibit I which is attached hereto and incorporated herein.

COUNT I
FALSE LIGHT INVASION OF PRIVACY
(BRZANA V. ALL NAMED DEFENDANTS)

47. BRZANA restates, re-alleges and reiterates each and every allegation contained in paragraphs numbered "1" through "46" inclusive with the same force and effect as though the same were fully set forth at length in this Count I of Plaintiffs’ Amended Complaint.

48. The statements of Defendants that BRZANA is a pedophile are false and each of Defendants has knowledge of the falsity of the allegation or that the statements were made with reckless disregard of the truth of the statements made.

49. The statements of Defendants that BRZANA was a pedophile are offensive.

50. Any reasonable person would find a false statement about them being a pedophile offensive.

51. Defendants widely disseminated the idea that BRZANA was a pedophile. The dissemination of the false claim that BRZANA was a pedophile included park flyers, coupled with oral statements, social media posts and voluntary statements to news media that furthered the idea that BRZANA was a pedophile.

These statements were then supplemented by repeated statements by JOHN in public meetings that BRZANA was a “whore”, and a “dirty whore”.

52. Defendants widely disseminated the idea that the BRZANA was a whore.

53. The statements labeling BRZANA as a whore are highly offensive.

54. Being labeled a whore is highly offensive to a reasonable person.

55. Defendants encouraged members of the public to drive to the home of BRZANA to encourage the public to harass BRZANA and to interfere with her right to be left alone.

56. SARAH publishing BRZANA’S phone number with a request that members of the public harass BRZANA was malicious and wantonly made to falsely paint BRZANA as a pedophile so that she would suffer ridicule and shame in public.

57. The collective actions of Defendants painted BRZANA in a false light as being both a whore and a pedophile.

WHEREFORE, PLAINTIFF, BRZANA, respectfully pray that this Honorable Court grant the following relief:

- A. Award BRZANA monetary damages in an amount to be determined at trial against each named Defendant in an amount of at least \$1,000,000 or such other amount required for jurisdiction in this cause;

- B. Award BRZANA punitive damages against each named Defendant;
- C. Award BRZANA the costs of suit and attorney's fees;
- D. Enjoin Defendants from making further false and disparaging statements concerning BRZANA; and
- E. That BRZANA have such other and further relief as this Court deems just, equitable or necessary.

COUNT II
SLANDER PER SE
(BRZANA V. ALL NAMED DEFENDANTS)

58. BRZANA repeats, re-alleges and reiterates each and every allegation contained in paragraphs numbered "1" through "46" inclusive with the same force and effect as though the same were fully set forth at length in this Count II of Plaintiffs' Amended Complaint.

59. KENNEDY published the statement that BRZANA was a pedophile to Cindy Adams on or about August 8, 2018.

60. KENNEDY'S statements that BRZANA was a pedophile are false.

61. The statements of JOHN alleging that BRZANA was a "whore" and a "dirty whore" are false. The statements of KENNEDY and JOHN were made in furtherance of the agreement amongst all Defendants to malign the reputation of BRZANA.

62. Defendants' statements were knowingly made or made with the wanton disregard of the truth.

63. Defendants' statements were not privileged.

64. Defendants' statements were designed to harm the reputation of BRZANA.

65. Defendants did in fact harm the reputation of BRZANA.

WHEREFORE, PLAINTIFF, BRZANA, respectfully prays that this Honorable Court grant the following relief:

- A. Award BRZANA monetary damages in an amount to be determined at trial against each named Defendant in an amount of at least \$1,000,000 or such other amount required for jurisdiction in this cause;
- B. Award BRZANA punitive damages against each named Defendant;
- C. Award BRZANA the costs of suit and attorney's fees;
- D. Enjoin Defendants from making further false and disparaging statements concerning BRZANA; and
- E. That BRZANA have such other and further relief as this Court deems just, equitable or necessary.

COUNT III
LIBEL PER SE
(BRZANA V. ALL NAMED DEFENDANTS)

66. BRZANA restates, re-alleges and reiterates each and every allegation contained in paragraphs numbered "1" through "46" inclusive with the same force

and effect as though the same were fully set forth at length in this Count III of Plaintiffs' Amended Complaint.

67. Defendants' statements that BRZANA was a pedophile are false.

68. Defendants' collective publication put on the "Guardians of Wesley Township" Facebook page alleging that BRZANA is a pedophile were and are false.

69. Defendants' statements were knowingly made or made with wanton disregard of the truth.

70. Defendants' statements were not privileged.

71. Defendants' statements were designed to harm the reputation of BRZANA.

72. Defendants did in fact harm the reputation of BRZANA.

WHEREFORE, PLAINTIFF, BRZANA, respectfully prays that this

Honorable Court grant the following relief:

- A. Award BRZANA monetary damages in an amount to be determined at trial against each named Defendant in an amount of at least \$1,000,000 or such other amount required for jurisdiction in this cause;
- B. Award BRZANA punitive damages against each named Defendant;
- C. Award BRZANA the costs of suit and attorney's fees;
- D. Enjoin Defendants from making further false and disparaging statements concerning BRZANA; and

- E. That BRZANA have such other and further relief as this Court deems just, equitable or necessary.

COUNT IV
CIVIL CONSPIRACY
(BRZANA V. ALL NAMED DEFENDANTS)

73. BRZANA repeats, re-alleges and reiterates each and every allegation contained in paragraphs numbered "1" through "46" inclusive with the same force and effect as though the same were fully set forth at length in this Count IV of Plaintiffs' Amended Complaint.

74. Upon information and belief, an agreement was struck between Defendants to malign the reputation of BRZANA as described in paragraphs 1-46.

75. The purpose of the agreement was accomplishing an unlawful attack by unlawful means as described herein.

76. At least one tortuous act, the accusation by Defendants alleging that BRZANA is a pedophile when she is not, was in furtherance of the agreement that caused the injuries to BRZANA.

WHEREFORE, PLAINTIFF, BRZANA, respectfully prays that this Honorable Court grant the following relief:

- A. Award BRZANA monetary damages in an amount to be determined at trial against each named Defendant in an amount of at least \$1,000,000 or such other amount required for jurisdiction in this cause;

- B. Award BRZANA punitive damages against each named Defendant;
- C. Award BRZANA the costs of suit and attorney's fees;
- D. Enjoin Defendants from making further false and disparaging statements concerning BRZANA; and
- E. That BRZANA have such other and further relief as this Court deems just, equitable or necessary.

COUNT V
FALSE LIGHT INVASION OF PRIVACY
(MICHAEL ESPOSITO V JOHN NORTON)

77. ESPOSITO repeats, re-alleges and reiterates each and every allegation contained in paragraphs numbered "1" through "46" inclusive with the same force and effect as though the same were fully set forth at length in this Count V of Plaintiffs' Amended Complaint.

78. The statements of JOHN that ESPOSITO is a pedophile are false.

79. The false statements of JOHN that ESPOSITO was a pedophile are highly offensive.

80. Any reasonable person would find a false statement about them being a pedophile to be highly offensive.

81. JOHN disseminated the idea that ESPOSITO was a pedophile.

82. Being labeled a pedophile is highly offensive to a reasonable person.

WHEREFORE, Plaintiff, ESPOSITO, prays that this Honorable Court grant the following relief:

- A) Enter Judgment against Defendant, JOHN, in favor of ESPOSITO in an amount of at least \$1,000,000 or such other amount required for jurisdiction in this cause;
- B) Award ESPOSITO punitive damages against JOHN;
- C) Enjoin JOHN from making further false and disparaging statements concerning ESPOSITO; and
- D) That ESPOSITO have such other and further relief as this Court deems just, equitable or necessary.

COUNT VI
SLANDER PER SE
(ESPOSITO V. JOHN NORTON)

83. ESPOSITO restates, re-alleges and reiterates each and every allegation contained in paragraphs numbered "1" through "46" inclusive with the same force and effect as though the same were fully set forth at length in this Count VI of Plaintiffs' Amended Complaint.

84. JOHN published the statement that ESPOSITO was a pedophile on or about August 16, 2016.

85. JOHN'S statements that ESPOSITO was a pedophile were false.

86. JOHN knew at the time that he made the statements that ESPOSITO was a pedophile that the statements were false.

87. JOHN'S statements accusing ESPOSITO of being a pedophile were knowingly made or made with the wanton disregard of the truth.

88. JOHN'S statements were not privileged.

89. JOHN'S statements were designed to harm the reputation of ESPOSITO.

90. JOHN did in fact harm the reputation of ESPOSITO.

91. On or about September 4, 2018 JOHN made statements to Vicki Henke that ESPOSITO was on parole and was going to jail for a parole violation when in fact ESPOSITO has never been convicted of a felony nor has he been on parole. See Exhibit K attached hereto and incorporated herein.

92. On or about September 4, 2018, JOHN published statements to at least two other persons that ESPOSITO engaged in the crime of attempted murder. See Exhibit K.

93. The statements of JOHN seeking to label ESPOSITO as a criminal are false and made with the knowledge of the falsity or the reckless disregard of the truth.

WHEREFORE, Plaintiff, ESPOSITO, prays that this Honorable Court enter the following relief:

- A) Enter Judgment against JOHN in favor of ESPOSITO in an amount of at least \$1,000,000 or such other amount required for jurisdiction in this cause;

- B) Award ESPOSITO punitive damages against JOHN;
- C) Enjoin JOHN from making further false and disparaging statements concerning ESPOSITO; and
- D) That ESPOSITO have such other and further relief as this Court deems just, equitable or necessary.
- E)

Respectfully submitted,
Plaintiffs, CYNTHIA BRZANA AND
MICHAEL ESPOSITO

By: /s/Robert T. Hanlon
Robert T. Hanlon, One of their
Attorneys

Robert T. Hanlon, ARDC #6286331
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& Associates P.C.
131 East Calhoun Street
Woodstock, IL 60098
(815) 206-2200
(815) 206-6184 (Fax)
Email: robert@robhanlonlaw.com

Exhibit List

- A) Park Flyer
- B) Warning to Parents
- C) Golden Knee pads comment
- D) Wack-a-mole
- E) Taking Pictures of Kids
- F) Tip to Edgar Co Watchdogs alleging Brzana is a pedophile.
- G) Transcript pages from hearing re Esposito
- H) Sarah Norton Post asking the public to harass Brzana
- I) Concerning Brzana's place of employment.
- J) Guardians page concerning Esposito.
- K) Receipt of statements that Norton was attempting to label Michael Esposito a felon when he is not a felon and attempted to murder John Norton

EXHIBIT A
(Park Flyer)

Plate ~~223~~ OF Township
Park Harassers.

Arlow Frite

Cynthia BRZANQ
~~BRZANQ~~ ~~BRZANQ~~

Silver Chevy

Red FORD
SUV

1672573

278 8353

Tool Box in Bed
LOCK

Z

Peterson Lane

Thelma Rd

EXHIBIT B

(Warning to Parents)



Write a comment... GIF 😊 ➤





 Like  Comment  Share

Be the first to like this



Guardians of Wesley Township
WARNING to PARENTS: If you see this woman with any device capable of taking photos or videos when children are nearby, clear the area immediately!



Write a comme...



EXHIBIT C

(Golden Knee pads comment)



EXHIBIT D

(Wack-a-mole Whore
Statement)



Guardians of Wesley Township



October 10 at 6:34 AM · 🌐



 Share

1 Share



Guardians of Wesley Township

It's like playing Whack-a-Mole with these Attention Whores

1 mo [More](#)

EXHIBIT E

(Statement re taking pictures of kids)

Done

32 of 310



Expressionism in Matter

VISIT SITE

STAY IN THE LOOP!

Email me when this thread is updated

YOUR EMAIL

SUBSCRIBE

MORE FROM WILMINGTON



Custer's 57

jeremy ryan hicks 32

Phsyco Cindy of Wesley 4

Ta ta trot is a scam 4

P.T's 9

Jeremy Hicks 22

guy nowak 4



Done

31 of 310



0 ^ | 0 v

Reply >



Dana

Tuesday Aug 7

Timothy may want to stay home that night. Who else is there to watch his nice house while she is being a troublemaker ?

Report Abuse

0 ^ | 0 v

Reply >



Dana

Monday Aug 13

She was down at the park again today taking pictures of kids. She now uses a black Ford FX4 pick-up truck to stalk people.

Report Abuse

0 ^ | 0 v

Reply >

HAVE SOMETHING TO SAY?



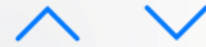
SHARE YOUR THOUGHTS HERE



EXHIBIT F

(ECW TIP)

 Sent



[memo-pay-attention-to-question-asked/](#)

Author: blah blah (IP address:
24.12.245.122,
[c-24-12-245-122.hsd1.il.comcast.net](#))

Email: xyz@here.com

URL:

Comment:

Did you know Cynthia Brzana aka
Charlotte Tenn is a pedophile and post
pics of other peoples kids on Facebook?
Do you condone and promote this type of
actions?

Approve it: [http://
edgarcountywatchdogs.com/wp-admin/
comment.php?
action=approve&c=63668#wpbody-
content](http://edgarcountywatchdogs.com/wp-admin/comment.php?action=approve&c=63668#wpbody-content)

Trash it: [http://
edgarcountywatchdogs.com/wp-admin/
comment.php?
action=trash&c=63668#wpbody-content](http://edgarcountywatchdogs.com/wp-admin/comment.php?action=trash&c=63668#wpbody-content)

Spam it: <http://>



EXHIBIT G

(Selected Transcript Testimony)

Pg 43 – Cross examination of John Norton 11-16-2018 *Norton v Brzana* Case Number 2018 OP 2306

16 Q Are you an administrator under Guardians of Wesley
17 Township Facebook page?
18 A One of many

Pg 57

1 A I am aware of it, but I am not directly involved
2 in that.
3 Q Okay. Do you know what a pedophile means?
4 A I have had layman's terms definition of it.
5 Q Well, why don't you share what you understand it
6 to be.
7 A A person over the age of 18 conducting sexual
8 activity with or illicit activity with a person under the
9 age of 18 depending on the state. I believe nationwide it's
10 18. Some states it's 17, some are 13. So it would imply
11 illegal sexual activity.
12 Q That's a serious accusation, right?
13 A Yes, it is.

Pg 108

17 MR. NORTON: I will bring that up right now with this
18 question.
19 THE COURT: No, I just asked it. What happened? Just
20 tell me what happened.
21 THE WITNESS: We were in the file room because dad
22 was -- well, Mr. Norton, sorry, was helping me bring in a
23 huge box because I can't lift heavy things and all of a
24 sudden he decided he was going to come in the township hall

Pg 109

1 with a camera in our face and take video, and he is a big
2 guy, so, of course, I was scared as ever. So my father
3 decided to try and divert his attention from me to him, and

4 he called him a pedophile and he continued to keep going and
5 I asked him to leave numerous times and he refused.

7 THE COURT: Hold on a second. You are saying that Mick
8 Esposito came into the township hall with a camera or some
9 kind of video equipment, phone, whatever, and recorded the
10 both of you or you specifically, your father diverted his
11 attention, at which point in time when he began to record
12 your father, your father called Mick Esposito a pedophile.

13

14

THE WITNESS: Yes.

EXHIBIT H

(Sarah Norton Post)

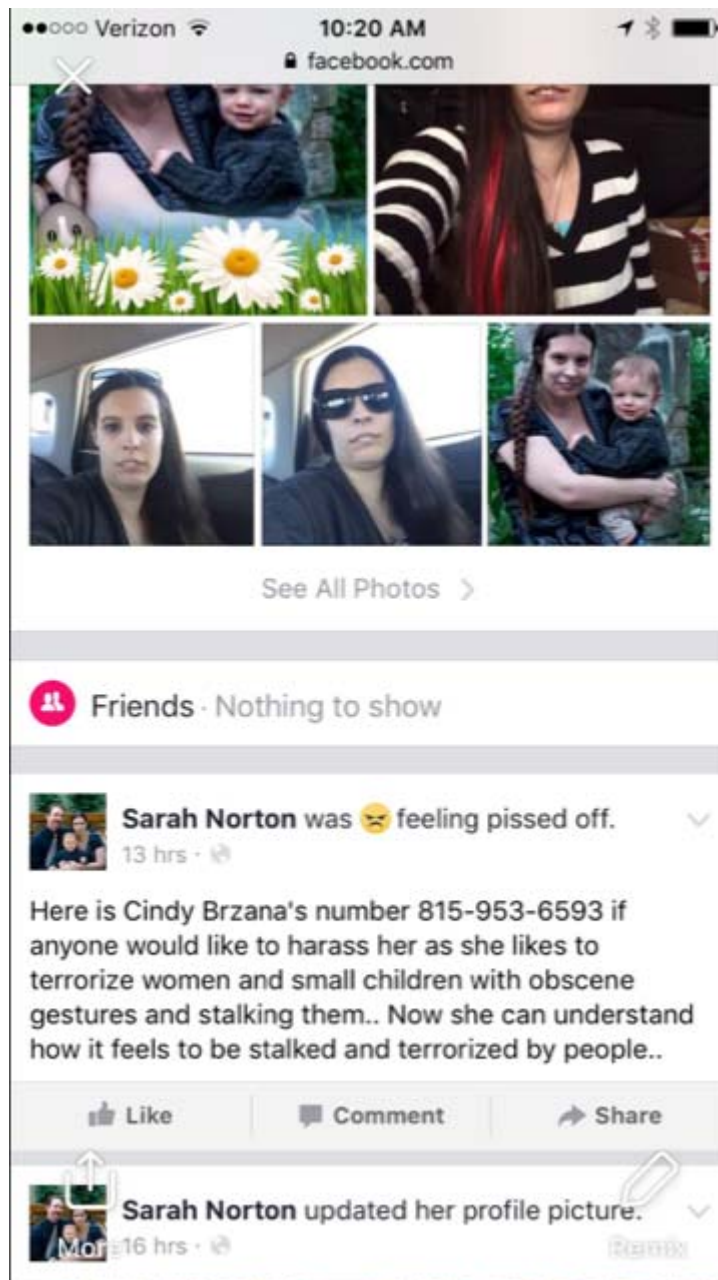


EXHIBIT I

(Posts Concerning Brzana
Employment)



Guardians of Wesley Township ...

is 🍀 feeling lucky.

September 18 at 4:20 PM · 🌐

Nice try, Crazy Cyndi.

You have made several new enemies today !

How's that new job search coming along?



 Share



Guardians of Wesley Township

I miss having the vending machines across the hall from the board meeting room.

2 mos [More](#)

1 reply



Guardians of Wesley Township

Catered Board Meetings are a nice touch.



You have made several new enemies today !
How's that new job search coming along?



 Share



Guardians of Wesley Township

I miss having the vending machines across the hall from the board meeting room.

2 mos [More](#)

1 reply



Guardians of Wesley Township

Catered Board Meetings are a nice touch.



2 mos [More](#)

Exhibit J

(Guardian Post concerning
Michael Esposito)

click away from filing the complaint

Share



Guardians of Wesley Township Conspiracy to commit attempted murder might also be a good reason, Right, Mick???

21 hrs More



Guardians of Wesley Township Mick's blade is like his brain --> DULL<--

18 hrs More

Exhibit K

(receipt of statements that Norton was attempting to label Michael Esposito a felon when he is not a felon and attempted to murder John Norton)

Verizon LTE

4:28 PM

73%



Karey >

iMessage
Tuesday 12:20 PM

So I hear you attempted to murder John norton.

That's the rumor... lol

He stopped me at mid town to tell me

I said well I've known Mickey my entire life and if he wanted to it wouldn't be attempted. He said they have you on video.

He's a moron

Verizon LTE

2:23 PM

71%

< Home (1)

Vicki Henke >

Active 3h ago



12:59 PM

Hey baby I got to ask you this because you know why I ran into at Mr. Norton and he said you violated something with your parole and you're going to jail over all this mess it's going on



I've never been on parole

He's fucking retarded