

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

David Blockowicz, Mary Blockowicz, and Lisa)	
Blockowicz, individuals,)	
)	Civil Action No.:
Plaintiffs,)	
)	Judge:
v.)	
)	Magistrate:
Joseph David Williams and Michelle Ramey,)	
individuals,)	
)	
Defendants.)	

COMPLAINT

Plaintiffs David Blockowicz and Lisa Blockowicz allege against Defendants Joseph David Williams and Michelle Ramey as follows:

NATURE OF ACTION

1. This is an action for defamation, including defamation *per se*, false light, and reckless infliction of emotional distress. Plaintiffs seek compensatory damages, punitive damages, attorneys’ fees, costs, and preliminary and permanent injunctive relief.

JURISDICTION AND VENUE

2. This Court has diversity jurisdiction over this case pursuant to 28 U.S.C. §§ 1332.

3. This Court has personal jurisdiction over Defendants Joseph David Williams and Michelle Ramey, currently residents of Oregon, because they have intentionally directed harmful and egregious tortious acts at Plaintiffs, causing injury and having other harmful effects in this state, related to this specific cause of action. 735 ILCS 5/2.209; Fed.R.Civ.P. 4.

4. Venue is proper in the United States District Court for the Northern District of Illinois pursuant to 28 U.S.C. § 1391(a)(2).

PARTIES

5. David Blockowicz is 67 years old, and resides in Illinois with his wife of forty-two (42) years, Mary Blockowicz. He is a principal of his own accounting firm, Blockowicz and Tognocchi LLP, which has a principal place of business at 1701 East Lake Avenue, Suite 480, Glenview, Illinois.

6. Lisa Blockowicz is also an Illinois resident and the oldest of David and Mary Blockowicz's four adopted children. She is 39 years old, and an elementary school teacher for Chicago Public Schools. Though not parties to this case, Lisa's other siblings are Brendan, age 38, Megan, age 36, and Scott, age 34.

7. In or around 1992, Megan Blockowicz married Defendant Joseph David Williams. Megan Blockowicz and Joseph David Williams divorced in or around 1999 or 2000. Joseph David Williams was physically and emotional abusive to Megan Blockowicz and, as set forth below, he has begun directing his aggressive behavior towards Megan's family, including Megan's parents David and Mary Blockowicz, and her sister Lisa Blockowicz. On information and belief, Joseph David Williams resides in or around Hillsboro, Oregon.

8. On information and belief, Michelle Ramey a/k/a Michelle Clayborn, is a long-time associate of Joseph David Williams who also resides with him in or around Hillsboro, Oregon.

ALLEGATIONS COMMON TO ALL COUNTS

9. On information and belief, Joseph David Williams has been posting and continues to post false statements about David Blockowicz, Mary Blockowicz, and Lisa Blockowicz on numerous websites.

10. The website <ripoffreport.com> is a purported "consumer advocacy" website

which allows consumers to post anonymous criticisms about other individuals and companies. <Ripoffreport.com>. <Ripoffreport.com> encourages users by promising “justice” and by promising that filing a report is “almost like creating your own website.” <Ripoffreport.com> also promises potential media exposure. <Ripoffreport.com> has an express policy of **never** removing reports from its website, even when it has been put on notice that the reports are false and defamatory. On information and belief, <Ripoffreport.com> often attempts to charge individuals and companies money if they wish to respond to “reports” posted on <ripoffreport.com>.

11. On information and belief, Joseph David Williams and/or his associate, Michelle Ramey, have engaged in a pattern of posting false “reports” at <ripoffreport.com> directed at Lisa Blockowicz, David and Mary Blockowicz, Megan Blockowicz, and even Joseph David Williams’ own daughter. Among the false statements found at the <ripoffreport.com> website:

- Defendants refer to David, Mary and Lisa Blockowicz as Megan’s “scumbag family.”
- Defendants falsely state that “Megan's father was an incestuous creep who forced all of his children to satisfy him sexually.”
- Defendants spin a false tale about Mary and Lisa Blockowicz interacting with Nevada Child Protection Services.
- Defendants falsely state that the Blockowicz family is a danger to Megan’s children.
- Defendants falsely suggest that Lisa Blockowicz uses a number of aliases.
- Defendants call Lisa Blockowicz a “Scumbag Con-Artist, Diseased Alcoholic, Compulsive Liar, Thief.”
- Defendants state that Lisa Blockowicz is a lesbian, and is “diseased.”

These statements are just some of the false statements published by Defendants.

12. On information and belief, the statements posted at <ripoffreports.com> are all

posted by Joseph David Williams and/or his associate, Michelle Ramey, under false usernames carefully selected to attempt to make the false statements appear more credible. For example ,in one instance Defendants posted a “report” at <ripoffreports.com> wherein they falsely claim to be an employee of a state government agency.

13. On information and belief, Defendants update the false posts and “reports” from time to time, including as recently as March and April, 2009, by revising the original reports. On further information and belief, these changes have the effect of increasing the relevance of these statements to internet search engines.

14. On information and belief, Joseph David Willams and/or his associate, Michelle Ramey, have also posted “comments” in support of the false statements, under yet additional false usernames. In those “comments,” Defendants further attack the Blockowicz family and attempt to add credibility to their false statements.

15. On information and belief, Defendants’ practice of adding false user comments to their “reports” has the effect of increasing the relevance of those reports to internet search engines, and further has the effect of republishing the false statements.

16. On information and belief, Defendants have also posted similar and additional false statements at <Facebook.com>, <MySpace.com>, and <complaintsboard.com>. Defendants use yet additional false usernames to post these statements and to more effectively disseminate their false statements to the public. This activity is current and ongoing, as many of these additional publications occurred in Spring, 2009.

17. Defendants’ false statements occupy the top search engine results for the search terms “David Blockowicz” and “Lisa Blockowicz” in the most popular search engines.

18. Defendants’ false statements are so widely publicized that Plaintiffs find

themselves having to explain and defend the false statements in their private and personal lives. Having to address these false statements is especially embarrassing and humiliating for Lisa Blockowicz, who is a Chicago Public Schools teacher.

19. On information and belief, Defendants' false statements have caused lost professional and business opportunities for Plaintiffs.

Count I – Defamation

20. Plaintiffs incorporate and re-allege paragraphs 1 through 19 as though fully set forth herein.

21. Defendants Joseph David Williams and/or Michelle Ramey have made the false statements detailed above, and yet other false statements, regarding Lisa Blockowicz, David Blockowicz, and Mary Blockowicz.

22. Defendants Joseph David Williams and/or Michelle Ramey have repeatedly published those statements via the internet, both in their original "reports" as well as through "comments," all posted under false usernames.

23. Defendants' false statements constitute defamation *per se* under all applicable laws, by falsely accusing Plaintiffs of committing crimes, by suggesting that at least Lisa Blockowicz has a loathsome communicable disease, by prejudicing Lisa Blockowicz in her profession as an elementary school teach and by prejudicing David Blockowicz in his profession as an accountant, and by imputing particularly disgusting acts of fornication to Plaintiffs.

24. Defendants' false statements have damaged each of Plaintiffs in both their professional and personal lives, by interfering with Plaintiff's business relationships, by damaging Plaintiffs' reputations in their communities, and by interfering in Plaintiffs' personal relationships with persons afraid that some of the false statements might be true.

Count II – False Light

25. Plaintiffs incorporate and re-allege paragraphs 1 through 19 as though fully set forth herein.

26. Defendants' false statements detailed above, and yet other false statements, have placed Plaintiffs in a false light before the public.

27. Defendants' false statements are highly offensive to reasonable persons.

28. Defendants published these false statements with actual malice towards Plaintiffs, as illustrated by the malicious tone of the statements, the clearly false nature of the statements, and the intent to harm Plaintiffs through the false nature of the statements.

Count III – Reckless Infliction of Emotional Distress

29. Plaintiffs incorporate and re-allege paragraphs 1 through 19 as though fully set forth herein.

30. Defendants' conduct detailed above, and on information and belief Defendants' yet-undiscovered conduct, is extreme and outrageous.

31. Through the intentional conduct described in this Complaint, Defendants intend to inflict severe emotional distress upon Plaintiffs, and are further aware that there is at least a high probability that their conduct will cause severe emotional distress.

32. Plaintiffs have in fact suffered severe emotional distress as a result of Defendants' conduct.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs respectfully pray that the Court grant the following relief:

A. A preliminary and permanent injunction prohibiting Defendants, their agents, servants, employees and/or all persons acting in concert or participation with

them, or any of them, from publishing any further statements regarding the Blockowicz family.

- B. An order requiring Defendants to remove all statements regarding the Blockowicz family from all websites where Defendants have posted such statements.
- C. An order to third party websites where Defendants have posted their defamatory statements that all such material be taken down immediately, that all accounts controlled by Defendants be deactivated, and that those third parties take reasonable, available steps to prevent Defendants from posting further statements.
- D. An award of compensatory damages, including damages for emotional distress, in the amount of at least \$100,000;
- E. An award of punitive damages to Plaintiffs in an amount to be determined at trial;
- F. An award of interest, costs and attorneys' fees incurred by Plaintiff in prosecuting this action; and
- G. All other relief to which Plaintiff is entitled.

JURY DEMAND

Plaintiffs demand a trial by jury on all issues presented in this complaint.

DATED: June 30, 2009.

Respectfully Submitted,

s/Cameron M. Nelson
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