

EXHIBIT A

Sean E. Summers, Esquire
Direct Dial Number: 717.852.4997
E-mail: ssummers@barley.com

June 22, 2006

Via Facsimile and First Class Mail

Margie J. Phelps, Esquire
Phelps-Chartered
1414 SW Topeka Blvd.
P.O. Box 1886
Topeka, KS 66601-1866

Rachel I. Hockenbarger, Esquire
Phelps-Chartered
1414 SW Topeka Blvd.
P.O. Box 1886
Topeka, KS 66601-1866

Re: Al Snyder v. Fred W. Phelps, Sr., et al. (RDB-06-CV-1389)

Dear Ms. Phelps and Ms. Hockenbarger:

Your letter dated June 12, 2006 stated that you represent the Westboro Baptist Church and its members. As you know, we filed a Complaint against your clients on June 5, 2006. Since that time, we have taken reasonable steps to serve the defendants in the above-captioned case. Our process server has attempted to serve the defendants at the defendant's registered place of business and personal residence. In addition, our process server requested information concerning the defendants whereabouts from various family members, to include your law firm. Incredibly, no one seems to know the location of Mr. Phelps and/or Ms. Abigail Phelps, who we understand to be the registered representative for the Westboro Baptist Church. When the process server knocked on doors, no one answered - yet, he could hear voices inside the residence.

Please find enclosed the standard forms for waiver of service. As you know, under the Federal Rules of Civil Procedure, the defendants have a duty to waive service. Additionally, if the defendants refuse to waive service, we will request that the Court "impose the costs subsequently incurred in effecting service on the defendant." *See* F.R.C.P. 4(d).

Under the Rules of Civil Procedure, we are required to give you 30 days to respond to a request for a waiver of service. In the meantime, we will continue to attempt to serve the defendants unless we receive written confirmation from you or your clients stating that you will waive service. At the expiration of 30 days, we will file a Motion requesting that the U.S. Marshall serve the defendants in the above-captioned case, and request that your clients pay the costs and attorney fees associated with the same. *See* F.R.C.P. 4(c)(2)

June 22, 2006

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Alternatively, we would be willing to arrange for our process server to serve your clients at your law office at a mutually agreeable time. If you would like to accept this offer, please identify the date and time when your clients will be present to accept service. As you might suspect, I need you to confirm any offers to accept service in writing. Any agreed upon date would have to be within the previously mentioned 30 days. I await your response.

Sincerely,

Sean E. Summers

SES/eac:1654057_1.DOC

Enclosures

cc: Albert Snyder (w/out enclosures)- via first class mail

**NOTICE OF LAWSUIT AND REQUEST FOR
WAIVER OF SERVICE OF SUMMONS**

TO: (A) Abigail R. Phelps
as (B) Registered Agent of (C) Westboro Baptist Church, Inc.

A lawsuit has been commenced against you (or the entity on whose behalf you are addressed). A copy of the complaint is attached to this notice. It has been filed in the United States District Court for the (D) District of Maryland and has been assigned docket number RDB 06 CV 1389.

This is not a formal summons or notification from the court, but rather my request that you sign and return the enclosed waiver of service in order to save the cost of serving you with a judicial summons and an additional copy of the complaint. The cost of service will be avoided if I receive a signed copy of the waiver within (F) 30 days after the date designated below as the date on which this Notice and Request is sent. I enclose a stamped and addressed envelope (or other means of cost-free return) for your use. An extra copy of the waiver is also attached for your records.

If you comply with this request and return the signed waiver, it will be filed with the court and no summons will be served on you. The action will then proceed as if you had been served on the date the waiver is filed, except that you will not be obligated to answer the complaint before 60 days from the date designated below as the date on which this notice is sent (or before 90 days from that date if your address is not in any judicial district of the United States).

If you do not return the signed waiver within the time indicated, I will take appropriate steps to effect formal service in a manner authorized by the Federal Rules of Civil Procedure and will then, to the extent authorized by those Rules, ask the court to require you (or the party on whose behalf you are addressed) to pay the full costs of such service. In that connection, please read the statement concerning the duty of parties to waive the service of the summons, which is set forth at the foot of the waiver form.

I affirm that this request is being sent to you on behalf of the plaintiff, this 22nd day of June, 2006.

Sean E. Summers
Signature of Plaintiff's Attorney
or Unrepresented Plaintiff

- A—Name of individual defendant (or name of officer or agent of corporate defendant)
- B—Title, or other relationship of individual to corporate defendant
- C—Name of corporate defendant, if any
- D—District
- E—Docket number of action
- F—Addressee must be given at least 30 days (60 days if located in foreign country) in which to return waiver

WAIVER OF SERVICE OF SUMMONS

TO: Sean E. Summers
(NAME OF PLAINTIFF'S ATTORNEY OR UNREPRESENTED PLAINTIFF)

I, Westboro Baptist Church, Inc., acknowledge receipt of your request
(DEFENDANT NAME)

that I waive service of summons in the action of Albert Snyder v. Fred W. Phelps, Sr., et al.
(CAPTION OF ACTION)

which is case number RDB 06 CV 1389 in the United States District Court
(DOCKET NUMBER)

for the _____ District of Maryland

I have also received a copy of the complaint in the action, two copies of this instrument, and a means by which I can return the signed waiver to you without cost to me.

I agree to save the cost of service of a summons and an additional copy of the complaint in this lawsuit by not requiring that I (or the entity on whose behalf I am acting) be served with judicial process in the manner provided by Rule 4.

I (or the entity on whose behalf I am acting) will retain all defenses or objections to the lawsuit or to the jurisdiction or venue of the court except for objections based on a defect in the summons or in the service of the summons.

I understand that a judgment may be entered against me (or the party on whose behalf I am acting) if an answer or motion under Rule 12 is not served upon you within 60 days after

June 22, 2006
(DATE REQUEST WAS SENT)

or within 90 days after that date if the request was sent outside the United States.

(DATE)

(SIGNATURE)

Printed/Typed Name: Abigail R. Phelps

As Registered Agent of Westboro Baptist Church, Inc.
(TITLE) (CORPORATE DEFENDANT)

Duty to Avoid Unnecessary Costs of Service of Summons

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It is not good cause for a failure to waive service that a party believes that the complaint is unfounded, or that the action has been brought in an improper place or in a court that lacks jurisdiction over the subject matter of the action or over its person or property. A party who waives service of the summons retains all defenses and objections (except any relating to the summons or to the service of the summons), and may later object to the jurisdiction of the court or to the place where the action has been brought.

A defendant who waives service must within the time specified on the waiver form serve on the plaintiff's attorney (or unrepresented plaintiff) a response to the complaint and must also file a signed copy of the response with the court. If the answer or motion is not served within this time, a default judgment may be taken against that defendant. By waiving service, a defendant is allowed more time to answer than if the summons had been actually served when the request for waiver of service was received.

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TO: Sean E. Summers
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FILED
U.S. DISTRICT COURT
DISTRICT OF MARYLAND

2006 JUN -5 A 11: 39

CLERK'S OFFICE
IN THE UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND

ALBERT SNYDER,
Plaintiff

v.

FRED W. PHELPS, SR.,
JOHN DOES, JANE DOES, and
WESTBORO BAPTIST CHURCH, INC.
Defendants

Civil Action No. **RDB 06 CV 1389**

COMPLAINT

Preliminary Statement

1. This is a suit for defamation, invasion of privacy and intentional infliction of emotional distress. Plaintiff Albert Snyder is a resident of York, Pennsylvania and the father of the now deceased Lance Corporal Matthew A. Snyder. He alleges that the defendant church and its members wrongfully intruded upon his son's funeral and subsequently defamed him on the defendants' webpage, causing physical and emotional damages. In addition, defendants' conduct was so intentional and outrageous that the imposition of punitive damages is appropriate to punish the defendants for their actions and to deter the defendants from further reprehensible conduct.

Jurisdiction And Venue

2. The Court has jurisdiction under 28 U.S.C. § 1332, which provides for original district court jurisdiction for diversity of citizenship and where the amount in controversy exceeds \$75,000.00.

3. Venue is proper in the District of Maryland under 28 U.S.C. § 1391, because a substantial part of the events giving rise to the claim occurred in Maryland.

4. A jury trial is demanded.

Parties

5. Plaintiff, Albert Snyder, is an adult individual who resides at 760 Spring Lane, York, Pennsylvania 17403.

6. Defendant, Fred W. Phelps, Sr., is an adult individual who has an office at 3701 SW 12th Street, Topeka, Kansas 66604.

7. Defendant, Westboro Baptist Church, Inc., is a corporation organized under the laws of the state of Kansas with its principal place of business located at 3701 SW 12th Street, Topeka, Kansas 66604.

8. The remaining defendants are various "John and Jane Does" that disrupted, funded or otherwise conspired with defendant Fred W. Phelps, Sr. for the purpose of disrupting Marine Lance Corporal Matthew A. Snyder's funeral. Upon information and belief, all unnamed defendants reside in or around the Westboro Baptist Church compound in Topeka, Kansas.

9. The individual defendants acted as agents of defendant Westboro Baptist Church and in their individual capacities.

Summary Of Plaintiff's Claims

10. Plaintiff, Albert Snyder, is the father of Marine Lance Corporal Matthew A. Snyder (now deceased) ("Matt"); Matt was born on July 18, 1985.

11. In or about October 2003, Matt joined the United States Marine Corps.

12. Subsequently, Matt was deployed to Iraq with his unit as part of Operation Iraqi Freedom.

13. On March 3, 2006, while conducting combat operations, Matt was killed in the line of duty.

14. Matt was transported back to the United States and plaintiff Albert Snyder and Matt's family planned and commenced a traditional funeral and burial service in honor of their son. The funeral was on March 10, 2006, at St. John's Catholic Church, in Westminster, Maryland.

15. The defendants operate and maintain several websites: (1) www.thesignsofthetimes.net; (2) www.smellthebrimstone.com; (3) www.godhatesamerica.com; (4) www.priestrapeboys.com; (5) www.godhatesweden.com; (6) www.godhatescanada.com; and lastly, (7) www.godhatesfags.com.

16. Among other things, the defendants preach and advocate a hatred for homosexuals. On numerous occasions, the defendants have protested military funerals proclaiming, for example, "God hates fags" and "Semper Fi Fags" and "thank God for dead soldiers".

17. The defendants protest military funerals because, according to the defendants:

"Here are some axiomatic matters of fact:

These turkeys are not heroes. They are lazy, incompetent idiots looking for jobs because they're not qualified for honest work.

They were raised on a steady diet of fag propaganda in the home, on TV, in church, in school, in mass media - everywhere - the two-pronged lie: 1) It's OK to be gay, and, 2) Anyone saying otherwise, like WBC, is a hater who must be vilified, demonized, marginalized into silence.

Therefore, with full knowledge of what they were doing, they voluntarily joined a fag-infested army to fight for a fag-run country now utterly and finally forsaken by God who Himself is fighting against that country.

They turned America
Over to fags;
They're coming home
In body bags.

America used an IED to bomb Westboro Baptist Church on August 20, 1995 - an act of terror aimed at terrorizing us into discontinuing our nationwide Gospel preaching against the homosexual menace.

When America thus became WBC's terrorist, God became America's Terrorist.

Therefore the IED is God's weapon of choice in avenging Westboro Baptist Church by blowing America's kids to smithereens in Iraq. And the carnage has barely begun.

Thus, their funerals are the forum of choice for delivering WBC's message of choice."

18. On March 10, 2006, the defendants protested Matt's funeral proclaiming similar outrageous and defamatory comments, with the intention of inflicting distress upon the Snyder family.

19. No one invited any of the defendants to attend Matt's funeral or in any way requested their presence at such a private event.

20. In addition to the aforementioned outrageous statements, on the www.godhatesfags.com website, the defendants proclaimed similar outrageous statements concerning Matt and plaintiff Albert Snyder.

21. In particular, the website states "God blessed you, Mr. and Mrs. Snyder, with a resource and his name was Matthew. He was an arrow in your quiver. In thanks to God for the comfort the child could bring you, you had a DUTY to prepare that child to serve the LORD his GOD - PERIOD! You did JUST THE OPPOSITE- you raised him for the devil."

22. In addition to the previously described false and outrageous statements, the website states "Albert and Julie RIPPED that body apart and taught Matthew to defy his Creator, to divorce, and to commit adultery. They taught him how to support the largest pedophile machine in the history of the entire world, the Roman Catholic monstrosity. Every dime they gave the Roman Catholic monster they condemned their own souls. They also, in supporting satanic Catholicism, taught Matthew to be an idolator."

23. Notwithstanding the outrageous conduct perpetrated by defendant Phelps and his co-conspirators at Matt's funeral, the defendants went further and posted their actions, signs and misdeeds on the internet.

24. On the www.godhatesfags.com website, the defendants posted the signs that they held at Matt's funeral. The signs the defendants held at the funeral, and subsequently posted on the internet, stated: "God hates you" and "America is doomed" and "You're going to hell" and "Fag troops" and "God hates the U.S.A." and "Pope in hell in Westminster, MD" and "God's view" and "Semper Fi, Semper fags" and "Don't pray for the USA" and "God hates fags". Upon information and belief, the defendants had more signs at the funeral which were similar in content.

25. The defendants shouted similar words while they were protesting Matt's funeral for the purpose of inflicting emotional distress on the Snyder family.

Count I
Defamation

26. Plaintiff incorporates herein by reference all of the averments of paragraphs 1 through 25 with like force and effect as though set forth in full herein.

27. The conduct of the defendants, as described above, constitutes defamation by the defendants. More specifically, the plaintiff never committed adultery nor taught Matt to commit adultery. The defendants' defamatory statements are liable per se.

28. Plaintiff Albert Snyder, contrary to the defendants' defamatory statements, did not literally raise Matt "for the devil," nor raise him in an evil or immoral manner - the natural connotation of that statement.

29. Plaintiff Albert Snyder, contrary to the defendants' defamatory statements, did not teach "Matthew to defy his Creator, to divorce, and to commit adultery."

30. The defendants conducted no investigation concerning the truth or veracity of their defamatory statements.

31. In fact, the defendants' defamatory statements were made intentionally and without concern whether the statements were true. The false statements have harmed the plaintiff.

32. The defendants' defamatory statements were made intentionally or with reckless disregard to the truth or veracity of the statements. The defendants knew their statements would harm the plaintiff.

33. The defendants' defamatory statements were made publicly and were intended to be made public.

34. The conduct of the defendants has been sufficiently outrageous as to entitle plaintiff, Albert Snyder, to punitive damages.

35. Since the time that the defendants protested Matt's funeral, members of Westboro Baptist Church have stated that they intend to continue to protest military funerals. Punitive damages are appropriate to deter the defendants' future outrageous conduct.

36. In fact, the defendants post their future funeral protesting and picketing activities on their www.godhatesfags.com website.

37. Upon information and belief, the defendants spend one quarter of a million dollars annually on travel to protest, among other things, military funerals.

Count II
Invasion Of Privacy - Intrusion Upon Seclusion

38. Plaintiff incorporates herein by reference all of the averments of paragraphs 1 through 37 with like force and effect as though set forth in full herein.

39. The defendants intentionally entered upon the solitude and seclusion of the plaintiff and his family members. Additionally, the defendants intruded upon the plaintiff's private affairs and concerns.

40. Plaintiff Albert Snyder's personal affairs are not a matter of public concern. Matt's private funeral was not a matter of public concern.

41. The aforementioned intrusion upon seclusion was highly offensive to a reasonable person.

42. The conduct of the defendants has been sufficiently outrageous as to entitle plaintiff an award of punitive damages.

Count III
Invasion Of Privacy - Publicity Given To Private Life

43. Plaintiff incorporates herein by reference all of the averments of paragraphs 1 through 42 with like force and effect as though set forth in full herein.

44. In addition, or alternatively, the defendants' publicity given to private life was and is an invasion of privacy.

45. The defendants' actions and statements were highly offensive to a reasonable person.

46. The defendants' actions and statements were not consistent with any legitimate concern to the public.

47. The conduct of the defendants has been sufficiently outrageous as to entitle plaintiff to an award of punitive damages.

48. The continuous use of the website www.godhatesfags.com website concerning the plaintiff is sufficiently outrageous to entitle plaintiff to an award of punitive damages. Punitive damages will deter the defendants future outrageous conduct.

Count IV
Intentional Infliction Of Emotional Distress

49. Plaintiff incorporates herein by reference all of the averments of paragraphs 1 through 48 with like force and effect as though set forth in full herein.

50. The defendants' conduct, as described above, was intentional and reckless.

51. The defendants' conduct was extreme and outrageous. The defendants intended to harm Plaintiff Albert Snyder and his family.

52. The defendants' wrongful conduct has caused severe physical and emotional distress to the plaintiff.

53. The defendants' conduct has caused the plaintiff to be physically and emotionally damaged. The physical and emotional damage is ongoing and directly caused by the defendants' actions at Matt's funeral and subsequent postings concerning the plaintiff on www.godhatesfags.com.

54. The conduct of the defendants has been sufficiently outrageous as to entitle plaintiff to an award of punitive damages.

Count V
Civil Conspiracy

55. Plaintiff incorporates herein by reference all of the averments of paragraphs 1 through 54 with like force and effect as though set forth in full herein.

56. The individual defendants reached an agreement and conspired to travel from Kansas to Maryland to protest Matt's funeral, to invade the privacy of the plaintiff and defame the plaintiff.

57. The individual defendants used their website, www.godhatesfags.com, to further perpetrate their tortious acts by defaming the plaintiff and causing further harm by committing a continual intentional infliction of emotional distress, invasion of privacy and defamation.

58. As more fully described above, the defendants' actions were and continue to be unlawful.

59. Upon information and belief, the defendants financially contributed to defendant Westboro Baptist Church in order to carry out their conspiracy and wrongful acts.

60. The conduct of the defendants has been sufficiently outrageous as to entitle plaintiff to an award of punitive damages.


WHEREFORE, Plaintiff, Albert Snyder, demands judgment as follows:

1. An award of general damages for the defendants' wrongful acts;
2. An award of the special damages for the defendants' wrongful acts;
3. An award of costs and disbursements incurred in this action, as provided by state and federal law;
4. An award of punitive damages for the defendants' reprehensible and outrageous conduct; and

5. An award of punitive damages to deter the defendants' future reprehensible and outrageous conduct.

BARLEY SNYDER LLC

By:


Paul W. Minnich T6783
100 East Market Street
P. O. Box 15012
York, PA 17405-7012
(717)846-8888

1623769

WAIVER OF SERVICE OF SUMMONS

TO: Sean E. Summers
(NAME OF PLAINTIFF'S ATTORNEY OR UNREPRESENTED PLAINTIFF)

I, Fred W. Phelps, Sr., acknowledge receipt of your request
(DEFENDANT NAME)

that I waive service of summons in the action of Albert Snyder v. Fred W. Phelps, Sr., et al.
(CAPTION OF ACTION)

which is case number RDB 06 CV 1389 in the United States District Court
(DOCKET NUMBER)

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I have also received a copy of the complaint in the action, two copies of this instrument, and a means by which I can return the signed waiver to you without cost to me.

I agree to save the cost of service of a summons and an additional copy of the complaint in this lawsuit by not requiring that I (or the entity on whose behalf I am acting) be served with judicial process in the manner provided by Rule 4.

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June 22, 2006
(DATE REQUEST WAS SENT)

or within 90 days after that date if the request was sent outside the United States.

(DATE)

(SIGNATURE)

Printed/Typed Name: Fred W. Phelps, Sr.

As _____ of _____
(TITLE) (CORPORATE DEFENDANT)

Duty to Avoid Unnecessary Costs of Service of Summons

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FILED
U.S. DISTRICT COURT
DISTRICT OF MARYLAND

2006 JUN -5 A 11:39

CLERK'S OFFICE
IN THE UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND

ALBERT SNYDER,
Plaintiff

v.

FRED W. PHELPS, SR.,
JOHN DOES, JANE DOES, and
WESTBORO BAPTIST CHURCH, INC.
Defendants

Civil Action No. **RDB 06 CV 1389**

COMPLAINT

Preliminary Statement

1. This is a suit for defamation, invasion of privacy and intentional infliction of emotional distress. Plaintiff Albert Snyder is a resident of York, Pennsylvania and the father of the now deceased Lance Corporal Matthew A. Snyder. He alleges that the defendant church and its members wrongfully intruded upon his son's funeral and subsequently defamed him on the defendants' webpage, causing physical and emotional damages. In addition, defendants' conduct was so intentional and outrageous that the imposition of punitive damages is appropriate to punish the defendants for their actions and to deter the defendants from further reprehensible conduct.

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4. A jury trial is demanded.

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9. The individual defendants acted as agents of defendant Westboro Baptist Church and in their individual capacities.

Summary Of Plaintiff's Claims

10. Plaintiff, Albert Snyder, is the father of Marine Lance Corporal Matthew A. Snyder (now deceased) ("Matt"); Matt was born on July 18, 1985.

11. In or about October 2003, Matt joined the United States Marine Corps.

12. Subsequently, Matt was deployed to Iraq with his unit as part of Operation Iraqi Freedom.

13. On March 3, 2006, while conducting combat operations, Matt was killed in the line of duty.

14. Matt was transported back to the United States and plaintiff Albert Snyder and Matt's family planned and commenced a traditional funeral and burial service in honor of their son. The funeral was on March 10, 2006, at St. John's Catholic Church, in Westminster, Maryland.

15. The defendants operate and maintain several websites: (1) www.thesignsofthetimes.net; (2) www.smellthebrimstone.com; (3) www.godhatesamerica.com; (4) www.priestsrapeboys.com; (5) www.godhatesweden.com; (6) www.godhatescanada.com; and lastly, (7) www.godhatesfags.com.

16. Among other things, the defendants preach and advocate a hatred for homosexuals. On numerous occasions, the defendants have protested military funerals proclaiming, for example, "God hates fags" and "Semper Fi Fags" and "thank God for dead soldiers".

17. The defendants protest military funerals because, according to the defendants:

"Here are some axiomatic matters of fact:

These turkeys are not heroes. They are lazy, incompetent idiots looking for jobs because they're not qualified for honest work.

They were raised on a steady diet of fag propaganda in the home, on TV, in church, in school, in mass media - everywhere - the two-pronged lie: 1) It's OK to be gay; and, 2) Anyone saying otherwise, like WBC, is a hatemonger who must be vilified, demonized, marginalized into silence.

Therefore, with full knowledge of what they were doing, they voluntarily joined a fag-infested army to fight for a fag-run country now utterly and finally forsaken by God who Himself is fighting against that country.

They turned America
Over to fags;
They're coming home
In body bags.

America used an IED to bomb Westboro Baptist Church on August 20, 1995 - an act of terror aimed at terrorizing us into discontinuing our nationwide Gospel preaching against the homosexual menace.

When America thus became WBC's terrorist, God became America's Terrorist.

Therefore the IED is God's weapon of choice in avenging Westboro Baptist Church by blowing America's kids to smithereens in Iraq. And the carnage has barely begun.

Thus, their funerals are the forum of choice for delivering WBC's message of choice.”

18. On March 10, 2006, the defendants protested Matt's funeral proclaiming similar outrageous and defamatory comments, with the intention of inflicting distress upon the Snyder family.

19. No one invited any of the defendants to attend Matt's funeral or in any way requested their presence at such a private event.

20. In addition to the aforementioned outrageous statements, on the www.godhatesfags.com website, the defendants proclaimed similar outrageous statements concerning Matt and plaintiff Albert Snyder.

21. In particular, the website states “God blessed you, Mr. and Mrs. Snyder, with a resource and his name was Matthew. He was an arrow in your quiver. In thanks to God for the comfort the child could bring you, you had a DUTY to prepare that child to serve the LORD his GOD - PERIOD! You did JUST THE OPPOSITE- you raised him for the devil.”

22. In addition to the previously described false and outrageous statements, the website states "Albert and Julie RIPPED that body apart and taught Matthew to defy his Creator, to divorce, and to commit adultery. They taught him how to support the largest pedophile machine in the history of the entire world, the Roman Catholic monstrosity. Every dime they gave the Roman Catholic monster they condemned their own souls. They also, in supporting satanic Catholicism, taught Matthew to be an idolator."

23. Notwithstanding the outrageous conduct perpetrated by defendant Phelps and his co-conspirators at Matt's funeral, the defendants went further and posted their actions, signs and misdeeds on the internet.

24. On the www.godhatesfags.com website, the defendants posted the signs that they held at Matt's funeral. The signs the defendants held at the funeral, and subsequently posted on the internet, stated: "God hates you" and "America is doomed" and "You're going to hell" and "Fag troops" and "God hates the U.S.A." and "Pope in hell in Westminster, MD" and "God's view" and "Semper Fi, Semper fags" and "Don't pray for the USA" and "God hates fags". Upon information and belief, the defendants had more signs at the funeral which were similar in content.

25. The defendants shouted similar words while they were protesting Matt's funeral for the purpose of inflicting emotional distress on the Snyder family.

Count I
Defamation

26. Plaintiff incorporates herein by reference all of the averments of paragraphs 1 through 25 with like force and effect as though set forth in full herein.

27. The conduct of the defendants, as described above, constitutes defamation by the defendants. More specifically, the plaintiff never committed adultery nor taught Matt to commit adultery. The defendants' defamatory statements are liable per se.

28. Plaintiff Albert Snyder, contrary to the defendants' defamatory statements, did not literally raise Matt "for the devil," nor raise him in an evil or immoral manner - the natural connotation of that statement.

29. Plaintiff Albert Snyder, contrary to the defendants' defamatory statements, did not teach "Matthew to defy his Creator, to divorce, and to commit adultery."

30. The defendants conducted no investigation concerning the truth or veracity of their defamatory statements.

31. In fact, the defendants' defamatory statements were made intentionally and without concern whether the statements were true. The false statements have harmed the plaintiff.

32. The defendants' defamatory statements were made intentionally or with reckless disregard to the truth or veracity of the statements. The defendants knew their statements would harm the plaintiff.

33. The defendants' defamatory statements were made publicly and were intended to be made public.

34. The conduct of the defendants has been sufficiently outrageous as to entitle plaintiff, Albert Snyder, to punitive damages.

35. Since the time that the defendants protested Matt's funeral, members of Westboro Baptist Church have stated that they intend to continue to protest military funerals. Punitive damages are appropriate to deter the defendants' future outrageous conduct.

36. In fact, the defendants post their future funeral protesting and picketing activities on their www.godhatesfags.com website.

37. Upon information and belief, the defendants spend one quarter of a million dollars annually on travel to protest, among other things, military funerals.

Count II
Invasion Of Privacy - Intrusion Upon Seclusion

38. Plaintiff incorporates herein by reference all of the averments of paragraphs 1 through 37 with like force and effect as though set forth in full herein.

39. The defendants intentionally entered upon the solitude and seclusion of the plaintiff and his family members. Additionally, the defendants intruded upon the plaintiff's private affairs and concerns.

40. Plaintiff Albert Snyder's personal affairs are not a matter of public concern. Matt's private funeral was not a matter of public concern.

41. The aforementioned intrusion upon seclusion was highly offensive to a reasonable person.

42. The conduct of the defendants has been sufficiently outrageous as to entitle plaintiff an award of punitive damages.

Count III
Invasion Of Privacy - Publicity Given To Private Life

43. Plaintiff incorporates herein by reference all of the averments of paragraphs 1 through 42 with like force and effect as though set forth in full herein.

44. In addition, or alternatively, the defendants' publicity given to private life was and is an invasion of privacy.

45. The defendants' actions and statements were highly offensive to a reasonable person.

46. The defendants' actions and statements were not consistent with any legitimate concern to the public.

47. The conduct of the defendants has been sufficiently outrageous as to entitle plaintiff to an award of punitive damages.

48. The continuous use of the website www.godhatesfags.com website concerning the plaintiff is sufficiently outrageous to entitle plaintiff to an award of punitive damages. Punitive damages will deter the defendants future outrageous conduct.

Count IV
Intentional Infliction Of Emotional Distress

49. Plaintiff incorporates herein by reference all of the averments of paragraphs 1 through 48 with like force and effect as though set forth in full herein.

50. The defendants' conduct, as described above, was intentional and reckless.

51. The defendants' conduct was extreme and outrageous. The defendants intended to harm Plaintiff Albert Snyder and his family.

52. The defendants' wrongful conduct has caused severe physical and emotional distress to the plaintiff.

53. The defendants' conduct has caused the plaintiff to be physically and emotionally damaged. The physical and emotional damage is ongoing and directly caused by the defendants' actions at Matt's funeral and subsequent postings concerning the plaintiff on www.godhatesfags.com.

54. The conduct of the defendants has been sufficiently outrageous as to entitle plaintiff to an award of punitive damages.

Count V
Civil Conspiracy

55. Plaintiff incorporates herein by reference all of the averments of paragraphs 1 through 54 with like force and effect as though set forth in full herein.

56. The individual defendants reached an agreement and conspired to travel from Kansas to Maryland to protest Matt's funeral, to invade the privacy of the plaintiff and defame the plaintiff.

57. The individual defendants used their website, www.godhatesfags.com, to further perpetrate their tortious acts by defaming the plaintiff and causing further harm by committing a continual intentional infliction of emotional distress, invasion of privacy and defamation.

58. As more fully described above, the defendants' actions were and continue to be unlawful.

59. Upon information and belief, the defendants financially contributed to defendant Westboro Baptist Church in order to carry out their conspiracy and wrongful acts.

60. The conduct of the defendants has been sufficiently outrageous as to entitle plaintiff to an award of punitive damages.


WHEREFORE, Plaintiff, Albert Snyder, demands judgment as follows:

1. An award of general damages for the defendants' wrongful acts;
2. An award of the special damages for the defendants' wrongful acts;
3. An award of costs and disbursements incurred in this action, as provided by state and federal law;
4. An award of punitive damages for the defendants' reprehensible and outrageous conduct; and

5. An award of punitive damages to deter the defendants' future reprehensible and outrageous conduct.

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