

IN THE CIRCUIT COURT OF BOONE COUNTY, MISSOURI

LYNLEE JO RENICK

|

VS.

|

CASE NO. _____

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BRANDON BLACKWELL

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PETITION FOR DEFAMATION

COMES NOW Plaintiff, LYNLEE JO RENICK, by and through her undersigned counsel, and for her Petition for Defamation, states as follows:

1. Plaintiff was at all times herein a resident of the State of Missouri, County of Boone.
2. Defendant was at all times herein a resident of the State of Missouri.
3. On January 14, 2020, through January 16, 2020, Defendant stated, both orally and in writing, to law enforcement officer that Plaintiff had committed murder.
4. The statements made by Defendant were known to Defendant to be false and were made without justification or cause and were made maliciously for the purpose of causing injury to Plaintiff's reputation and subjecting her to arrest, incarceration, criminal prosecution and loss of custody of the child Plaintiff and Defendant have in common.
5. As a direct and proximate result of Defendant's false and defamatory statements, the reputation of Plaintiff has been damaged, and she was subjected to prosecution.
6. As a direct and proximate result of Defendant's false and defamatory statements, Plaintiff has been deprived of her freedoms of movement and association.

7. As a direct and proximate result of Defendant's false and defamatory statements, Plaintiff has been deprived of her right to work, employment, and financial security.
8. As a direct and proximate result of Defendant's false and defamatory statements, Plaintiff has been deprived of the love, comfort, affection, and companionship of her three children, M.H., E.R., and J.B.

WHEREFORE, Plaintiff, Lynlee Jo Renick, requests the entry of a Judgment in favor of Plaintiff and against Defendant Brandon Blackwell, pursuant to §509.210, RSMo, for actual damages in an amount that is fair and reasonable and in excess of the amount of twenty-five thousand dollars (\$25,000.00), for punitive damages, for court costs incurred herein, and for such other and further relief as this Court deems just and proper under the circumstances.

Respectfully submitted,

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