

SUPREME COURT STATE OF NEW YORK  
COUNTY OF SENECA

---

CLINT HALFTOWN AND  
MARK LINCOLN,

*Plaintiffs,*

v.

CHARLES BOWMAN

*Defendant.*

---

**SUMMONS**

Index. No \_\_\_\_\_

**TO THE ABOVE-NAMED DEFENDANTS:**

**YOU ARE HEREBY SUMMONED** and required to serve upon Plaintiffs' attorneys an answer to the Verified Complaint in this action within twenty (20) days after the service of this Summons, exclusive of the day of service, or within thirty (30) days after service is complete if this Summons is not personally delivered to you within the State of New York. In case of your failure to answer, judgment will be taken against you by default for the relief demanded in the Complaint.

Venue in the County of Seneca is proper pursuant to CPLR 503 because both parties reside in this County.

**DATED:** January 26, 2022

**BARCLAY DAMON LLP**

By: \_\_\_\_\_

Lee Alcott

*Attorneys for Plaintiffs,*

Barclay Damon Tower

125 East Jefferson Street

Syracuse, New York 13202

Tel: (315) 425-2749

Email: lalcott@barclaydamon.com

TO: Charles Bowman  
2618 Leader Road  
Seneca Falls, New York 13148

SUPREME COURT STATE OF NEW YORK  
COUNTY OF SENECA

---

CLINT HALFTOWN AND  
MARK LINCOLN,

*Plaintiffs,*

v.

CHARLES BOWMAN

*Defendant.*

---

**VERIFIED  
COMPLAINT**

Index. No \_\_\_\_\_

Plaintiffs, Clint Halftown and Mark Lincoln, by and through their attorneys, Barclay Damon LLP, as and for their Complaint against Defendant Charles Bowman allege as follows:

**PRELIMINARY STATEMENT**

1. The denigration of Native Americans has endured for far too long. This case supplies just the latest example. Resurrecting offensive stereotypes of Native Americans as corrupt and even criminal people, Defendant Bowman has engaged in a continuous and relentless Facebook defamation campaign against Mr. Halftown, publicly referring to him as a perpetrator of domestic terrorism who leads a corrupt and criminal organization backed by an assault-weapon-wielding mercenaries who menace and assault law abiding citizens, loot businesses, beat women, and threaten the lives of people inside and outside of the Cayuga Nation.

2. By dint of his association with the Cayuga Nation and enforcement of its laws as Superintendent of the Cayuga Nation Police, Mark Lincoln has been the subject of targeted defamation by Defendant Bowman as well, in an apparent effort to harm his standing in the community and its faith in the impartial performance of his duties.

3. Defendant Bowman's ongoing defamation offensive does not occur in a vacuum. He has knowingly and intentionally broadcasted his smears into the public sphere at the direct expense of, and harm to, the reputation and good names of Mr. Halftown and Mr. Lincoln.

4. Mr. Halftown and Mr. Lincoln have good reason to believe Mr. Bowman has defamed them in other forums on other occasions, and that he continues to do all he can to sully their names and reputations. This action seeks to put an end to that misconduct once and for all, and to recover damages for harms inflicted.

### **PARTIES**

5. Plaintiff Clint Halftown is a citizen of the Cayuga Nation (the "Nation"), a federally recognized Indian nation, and is also the Nation's federal representative as well as a member of the Nation's governing body, the Cayuga Nation Council, recognized by the U.S. Department of the Interior. Mr. Halftown resides in Seneca Falls, Seneca County, New York.

6. Plaintiff Mark Lincoln is a non-Native individual who serves as the Superintendent of Police for the Cayuga Nation Police Department. Mr. Lincoln resides in Auburn, Cayuga County, New York.

7. Upon information and belief, Defendant Charles Bowman is a non-Native individual who resides at 2618 Leader Road, Seneca Falls, Seneca County, New York.

### **JURISDICTION AND VENUE**

8. The amount in controversy in this action meets the jurisdictional threshold of this Court.

9. This Court has jurisdiction over this matter pursuant to CPLR 301.

10. Venue in this court is proper pursuant to CPLR 503 because Defendant Bowman and Mr. Halftown reside in Seneca County.

## FACTS

11. Defendant Bowman maintains an active presence on Facebook on which he publicly posts both written and video statements. According to his Facebook page, Defendant Bowman joined Facebook more than a decade ago in March 2010.

12. Defendant Bowman is engaged in an ongoing and public defamation offensive against Mr. Halftown and Mr. Lincoln, producing permanently-preserved live video statements, in addition to publishing written words.

13. Specifically, Defendant Bowman utilizes Facebook as vehicle to broadcast livestream videos of himself publicly defaming Mr. Halftown and Mr. Lincoln—which videos are then permanently preserved on his public Facebook page—where his written defamatory statements are also stored.

14. Among the many defamatory statements made by Defendant Bowman on Facebook about Mr. Halftown and Mr. Lincoln are the following.

15. On January 1, 2022, at approximately 3:23 a.m., Defendant Bowman livestreamed a lengthy video on Facebook stating, “the tyrant Clint Halftown’s got goons come in an raided the store at 3 o’clock in the morning,” “he’s a tyrant,” “this is what a terrorist looks like.” This video remains publicly accessible on Facebook, and has been submitted to the Seneca County Clerk on a Flash Drive labeled **Exhibit A**.

16. Less than an hour later, at approximately 4:03 a.m., Defendant Bowman livestreamed a video on Facebook stating “Clint Halftown can get away with terroristic acts on his own people” committing “terroristic work in the middle of the night,” and describing those acts to include assaulting and beating a woman. This video remains publicly accessible on Facebook, and has been submitted to the Seneca County Clerk on a Flash Drive labeled **Exhibit A**.

17. That same afternoon, at approximately 1:24 p.m., Defendant Bowman livestreamed an invective-laden rant on Facebook in which he accused Mr. Halftown of conspiring with the Nation Police to menace and terrorize citizens with assault rifles, including pointing a gun directly at Defendant Bowman's head, and then lying about what happened to the local news. Defendant Bowman concluded this diatribe with the statement: "Clint's a fucking liar." This video remains publicly accessible on Facebook, and has been submitted to the Seneca County Clerk on a Flash Drive labeled **Exhibit A**.

18. On January 2, 2022, at approximately 1:09 p.m., Defendant Bowman posted the following to his public Facebook wall: "With all the violent acts taken by Clint Halftown in our community, a lot of you have showed an interest in helping to correct this wrong. I hope you can and will be willing answer that call when needed." The posting remains publicly accessible on Facebook, and a PDF copy of the posting is attached hereto as **Exhibit B**.

19. On January 3, 2022 at approximately 3:03 p.m., Defendant Bowman livestreamed a lengthy prepared statement on Facebook, which is transcribed below, accusing Mr. Halftown of domestic terrorism, corruption, and criminality:

Okay. I've prepared more of a little statement. I'd really like everybody to share this with everybody. This is a message that really needs to be heard. It is domestic terrorism the way Clint Halftown brings heavily armed mercenaries, brings armed mercenaries into the middle of the night under the cover of darkness. They scare countless people in the neighborhood with children and people sleeping in their beds—they're scared to go out of their homes. They broke so many state and federal laws and our police department does have complete authority to arrest them. I just spoke with a BIA Agent, BIA, and he told me the Seneca Falls police, the Seneca County and State police should be arresting them on these charges. Clint does not, cannot do the things he just got away with. This is something that needs to be brought to the attention of our officials. This is plain and simple domestic terrorism. You don't come in in the middle of the night, under the cover of darkness with mercenaries, just to close a store down. It's not the way things work. Clint's bullied our county saying he's going to sue them over this, sue them over parking says, sue them over who knows what, shutting off water, everything. I'm done getting bullied by Clint. He's plain and simple a domestic terrorist. Him and all his hired mercenaries. Just being they're retired police officers. They were good men. Were. The local law

enforcement, the Seneca Falls PD, did contact me for a statement. They're finally starting to step up. Well they don't need a statement to arrest them for domestic terrorism. We all witnessed it. We all witness all the crimes. Those mercenaries had no right to have a gun pointed at me. They have no right wearing police coats. This time or the last time they were here. So over two years we could have been arresting these guys, and we've done nothing. We sit here and let domestic terrorists just do whatever the hell he wants because it's Clint Halftown. We'll hear soon if the BIA doesn't do anything. I think we all ought to go down to his stores, lock arms, and shut them down ourselves. I'm not saying be violent, but we just lock arms right in front of every driveway he has, and we shut them down ourselves.

I'm sick of this guy getting away with all of this. If our police and our law enforcement isn't gonna step up and do it, then we'll shut him down. The only reason he's still operating is because you guys keep buying stuff from him. Please share this. We don't need a domestic terrorist in Seneca County. The neighbors, everybody who lives around one of his properties should fear because he could come in any time night or day with his armed mercenaries having a shootout, and you sitting beside them in your house, you're just cannon fodder. He doesn't give a shit about anybody around here. He doesn't give a shit about his own people. What do you think he thinks about Seneca County residents? As long as you keep giving him this money, that's all he cares about. It's disgusting. Please share this message. Thank you.

This video remains publicly accessible on the Facebook page, and has been submitted to the Seneca County Clerk on a Flash Drive labeled **Exhibit A**.

20. On January 5, 2022, at approximately 6:02 a.m., Defendant Bowman livestreamed a video on Facebook calling for the arrest of Mr. Halftown and all of the Cayuga Nation Police, and claiming the Cayuga Nation Police "beat the hell out of me and sent me to the hospital" and "are not police officers," to "arrest all of them, every single one of them, Lincoln included, Mark Lincoln is the biggest culprit in this." This video remains publicly accessible on Facebook, and has been submitted to the Seneca County Clerk as a Flash Drive labeled **Exhibit A**.

21. Later that day, at approximately 9:38 a.m., Defendant Bowman livestreamed a video on Facebook claiming Cayuga Nation police are "baton-wielding, mace-spraying, face-punching" individuals, and insisting "this is not a joke, this is domestic terrorism happening in Seneca Falls," "these are the same guys who beat the hell out of everybody, these are the same ones that raided Nora and beat the shit out of her in the middle of the night, they're the same ones

that beat me two years ago.” This video remains publicly accessible on Facebook, and has been submitted to the Seneca County Clerk on a Flash Drive labeled **Exhibit A**.

22. On January 7, 2022, at approximately 7:17 a.m., Defendant Bowman posted an image of Mr. Lincoln’s official portrait as Superintendent of the Cayuga Nation Police along with the following statement:

One of the most incorrigible pepole of Clint Halftowns whole corrupt criminal organization. This man ( Mark Lincoln) has been caught in countless lies in his official reports and press releases. He is a paid professional liar!! Yes we have proven his statements over and over again are false. He is the Boss of all the top flight security Clint employs. Do you know they wrote in (clints law) the sublaws that if a judge makes a judgement that Clint dose not like he can overturn the dession in his favor. Do you know Sharon LeRoy(clints mother) made her self, Treasurer for life. She pays the police, she pays the judge, she used Cayuga nation money to buy a Cayuga run business and shut it down. They have spent over 4 million dollars just to destroy all traditional Cayuga pepole.

(typographical errors in original). The posting remains publicly accessible on Facebook, and a PDF copy of the posting is attached hereto as **Exhibit C**.

23. On or about January 20, 2020, Defendant Bowman posted pictures of what he identified as “Stickers available at Gramma Approved Sovereign Trades. The stickers say “Fuck Halftown” with the “F” and the “K” rendered in images of automatic rifles. A copy of the posting is attached hereto as **Exhibit D**.

24. Upon information and belief, Defendant Bowman has made a number of additional defamatory statements on Facebook which he has removed or are otherwise no longer accessible, in addition to defamatory statements via other media which were not preserved.

25. All of the statements made by Defendant Bowman regarding Mr. Halftown and Mr. Lincoln are false and have harmed Mr. Halftown’s and Mr. Lincoln’s reputations.

**AS AND FOR A FIRST CAUSE OF ACTION**  
**DEFAMATION PER SE (MR. HALFTOWN)**

26. Plaintiffs repeat and reallege each and every allegation set forth in the preceding paragraphs as if fully set forth herein.

27. Defendant Bowman's statements about Mr. Halftown as set forth above are false statements.

28. Defendant Bowman published those false statements to a third party without privilege or authorization from Mr. Halftown.

29. Defendant Bowman's false statements charge Mr. Halftown with the commission of serious crimes.

30. Defendant Bowman's false statement injured Mr. Halftown in his trade, business, or profession.

31. Defendant Bowman's false statement about Mr. Halftown were made with requisite intent.

32. Defendant Bowman's false statements about Mr. Halftown constitute defamation per se.

33. By reason of the foregoing, Mr. Halftown is entitled to damages in an amount as may be determined by a court or jury.

**AS AND FOR A SECOND CAUSE OF ACTION**  
**DEFAMATION PER SE (MR. LINCOLN)**

34. Plaintiffs repeat and reallege each and every allegation set forth in the preceding paragraphs as if fully set forth herein.

35. Defendant Bowman's statements about Mr. Lincoln as set forth above are false statements.



36. Defendant Bowman published these false statements to a third party without privilege or authorization from Mr. Lincoln.

37. Defendant Bowman's false statements charge Mr. Lincoln with the commission of serious crimes.

38. Defendant Bowman's false statements injured Mr. Lincoln in his trade, business, or profession.

39. Defendant Bowman's false statement about Mr. Lincoln were made with requisite intent.

40. Defendant Bowman's false statements about Mr. Lincoln constitute defamation per se.

41. By reason of the foregoing, Mr. Lincoln is entitled to damages in an amount as may be determined by a court or jury.

**AS AND FOR A THIRD CAUSE OF ACTION**  
**BIAS-RELATED INTIMIDATION**  
**(N.Y. Civil Rights Law §79-n)**

42. Plaintiffs repeat and reallege each and every allegation set forth in the preceding paragraphs as if fully set forth herein.

43. Defendant Bowman intentionally selected Mr. Halftown for harm based upon his race.

44. Defendant Bowman intentionally selected Mr. Halftown for harm based upon his color.

45. Defendant Bowman intentionally selected Mr. Halftown for harm based upon his national origin.

46. Defendant Bowman continues to target Mr. Halftown for harm based upon the above-stated immutable characteristics.

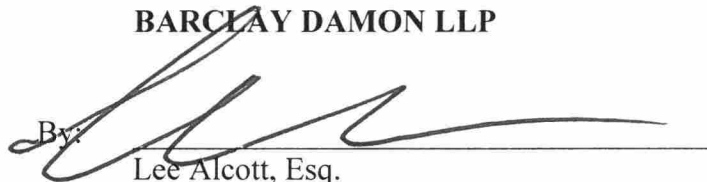
47. Defendant Bowman's conduct therefore constitutes violations of New York Civil Rights Law § 79-n.

48. By reason of the foregoing, Mr. Halftown is entitled to damages in an amount as may be determined by a court or jury together with an injunction pursuant to New York Civil Rights Law § 79-n enjoining and restraining further violation.

WHEREFORE, Plaintiffs Mr. Halftown and Mr. Lincoln demand judgment against Defendant Charles Bowman as may be determined by a court or jury and an injunction prohibiting further violation of New York Civil Rights Law § 79-n, together with the costs and disbursements of this action and such other and further relief as the court may deem just and proper.

DATED: January 26, 2022

**BARCLAY DAMON LLP**

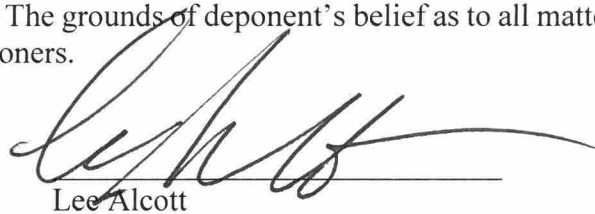
By: 

Lee Alcott, Esq.  
*Attorneys for Plaintiffs, Clint Halftown  
and Mark Lincoln*  
Barclay Damon Tower  
125 East Jefferson Street  
Syracuse, New York 13202  
Tel: (315) 425-2749  
lalcott@barclaydamon.com

## VERIFICATION

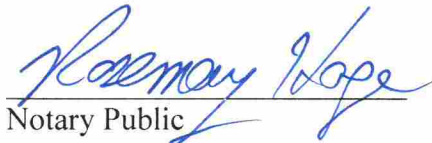
STATE OF NEW YORK     )  
  ) SS.:  
COUNTY OF ONONDAGA )

I, Lee Alcott, an attorney duly admitted to practice law in the courts of the State of New York, deposes and states that I am the attorney of record for the Plaintiffs, Clint Halftown and Mark Lincoln in the within action. I have read the foregoing Verified Complaint and know the contents thereof, that the same is true upon information and belief, and that deponents believe it to be true. The reason this Verification is made by me and not by the Plaintiffs is that the Plaintiffs are not in the county where I maintain my office. The grounds of deponent's belief as to all matters stated herein are communications with the Petitioners.



Lee Alcott

Sworn to before me this  
26<sup>th</sup> day of January, 2022.



Notary Public

NOTARY PUBLIC  
STATE OF NEW YORK  
No. 01HA63750  
Onondaga County  
Commission Expires May 29, 2024

# **EXHIBIT A**

**Flash Drive to be submitted to Seneca  
County Clerk following  
assignment of index number**

### NOTICE OF HARD COPY EXHIBIT FILING

Index Number: \_\_\_\_\_

Pursuant to Uniform Rule § 202.5-b(d)(7), notice is hereby given that the exhibit described below:

[ ☒ ] was filed in hard copy only with the County Clerk of SENECA County under the above referenced Index Number

or

[ ☐ ] will be retained by the party set forth below until the conclusion of this action/proceeding, including all appeals, and therefore will not appear in electronic form in the e-docket.

Filing/Retaining Party: Clint Halftown and Mark Lincoln

Brief Description (e.g., map, videotape, etc.) Exhibit A - USB of Videos

and, in either case, has been or will be served in hard copy on all parties in this action, with proof of service filed electronically

Dated: 1/27/2022

Lee Alcott

Name

Barclay Damon LLP

Firm/Department

125 E. Jefferson Street

Street Address

Syracuse, NY 13202

City, State and Zip Code

(315)425-2749

Phone

lalcott@barclaydamon.com

E-Mail Address

# EXHIBIT B



**Charles Bowman** is 😊 feeling proud.



January 2 at 1:09 PM · 🌐

With all the violent acts taken by Clint Halftown in our community, a lot of you have showed an interest in helping to correct this wrong. I hope you can and will be willing answer that call when needed.



**This content isn't available right now**

When this happens, it's usually because the owner only shared it with a small group of people, changed who can see it or it's been deleted.



19

2 Comments



Like



Comment



Share

# EXHIBIT C





**Charles Bowman**

January 7 at 7:17 AM · 🌐



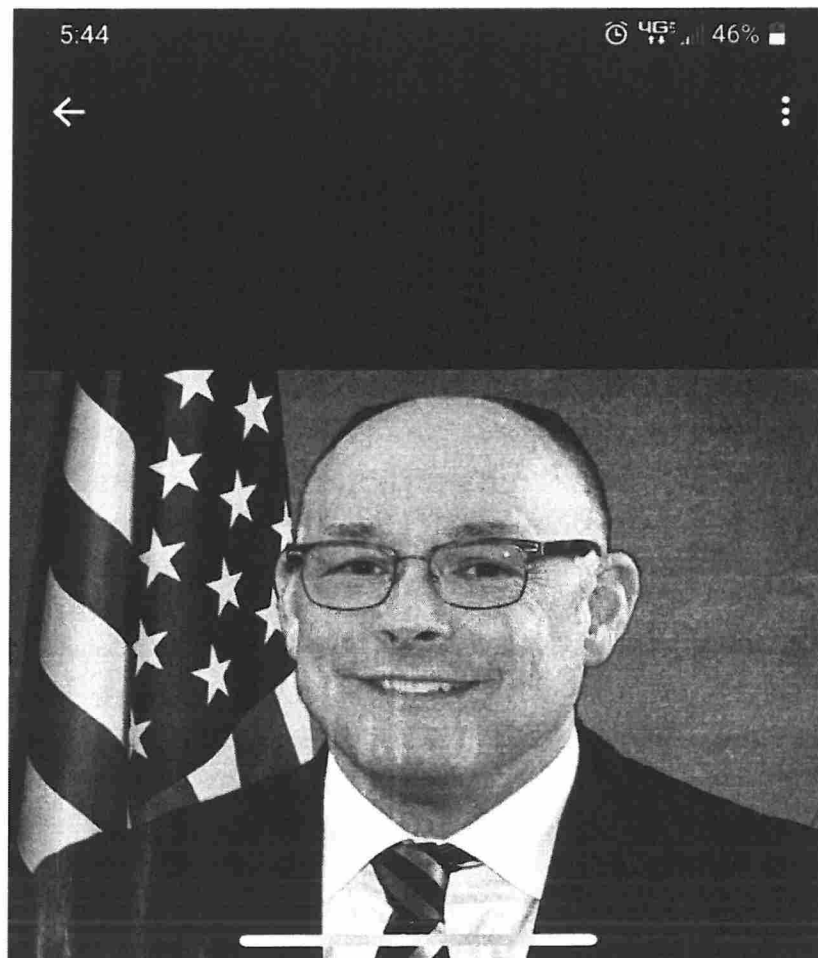
One of the most incorrigible people of Clint Halftowns whole corrupt criminal organization.

This man ( Mark Lincoln) has been caught in countless lies in his official reports and press releases. He is a paid professional liar!!

Yes we have proven his statements over and over again are false. He is the Boss of all the top flight security Clint employs.

Do you know they wrote in (clints law) the sublaws that if a judge makes a judgement that Clint dose not like he can overturn the decision in his favor. Do you know Sharon LeRoy(clints mother) made her self, Treasurer for life. She pays the police, she pays the judge, she used Cayuga nation money to buy a Cayuga run business and shut it down.

They have spent over 4 million dollars just to destroy all traditional Cayuga people.





Like



Comment



Share

17

13 Shares



**Wanda John**

Clint, Chuck, Tim and Gary put her in that position. Sharon stole the cayuga nation and now Betty Jean Radford and her brother Clint halftown are all about genocide.



2 wks Like Reply More



**Scott Smith**

Hopefully the paperwork, served, works and they are banished fore



2 wks Like Reply More



**Penny Saunders**

Apparently he prefers money over the law he chose to uphold....typical nowadays....Fuckin Scum 🤔



2 wks Like Reply More



**Mary Edwards**

The BIA should be the final voice in the matter of Clint but, may have to get the whole Iroquois Nation involve to settle it once and for all.



2 wks Like Reply More



**Corey James**

Corrupt scumbag.

2 wks Like Reply More

# EXHIBIT D



## Mobile Uploads



**Charles Bowman**

Stickers available at Gramma Approved Sovereign Trades.

Mobile Uploads · Yesterday at 8:34 PM ·

[View Full Size](#) · [More Options](#)



Like



Comment



Share



70

8 Shares



**Jaden Arden**

I want one

16 hrs Like Reply More



**Jaden Arden**

How much

16 hrs Like Reply More



**Charles Bowman**

Jaden Arden 12 bucks

15 hrs Like Reply More