

STATE OF INDIANA) FILED IN IN THE LAKE _____ COURT
CLERK'S OFFICE)
COUNTY OF LAKE) 2015 FEB 18 AM 8 25 _____, INDIANA

ANTHONY HIGGS
Plaintiff,

-vs-

MATTHEW D. MARCUM
Defendant.

CLERK LAKE SUPERIOR COURT)
CAUSE NO.: 4500115020T00032)

COMPLAINT FOR DEFAMATION OF CHARACTER

Comes now Plaintiff, Anthony Higgs, by counsel William J. O'Connor, and for his Complaint for Defamation of Character, states:

1. That Plaintiff lives in Hammond, Indiana and is employed by the office of the Lake County Commissioners, and has served as City Councilman for Hammond's third district for a number of years.
2. During that time, Plaintiff has maintained a good and sound reputation for character, honesty, and service to the community.
3. That Defendant herein created disseminated and published the most heinous false and defamatory statements me in his Facebook publication commencing on February 11, 2015, conduct that was planned, intentional and designed to cause Plaintiff serious injury.
4. That the cover of Defendant's Facebook publication is attached as Exhibit A, and introduces a music falsely setting forth the image of Plaintiff and falsely imitating Plaintiff's voice in a narrative manner to make false, heinous, and misleading statements about himself.
5. That Defendant falsely imitated Plaintiff's image and voice to make self-defaming statements to attribute wrongful conduct to Plaintiff, including conduct of a sexual nature, including Plaintiff's image and voice in a manner to directly and inferentially communicate Plaintiff's participation in sexual intercourse.
6. That all the representations in Defendant's warped video are false and were made to harm Plaintiff personally and politically.

7. As a result to Defendant's false and defamatory publications, Plaintiff has suffered loss, injury, recrimination, suffering and damages for loss personally, damage to reputation and character, and loss to political reputation and statue, among other elements of damage.

WHEREFORE, Plaintiff prays judgment for compensatory damages, for punitive damages not less than \$25,000.00, for attorney fees and costs, and for all other proper relief.



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