

# **Exhibit 1**

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
Division**

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PEYTON ASHLEIGH	)	
<i>Plaintiff,</i>	)	
	)	
v.	)	Civil Case No. _____
	)	
GOFUNDME, INC.; FACEBOOK, INC.	)	
<i>Defendants.</i>	)	

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**DECLARATION OF NATHANIEL BROWN IN SUPPORT OF NOTICE OF REMOVAL**

Pursuant to 28 U.S.C. § 1746, NATHANIEL BROWN declares as follows:

1. I am an attorney licensed to practice law in the State of California and am an associate with the law firm of Keeker, Van Nest & Peters LLP, located at 633 Battery Street, San Francisco, California 94111, counsel for Defendants GoFundMe, Inc. and Facebook, Inc. (“Defendants”) in this matter.

2. I have knowledge of the facts set forth herein, and if called to testify as a witness thereto, could do so competently under oath.

3. On July 19, 2021, Peyton Ashleigh (“Ms. Ashleigh” or “Plaintiff”) filed a Complaint pro se in the Circuit Court for Loudoun County, Virginia. The case is styled *Peyton Ashleigh v. GoFundMe, Inc. and Facebook, Inc.*, Case No. CL-21004145-00 (the “State Court Action”). Attached as **Exhibit A** is a true and correct copy of Plaintiff’s Complaint, with confidential information and private identifiers redacted. Attached as **Exhibit B** is a true and correct copy of all process, pleadings (other than Plaintiff’s Complaint already included as **Exhibit A** hereto), and orders from the State Court Action which have been served upon GoFundMe and Facebook.

4. Neither GoFundMe nor Facebook have made an appearance or filed any papers in the State Court Action.

5. I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on August 24, 2021.



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Nathaniel Brown

EXHIBIT A TO DECLARATION OF NATHANIEL BROWN

Clear All Data

COVER SHEET FOR FILING CIVIL ACTIONS
COMMONWEALTH OF VIRGINIA

Case No. CL 21-4145
(CLERK'S OFFICE USE ONLY)

Loudoun County
Peyton Ashleigh

Go Fund Me, Inc
Facebook Operations, Inc

Circuit Court

PLAINTIFF(S)

v./In re:

DEFENDANT(S)

I, the undersigned [X] plaintiff [ ] defendant [ ] attorney for [ ] plaintiff [ ] defendant hereby notify the Clerk of Court that I am filing the following civil action. (Please indicate by checking box that most closely identifies the claim being asserted or relief sought.)

GENERAL CIVIL

- Subsequent Actions
[ ] Claim Impleading Third Party Defendant
[ ] Monetary Damages
[ ] No Monetary Damages
[ ] Counterclaim
[ ] Monetary Damages
[ ] No Monetary Damages
[ ] Cross Claim
[ ] Interpleader
[ ] Reinstatement (other than divorce or driving privileges)
[ ] Removal of Case to Federal Court

Business & Contract

- [ ] Attachment
[ ] Confessed Judgment
[ ] Contract Action
[ ] Contract Specific Performance
[ ] Detinue
[ ] Garnishment

Property

- [ ] Annexation
[ ] Condemnation
[ ] Ejectment
[ ] Encumber/Sell Real Estate
[ ] Enforce Vendor's Lien
[ ] Escheatment
[ ] Establish Boundaries
[ ] Landlord/Tenant
[ ] Unlawful Detainer
[ ] Mechanics Lien
[ ] Partition
[ ] Quiet Title
[ ] Termination of Mineral Rights

Tort

- [ ] Asbestos Litigation
[ ] Compromise Settlement
[ ] Intentional Tort
[ ] Medical Malpractice
[ ] Motor Vehicle Tort
[ ] Product Liability
[ ] Wrongful Death
[X] Other General Tort Liability

ADMINISTRATIVE LAW

- [ ] Appeal/Judicial Review of Decision of (select one)
[ ] ABC Board
[ ] Board of Zoning
[ ] Compensation Board
[ ] DMV License Suspension
[ ] Employee Grievance Decision
[ ] Employment Commission
[ ] Local Government
[ ] Marine Resources Commission
[ ] School Board
[ ] Voter Registration
[ ] Other Administrative Appeal

DOMESTIC/FAMILY

- [ ] Adoption
[ ] Adoption - Foreign
[ ] Adult Protection
[ ] Annulment
[ ] Annulment - Counterclaim/Responsive Pleading
[ ] Child Abuse and Neglect - Unfounded Complaint
[ ] Civil Contempt
[ ] Divorce (select one)
[ ] Complaint - Contested\*
[ ] Complaint - Uncontested\*
[ ] Counterclaim/Responsive Pleading
[ ] Reinstatement - Custody/Visitation/Support/Equitable Distribution
[ ] Separate Maintenance
[ ] Separate Maintenance Counterclaim

WRITS

- [ ] Certiorari
[ ] Habeas Corpus
[ ] Mandamus
[ ] Prohibition
[ ] Quo Warranto

PROBATE/WILLS AND TRUSTS

- [ ] Accounting
[ ] Aid and Guidance
[ ] Appointment (select one)
[ ] Guardian/Conservator
[ ] Standby Guardian/Conservator
[ ] Custodian/Successor Custodian (UTMA)
[ ] Trust (select one)
[ ] Impose/Declare/Create
[ ] Reformation
[ ] Will (select one)
[ ] Constructive
[ ] Contested

MISCELLANEOUS

- [ ] Amend Death Certificate
[ ] Appointment (select one)
[ ] Church Trustee
[ ] Conservator of Peace
[ ] Marriage Celebrant
[ ] Approval of Transfer of Structured Settlement
[ ] Bond Forfeiture Appeal
[ ] Declaratory Judgment
[ ] Declare Death
[ ] Driving Privileges (select one)
[ ] Reinstatement pursuant to § 46.2-427
[ ] Restoration - Habitual Offender or 3rd Offense
[ ] Expungement
[ ] Firearms Rights - Restoration
[ ] Forfeiture of Property or Money
[ ] Freedom of Information
[X] Injunction
[ ] Interdiction
[ ] Interrogatory
[ ] Judgment Lien-Bill to Enforce
[ ] Law Enforcement/Public Official Petition
[ ] Name Change
[ ] Referendum Elections
[ ] Sever Order
[ ] Taxes (select one)
[ ] Correct Erroneous State/Local
[ ] Delinquent
[ ] Vehicle Confiscation
[ ] Voting Rights - Restoration
[ ] Other (please specify)

Damages in the amount of \$ 350,000.00 are claimed.

July 9, 2021
Peyton Ashleigh

Peyton Ashleigh
[ ] PLAINTIFF [ ] DEFENDANT [ ] ATTORNEY FOR [ ] PLAINTIFF [ ] DEFENDANT

20611 Morningside Terrace
Sterling, VA 20165 571-762-9602
bubba1bubba2@icloud.com

\*\*"Contested" divorce means any of the following matters are in dispute: grounds of divorce, spousal support and maintenance, child custody and/or visitation, child support, property distribution or debt allocation. An "Uncontested" divorce is filed on no fault grounds and none of the above issues are in dispute.

FILED

2021 JUL 19 PM 1:26

CIRCUIT COURT  
LOUDOUN COUNTY, VIRGINIA  
S. Edmundson

VIRGINIA:  
IN THE CIRCUIT COURT FOR THE COUNTY OF LOUDOUN

PEYTON ASHLEIGH )  
20611 Morningside Terrace )  
Sterling, Virginia 20165 )

Petitioner/Plaintiff )

v. )

Case No. #CL 21-4145  
Plaintiff demands a jury trial for all  
issues triable by a jury

GOFUNDME, INC )  
Serve Registered Agent through )  
Sec of Commonwealth: )  
Cogency Global, Inc )  
1323 J Street, Suite 1550 )  
Sacramento, California, 95814 )

And )

FACEBOOK, INC )  
Serve Registered Agent: )  
Corporation Service Corporation )  
100 Shockoe Slip, Floor 2 )  
Richmond, Virginia, 23219 )

Respondents/Defendants. )

**VERIFIED COMPLAINT**  
**FOR NEGLIGENCE AND PETITION FOR EMERGENCY AND PERMANENT**  
**INJUNCTIVE RELIEF TO HAVE SEPTEMBER 10, 2020 DEFAMATORY**  
**PUBLICATIONS REMOVED**

COMES NOW, the Plaintiff, Peyton Ashleigh, *pro se*, complains, and for causes of action, alleges/certifies under penalty of perjury pursuant to Virginia Code § 8.01-4.3 the following:

**PARTIES AND JURISDICTION**

1. Plaintiff is a private individual and is now, and at all times mentioned in this complaint, was a resident of Loudoun County, Virginia, residing at 20611 Morningside Terrace, Sterling, Virginia since June 25, 1997.

2. Defendant Facebook, Inc, is a Delaware corporation who became authorized to transact business in Virginia in 2009, and whose principal office address is 7902 Tysons One Pl, Unit 615, McLean, Virginia 22102.
3. Defendant GoFundMe, Inc is a foreign corporation from California who has not received authority to transact business in the Commonwealth of Virginia, but jurisdiction is appropriate pursuant to Virginia Code §8.01-328.1(A)(1), §8.01-328.1(A)(4), and §8.01-328.1(B).
4. This Court also has personal jurisdiction on this matter pursuant to Virginia Code § 8.01-328.1.
5. Venue is appropriate pursuant to Virginia Code § 8.01-262.

#### **BACKGROUND**

6. Plaintiff incorporates herein by reference the allegations at paragraphs #1 through #5 inclusive of this Complaint as though fully set forth herein.
7. Plaintiff is seeking:
  - a. Temporary and permanent injunctive relief against both Defendants, Facebook, Inc. (hereafter “Facebook”) and GoFundMe, Inc. (hereafter “GoFundMe”) to remove a fraudulent and defamatory solicitation, created about Plaintiff by Robert Kevin Lawler on GoFundMe and reposted to Facebook on the same day, September 10, 2020. A copy of the GoFundMe publication appears on pages 11-12 of attached **EXHIBIT #1, a May 5, 2021 “GoFundMe, Inc Certificate of Records” by Custodian of Records Alex Wardle,** as provided to Plaintiff under a subpoena *duces tecum* issued through the Clerk of the Loudoun County Circuit Court.
  - b. A claim of negligence against GoFundMe for failing to “know your customer” and for continuing to allow the fraudulent publication, without any apparent investigation, after

two separate people, including Plaintiff, informed it of the fraud on the very date of publication, as pictured here, from page 11 of **Exhibit #1**:

**Comment History**

View all comments and replies to comments for this campaign

**Accusations**

Created At (PST)	Accuser Name	Accuser Email	Accuser Phone	Message
09/10/2020 8:58 PM	Robin Lawler	bubba11@bto2914cloud.com	15717629002	He is taking His own daughter posted on Facebook and lie that there is no medical cure. He took pancreatic cancer for two years. He's defaming me on your site to get money while he and dramed \$100k out of my parents accounts. The Virginia Police are currently investigating him for cyberstalking and I reported this to them to them earlier
09/10/2020 8:54 PM	Bella Beila	kkhate@bto2914cloud.com	15717629006	Okay This is just heads up! This man is a pathological liar! He has lied and cheated his way all through life. He has lied about dying with all kinds of medical ailments and he has lied about years ago and he has lied "MURDER" This is fraud! Many people need help right now, but not this person! You seriously need to research the person cause we CAN NOT REMAIN anonymous!

8. Under penalty of perjury, Plaintiff certifies that this specific cause of action, which occurred on September 10, 2020, has never been the subject of any type of legal action whatsoever in any jurisdiction, either in Virginia or any place else. *However*, there are two pending lawsuits in Loudoun General District Court against the person who created the publications, Robert Kevin Lawler. The lawsuit for the first publication to GoFundMe, specifically, has Case No. GV21008063. The second lawsuit, against Facebook for the republication of the original GoFundMe charity, is Case No GV21008066, and it is attached hereto, in full with all of its exhibits, as **EXHIBIT #2**. With the exception of a few typos and exhibits that have the wrong dates cited, Plaintiff stands by everything in those verified complaints, and hereby incorporates

herein all of the allegations and attached exhibits in attached Exhibit #2 as if they are specifically realleged herein. Plaintiff believes, and therefore alleges, that attached Exhibit #2, the Verified Complaint, provides *prima facie* evidence that the publications were not only defamatory against Plaintiff, but that almost every claim made therein was false to some measure; as such, the publications were, in fact, used by an accomplished criminal to obtain over \$1000.00 under false pretenses, a felony in violation of Virginia Codes § 18.2-178 and § 18.2-95.

9. THE INSTANT ACTION FOR INJUNCTIVE RELIEF IS BEING FILED AFTER LONG CONSULTATION WITH ROBERT KEVIN LAWLER'S ATTORNEY ON THE DEFAMATION MATTERS, NAMELY JASON COLLINS, WHO STATED THAT HIS CLIENT BELIEVED THAT THE PUBLICATIONS HAD BEEN AFFIRMATIVELY REMOVED, BUT AFTER REALIZING A LINK WAS STILL ACTIVE THAT WOULD ALLOW KEVIN AND EVERYONE WHO DONATED TO HIM UNDER FALSE PRETENSES WOULD STILL HAVE ACCESS TO THE GOFUNDME SITE, SPECIFICALLY, JASON COLLINS TOLD PLAINTIFF TO SUE FACEBOOK AND GOFUNDME TO HAVE THE PUBLICATIONS REMOVED, AS THEY COULD DO NOTHING ELSE.
10. For reference, the Defendant in the aforementioned defamation lawsuits is Robert "Kevin" Lawler, the Plaintiff's brother (hereafter "Kevin"). He has convictions/arrests for a wide gamut of illegal actions, including but not limited to: credit card fraud, grand theft, petit theft, breaking and entering, destruction of property, assault on a family member, assault and battery, contributing to the delinquency of a minor, contempt of court, stalking with fear of death, violations of protective orders, theft of public utilities. His certified 2019 criminal history,



provided in affidavit form by the “Central Criminal Records Exchange” of the Virginia State Police, is attached **IN ATTACHED EXHIBIT #1, the lawsuit GV21-008066**, as “Exhibit #1,” but does not contain his latest conviction for tampering with a fire hydrant or arrest for theft of public utilities, which he used to fill his new swimming pool in July 2020, for the second year in a row.<sup>1</sup>

11. Plaintiff learned of the defamatory GoFundMe page at approximately 6:00pm on September 10, 2020, after a third party sent the posting to her from Facebook.
12. Plaintiff immediately thereafter notified law enforcement **and GoFundMe** (at 8:18PM on September 10, 2020) that the claims were fraudulent, as pictured here:

Created At (PST)	Accuser Name	Accuser Email	Accuser Phone	Message
09/10/2018 18:PM	Robin Lawler	barbathbath@icloud.com	15717629602	He is faking His own daughter posted on Facebook saying that there is no medical issue He faked pancreatic cancer for two years He's defaming me on your site to get money, while he just drained \$1000s and \$1000s out of my parents accounts The Virginia State Police are currently investigating him for embezzlement and I reported this account to them earlier

13. Shortly thereafter, and many times over the next several months, Plaintiff demanded of Kevin Lawler, through his attorneys at Johnston & Gregg (now The Law Offices of Sean D. Gregg) and Jason R Collins, that he was to cease and desist, and he must immediately demand the removal of the charity from GoFundMe’s website.

<sup>1</sup> Kevin Lawler’s criminal charge of theft of public utilities in 2020 was for tapping into a fire hydrant for the second time in two years to fill his brand new swimming pool. This is one of legal fees he claims was caused by Plaintiff. See “Exhibit #21” in attached **Exhibit #1**, which is not included in his criminal history and is a true and accurate accounting of the incident report provided to Plaintiff from the Spotsylvania Sheriff’s Department under the Virginia Freedom of Information Act in September 2020; and “Exhibit #22” of attached **Exhibit #1**, his plea of guilty in one of the related cases)

- a. While the fund was discontinued on November 24, 2020 by Defendant after he cashed out his earnings, the site itself was not taken down.
- b. On **February 17, 2021**, Plaintiff exchanged an email thread, attached as in **EXHIBIT #1** as “Exhibit #3”, with Jason Collins, in which she stated in pertinent part:

**Subject:** CEASE AND DESIST Fundraiser by R. Kevin Lawler : Legal & Medical Aid AND AMENDED COMPLAINT IF LEAVE TO FILE LATE IS GRANTED

February 17, 2021

Mr Collins:

Attached is a link to a defamatory and fraudulent GoFundMe page Kevin Lawler started on September 10, 2020.

His own sworn testimony of October 14 2020 proves that the claims he made about me, about his health, and about his finances were false and fraudulent.

This site is still online, both on GoFundMe and, upon information and belief, Facebook.

People I have known for 43 years donated to this and can still read it.

His prior counsel was warned about it, yet it still exists. It appears that the only change to it is that it cannot be viewed openly by all of the public (me, the State Police, etc), but can by the people who donated to it.

While the live link is attached below, so is a screenshot, taken moments ago, showing that “donors” can still actively sign in to read the false information.

<image002.png>

<https://www.gofundme.com/f/legal-amp-medical-aid?qid=c324c6dff5134cba2ee9397f2202aeb8.....>

**YOUR CLIENT MUST IMMEDIATELY CEASE AND DESIST, REMOVING THAT PAGE FROM ALL SOCIAL MEDIA BY THE END OF TODAY....**

**Counsel did not respond to this email.**

- c. On **March 10, 2021**, Plaintiff made the following demand to Defendant through Mr. Collins and Mr. Gregg concerning Kevin removing the defamatory content: “he must

remove all references about me from Facebook, GoFundMe, and all social media immediately and agree to cease and desist commenting about me in any fashion publicly and to anyone other than his girlfriend and his daughter. He will not have to publicly apologize nor admit that he lied. I want a certification from Mr Collins office within, say, two weeks, that all items have been removed.” That demand was summarily rejected by Jason Collins on March 12, 2021 via email at 5:37PM.

- d. On or about **April 12, 2021**, prior to filing the instant case in Loudoun General District Court, Plaintiff checked the GoFundMe site, and found no record of the post. This informed her decision at the time to file in Loudoun General District Court as opposed to in Circuit Court, as she believed that an injunction was not necessary.
- e. **HOWEVER, on May 14, 2021**, after GoFundMe responded to the aforementioned subpoena *duces tecum*, Plaintiff once again checked the GoFundMe website and found that the site was once again active. AFTER STATING THAT THEY HAD DONE EVERYTHING TO HAVE THE SITE REMOVED, AT THIS POINT, COLLINS TOLD PLAINTIFF TO FILE THE INSTANT LAWSUIT TO ACHIEVE HER DESIRE TO HAVE THE PUBLICATIONS PERMANENTLY REMOVED, AS, ACCORDING TO COLLINS, THERE WAS NOTHING LEFT THAT HE OR HIS CLIENT COULD DO TO HAVE THE PUBLICATIONS REMOVED FROM GOFUNDME. He, however, did not mention that his client could have certainly insured that, at the very least, his own personal publications of the charity to Facebook had been removed.

14. **Attached Exhibit #1 proves the following:**

- a. that “R Kevin Lawler” created the defamatory publication at 8:19AM on September 10, 2020 with his admitted email address of [kevlawler1@aol.com](mailto:kevlawler1@aol.com),

- b. that the creators phone number was Kevin's admitted phone number of 540-760-5384
- c. that the GoFundMe ID is 51243922
- d. that the GoFundMe URL is <https://www.gofundme.com/t/legal-amp-medical-aid>
- e. that Kevin "used Ayden as a payment account" under user ID number "GFM-W-51243922" to withdraw on November 12, 2020 the \$1,107.89 he obtained through the defamatory statements, to deposit in his Wells Fargo Bank account ending in "0281" at 4:39pm that day.
- f. That the following people, many of whom LIVE IN VIRGINIA and whom Plaintiff has known as great friends since 1978-1979, read the defamatory comments about Plaintiff PUBLISHED BY Kevin Lawler and donated money to him, based upon his false claims and allegations, as will be outlined further below:
  - i. "**Kellie Amberger**" donated \$125 on September 10, 2020 (Plaintiff is not aware who this is)
  - ii. "**Natalie Woodward**" donated \$50 on September 10, 2020 (Plaintiff has known her and her brothers since high school, if it is the same person)
  - iii. "**Chris Seats**" donated \$100 on September 10, 2020. Plaintiff has known him most of her life, and their mothers were good friends, if it is the same person)
  - iv. "**Pamela Bennett**" donated \$100 on September 10, 2020. (Plaintiff believes this may be Pamela Sagun Bennett. If so, Plaintiff has known her since 1989. If it is her, her Father sold Plaintiff's parents a model home, and either she or her brother dated Defendant.)

- v. **“Tammy Diamond”** donated \$50 TWICE on September 10, 2020. (While Plaintiff does not personally know this person, it is believe that she may be related to Plaintiff’s friend Melissa Diamond Kozloff)
- vi. **“Glenda Smith”** donated \$50 on September 10, 2020 (This is Glenda Stephenson Smith, with who Plaintiff has been friends since at least 1986)
- vii. **“Chris Conley”** donated \$100 on September 10, 2020 (While Plaintiff is unsure, she believes this is the Chris Conley with whom she attended high school)
- viii. **“Barbra Hopkins”** donated \$200 on September 10, 2020 (Mrs. Hopkins is someone Plaintiff has highly respected since 1979, when she and her husband Bruce became great friends with Plaintiff’s parents. Mrs. Hopkins has been a guest in Plaintiff’s current home, visiting her son, Jeff, who was Plaintiff’s roommate in 1997. Plaintiff is certain this is the same “Barb” Hopkins, as the email address she used to make the donation is [brucehopkins@verizon.net](mailto:brucehopkins@verizon.net).)
- ix. **“Courtney Horseman”** donated \$100 on September 10, 2020. (While Plaintiff was not *per se* friends with Ms. Horseman, Plaintiff has known her since high school, which was probably in 1985-86.)
- x. **“Jeff Hopkins”** donated \$100 on September 10, 2020. (Plaintiff used to consider Jeff as one of her closest friends. He was actually her first roommate in her current home and would often visit after moving out. Plaintiff has known him since 1979. He is Barbara and Bruce Hopkins oldest son and had been to countless dinners, to Plaintiff’s parents home, and even on vacation with the family)

- xi. **“Lethia Jackson”** donated \$50 on September 10, 2020. (Plaintiff has known Lethia Minor Jackson since grade school. Upon information and belief, Plaintiff used to cheerlead for a team coached by her relative starting in 1978.)
- xii. **“Kendra LaMonte”** donated \$20 on September 10, 2020 (Plaintiff does not believe she knows this person)
- xiii. **“Jason Caroon”** donated \$100 on September 11, 2020. (Plaintiff has known Mr. Caroon since September 1978, when she moved in two blocks from him. They remained neighbors for the next 11 years and Plaintiff was best friends with Jason’s sisters Christie and Tylynn. She was close enough to Jason to give him her Redskins ticket so that he could attend with Plaintiff’s mother)
- xiv. **“Heather Hepburn”** donated \$50 on September 11, 2020. (Plaintiff is not sure if she knows this person)
- g. That GoFundMe placed an “Action Deadline updated by processor ADYEN to value: 2020-11-01 15:28:38.0” on September 10, 2020 at 1:28pm
- h. “User cancelled account” at 9:22am on November 24, 2020
- i. That a third party identified as “Bella Bella” wrote to GoFundMe at 1:54pm PST the following:

“Okay. This is just heads up. This man is a pathological liar! He has lied and cheated his way all through life. He has lied about dying with all kinds of medical disorders (like 10 years ago) and he is fine! ALL LIES! This is fraud. Many people need help right now, but not this person! You seriously need to research the person, cause etc. I AM TO REMAIN anonymous!”

15. **AS PER THE NEGLIGENCE CLAIM:** For the claim of negligence against GoFundMe, after the charity was reported by “Bella Bella” at 1:54pm PST for possible fraud, there is no

indication that GoFundMe investigated the claim, and thereafter, provably, several more people read the fraudulent and defamatory publication and donated to it.

- a. AT ALL TIMES. GOFUNDME was accepting a percentage of the donations and had a pecuniary interest in not taking the site down
- b. Upon information and belief, after the “accusation” made by “Bella Bella,” countless unnamed individuals continued to read the fraudulent and defamatory publication, both on GoFundMe and its republication onto Facebook by Kevin Lawler
- c. Given the nature of the GoFundMe charity, which relies on word of mouth and republication to reach a maximum number of people to donate, countless other people further republished the fraudulent and defamatory publication

16. **AS PER THE NEGLIGENCE CLAIM:** HOWEVER, most importantly for the claim of negligence against GoFundMe, after the charity was reported by Plaintiff herself as fraudulent and defamatory towards her specifically at 8:18pm PST, there is no indication that GoFundMe investigated the claim, and thereafter, provably, several more people read the fraudulent and defamatory publication and donated to it.

- a. **In fact, after sending Plaintiff an email at 11:18pm on September 10, 2020 from [support@gofundme.com](mailto:support@gofundme.com) , in which GoFundMe stated, with regard ton fraud claims, “our team will reach out to you if we have any further questions.” no one from GoFundMe ever contacted Plaintiff about her claims, not just of fraud, but specifically about defamation (despite two “accusations” within just a few hours of publication). That full email is attached hereto as **EXHIBIT #3**, but this is a screenshot:**

## (legal-amp-medical-aid) Fraud Report

September 10, 2020 at 11:32 AM

From GofundMe

To Robert Lawler

Thank you for bringing this to our attention. Our Trust & Safety team will be investigating the campaign and taking appropriate action.

If you donated to this campaign or should have received some or all of the money raised, please fill out the appropriate GofundMe Guarantee claim form. If you know donors or individuals who should have received funds from this campaign, please ask them to submit claims or contact our team directly.

Please note that when a donation is refunded, the name used to donate is included in a notification email sent to the campaign organizer. All other information in Guarantee claims will remain confidential.

Claim forms for the GofundMe Guarantee can be found here: <https://www.gofundme.com/guarantee>.

For general fraud reports, please note that:

1. We will be unable to disclose any details about our investigation.
2. Personal disputes will be ignored and should be settled outside of GofundMe.
3. Your personal information will be kept confidential from the campaign organizer.

In addition to the report you have submitted, we encourage you to contact law enforcement officials in your area if you believe someone is committing fraud or breaking the law in any way.

Our team will reach out to you if we have any further questions.

If this is your campaign and you need assistance, please contact our support team here: <https://support.gofundme.com/hc/en-us>.

b. While GoFundMe sends out apparently standard emails to those people making any “accusations,” that include language that they will not investigate fraud, “defamation” and “fraud” are not the same thing, legally.<sup>2</sup> While Plaintiff did notify GoFundMe that the site was fraudulent (for which GoFundMe instructs the person making the “accusation” to “contact law enforcement officials in your area if you believe someone is committing fraud or breaking the law in any way.”), Plaintiff also **specifically** notified GoFundMe, in writing on the very night of the publication, that “*he’s defaming me on your site to get money.*” Despite that expressed written warning, no one from GoFundMe contacted Plaintiff, no one investigated further, and instead, GoFundMe, through that negligence,

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<sup>2</sup> For instance, one can be investigated by the police and criminally charged in Virginia for “fraud.” However, on a claim of “defamation,” as Plaintiff warned GoFundMe, cannot be investigated as a crime.



allowed the defamation to remain unchallenged on an active site, available worldwide, for countless people to read and to republish themselves, onto such sites as Facebook.

- c. **Instead, GoFundMe allowed donations to continue, and for the site to remain fully active and open to all readers/possible donors until at least 4:39pm on November 12, 2020, when Kevin withdrew his cut, \$1,107.89, as seen here from page 8 of EXHIBIT #1:**

<b>Adyen Information</b>	The User used Adyen as a payment account  Adyen Email: Kevlawler1@aol.com Adyen User ID: GFM-W-51243922  KYC Name: Robert Kevin Lawler  \$1,107.89 withdrawn on November 12th, 2020 4:39 PM Status: paid, Type: ach Bank: WELLS FARGO BANK ending in 0281
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- d. Upon information and belief, when an account creator creates a GoFundMe charity, as Kevin Lawler did on September 10, 2020, the individual must supply basic identifying information, such as name, birthdate, address, and social security number.
- i. A basic investigation of the “accusations,” especially the one of defamation would have revealed Kevin’s storied criminal history
  - ii. An independent investigation by GoFundMe, using the identifying information, upon information and belief, that Kevin Lawler provided when creating the publication on September 10, 2020 would have revealed there was reasonable cause to believe the claims of defamation
  - iii. Had GoFundMe ever contacted Plaintiff at all specifically about her specific claim of defamation, Plaintiff could have provided that entity with most, if

not all, of the Exhibits attached to the lawsuit that is **EXHIBIT #1**, and perhaps the account would have been suspended, and most importantly, exponentially fewer people would have ever read it and/or republished it, and Plaintiff would have suffered far less.

- e. GoFundMe, despite having a function entitled "Know Your Customer" (see page 8 of **EXHIBIT #1**), GoFundMe failed to do that basic investigation until November 12, 2020, as pictured here:

		checking w/ Alex or lead	
5 months ago on November 24 9:22 am	<a href="#">Campaign Organizer</a>	User Canceled Account	
5 months ago on November 12 10:54 am	<a href="#">Admin</a>	Transfers enabled by ADYEN	127.001
5 months ago on November 12 10:54 am	<a href="#">Admin</a>	Action Deadline updated by processsor ADYEN to value : null	127.001
5 months ago on November 12 10:48 am	<a href="#">Campaign Organizer</a>	User Did KYC	173 72 191 154
5 months ago on November 12 10:44 am	<a href="#">Admin</a>	Action Deadline updated by processsor ADYEN to value : 2021-01-08 16:00:32.0	127.001

17. Upon information and belief, immediately upon publishing the GoFundMe charity by Kevin Lawler, in addition to the listed people who donated, countless other people immediately saw it ON FACEBOOK after Lawler published it there, and with some people personally notifying Plaintiff directly, as she is not active on Facebook since 2017.
18. Upon information and belief, based upon the nature of GoFundMe, countless people worldwide read the false claims about Plaintiff on that site
19. While Defendant did not specifically name Plaintiff in the defamatory publication, Plaintiff has herein listed the names of the provable people who read the publication while also listing Plaintiff's association with those people, as it would be clear to each and all to whom Kevin Lawler was referring.

**PLAINTIFF'S DENIAL UNDER OATH OF THE PUBLISHED ALLEGATIONS**

20. Plaintiff incorporates herein by reference the allegations at paragraphs #1 through #19 inclusive of this Complaint as though fully set forth herein.

21. FOR PURPOSES OF THIS LITIGATION, PLAINTIFF INCORPORATES THE CONTENT OF **EXHIBIT #1**, AND CERTIFIES THAT ALMOST EVERY ALLEGATION CONTAINED THEREIN THAT WAS WRITTEN AND PUBLISHED BY KEVIN LAWLER TO GOFUNDME AND, SUBSEQUENTALLY, TO FACEBOOK ON SEPTEMBER 10, 2020...WHETHER DIRECTLY ABOUT PLAINTIFF, SIMPLY REFERENCING PLAINTIFF, OR ABOUT ANY OTHER GENERAL INFORMATION AT ALL ABOUT DEFENDANT'S FINANCES AND HEALTH ISSUES (which he seems to imply were each caused by Plaintiff)... **IS EMPHATICALLY FALSE**, AND WERE KNOWINGLY, WILLFULLY, AND WANTONLY MADE WITH KNOWLEDGE OF THEIR FALSITY BY PROLIFIC CRIMINAL ROBERT KEVIN LAWLER, WITH THE ABSOLUTE INTENT TO CAUSE PLAINTIFF HARM AND EMBARRASSMENT, WHILE USING THE ALLEGATIONS FOR HIS OWN CRIMINAL FINANCIAL BENEFIT, TO FELONIOUSLY OBTAIN THE STATED GOAL OF \$10,000.00 IN CHARITABLE DONATIONS FROM UNSUSPECTING READERS, UNDER KNOWINGLY FALSE PRETENSES.

**COUNT #1: NEGLIGENCE**  
**GOFUNDME ONLY**

22. Plaintiff incorporates herein by reference the allegations at paragraphs #1 through #21 inclusive of this Complaint as though fully set forth herein.

23. As outlined herein, GoFundMe was negligent in not investigating the multiple "accusations" made against Kevin Lawler's publication, especially when the "accusations" went beyond just

straight claims of “fraud,” and expanded into claims of “defamation,” by the very target of said defamation, the Plaintiff herself.

24. Instead, GoFundMe, with absolutely no investigation whatsoever, allowed the site to remain “live” and accessible to literally every person in the world, and capable of being republished to such entities as Facebook, until Kevin Lawler closed the account in November of 2020: over two full months.
25. Moreover, those who contributed to the charity, as well as Kevin Lawler, apparently still have access to site via the link, <https://www.gofundme.com/f/legal-amp-medical-aid?qid=c324c6dff5134cba2ee9397f2202aeb8>.
26. Upon information and belief, based upon emails Plaintiff constantly receives from GoFundMe for charities that she has donated to in the past, those who donated, most of whom Plaintiff personally know
27. While Plaintiff has no independent knowledge of this, should her suspicions be correct and those aforementioned parties still have access to the charity, either through the link or through email updates, there is absolutely nothing preventing said people from continuously fully republishing, or taking screenshots from the link to republish, in perpetuity, causing possibly never-ending defamatory republications and never ending damage to Plaintiff.
28. As a direct, foreseeable, and proximate result by GoFundMe for allowing the published charity to remain live and active for at least two months, while accepting donations for which it itself would receive a percentage, ESPECIALLY AFTER PLAINTIFF WARNED GOFUNDME THAT THE PUBLISHED CLAIMS WERE DEFAMATORY AGAINST HER, Plaintiff suffered injuries and damages, including but not limited to mortification, shame, anger, nightmares, damage to her reputation, extreme embarrassment, and extreme emotional distress.

These injuries and damages continue into the present and will continue into the foreseeable future.

29. As a direct, foreseeable, and proximate result by GoFundMe for the foreseeable **republication by third parties** of “Kevin” Lawler’s statements complained of herein, ESPECIALLY AFTER PLAINTIFF WARNED GOFUNDME THAT THE PUBLISHED CLAIMS WERE DEFAMATORY AGAINST HER, Plaintiff suffered injuries and damages, including but not limited to mortification, shame, anger, nightmares, damage to her reputation, extreme embarrassment, and extreme emotional distress. These injuries and damages continue into the present and will continue into the foreseeable future.

30. Based solely upon information and belief that donors and Kevin Lawler personally can still actively access the fraudulent and defamatory publication through the aforementioned link, ESPECIALLY AFTER PLAINTIFF WARNED GOFUNDME THAT THE PUBLISHED CLAIMS WERE DEFAMATORY AGAINST HER, it is absolutely foreseeable that any person with access could republish, either directly or through screenshots, and that as a direct and proximate result thereof, Plaintiff will continue to suffer injuries and damages, including but not limited to mortification, shame, anger, nightmares, damage to her reputation, extreme embarrassment, and extreme emotional distress.

31. Plaintiff’s further request relief is hereinafter provided.

**COUNT #2: PRELIMINARY AND PERMANENT INJUNCTIVE RELIEF**  
**AGAINST BOTH DEFENDANTS**

32. Plaintiff incorporates herein by reference the allegations at paragraphs #1 through #31 inclusive of this Complaint as though fully set forth herein.

33. Plaintiff requests both preliminary and injunctive relief against both named Defendants to remove and all references whatsoever on both sites to the defamatory and fraudulent

publication about her, as originally identified as "GoFundMe URL <https://www.gofundme.com/f/legal-amp-medical-aid>."

34. Plaintiff specifically requests that Facebook be required to remove any and all republications by any person whatsoever, in any form, whether full republication, or, to the greatest extent possible, screenshots from the published charity, either by Kevin Lawler or any other person.

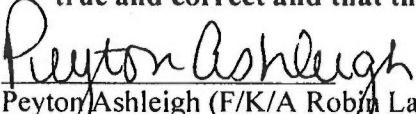
**WHEREFORE**, Plaintiff Peyton Ashleigh, *pro se*, demands judgment, as outlined herein, against both Defendants, namely Facebook, Inc, and GoFundMe, for immediate and permanent injunctive relief to have any and all references to the GoFundMe charity, identified by the GoFundMe URL is <https://www.gofundme.com/f/legal-amp-medical-aid> and created by Robert Kevin Lawler on September 10, 2020, to be permanently removed from each site. For Count #1 specifically, Plaintiff further demands a monetary judgment against Defendant GoFundMe, Inc. alone, for a total \$350,000.00, for the following:

1. Actual damages according to proof;
2. Presumed damages;
3. Nominal damages;
4. Interest as allowed by law;
5. All applicable attorneys' fees allowed by law
6. Costs of suit, including but not limited to filing fees and all service fees; and
7. Such other and further relief as this court may deem just and proper.

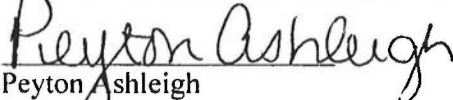
**CERTIFICATION/VERIFICATION PURSUANT TO VIRGINIA CODE § 8.01-4.3**

On July 19, 2021, under penalty of perjury pursuant to Virginia Code § 8.01-4.3, I, Peyton Ashleigh (also known as Robin Lawler), certify that I am of sound mind and

body, am not currently on any drug that would alter my ability to think or sign this statement, and am the Plaintiff in the above entitled action. I have read the foregoing and know the contents thereof. The same is true of my own knowledge, except as to those matters which are therein alleged on information and belief, and as to those matters, I believe it to be true. While there may be incidental that eventually may need amending, in the off chance of typographical errors and imprecise dates and times, etc, the gist of the allegations in this pleading are true and accurate, to the best of my knowledge. I declare under penalty of perjury that, to the best of my current knowledge, understanding, and belief, the foregoing is true and correct and that this declaration was executed in Sterling, Virginia

  
Peyton Ashleigh (F/K/A Robin Lawler)

Respectfully submitted this \_\_\_<sup>th</sup> day of July, 2021

  
Peyton Ashleigh  
20611 Morningside Terrace  
Sterling, Virginia 20165  
Tel: (571) 762-9602  
Email: [bubba1bubba2@icloud.com](mailto:bubba1bubba2@icloud.com)  
Plaintiff *pro se*

Purposefully Blank



# **EXHIBIT # 1**

gofundme

May 5th, 2021

VIA EMAIL PDF (bubba1bubba2@icloud.com)

Peyton Ashleigh:

Pursuant to your recent subpoena duces tecum, below please find records in GoFundMe's possession, custody or control relating to the GoFundMe campaign entitled "Legal & Medical Aid" created by R. Kevin Lawler on September 10th, 2020. For bank account and related information, please contact our third-party payment processor, Adyen.

Please do not hesitate to be in touch should you have any questions.

Sincerely,

Alex Wardle



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How it works

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Your fundraisers

Share

# Legal & Medical Aid



**\$1,145** raised



Share

This fundraiser has been deactivated by the organizer.



R. Kevin Lawler is organizing this fundraiser.

Hello. I'm so ashamed and embarrassed it has come to this for me but I could use some help. I've been working since I was 8 years old. I've been running my own business for 18 years and fortunate enough to be blessed with success. I've always made it a mission to put away funds for a rainy day. Unfortunately, it's been raining for almost 4 years now and I'm almost broke. I just can't keep up and depleted just about everything down to a few dollars. Sadly, even my daughters college fund. For the last 4 years, my family and I have been in a civil court battle with another family member. I was my parents caretaker for years moving them home with me to assist my Dad with dementia and my Mom with a host of ailments. We were prepared for that but God brought both my parents home to Heaven within 6 months of each other last year. Since then, I've inherited all these frivolous debts



Heather Hepburn

**\$50** 7 mos



Jason Caroon

**\$100** 7 mos



Anonymous

**\$20** 7 mos



Lethia Jackson

**\$50** 7 mos



Anonymous

**\$100** 7 mos

See all



See top donations

Since then, I've endured all these frivolous, petty lawsuits against my family. In almost 4 years, I've been forced to pay out to date \$301,000 while still owing \$67,000 and these court proceedings are still going on. In the last 4 years, my health has deteriorated with pancreatic issues & surgeries and yesterday I was diagnosed with a heart condition. I've always been fortunate enough to recover, build my strength back, and start over. I'm scared as Hell and never been this nervous in my life. I've never received a penny of government assistance in my life. I believe that's for people that really need it. I don't qualify for any grants because my assets used somewhat in check. I was raised to help others and now I'm in a seriously bad place and asking for some help. Friends have been pushing me for years to start a Go Fund Me but my pride and upbringing wouldn't allow me. I was determined to work my tail off, sell off as many assets as possible, clip coupons, stretch my savings, what have you to endure this battle. With my medical diagnosis yesterday, I felt it necessary to use a large chunk of what little I have left to pay my future health insurance premiums at \$726 a month so that I'm covered for 6 months. I was advised to take it easy and lay-off work for a while but I can't. Life keeps going and I take my responsibilities very seriously and can't let down my clients. Plus I have no choice. I need the income no matter the circumstances. We win every lawsuit but it takes so much time, energy, and of course, a ton of attorneys fees. It just never stops. The family member suing me has been deemed a vexatious litigant in 2 Va jurisdictions but it hasn't stopped the lawsuits currently on the dockets. We've come so far. The end is hopefully near. Hopefully. Once I win my parents house back, I maybe able to recover a large portion of the loss when I can sell it. But that's still some time away and I'm still responsible for the mortgage, home owners insurance, hoa fees, and property taxes in a front yard of Northern Virginia. Due to my own

in the area of Northern Virginia. Plus my own regular living expenses but I've learned to live as small as possible. All our savings are gone. My plan is to hopefully pay every one back one day if possible. I never wanted to put this hardship on anyone. It's been a 4 year nightmare but I made a promise to my parents and I have to see it through. I honestly have no choice now. I'm praying the day will come when I can finally spread their ashes in the 3 places they want their eternal rest. But I can't until this is over. They deserve it

People that know me know I must have hit an all time low to even consider this. I'm doing everything possible I promise but just feel so utterly defeated and sadly depressed. It kills me on the inside to ask anyone for help. I've always prided myself on helping others. I gave up my life for my parents well being. It was an honor and I'd do it again in a flash if I could but God had other plans to bring them home. I've helped friends, family, my community, friends and total strangers with fund raisers and kids events. Proud Wounded Warrior volunteer. Donating my time and services to cancer patients deliberately on fixing their house with necessary repairs or paying for prescriptions. It was a no brainer- help them because I could and it was the right thing to do. This isn't some woe is me, give me a trophy for helping others thing either. It's just a little insight if you never met me

i feel awful for asking but if you could help me out. I promise I will never forget it and be indebted, I'm hoping to refund every penny back if I can recover, or we can barter it for my services. I'd rather go that route for my own pride but I can't exactly guarantee that in the short term

I'm trying to keep my head up but just asking for help due to the core reasons is a big gut punch. I'm dealing with someone that I can't explain. Mostly legal reasons but I'm not a certified professional in that area. This person is out for blood and ruin

anyone that supposeory crosses it. There have been countless victims for over a decade unfortunately and the civil court system lets it continue on and on and on. My parents were so ashamed and felt responsible like they failed in some fashion. It broke their hearts and one of only 5 times in my life I ever saw my Dad cry. They supported this person, gave this person every tool and resource for life and intelligence. And they were paid back with countless bogus lawsuits. Normally, deep pocket organizations/businesses are targeted but if a regular individual of regular means is targeted, it's one incredible and unimaginable hardship to endure. I've said this a million times- my family apologizes immensely and repeatedly if you were ever victimized by this person. I promise we weren't raised that way.

Love you all and sincerely appreciate everyone's support over the years. Many of you inspire me to keep moving and I can't put into words how grateful I am. If you are not in a position to donate please send prayers. And also, sign any petitions that may help change the law in people taking advantage of the legal/civil justice system. It's the righteous thing to do

## Organizer




R. Kevin Lawler  
Organizer  
Fredericksburg, VA

Contact

Created September 10, 2020

Medical, Illness & Healing

 [Report fundraiser](#)



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PLATFORM**

More people  
start  
fundraising  
campaigns  
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something  
doesn't quite  
work out with  
us, for  
your current  
cause,  
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with your  
questions  
and we'll  
answer them  
at night.  
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All times listed are in Pacific Standard Time (PST).

**Legend**

Failed (Donation History)	A donation did not successfully process; this can occur for a variety of reasons, ranging from: entering wrong account information, the credit card company failed the transaction, payment processor failed the transaction, or technical difficulties.
Captured (User Information: Withdrawals)	The transfer transaction successfully went through to the receiving bank/organization.
KYC (Know Your Customer)	A payment processor's process of verifying customer information by requiring them to enter in their personal information, such as, name, DOB, SSN, and address.
MFA (Multi-Factor Authentication)	A security measure for customers where they must enter in a telephone number or other personally identifiable data.
Admin	GoFundMe.
Campaign Organizer	The person who created the GoFundMe account.
Beneficiary	The person who was granted access to the account's funds. If there is no beneficiary, the campaign organizer is the person with access to the funds.

**Campaign Information**

GoFundMe URL	<a href="https://www.gofundme.com/f/legal-amr-medical-aud">https://www.gofundme.com/f/legal-amr-medical-aud</a>
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**Campaign Organizer Information**

GoFundMe ID	51243922
Current Email	Kevinlawler1@aol.com
Current First Name	R.
Current Last Name	Kevin Lawler
MFA Phone Number	+15407605384
Created At (PST)	September 10th, 2020 8:19 AM

**Payment Information**

Adyen Information	<p>The User used Adyen as a payment account</p> <p>Adyen Email: Kevinlawler1@aol.com                  Adyen User ID: GFM W 51243922</p> <p>KYC Name: Robert Kevin Lawler</p> <p>\$1,107.89 withdrawn on November 12th, 2020 4:39 PM                  Status: paid, Type: ach                  Bank: WELLS FARGO BANK ending in 0281</p>
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**Activity Log [+]**

Date	User	Change	Ip Address
3 mins ago on May 5 11:16 am	Admin	Subpoena received (8109150), DO NOT ACTION campaign without	0.0.0.0

		checking w Alex or lead	
5 months ago on November 24 9:22 am	<u>Campaign Organizer</u>	User Cancelled Account	
5 months ago on November 12 10:54 am	<u>Admin</u>	Transfers enabled by ADYEN	127.0.0.1
5 months ago on November 12 10:54 am	<u>Admin</u>	Action Deadline updated by processor ADYEN to value : null	127.0.0.1
5 months ago on November 12 10:48 am	<u>Campaign Organizer</u>	User Did KYC	173.72.191.154
5 months ago on November 12 10:44 am	<u>Admin</u>	Action Deadline updated by processor ADYEN to value : 2021-01-08 16:00:32.0	127.0.0.1
5 months ago on November 7 1:23 am	<u>Admin</u>	Skipped deadline email send PAYM 7308 (payments.generic_kyc.required_or_inactivate)	0.0.0.0
6 months ago on November 4 1:49 am	<u>Admin</u>	Skipped deadline email send PAYM 7308 (payments.generic_kyc.required_or_inactivate)	0.0.0.0
6 months ago on November 1 2:19 am	<u>Admin</u>	Skipped deadline email send PAYM 7308 (payments.generic_kyc.required_or_inactivate)	0.0.0.0
6 months ago on October 31 2:28 am	<u>Admin</u>	Skipped deadline email send PAYM 7308 (payments.generic_kyc.required_or_inactivate)	0.0.0.0
6 months ago on October 28 2:57 am	<u>Admin</u>	Skipped deadline email send PAYM 7308 (payments.generic_kyc.required_or_inactivate)	0.0.0.0
7 months ago on September 11 10:44 am	<u>Admin</u>	Beneficiary Auto Outreach sent at \$1000 <a href="#">Ticket Link</a>	0.0.0.0
7 months ago on September 10 1:28 pm	<u>Campaign Organizer</u>	ACCOUNT HOLDER STATUS CHANGE - Account Status: ACTIVE -> ACTIVE (Processing tier updated), Charges: false -> false (n/a), Transfers: false -> false (n/a)	82.199.90.162
7 months ago on September 10 1:28 pm	<u>Admin</u>	Action Deadline updated by processor ADYEN to value : 2020-11-09 15:28:38.0	127.0.0.1
7 months ago on September 10 10:07 am	<u>Campaign Organizer</u>	ACCOUNT HOLDER VERIFICATION - []	82.199.90.162
7 months ago on September 10 10:07 am	<u>Campaign Organizer</u>	ACCOUNT HOLDER STATUS CHANGE - Account Status: ACTIVE -> ACTIVE (Processing tier updated), Charges: false -> false (n/a), Transfers: false -> false (n/a)	82.199.90.162
7 months ago on September 10 10:07 am	<u>Admin</u>	Action Deadline updated by processor ADYEN to value : 2020-11-09 12:07:21.0	127.0.0.1
7 months ago on September 10 9:33 am	<u>Campaign Organizer</u>	ACCOUNT HOLDER STATUS CHANGE - Account Status: ACTIVE -> ACTIVE (Account holder has been updated), Charges: false -> false (n/a), Transfers: false -> false (n/a)	82.199.90.162
7 months ago on	<u>Campaign Organizer</u>	ACCOUNT HOLDER VERIFIC	82.199.90.162

September 10 9:33 am		ATHON 11	
7 months ago on September 10 9:33 am	<u>Campaign Organizer</u>	User launched Personal fund: Legal & Medical Aid (responsive campaign create on tablet)	173.72.191.154
7 months ago on September 10 9:33 am	<u>Campaign Organizer</u>	User launched fund (customize complete!).	173.72.191.154
7 months ago on September 10 8:25 am	<u>Campaign Organizer</u>	User uploaded media for fund: Legal & Medical Aid (responsive campaign create on tablet).	173.72.191.154
7 months ago on September 10 8:22 am	<u>Campaign Organizer</u>	User created Personal fund: Legal & Medical Aid (responsive campaign create on tablet).	173.72.191.154
7 months ago on September 10 8:19 am	<u>Campaign Organizer</u>	User Signed Up	173.72.191.154

**Donation History**

Created At (PST)	Donor Name	Email	Amount	Postal Code	Country	WebPay Check Out ID	IP Address	Status
09/10/20 5:50 AM	Heather Hepburn	hdkurz@aol.com	\$50.00	22408	US		174.226.7.194	Success
09/10/20 10:44 AM	Jason Carson	roonirtoon@msn.com	\$100.00	88310	US		69.128.212.232	Success
09/10/20 3:11 PM	Kendra LaMonte	klamonte73@gmail.com	\$20.00	11787	US		68.198.153.185	Success
09/10/20 2:30 PM	Lethia Jackson	BoCreo@aol.com	\$50.00	22407	US		108.44.170.188	Success
09/10/20 1:21 PM	jeff hopkins	jeff@jhopkinsco.com	\$100.00	22405	US		68.100.150.180	Success
09/10/20 12:59 PM	Courtney Horseman	julybaby21@comcast.net	\$100.00	22407	US		174.251.67.109	Success
09/10/20 11:42 AM	Barbara Hopkins	brucehopkins@verizon.net	\$200.00	22553	US		24.185.1.108	Success
09/10/20 11:37 AM	Chris Conley	ccon99@aol.com	\$100.00	20169	US		166.137.175.59	Success
09/10/20 10:56 AM	Glenda Smith	bendinsticks@gmail.com	\$50.00	32656	US		172.56.27.174	Failed
09/10/20 10:48 AM	Tammy Diamond	tdiamond05@yahoo.com	\$50.00	22553	US		73.31.10.47	Success
09/10/20 10:46 AM	Tammy Diamond	tdiamond05@yahoo.com	\$50.00	22553	US		73.31.10.47	Failed
09/10/20 10:44 AM	Pamela Bennett	pbennett72@comcast.net	\$100.00	22553	US		174.196.138.130	Success
09/10/20 10:44 AM	Chris Sears	sears@yahoo.com	\$100.00	22408	US		73.147.211.127	Success
09/10/20 10:38 AM	Natalie Woodward	Italian170@msn.com	\$50.00	22405	US		173.72.164.176	Success
09/10/20 10:03 AM	Kellie Amberger	jkamberger@msn.com	\$125.00	22407	US		107.77.204.185	Success

[1]

**Comment History**

User did not receive any comments for this campaign

**Accusations**

Created At (PST)	Accuser Name	Accuser Email	Accuser Phone	Message
09/10/20 8:18 PM	Robin Lawler	bubba1bubba2@icloud.com	15717629602	He is taking. His own daughter posted on Facebook tonight that there is no medical issue. He faked pancreatic cancer for two years. He's demanding me on your site to get money, while he just drained \$100s of \$1000s out of my parents accounts. The Va State Police are currently investigating him for embezzlement and I reported this account to them earlier.
09/10/20 1:54 PM	Bella Bella	kkbates1@comcast.net	15407869100	Okay. This is just heads up. This man is a pathological liar! He has lied and cheated his way all through life. He has lied about dying with all kinds of medical disorders (like 10 years ago) and he is here! A.L.I.E.S! This is fraud! Many people need help right now, but not this person! You seriously need to research the person, cause etc. I AM TO REMAIN anonymous!

**Fund Edit History**

Showing 2 of 2 Campaign Edits

Created At (PST)	Description
09/10/20 9:33 AM	<p>Hello, I'm so ashamed and embarrassed it has come to this for me but I could use some help. I've been working since I was 8 years old. I've been running my own business for 18 years and fortunate enough to be blessed with success. I've always made it a mission to put away funds for a rainy day. Unfortunately, it's been raining for almost 4 years now and I'm almost broke. I just can't keep up and depleted just about everything down to a few dollars. Sadly, even my daughter's college fund. For the last 4 years, my family and I have been in a civil court battle with another family member. I was my parents caretaker for years moving them home with me to assist my Dad with dementia and my Mom with a host of ailments. We were prepared for that but God brought both my parents home to Heaven within 6 months of each other last year. Since then, I've inherited all these frivolous, petty lawsuits against my family. In almost 4 years, I've been forced to pay out to date \$301,000 while still owing \$67,000 and these court proceedings are still going on. In the last 4 years, my health has deteriorated with pancreatic issues &amp; surgeries and yesterday I was diagnosed with a heart condition. I've always been fortunate enough to recover, build my strength back, and stay over. I'm scared as Hell and never been this nervous in my life. I've never received a penny of government assistance in my life. I believe that's for people that really need it. I don't qualify for any grants because my assets used somewhat in check. I was raised to help others and now I'm in a seriously bad place and asking for some help. Friends have been pushing me for years to start a Go Fund Me but my pride and upbringing wouldn't allow me. I was determined to work my tail off, sell off as many assets as possible, clip coupons, stretch my savings, what have you to endure this battle. With my medical diagnosis yesterday, I felt it necessary to use a large chunk of what little I have left to pay my future health insurance premiums at \$720 a month so that I'm covered for 6 months. I was advised to take it easy and lay-off work for a while but I can't. Life keeps going and I take my responsibilities very seriously and can't let down my clients. Plus I have no choice, I need the income no matter the circumstances. We win every lawsuit but it takes so much time, energy, and of course, a ton of attorney's fees. It just never stops. The family member suing me has been deemed a vexatious litigant in 2 Va jurisdictions but it hasn't stopped the lawsuits currently on the dockets. We've come so far. The end is hopefully near. Hopefully. Once I win</p>

	<p>my parents house back, I maybe able to recover a large portion of the loss when I can sell it. But that's still some time a way and I'm still responsible for the mortgage, home owners insurance, hoa fees, and property taxes in a fluent area of Northern Virginia. Plus my own regular living expenses but I've learned to live as small as possible. All our savings are gone. My plan is to hopefully pay every one back one day if possible. I never wanted to put this hardship on anyone. It's been a 4 year nightmare but I made a promise to my parents and I have to see it through. I honestly have no choice now. I'm praying the day will come when I can finally spread their ashes in the 3 places they want their eternal rest. But I can't until this is over. They deserve it.</p> <p>People that know me know I must have hit an all time low to even consider this. I'm doing everything possible I promise but just feel so utterly defeated and sadly depressed. It kills me on the inside to ask anyone for help. I've always pride d myself on helping others. I gave up my life for my parents well being. It was an honor and I'd do it again in a flash if I could but God had other plans to bring them home. I've helped friends, family, my community, friends and total strangers with fund raisers and kids events. Proud Wounded Warrior volunteer. Donating my time and services to cancer patients deliberately on fixing their house with necessary repairs or paying for prescriptions. It was a no brainer help them because I could and it was the right thing to do. Has isn't some woe in me, give me a trophy for helping others thing either. It's just a little insight if you never met me.</p> <p>I feel awful for asking but if you could help me out, I promise I will never forget it and be indebted. I'm hoping to refund every penny back if I can recover, or we can barter it for my services. I'd rather go that route for my own pride but I can't exactly guarantee that in the short term.</p> <p>I'm in trying to keep my head up but just asking for help due to the core reasons is a big gut punch. I'm dealing with someone that I can't explain. Mostly legal reasons but I'm not a certified professional in that area. This person is out for blood and ruin anyone that supposedly crosses it. There have been countless victims for over a decade unfortunately and the civil court system lets it continue on and on and on. My parents were so ashamed and felt responsible like they failed in some fashion. It broke their hearts and one of only 5 times in my life I ever saw my Dad cry. They supported this person, gave this person every tool and resource for life and intelligence. And they were paid back with countless bogus lawsuits. Normally, deep pocket organizations/businesses are targeted but if a regular individual of regular means is targeted, it's one incredible and unimaginable hardship to endure. I've said this a million times- my family apologizes immensely and repeatedly if you were ever victimized by this person. I promise we weren't raised that way.</p> <p>Love you all and sincerely appreciate everyone's support over the years. Many of you inspire me to keep moving and I can't put into words how grateful I am. If you are not in a position to donate please send prayers. And also, sign any petitions that may help change the law in people taking advantage of the legal/civil justice system. It's the righteous thing to do.</p>
09/10/20 8:25 AM	

**Fund Updates**

No Campaign updates found.

This report was created at: May 5th, 2021 11:19 AM



GOFUNDME, INC. CERTIFICATE OF RECORDS

I, Alex Wardle, hereby certify and affirm that the attached is a true and complete copy of the documents and records related to the fundraiser titled, "Legal & Medical Aid" held by GoFundMe, Inc. I certify that I am employed by GoFundMe and, by virtue of my duties and responsibilities, am familiar with the manner and process in which these records are created and maintained.

I further certify that the attached records are in the custody and control of GoFundMe, Inc. These records were made and kept in the course of regularly conducted business activity and were made at the time of the events, transactions, or occurrences to which they refer, or within a reasonable time thereafter.

Signed on this 5 day of May, 2021

Alex Wardle  
Custodian of Records

# **EXHIBIT #2**

**VIRGINIA:  
IN THE GENERAL DISTRICT COURT FOR THE COUNTY OF LOUDOUN**

**PEYTON ASHLEIGH** )  
20611 Morningside Terrace )  
Sterling, Virginia 20165 )  
 )  
Plaintiff, )  
 )  
v. )  
 )  
**ROBERT KEVIN LAWLER** )  
5600 Westbury Court )  
Fredericksburg, Virginia 22407 )  
 )  
Defendant. )  
 )

Case No. #GV21008066

2021 JUL -6 PM 3:31  
LOUDOUN COUNTY  
GENERAL DISTRICT COURT

**VERIFIED BILL OF PARTICULARS/COMPLAINT FOR DEFAMATION**  
**for**  
**AN INTENTIONAL FACEBOOK REPUBLICATION OF A "GOFUNDME" CHARITY**  
**REQUEST PUBLISHED ON SEPTEMBER 10, 2020**

COMES NOW, the Plaintiff, Peyton Ashleigh, *pro se*, complains, and for causes of action, alleges/certifies under penalty of perjury pursuant to Virginia Code § 8.01-4.3 the following:

1. A separate lawsuit, GV21008063, was filed simultaneously against Defendant. The defamatory allegations that are the subject of that lawsuit, namely a fraudulently GoFundMe charity created and published by Defendant on September 10, 2020, are the same in this instant lawsuit; HOWEVER, THIS LAWSUIT IS CENTERED ON THE FACT THAT, AFTER DEFENDANT FIRST INTENTIONALLY PUBLISHED SAID ALLEGATIONS DIRECTLY UPON GOFUNDME'S PLATFORM, DEFENDANT IMMEDIATELY THEREAFTER INTENTIONALLY REPUBLISHED THE SAME CONTENT DIRECTLY TO FACEBOOK.





- a. Upon information and belief, that Facebook publication that contained the GoFundMe link also contained an additional plea for money, with additional false allegations about Plaintiff.
  - b. The audience for the Facebook publication differed greatly from the audience for the original GoFundMe site, which is published worldwide. Upon information and belief, to view a GoFundMe page, one would have to know to look for it, or could search for basic search terms...therefore, it is possible that the GoFundMe page would not have been read by people who actually know Plaintiff had Defendant not specifically republished it to Facebook. Arguably, the Facebook publication was limited to Defendant's personal "friends" and possibly their associates, who contain Plaintiff's family members, teachers, schoolmates, and friends of decades.
  - c. Under the republication doctrine, "where the same defamer communicates a defamatory statement on several different occasions to the same or different audience, each of those statements constitutes a separate publication" triggering a new statute of limitations. (See *Doe v. Roe*, 295 F. Supp. 3d 664, 670-71 (E.D. Va. 2018)).
2. Plaintiff is a private individual and is now, and at all times mentioned in this complaint, was a resident of Loudoun County, Virginia, residing at 20611 Morningside Terrace, Sterling, Virginia since June 25, 1997.
  3. Under penalty of perjury, Plaintiff certifies that this cause of action, which occurred on September 10, 2020, has never been the subject of any type of legal action whatsoever in any jurisdiction, either in Virginia or any place else.
  4. Plaintiff changed her name to "Peyton Ashleigh" from "Robin Lawler" in approximately 2004.

5. Defendant Robert “Kevin” Lawler is Plaintiff’s brother (hereafter “Kevin”). He has convictions/arrests for a wide gamut of illegal actions, including but not limited to: credit card fraud, grand theft, petit theft, breaking and entering, destruction of property, assault on a family member, assault and battery, contributing to the delinquency of a minor, contempt of court, stalking with fear of death, violations of protective orders, theft of public utilities. His certified 2019 criminal history, provided in affidavit form by the “Central Criminal Records Exchange” of the Virginia State Police, is attached as **Exhibit #1**, but does not contain his latest conviction for tampering with a fire hydrant or arrest for theft of public utilities, which he used to fill his new swimming pool in July 2020, for the second year in a row.<sup>1</sup>
6. The defamation complained of herein was published over a computer by Defendant on September 10, 2020 to GoFundMe. The publication is attached as **Exhibit #2**, and is a true, accurate, and complete copy of the GoFundMe “R. Kevin Lawler” organized, created, and published on “September 10, 2020,” with the identifying name of “Legal & Medical Aid.” In short, Defendant used his defamation against Plaintiff as yet another willful, wanton, and, illegal scheme to illegally obtain money from vulnerable third parties.
7. Plaintiff learned of the defamatory GoFundMe page at approximately 6:00pm on September 10, 2020, after a third party sent the posting to her.
8. Plaintiff immediately thereafter notified law enforcement and GoFundMe that the claims were fraudulent.

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<sup>1</sup> His criminal charge of theft of public utilities in 2020 was for tapping into a fire hydrant for the second time in two years to fill his brand new swimming pool. This is one of legal fees he claims was caused by Plaintiff. See **Exhibit #21**, which is not included in his criminal history and is a true and accurate accounting of the incident report provided to Plaintiff from the Spotsylvania Sheriff’s Department under the Virginia Freedom of Information Act in September 2020; and **Exhibit #22**, his plea of guilty in one of the related cases)

9. Shortly thereafter, and many times over the next several months, Plaintiff demanded of Kevin Lawler, through his attorneys at Johnston & Gregg (now The Law Offices of Sean D. Gregg) and Jason R Collins, that he was to cease and desist, and he must immediately demand the removal of the charity from GoFundMe's website.

- a. While the fund was discontinued on November 24, 2020 by Defendant after he cashed out his earnings, the site itself was not taken down.
- b. On **February 17, 2021**, Plaintiff exchanged an email thread, attached as **Exhibit #3**, with Jason Collins, in which she stated in pertinent part:

**Subject:** CEASE AND DESIST Fundraiser by R. Kevin Lawler : Legal & Medical Aid AND AMENDED COMPLAINT IF LEAVE TO FILE LATE IS GRANTED

February 17, 2021

Mr Collins:

Attached is a link to a defamatory and fraudulent GoFundMe page Kevin Lawler started on September 10, 2020.

His own sworn testimony of October 14 2020 proves that the claims he made about me, about his health, and about his finances were false and fraudulent.

This site is still online, both on GoFundMe and, upon information and belief, Facebook.

People I have known for 43 years donated to this and can still read it.

His prior counsel was warned about it, yet it still exists. It appears that the only change to it is that it cannot be viewed openly by all of the public (me, the State Police, etc), but can by the people who donated to it.

While the live link is attached below, so is a screenshot, taken moments ago, showing that "donors" can still actively sign in to read the false information.

<image002.png>

<https://www.gofundme.com/f/legal-amp-medical-aid?gid=c324c6dff5134cba2ee9397f2202aeb8.....>

**YOUR CLIENT MUST IMMEDIATELY CEASE AND DESIST. REMOVING THAT PAGE FROM ALL SOCIAL MEDIA BY THE END OF TODAY ...**

**Counsel did not respond to this email.**

- c. On **March 10, 2021**, Plaintiff made the following demand to Defendant through Mr. Collins and Mr. Gregg concerning Kevin removing the defamatory content: "he must remove all references about me from Facebook, GoFundMe, and all social media immediately and agree to cease and desist commenting about me in any fashion publicly and to anyone other than his girlfriend and his daughter. He will not have to publicly apologize nor admit that he lied. I want a certification from Mr Collins office within, say, two weeks, that all items have been removed. That demand was summarily rejected by Jason Collins on March 12, 2021 via email at 5:37PM.
- d. On or about **April 12, 2021**, prior to filing the instant case in Loudoun General District Court, Plaintiff checked the GoFundMe site, and found no record of the post. This informed her decision at the time to file in Loudoun General District Court as opposed to in Circuit Court, as she believed that an injunction was not necessary.
- e. **HOWEVER, on May 14, 2021**, after GoFundMe responded to a subpoena *duces tecum* on May 14, 2021, Plaintiff once again checked the GoFundMe website and found that the site was once again active.
10. **Exhibit #2** is an affidavit of business records created by GoFundMe on May 5, 2021 by GoFundMe's Custodian of Records, Alex Wardle. It was obtained via a subpoena *duces tecum* in Loudoun Circuit Court Case CL00115910-00 in part based upon accusations raised by Defendant in an October 14, 2020 deposition, and in part to defend against claims for sanctions raised by Defendant in an Answer and Grounds of Defense he filed in that case on or about December 28, 2020.

11. Exhibit #2 proves:

- a. that “R Kevin Lawler” created the defamatory publication at 8:19AM on September 10, 2020 with his admitted email address of kevlawler1@aol.com,
- b. that the creators phone number was Kevin’s admitted phone number of 540-760-5384
- c. that the GoFundMe ID is 51243922
- d. that the GoFundMe URL is https://www.gofundme.com/f/legal-amp-medical-aid
- e. that Kevin “used Ayden as a payment account” under user ID number “GFM-W-51243922” to withdraw on November 12, 2020 the \$1,107.89 he obtained through the defamatory statements, to deposit in his Wells Fargo Bank account ending in “0281” at 4:39pm that day.
- f. That the following people, many of whom Plaintiff has known as great friends since 1978-1979, read the defamatory comments about Plaintiff PUBLISHED BY THE DEFENDANT and donated money to Kevin, based upon his false claims and allegations, as will be outlined further below:
  - i. “Kellie Amberger” donated \$125 on September 10, 2020 (Plaintiff is not aware who this is)
  - ii. “Natalie Woodward” donated \$50 on September 10, 2020 (Plaintiff has known her and her brothers since high school, if it is the same person)
  - iii. “Chris Seats” donated \$100 on September 10, 2020. Plaintiff has known him most of her life, and their mothers were good friends, if it is the same person)
  - iv. “Pamela Bennett” donated \$100 on September 10, 2020. (Plaintiff believes this may be Pamela Sugun Bennett. If so, Plaintiff has known her since 1989. If it is

her, her Father sold Plaintiff's parents a model home, and either she or her brother dated Defendant.)

- v. **"Tammy Diamond"** donated \$50 TWICE on September 10, 2020. (While Plaintiff does not personally know this person, it is believe that she may be related to Plaintiff's friend Melissa Diamond Kozloff)
- vi. **"Glenda Smith"** donated \$50 on September 10, 2020 (This is Glenda Stephenson Smith, with who Plaintiff has been friends since at least 1986)
- vii. **"Chris Conley"** donated \$100 on September 10, 2020 (While Plaintiff is unsure, she believes this is the Chris Conley with whom she attended high school)
- viii. **"Barbra Hopkins"** donated \$200 on September 10, 2020 (Mrs. Hopkins is someone Plaintiff has highly respected since 1979, when she and her husband Bruce became great friends with Plaintiff's parents. Ms Hopkins has been a guest in Plaintiff's current home. Plaintiff is certain this is the same "Barb" Hopkins, as the email address she used to make the donation is [brucehopkins@verizon.net](mailto:brucehopkins@verizon.net))
- ix. **"Courtney Horseman"** donated \$100 on September 10, 2020. (While Plaintiff was not per se friends with Ms. Horseman, Plaintiff has known her since high school, which was probably in 1985-86.)
- x. **"Jeff Hopkins"** donated \$100 on September 10, 2020. (Plaintiff used to consider Jeff as one of her closest friends. He was actually her first roommate in her current home and would often visit after moving out. Plaintiff has known him since 1979. He is Barbara and Bruce Hopkins oldest son and had been to countless dinners, to Plaintiff's parents home, and even on vacation with the family)

- xi. **"Lethia Jackson"** donated \$50 on September 10, 2020. (Plaintiff has known Lethia Minor Jackson since grade school. Upon information and belief, Plaintiff used to cheerlead for a team coached by her relative starting in 1978.)
- xii. **"Kendra LaMonte"** donated \$20 on September 10, 2020 (Plaintiff does not believe she knows this person)
- xiii. **"Jason Caroon"** donated \$100 on September 11, 2020. (Plaintiff has known Mr. Caroon since September 1978, when she moved in two blocks from him. They remained neighbors for the next 11 years and Plaintiff was best friends with Jason's sisters Christie and Tylynn. She was close enough to Jason to give him her Redskins ticket so that he could attend with Plaintiff's mother)
- xiv. **"Heather Hepburn"** donated \$50 on September 11, 2020. (Plaintiff is not sure if she knows this person)
- g. That GoFundMe placed an "Action Deadline updated by processor ADYEN to value: 2020-11-01 15:28:38.0" on September 10, 2020 at 1:28pm
- h. "User cancelled account" at 9:22am on November 24, 2020
- i. That a third party identified as "Bella Bella" wrote to GoFundMe at 1:54pm PST the following:

"Okay. This is just heads up. This man is a pathological liar! He has lied and cheated his way all through life. He has lied about dying with all kinds of medical disorders (like 10 years ago) and he is fine! ALL LIES! This is fraud. Many people need help right now, but not this person! You seriously need to research the person, cause etc. I AM TO REMAIN anonymous!"

- 12. Upon information and belief, immediately upon publishing the GoFundMe charity by Defendant, in addition to the listed people who donated, countless other people immediately saw it, started donating, and with some personally notifying Plaintiff directly.

13. While Defendant did not specifically name Plaintiff in the defamatory publication, Plaintiff has herein listed the names of the provable people who read the publication while also listing Plaintiff's association with those people, as it would be clear to each and all to whom Kevin Lawler was referring.

**FULL CONTENT OF DEFAMATORY COMMENTS PUBLISHED IN EXHIBIT #2**

14. Plaintiff incorporates herein by reference the allegations at paragraphs #1 through #13 inclusive of this Complaint as though fully set forth herein.

15. As provided in the affidavit of business records from GoFundMe, Defendant published the following, each false allegation of which will be addressed separately:

"Hello, I'm so ashamed and embarrassed it has come to this for me but I could use some help. I've been working since I was 8 years old. I've been running my own business for 18 years and fortunate enough to be blessed with success. I've always made it a mission to put away funds for a rainy day. Unfortunately, it's been raining for almost 4 years now and I'm almost broke. I just can't keep up and depleted just about everything down to a few dollars. Sadly, even my daughters college fund. For the last 4 years, my family and I have been in a civil court battle with another family member. I was my parents caretaker for years moving them home with me to assist my Dad with dementia and my Mom with a host of ailments. We were prepared for that but God brought both my parents home to Heaven within 6 months of each other last year. Since then, I've inherited all these frivolous, petty lawsuits against my family. In almost 4 years, I've been forced to pay out to date \$301, 000 while still owing \$67,000 and these court proceedings are still going on. In the last 4 years, my health has deteriorated with pancreatic issues & surgeries and yesterday I was diagnosed with a heart condition. I've always was fortunate enough to recover, build my strength back, and start over. I'm scared as Hell and never been this nervous in my life. I've never received a penny of government assistance in my life. I believe that's for people that really need it. I don't qualify for any grants because my assets used somewhat in check. I was raised to help others and now I'm in a seriously bad place and asking for some help. Friends have been pushing me for years to start a Go Fund Me but my pride and upraising wouldn't allow me. I was determined to work my tail off, sell off as many assets as possible, clip coupons, stretch my savings, what have you to endure this battle. With my medical diagnosis yesterday, I felt it necessary to use a large chunk of what little I have left to pay my future health insurance premiums at \$726 a month so that I'm covered for 6 months. I was advised to take it easy and lay-off work for a while but I can't. Life keeps going and I take my responsibilities very seriously and can't let down my clients. Plus I have no choice, I need the income no matter the circumstances. We win every lawsuit but it takes so much time, energy, and of course, a ton of attorneys fees. It just never stops. The family member suing me has been deemed a vexatious litigant in 2



Va jurisdictions but it hasn't stopped the lawsuits currently on the dockets. We've come so far. The end is hopefully near. Hopefully. Once I win my parents house back, I maybe able to recover a large portion of the loss when I can sell it. But that's still some time a way and I'm still responsible for the mortgage, home owners insurance, hoa fees, and property taxes in a fluent area of Northern Virginia. Plus my own regular living expenses but I've learned to live as small as possible. **All our savings are gone.** My plan is to hopefully pay every one back one day if possible . I never wanted to put this hardship on anyone . I t's been a 4 year nightmare but I made a promise to my parents and I have to see it through. I honestly have no choice now. I'm praying the day will come when I can finally spread their ashes in the 3 places they want their eternal rest. But I can't until this is over. They deserve it People that know me know I must have hit an all time low to even consider this. I'm doing everything possible I promise but just feel so utterly defeated and sadly depressed. It kills me on the inside to ask anyone for help. I've always pride d myself on helping others. I gave up my life for my parents well being. It was an honor and I'd do it again in a flash if I could but God had other plans to bring them home. I've helped friends, family, my community, friends and total strangers with fund raisers and kids events. Proud Wounded Warrior volunteer. Donating my time and services to cancer patients deliberately on fixing their house with necessary repairs or paying for prescriptions. It was a no brainer- help them because I could and it was the right thing to do. This isn't some woe is me, give me a trophy for helping others thing either. It's just a little insight if you never met me i feel awful for asking but if you could help me out. I promise I will never forget it and be indebted. I'm hoping to refund every penny back if I can recover, or we can barter it for my services. I'd rather go that route for my own pride but I can't exactly guarantee that in the short term I'm m trying to keep my head up but just asking for help due to the core reasons is a big gut punch. I'm dealing with someone that I can't explain. Mostly legal reasons but I'm not a certified professional in that area. This person is out for blood and ruin anyone that supposedly crosses it. There have been countless victims for over a decade unfortunately and the civil court system lets it continue on and on and on. My parents were so ashamed and felt responsible like they failed in some fashion. It broke their hearts and one of only 5 times in my life I ever saw my Dad cry. They supported this person, gave this person every tool and resource for life and intelligence. And they were paid back with countless bogus lawsuits. Normally, deep pocket organizations/businesses are targeted but if a regular individual of regular means is targeted, it's one incredible and unimaginable hardship to endure. I've said this a million times- my family apologizes immensely and repeatedly if you were ever victimized by this person. I promise we weren't raised that way. Love you all and sincerely appreciate everyone's support over the years. Many of you inspire me to keep moving and I can't put into words how grateful I am. If you are not in a position to donate please send prayers. And also, sign any petitions that may help change the law in people taking advantage of the legal/civil justice system. It's the righteous thing to do."

16. Amongst other people who provably read it and knew the allegations to be false were Sherri Schwalm Goldsmith and Emily Ashton Lawler (who now goes by her mother's maiden name of "Rucker" on Facebook, as "Emily Rucker," abandoning her father's last name). Defendant's

own daughter. Attached Exhibit #4 are true, accurate, and complete screenshots Plaintiff took on her iPhone 11 on September 10, 2020 of Facebook posts sent to her by a third party on that same day of Facebook communications between Schwalm-Goldsmith and Emily Lawler on the evening of the publication. After Ms Goldsmith makes a vague reference to an unnamed person creating a charity based upon fraud after faking diseases for years, Emily confirms that the allegations in the GoFundMe page were made by her father and that the allegation he about his health are not true, and "it has nothing to do with medical reason."

- a. Of note, to demonstrate Defendant's willful and wanton blatant defamatory comments in the past, from which he never learned a lesson, Defendant has admitted under oath to accusing a friend of his ex-wife of sexually molesting Emily when she was in approximately kindergarten, requiring her to be subjected to a battery of gynecological exams before no evidence whatsoever was discovered.
- b. He has accused his current girlfriend's sons of stealing his narcotics (he's been convicted of assaulting one while he was a child)
- c. He has accused his current girlfriend in writing to others of being a "whore."
- d. He has accused Mrs Schwalm-Goldsmith of stalking him, breaking and entering, and a wide variety of other crimes on social media, while gaslighting.
- e. He has a history of continuous campaigns of unrelenting public defamations on social media, in texts and emails, and orally of literally anyone who he believes crosses him, which has been ongoing for decades. People get so tired of him that they do not seek civil redress to ensure contact with him ends, but many instead have sought and secured protective orders to end the abusive contact.

**PLAINTIFF'S DENIAL UNDER OATH OF THE PUBLISHED ALLEGATIONS**

17. Plaintiff incorporates herein by reference the allegations at paragraphs #1 through #16 inclusive of this Complaint as though fully set forth herein.
18. FOR PURPOSES OF THIS LITIGATION, PLAINTIFF INCORPORATES THE CONTENT OF EXHIBIT #2, AND CERTIFIES THAT ALMOST EVERY ALLEGATION CONTAINED THEREIN...WHETHER DIRECTLY ABOUT PLAINTIFF, SIMPLY REFERENCING PLAINTIFF, OR ABOUT ANY OTHER GENERAL INFORMATION AT ALL ABOUT DEFENDANT'S FINANCES AND HEALTH ISSUES (which he seems to imply were each caused by Plaintiff)... IS EMPHATICALLY FALSE, AND WERE KNOWINGLY, WILLFULLY, AND WANTONLY MADE WITH KNOWLEDGE OF THEIR FALSITY BY PROLIFIC CRIMINAL ROBERT KEVIN LAWLER, WITH THE ABSOLUTE INTENT TO CAUSE PLAINTIFF HARM AND EMBARRASSMENT, WHILE USING THE ALLEGATIONS FOR HIS OWN CRIMINAL FINANCIAL BENEFIT.
19. To the extent that Defendant later claims "truth" as an affirmative defense, Plaintiff demands strict proof thereof, under oath, of any and all allegations alleged herein. Namely, that other than his Wells Fargo Bank account held in conjunction with his unlicensed contracting company "Legacy Cleaning," with account number [REDACTED] 4020, Defendant should produce certified business records affidavits for each of his accounts, showing that, as of September 10, 2020, when he made the comments, Defendant had "*depleted just about everything down to a few dollars,*" that "*all our savings are gone.*"
- a. Based upon records already confirmed in prior litigation by Wells Fargo and GoFundMe itself:
    - i. Defendant holds at least one other account in his personal name at Wells Fargo that ends in "0281." This is the account into which the illegally obtained funds were

deposited straight from GoFundMe, at Defendants request, on November 12, 2020 at 4:39pm. It is believed that Defendant had a substantial balance in that account on September 10, 2020.

ii. Defendant also held an investment account numbered Acct # [REDACTED] 7054 with Charles Schwab, which will be discussed in depth herein, into which he had deposited \$255,256.00 JUST FROM ONE WELLS FARGO ACCOUNT ALONE BETWEEN JUNE 1, 2017 AND SEPTEMBER 10, 2020

b. Upon information and belief, on September 10, 2020, Defendant also held accounts at M&T Bank, and possibly several others. This is based upon communication Plaintiff had with Defendant's counsel Jason Collins in spring of 2021, after he stated he would move to quash a subpoena Plaintiff filed for Defendant's M&T records: if there were no such records, it would have probably been a sanctionable offense for Mr. Collins to move to quash nonexistent records. It is further believed that Defendant carried similar balances comparable to those with Wells Fargo in each such account that he held at other banking institutions.

c. Upon information and belief, Defendant still held substantial accounts at Edward Jones, including IRAs, etc, on September 10, 2020.

d. Upon information and belief, Defendant held other investment/savings accounts at other entities on September 10, 2020 when the statements were published.

**DEFENDANT'S FRAUDULENT STATEMENTS ABOUT LEGAL PAYMENT CLAIMS**

20. Plaintiff incorporates herein by reference the allegations at paragraphs #1 through #19 inclusive of this Complaint as though fully set forth herein.

21. Kevin Lawler fraudulently claimed on the GoFundMe page that *"In almost 4 years, I've been forced to pay out to date \$301, 000 while still owing \$67,000 and these court proceedings are still going on."* This is a provably false statement, proven by Defendant's own sworn testimony after the statement was published, namely on October 14, 2020. It is also proven false by certified financial statements obtained via subpoena *duces tecum* from Wells Fargo, M&T Bank, and Edward Jones.
22. Over the course of the prior "four years" mentioned by Defendant (which is, in and of itself, a falsity, as the first legal action had not even been filed by either party until November 2017, less that three years before the publication), Defendant claimed in his fraudulent publication that HE had been forced to pay out "301,000.00," yet adding together all of the billing statements filed on September 10, 2020 as Exhibits #11 and #12 for his law firms Getty & Associates and Johnston & Gregg prove legal fees of less than half of that amount.
- a. There was another lawyer hired by Defendant named Jonathon Vivona, but subpoenaed records through Loudoun Circuit Court show that the deceased Linda and Robert William Lawler paid his almost \$25,000.00 in fees to that point, with no indication whatsoever that Defendant ever paid him a cent.
  - b. It is possible, however, that just before publication on September 10, 2020, Defendant did actually pay Vivona some money, but that would have been for a contempt of court charge against him, Gregg, Johnston, and their lawfirm, which Plaintiff won.
23. Upon information and belief, based upon previously subpoenaed certified bank statements PAYMENTS made by Kevin Lawler of all legal fees by all parties over the period in question do not equal \$301,000, and in fact, until the deaths of both Linda and Robert William Lawler in 2019, there is absolutely no record obtained so far that even insinuates, much less proves,

that Kevin Lawler ever personally paid a single legal fee until January Of 2020, after Laura Johnston was fired/left his former law firm, Getty & Associates. EVEN WITH HIS OWN MULTIMILLION DOLLAR MEDICAL MALPRACTICE LAWSUIT JOHNSTON FILED ON HIS BEHALF IN FREDERICKSBURG CIRCUIT COURT ON JULY 23, 2018 AS CASE NUMBER CL18-600, KEVIN LAWLER REPAID JOHNSTON WITH A CHECK FOR \$350 DRAWN ON ROBERT WILLIAM LAWLER'S EDWARD JONES ACCOUNT TO REPAY HER FOR THE FILING FEE JOHNSTON HAD PAID WITH CASH.<sup>2</sup>

24. Defendant has admitted under oath during his October 14, 2020 deposition that he did not pay the legal fees at all while Linda and Robert William Lawler were alive, and the billing records filed September 10, 2020 for both Getty & Associates and Johnston & Gregg, ALONG WITH THE SUBPOENAED EDWARD JONES RECORDS FOR ROBERT WILLIAM LAWLER, LINDA LAWLER, AND KEVIN LAWLER, TOGETHER SEEM TO PROVE THAT ONLY LINDA AND ROBERT WILLIAM LAWLER PAID ALL LEGAL FEES. Given the fact that defendant had secured a durable power of attorney for Robert William Lawler after he had had him declared incompetent on July 5, 2018, there is little reason to believe that Robert William Lawler was ever aware that Kevin was using his funds to pay those bills.

25. Finally, Defendant's Counsel Sean Gregg filed an affidavit in November 2020 in CL00116767-00, the unlawful detainer Defendant improperly filed in his own personal name, stating, essentially, that of the \$301,000.00 Defendant claims Plaintiff intentionally caused Defendant to pay due to frivolous lawsuits, **DEFENDANT'S OWN IMPROPERLY FILED**

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<sup>2</sup> Defendant and his counsel provided a copy of the check under court order. It was signed by Kevin while he was acting as a fiduciary for the mentally incompetent Robert William Lawler, WHOM KEVIN HAD DECLARED INCOMPETENT WITH MULTIFACTORIAL DEMENTIA THE YEAR PRIOR, ON JULY 5, 2018.

**LAWSUIT ACCOUNTS FOR \$92,809.25 (SEE Exhibit #5, November 16, 2020 affidavit of Sean Gregg)**

**DEFENDANT'S FRAUDULENT STATEMENTS ABOUT PCURRENTLY OWING \$67,000.00 OF LEGAL FEES**

26. Plaintiff incorporates herein by reference the allegations at paragraphs #1 through #25 inclusive of this Complaint as though fully set forth herein.
27. The billing statements filed by Defense Counsel on the very day of the publication prove that when this statement was intentionally made, prove that Defendant owed \$33,840.53 for all types of legal fees as of September 3, 2020 for the firm of Johnston & Gregg.
28. While Defendant was also employing Jonathon Vivona in Bankruptcy Court for contempt at that time, there is no indication that Defendant ever owed him at that point an additional approximately \$33,000.00, especially since the contempt case had only been filed approximately one month prior to the publication.
29. To the extent that Kevin owed \$67,000 on September 10, 2020 to Johnston & Gregg, Jonathon Vivona, or any other law firm for actions associated with Plaintiff, Plaintiff demands strict proof thereof.

**DEFENDANT'S FRAUDULENT STATEMENTS ABOUT PLAINTIFF CAUSING ALL OF THE LEGAL FEES**

30. Plaintiff incorporates herein by reference the allegations at paragraphs #1 through #29 inclusive of this Complaint as though fully set forth herein.
31. At the time of publication, Defendant had filed FOUR separate lawsuits against Plaintiff:
- a. The first lawsuit started in this Court in December 2018, with a unlawful detainer he incorrectly filed in his own name when he was not a real party in interest and had no ownership interest whatsoever in the property.

b. The second and third were filed against Plaintiff in February 2020 in Loudoun Circuit Court, and it appears that both will be dismissed with prejudice on July 26, 2021.

c. The fourth was a multimillion dollar lawsuit that Gregg and his unlicensed partner Johnston filed against Plaintiff in April 2020 in Spotsylvania Circuit Court for actions that were actually taken by Johnston herself, in order to try to dissuade being compelled to provide a full fiduciary accounting of the actions criminal Kevin Lawler had taken while acting as attorney in fact for Linda and Robert William Lawler...which recent discovery in Loudoun Circuit Court now proves probable embezzlement of hundreds of thousands of dollars. That case was eventually nonsuited and was never refiled.

32. The first lawsuit Plaintiff filed. In November 2017, did not involve this Defendant as a party AT ALL, and was only filed because Defendant refused to report premises liability claim on behalf of his principals Linda and Robert William Lawler to State Farm Fire and Causality. Had he done so, the case would have never been filed, but he faced an investigation because the claim also alleged that he had stolen Plaintiff's \$15,000 video collection from that home. He lied and claimed he had notified State Farm but Getty & Associates were paid for representation due to his failure to report the claim UNTIL PLAINTIFF SUBPOENAED STATE FARM, WHO IMMEDIATELY HIRED ANOTHER FIRM.

- a. To the extent that the fees paid to Getty for that claim are a part of his claim of \$301,000.00 in legal fees, he is responsible for not ever informing State Farm<sup>3</sup>
- b. **This case was NOT frivolous, as Plaintiff eventually won approximately \$18,000.00.**

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<sup>3</sup> Certified subpoenaed records from State Farm prove he did not notify State Farm of the claim until late January 2018, months after the case was filed, and only after Plaintiff had filed the subpoena.



33. After Defendant admitted to coming to Plaintiff's home after he was served with multiple No Trespass Notices, Plaintiff obtained a protective order against Defendant, who has a substantial criminal history for stalking, stalking with fear of death, assault on a family member, assault and battery, violations of protective orders, etc. Apparently, Defendant had legal fees for that act. As he admitted it under oath, that claim by Plaintiff was not frivolous.
34. Plaintiff filed a Warrant in detinue against Defendant for return of the \$15,000 or so video collection and other items. The first case was nonsuited when unforeseen events prevented Plaintiff from attending trial, and it was later refiled. Plaintiff then missed the second trial date due to a severe concussion, and the case is about to go to trial on August 16, 2020.
- a. This case would have been tried on October 15, 2019, a full year before the publication and complaint of ongoing legal fees, but for an illegal ex parte communication between Defendant's counsel and Judge Irby, in which Counsel demanded a 60 day stay via faxed praecipe without ever filing a motion, or serving Plaintiff, acts that are completely improper and in violation of multiple codes/laws.
35. Plaintiff filed a civil trespass/defamation/IIED, etc lawsuit in Loudoun Circuit Court against Defendant in June 2018. As with the last mentioned case, it too was scheduled for trial in January 2020, 9 months before Defendants complaint of ongoing legal fees, but Defendant's counsel used the same faxed praecipe to obtain a 60 stay without Plaintiff's knowledge or consent, which eventually resulted in the cancellation of the January 2020 trial. (It was rescheduled for about August 17-18, 2020, but given that it was a jury trial, it was cancelled again only due to the COVID-19 Judicial Emergency, and no act by Plaintiff. **MOREOVER, DEFENDANT WAS IN DEFAULT FOR THAT CASE BETWEEN OCTOBER 2019 UNTIL APPROXIMATELY APRIL 2021 FOR FAILURE OF DEFENDANT TO FILE DEFENSIVE**

PLEADINGS. ANY CONTINUATION OF THE CASE AT THAT POINT WAS SOLELY DUE TO DEFENDANT'S OWN ACTS.

36. Plaintiff filed against Defendant in US Bankruptcy Court for violations of the federally mandated automatic stay and discharge injunctions. Recently obtained records prove Defendant and his counsel knew about the bankruptcy and intentionally acted in violation of its injunctions. Plaintiff obtained Order of Contempt against Defendant and his counsel. THIS WAS NOT A FRIVOLOUS FILING, AND BUT FOR DEFENDANT'S OWN ILLEGAL ACTS. HE WOULD NOT HAVE ACCURED LEGAL FEES FOR THAT DEFENSE.

37. In June 2018, Plaintiff filed against Defendant a petition for a fiduciary accounting on behalf of her mentally incompetent father. A trial date was set for March 2020. Laura Johnston lied and claimed she had not received the praecipe and motion for discovery set for January 13, 2020 (her former firm, Getty & Associates, told Judge Rigual that they had no knowledge of the motion and as such, wanted it continued). With no discovery less than two months before trial, Plaintiff exercised her absolute right in Virginia to nonsuit that case and refiled it on February 28, 2020. That is the case for which Defendant filed a multimillion dollar fraudulent counterclaim. DOCUMENTS OBTAINED SINCE THEN, WHILE DEFENDANT WAS IN DEFAULT IN CL00115910, PROVE WHY DEFENDANT AND COUNSEL WENT TO SUCH GREAT EXTENT TO PREVENT THE FIDUCIARY ACCOUNTING: THEY WERE EACH TAKING FUNDS HAND OVER FIST FROM A MENTALLY INCOMPETENT, FOR WHOM BOTH HAD FIDUCIARY RELATIONSHIPS, IN CRIMINAL VIOLATION OF VIRGINIA CODES 18.2-178.1 AND 18.2-111. To the extent that Defendant had legal fees for this civil petition, it was only to insure that his criminal acts were not discovered.

38. Plaintiff did file another case against Defendant in August 2019 for fiduciary accountings for Linda Lawler, amongst other claims that include overturning a fraudulent General Warranty Deed of FGift for Plaintiff's home that Defendant took while Linda Lawler was actively dying and while liens still existed on the property. THAT CLAIM WAS DISMISSED WITH PREJUDICED, BUT ONLY AFTER THE NOW "RETIRED" DEFENSE COUNSEL LAURA JOHNSTON (WHO FAILED TO PERSONALLY SIGN THE DEFENSIVE PLEADINGS) APPEARED IN LOUDOUN CIRCUIT COURT ON MARCH 12, 2020 WHILE SHE WAS SUSPENDED FROM PRACTICING LAW AND LIED TO THE JUDGE, STATING THAT IT HAD TO BE DISMISSED BECAUSED THE CLAIMS WERE BARRED BY RES JUDICATA. IT WAS A BOLDFACED LIE, ARGUED BY A PERSON ACTIVELY BREAKING THE LAW WHILE ARGUOING IT. PLAINTIFF MAINTAINS THAT DEFENDANT IS ACTUALLY IN DEFAULT FOR THE UNSIGNED PLEADING, AND THAT THE DISMISSAL ORDER IS VOID AB INITIO AS JOHNSTON WAS NOT LICENSED TO PRACTICE LAW WHEN SHE ARGUED IT.

**DEFENDANT'S FRAUDULENT STATEMENTS ABOUT HIS HEALTH AND INSURANCE PAYMENTS**

39. Plaintiff incorporates herein by reference the allegations at paragraphs #1 through #38 inclusive of this Complaint as though fully set forth herein.

40. As part of his fraudulent GoFundMe plea, Defendant published the following: "In the last 4 years, my health has deteriorated with **pancreatic issues & surgeries**<sup>4</sup> and yesterday I was diagnosed with a heart condition... With my medical diagnosis yesterday, I felt it necessary to

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<sup>4</sup> There is no evidence whatsoever that Defendant had surgery at any point since Plaintiff filed the premise liability case in November 2017, and should there actually be, Plaintiff not only demands strict proof thereof, but strict proof that said surgeries are the direct result of Plaintiff's actions, as he implies.

use a large chunk of what little I have left to pay my future health insurance premiums at \$726 a month so that I'm covered for 6 months. I was advised to take it easy and lay-off work for a while but I can't."

41. First, when specifically asked about his "medical diagnosis yesterday" during his October 14, 2020 deposition, Defendant said it was for "high blood pressure," a genetic condition for which literally every parent and grandparent suffered. A reasonable person could read that claim and assume that the "heart condition" was far more serious than simple high blood pressure. Moreover, Defendant was facing federal contempt charges (which he lost) and criminal fraud actions from July 2020 (one of which he pleaded guilty to when the alleged high blood pressure claim was made and allegedly diagnosed; under such self caused stressors, high blood pressure could have been reasonably foreseeable by Defendant when he broke those laws. AS SUCH, IT WOULD NOT HAVE BEEN PLAINTIFF'S FAULT.

42. Upon information and belief, based upon subpoenaed records from Wells Fargo, Defendant had been making the same basic health insurance payments, periodically, since at least March 2017, when the records started.

43. Upon information and belief, Defendant's carries Anthem Health Insurance, with account number 200529281M58477.

44. According to subpoenaed Wells Fargo records, the last premium Defendant paid was on June 1, 2020, for \$4,000.<sup>5</sup> (Plaintiff maintains that the cost is as high as it is as Defendant is both self-employed and Defendant has a vast number of serious preexisting conditions, including

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<sup>5</sup> Pursuant to the bank records, historically the payments Defendant made for health insurance premiums vacillated between \$3,000.00 and \$4,000.00.

but not limited to a severally failed back surgery and pancreatitis, for which he had an operation at UVA in October 2011)

45. To the extent that Defendant did in fact “just” pay his allegedly heightened insurance fees, Plaintiff demands strict proof thereof.

46. Defendant falsely implied that Plaintiff’s acts had caused further “pancreatic issues” for Defendant over the prior four years. The readers of this publication would assume that he was referring to PANCREATIC CANCER, which Defendant faked having over social media and to anyone who would listen, since 2011! A reasonable reader, knowing the history of those claims, would naturally assume that the alleged stress caused by Plaintiff’s alleged frivolous lawsuits caused a recurrence of his (nonexistent) cancer. In fact, FOIA records obtained as recently as June 2021 prove that in June 2017, When Defendant apparently made yet another fake suicide attempt, either his own daughter or he himself told Spotsylvania EMT’s that he had pancreatic cancer. Linda Lawler, a registered nurse since 1962, and Robert William Lawler, a microbiologist, each were fooled for years that he had pancreatic cancer, with Linda actually including it in an affidavit to the Social Security Administration in April 2013. DURING HIS OCTOBER 14, 2020 DEPOSITION, KEVIN LAWLER ADMITTED UNDER OATH THAT HE NEVER EVER HAD PANCREATIC CANCER. To the extent that he actually did have problems with his pancreas during the timeframe at issue, Plaintiff demands strict proof thereof, and further, that Defendant himself did not intentionally trigger pancreatitis attacks, as he has in the past to get the attention of his stalking victims, by overly drinking alcohol or over indulging in high fat foods.

**DEFENDANT’S MISLEADING STATEMENTS ABOUT BEING ADVISED NOT TO WORK BECAUSE OF HIS HEALTH, ALLEGEDLY DUE TO PLAINTIFF’S ACTIONS**

47. Plaintiff incorporates herein by reference the allegations at paragraphs #1 through #46 inclusive of this Complaint as though fully set forth herein.

48. Defendant filed the following intentionally misleading statement: "I was advised to take it easy and lay-off work for a while but I can't."

49. Defendant implies that he was advised not to work because of his health, which he implies is the result of Plaintiff's actions.

50. First. Plaintiff demands strict proof that a medical professional had just advised him not to work.

51. Second, upon memory and documents obtained via FOIA, DEFENDANT WAS TOLD SPECIFICALLY THAT HE COULD NOT WORK BY SPOTSYLVANIA COUNTY AT THE BEGINNING OF SEPTEMBER 2020, DAYS BEFORE THE PUBLICATION, BECAUSE HIS COMPANY, LEGACY CLEANING, WAS NEVER PROPERLY PERMITTED/LICENSED IN SPOTSYLVANIA COUNTY (OR ANYWHERE ELSE FOR THAT MATTER). AND UNTIL HE OBTAINED THE REQUIRED DOCUMENTATION, HE WAS FORBIDDEN FROM RUNNING THAT COMPANY, ESPECIALLY FROM 5600 WESTBURY COURT, FREDERICKSBURG, VIRGINIA 22407.

**DEFENDANT'S MISLEADING STATEMENTS ABOUT BEING RESPONSIBLE FOR MORTGAGE, HOA FEES, ETC FOR PLAINTIFF'S HOME**

52. Plaintiff incorporates herein by reference the allegations at paragraphs #1 through #51 inclusive of this Complaint as though fully set forth herein.

53. Defendant published the following misleading statement: "But that's still some time a way and I'm still responsible for the mortgage, home owners insurance, hoa fees, and property taxes in a fluent area of Northern Virginia."

54. First, Plaintiff was set to inherit the property in which she has lived since 1997, before Defendant exercised undue influence upon a dying Linda Lawler to have her change her will on July 5, 2018.

55. Second, more than a year before Defendant published those statements, Defendant knowingly and intentionally had his principal, the dying Linda Lawler, sign a General Warranty Deed of Gift on the property (while it had existing liens), gifting the property to Defendant.

56. Upon memory, under oath before Judge Irby on August 19, 2019, Defendant admitted under oath that he willingly accepted the gift of the property, which Defendant knew at the time carries a mortgage, insurance, HOA fees, etc.

57. Absolutely no argument could possibly be made that Plaintiff forced Defendant to:

- a. exert undue influence upon Linda Lawler to prevent Plaintiff from inheriting the property and its associated fees;
- b. accept the Deed of Gift and the associated fees that come with the property (a gift that can legally be presumed fraudulent given that he accepted the gift while acting a fiduciary for a person completely and utterly dependent upon him to live)

58. To the extent that Defendant makes the aforementioned arguments, Plaintiff demands strict proof thereof.

**COLLOQUIUM TO PROVE STATEMENTS WERE ABOUT PLAINTIFF**

59. Plaintiff incorporates herein by reference the allegations at paragraphs #1 through #58 inclusive of this Complaint as though fully set forth herein.

60. The legal definition of "**Colloquium**" is as follows: **1.** The offer of extrinsic evidence to show that an alleged defamatory statement referred to the plaintiff even though it did not explicitly

mention the plaintiff. 2. The introductory averments in a plaintiff's pleading setting out all the special circumstances that make the challenged words defamatory.

*Black's Law Dictionary*, Seventh Edition, at p. 258.

61. As pleaded above, almost everyone who donated to Defendant's defamatory GoFundMe page had known either Plaintiff, her brother, her family or all of them for literally decades, and knew of the familial relationship between Plaintiff and Defendant.

62. Kevin Lawler has stated under oath that Plaintiff is his only sibling, and Plaintiff certifies the same herein under penalty of perjury.

63. Defendant makes the following written references that would prove to the average reader, and especially those who donated, that the comments were about Plaintiff, without expressly stating her name:

- a. "For the last 4 years, my family and I have been in a civil court battle with another family member"
- b. "Once I win my parents house back, I maybe able to recover a large portion of the loss when I can sell it." As stated, with regard to Jeff and Barbara Hopkins, who each donated, Jeff was Plaintiff's roommate and Ms. Hopkins has visited the home, knowing that it was purchased by the parties' parents.
- c. "My parents were so ashamed and felt responsible like they failed in some fashion."
- d. "They supported this person, gave this person every tool and resource for life and intelligence."
- e. "I've said this a million times- my family apologizes immensely and repeatedly if you were ever victimized by this person."



E. "I promise we weren't raised that way. Love you all and sincerely appreciate everyone's support over the years." (emphasis added)

**SPECIFIC TIMING OF THE PUBLICATION TO INFLUENCE WITNESSES WHILE FACING CONTEMPT OF FEDERAL COURT CHARGES**

64. Plaintiff incorporates herein by reference the allegations at paragraphs #1 through #63 inclusive of this Complaint as though fully set forth herein.
65. Defendant published the comments two days after the US Bankruptcy Court set a trial against Kevin, and his counsel Laura Johnston, Sean D. Gregg and the law firm of Johnston & Gregg set a trial date for federal injunction contempt on September 8, 2020. (See **Exhibit #6**, August 27, 2020 "Order Granting Motion to Reopen and Setting Status Hearing." (of note, Plaintiff won that Contempt Motion against each of the above-named people, and **Exhibit #7**, a true and accurate copy of the US Bankruptcy Court's December 30, 2020 "Order Granting Motion for Contempt and Ordering Payment" against Defendant, amongst others, proves that at least that filing, which seeming directly led to the defamatory publication, was not "frivolous.")

**KEVIN LAWLER'S HISTORY OF DEFAMING PLAINTIFF, FOR PURPOSES OF PUNITIVE DAMAGES**

66. Plaintiff incorporates herein by reference the allegations at paragraphs #1 through #65 inclusive of this Complaint as though fully set forth herein.
67. *While not the subject of this litigation*, it is important for the Court to know Defendant's proven history of defaming Plaintiff, only to never learn from his actions.
68. In February of 2017, Defendant made a false claim of credit card fraud to Amazon for items Linda Lawler confirmed to him had been purchased on behalf of Robert William Lawler with his credit card and both of their knowledge through Plaintiff Amazon Prime account for

multiple reasons. Despite knowing that the claim was false, five months after being affirmatively told that the claim was false, Defendant made a claim of felony credit card fraud on July 25, 2017, in addition to other claims of credit card fraud, as certified by Detective William Lee of the Spotsylvania Sheriff's Department. Detective Lee sought a direct indictment, based upon Defendant's false allegations, and no true bill was returned.

69. On February 28, 2018, Defendant reported Plaintiff (who has been full disabled since April 15, 2007 with approximately 8 enumerated disabling conditions in the federal Judge's decision) to both the Social Security Disability Fraud Hotline and to Loudoun County Social Services for Social Security and Medicare fraud for over 11 years. Not only is it supported by his certified AT&T/Cingular cell phone records for his cell phone number of 540-760-5384. It resulted in an approximately 9 month federal investigation against Plaintiff before she was fully cleared. (See Exhibits #8-9, the cell phone record and the notice by the Social Security Administration.) Most importantly, Defendant admitted to making the reports, under oath:

6 Q. Okay. What's the, so does the system  
7 also include the Social Security Administration?

8 A. I don't even care.

9 Q. No, does the system according to you  
10 fleecing, quote, unquote, fleecing the system,  
11 does fleecing the system, part of the system  
12 include the Social Security Administration?

13 A. Yes.

14 Q. Oh, is that why you called them in  
15 February of 2018?

16 A. I don't remember when I spoke to the  
17 gentleman.

**ELEMENTS NECESSARY TO PROVE DEFAMATION**

70. Plaintiff incorporates herein by reference the allegations at paragraphs #1 through #69 inclusive of this Complaint as though fully set forth herein.

71. In Virginia, the elements of a defamation claim are

- a. publication of
- b. an actionable statement with
- c. the requisite fault on the part of the defendant.

72. To be "actionable," the statement must be a false statement of fact that harms the plaintiff's reputation in the community or deters other persons from associating with him or her.

73. Virginia courts apply a negligence standard to defamation claims brought by private figures seeking compensatory damages when the allegedly defamatory statement makes substantial danger to reputation apparent. In cases brought by private figures where substantial danger to

reputation is not apparent, the actual malice standard applies. *The Gazette, Inc. v. Harris*, 325 S.E.2d 713, 725 (Va. 1985).

**KEVIN LAWLER'S PROVEN MALICE TOWARDS PLAINTIFF**

74. Plaintiff incorporates herein by reference the allegations at paragraphs #1 through #73 inclusive of this Complaint as though fully set forth herein.
75. During the April 7, 2021 deposition of Spotsylvania Sheriff Major Troy Skebo, in which Defendant's current Counsel Jason Collins was present and did not object, Skebo, a friend of Defendant since high school was asked by Plaintiff "Did Kevin Lawler express to you that he hates me?" Major Skebo replied "yes" under oath.
76. The statement is seen here, at Lines 82:19-21 of the deposition:

17	CONTINUATION OF DIRECT EXAMINATION
18	BY MS. LAWLER:
19	Q. Did Kevin Lawler express to you that he
20	hates me?
21	A. Yes.

**KEVIN LAWLER'S FINANCES AS OF THE DATE OF PUBLICATION**

77. Plaintiff incorporates herein by reference the allegations at paragraphs #1 through #76 inclusive of this Complaint as though fully set forth herein.
78. Value of Properties at the time of the publication of the GoFundMe page on September 10, 2020:
- a. Defendant owns a 3,969 sq foot property, with six (6) bedrooms and four and a half bathrooms (4.5), located at 5600 Westbury Court, Fredericksburg, Virginia 22407. By his own admission under oath, the admission of his realtor Amanda Rattarree under oath, and court records, Defendant paid cash for the property in 2014 and does not owe a mortgage.

Moreover, in 2017-2018, he added an addition to the property worth at least \$133,000.00, funded almost entirely by the funds of Plaintiff's father while he suffered from dementia. Since then, at least two bedrooms, a bathroom, a living room, a storage room, a 28' by 8" exterior deck, and a swimming pool have been apparently added to the property, based upon admissions under oath and permitting records. No moneys are owed on the property, as the bills were paid in full from Robert William Lawler's Edward Jones accounts. **BASED UPON A CURRENT ASSESSMENT BY REALTOR.COM, WHICH HAS A PICTURE THAT DOES NOT SHOW THE ADDITION TO THE PROPERTY, MAKING IT UNCLEAR IF IT ACCOUNTED FOR IN THIS ESTIMATE, THE PROPERTY IS HAS AN 'ESTIMATED HOME VALUE OF \$439,300.00.** (See Exhibit #10, a true and accurate copy Plaintiff downloaded from Realtor.com on May 16, 2021, which includes a dated picture of the property that Plaintiff confirms is Defendant's home, but that seems to lack the addition on the right hand side of the house if facing it.). With no mortgage, and all of the upgrades that are no reflected in the Realtor.com listing, one can assume that, on September 10, 2020, Kevin Lawler had equity in his home of over \$430,000.00.

- b. While serving as a dying Linda Lawler's fiduciary, Defendant filed a **general warranty** deed of gift with the Loudoun Circuit Court land records department granting himself ownership of the home Plaintiff lives in at 20611 Morningside Terrace, Sterling, Virginia. That deed is attached as Exhibit #11. While Plaintiff denies that he owns it and asserts instead that the deed is void upon its face, Defendant nonetheless claims to own it.
  - i. As provided under subpoena by Wells Fargo for Mortgage Loan [REDACTED] 01261, with a purchase price of \$169,000.00, the only mortgage ever taken on the property was in

June 1997 for \$118,300.00. With a monthly mortgage of only \$878.37, as of August 21, 2020 (the last statement date before the defamatory posting), only \$55,123.21 was still owed on the property. (See Exhibits #12-13, affidavit of business records from Wells Fargo and mortgage Statement dated August 21, 2020 for the aforementioned mortgage, still in the name of Robert William Lawler and Linda Lawler)

ii. Counsel Jason Collins, on April 28, 2021 printed out the following estimated values for this property and filed them with the Circuit Court on April 29, 2021:

1. Exhibit #14 is a true and accurate copy provided by Counsel Collins to Plaintiff on April 29, 2021 of a Realtor.com estimate of property value of \$484,900.00. Under this estimate, one can assume that if Kevin Lawler is the rightful owner of the Sterling property, on September 10, 2020 he had equity in the property of at least \$420,000.00.

c. Plaintiff has recently been aware that Defendant has/or may have ownership in an apartment in Honolulu;<sup>6</sup> however, it is unclear if Defendant owned it on September 10, 2020. Plaintiff is in the process of ensuring his ownership of that property and when it was purchased.

d. Without adding in the value of any other properties other than the two listed and supported herein, on September 10, 2020, when Defendant falsely claimed “depleted just about everything down to a few dollars” while seeking \$10,000.00 from unsuspecting victims in the middle of a pandemic, Kevin Lawler had equity in properties of at least \$850,000.00.

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<sup>6</sup> Plaintiff has thus far not been in contact with the land records or tax assessment offices in Honolulu to verify this information.

79. *Value Of Bank Accounts On Date Of Publication:* Plaintiff is aware of at least two bank accounts at Wells Fargo alone for Kevin Lawler: one she discovered through the GoFundMe records at Wells Fargo ending in "0281", and another, held in conjunction with his as of then unlicensed and unpermitted contracting company "Legacy Cleaning" with the account number of [REDACTED]4020.

- a. Having only learned of the "0281" account, Plaintiff has no records for how much money Defendant had in that account on September 10, 2020.
- b. On page 182 of the 210 pages of subpoenaed records from Defendant's account ending in "4020," as attached as Exhibit #15, on September 10, 2020 specifically, when he fraudulently claimed to have only pennies left, Kevin actually had \$20,299.93 in that account, with another \$9,240.00 deposited in the next 20 days alone, in Plaintiff's math is correct (while claiming he was not capable of working)
- c. The subpoenaed records from Wells Fargo also reveal a Schwab account that a third party has informed Plaintiff that Kevin Lawler has had since at least 2009, at which point he had "about \$100K in a Charles Schwab account or accounts." Of the only account of which Plaintiff has knowledge, namely Acct # [REDACTED]7054, the subpoenaed Wells Fargo records show the following transfers made into that Schwab account by Kevin Lawler since April 2017:

- i. 6/20/17: \$7,000.00
- ii. 7/20/17: \$8,400.00
- iii. 7/26/17: \$8,000.00
- iv. 7/31/17: \$9,570.00
- v. 10/25/17: \$9,000.00
- vi. 10/26/17: \$9,000.00
- vii. 10/28/17: \$9,000.00
- viii. 10/31/17: \$9,000.00
- ix. 11/7/17: \$8,500.00
- x. 12/5/17: \$7,200.00
- xi. 12/7/17: \$500.00

- xii. 1/11/19: \$8,000.00
- xiii. 1/15/19: \$7,000.00
- xiv. 1/18/19: \$8,000.00
- xv. 1/30/19: \$9,000.00
- xvi. 2/1/19: \$9,220.00 (after a \$35,000 deposit made)
- xvii. 2/4/19: \$9,000.00
- xviii. 2/5/19: \$9,000.00
- xix. 2/11/19: \$2,000.00
- xx. 3/13/19: \$5,000.00
- xxi. 3/19/18: \$200.00
- xxii. 4/16/19: \$7,000.00 (deposit of IRS refund of \$1,996.79 on 4/24/19)
- xxiii. 5/14/19: \$8,000.00
- xxiv. 5/15/19: \$1,000.00
- xxv. 5/15/19: \$2,000.00
- xxvi. 7/18/19: \$5,386.00
- xxvii. 7/31/19: \$5,000.00
- xxviii. 8/8/19: \$3,000.00
- xxix. 8/26/19: \$2,500.00
- xxx. 8/26/19: \$4,000.00
- xxxi. 9/17/19: \$1,000.00
- xxxii. 10/24/19: 4,900.00
- xxxiii. 11/1/19: \$2,200.00
- xxxiv. 11/1/19 \$3,000.00
- xxxv. 11/4/19: \$10,000.00
- xxxvi. 11/5/19: \$3,815.00
- xxxvii. 11/21/19: \$2,000.00
- xxxviii. 11/26/19: \$6,000.00
- xxxix. 11/29/19: \$5,000.00
- xl. 12/10/19: \$1,400.00
- xli. 12/18/19: \$2,000.00
- xlii. 12/31/19: \$100.00
- xliii. 3/19/20: \$5,000.00
- xliv. 4/2/20: \$2,050.00 (deposit of IRS refund of \$1200 on 4/15)
- xlv. 4/17/20: \$3,000.00
- xlvi. 4/28/20: \$1,000.00
- xlvii. 5/1/20: \$1,400.00
- xlviii. 5/6/20: \$1,015.00
- xliv. 5/18/20: \$2,000.00
- l. 6/12/20: \$1,400.00
- li. 6/25/20: \$1,500.00
- lii. 6/26/20: \$1,000.00
- liii. 7/13/20: \$3,000.00
- liv. 8/31/20: \$2,000.00
- lv. 9/2/20: \$1,000.00
- lvi. 9/22/20: \$2,000.00
- lvii. 11/2/20: \$1,000.00
- lviii. 11/18/20: \$1,000.00
- lix. 11/19/20: \$2,000.00



- ix. 12/1/20: \$2,000.00
- lxi. 12/16/20: \$1,546.00
- lxii. 1/11/21: \$2,000.00
- lxiii. 1/13/21: \$1,000.00
- lxiv. 1/13/21: \$1,000.00

d. Given the \$255,256.00 in deposits made just from the one Wells Fargo account into the one Schwab investment account, from April 1, 2017 until September 10, 2020, it is highly unlikely that any of those funds were lost at all, much less all of them, to justify Defendant claiming to have only pennies left. According to [zacks.com](https://www.zacks.com), the Dow Jones Industrial Average closed at 27,940.47 on September 10, 2020, after closing at 20,636.92 on April 17, 2017, the earliest closing number Plaintiff can locate to coincide with the beginning of the Wells Fargo records, starting March 31, 2017. According to <https://www.macrotrends.net/1358/dow-jones-industrial-average-last-10-years>:

**Dow Jones Industrial Average - Historical Annual Data**

Year	Average Closing Price	Year Open	Year High	Year Low	Year Close	Annual % Change
2021	32,361.53	30,223.89	34,777.76	29,982.62	34,382.13	12.34%
2020	26,890.67	28,868.80	30,606.48	18,591.93	30,606.48	7.25%
2019	26,379.55	23,346.24	28,645.26	22,686.22	28,538.44	22.34%
2018	25,046.86	24,824.01	26,828.39	21,792.20	23,327.46	-5.63%
2017	21,750.20	19,881.76	24,837.51	19,732.40	24,719.22	25.08%

e. *Based upon these numbers, it is highly unlikely that Defendant's \$255,256.00 in investments directly from his Wells Fargo account lost any money, just as it is highly unlikely that these were the only funds in that account, Upon information and belief, Kevin Lawler had made similar almost monthly investments in that Schwab account, and possibly others, over the prior 10-15 years.*

**80. Value of Investment Accounts Obtained Via Subpoena From Edward Jones: Exhibits #**

are an affidavit of business records obtained from Edward Jones for Kevin Lawler's portfolio accounts prove that nine months before Kevin Lawler claimed on September 10, 2020 that he was almost penniless while implying it was Plaintiff's fault for filing frivolous lawsuits, he had the following portfolio balance on December 31, 2019 of **\$412,363.07**, which is **Exhibit #16:**

<b>Overview of Accounts</b>				
<b>Accounts</b>	<b>Account Holder</b>	<b>Account Number</b>	<b>Value 1 Year Ago</b>	<b>Current Value</b>
Individual Retirement Account Select	Robert K Lawler	██████ 31-1-2	\$4,213.62	\$13,092.67
Single Account	Robert K Lawler	██████ 42-1-6	\$0.00	\$103,936.86
Single Account Advisory Solutions Fund Model	Robert K Lawler	██████ 13-1-5	\$0.00	\$283,423.21
529 College Savings Plan	Robert K Lawler	██████ 04-1-0	\$0,595.63	\$11,910.33
<b>Total Accounts</b>			<b>\$15,809.25</b>	<b>\$412,363.07</b>

- a. While this does not prove Defendant still had the \$412,363.07 in funds on September 10, 2020 when he made the claim of essential poverty, it is highly unlikely that he lost those funds in the interim
- b. Given the increase in the Dow Jones Industrial Average over the period referenced above, and the fact that the accounts listed above are investment accounts, not only is it unlikely Defendant lost those funds, but it is highly likely that his investments gained a great deal of value between December 31, 2019 (the date of the statement) and September 10, 2020 (the date he claimed to be close to penniless)

81. To summarize, without even listing funds deposited into the now known Schwab account in the years before the Wells Fargo records start on March 31, 2017, or any of the funds in any other bank account owned by Defendant (including, but not limited to, the Wells Fargo account ending in "0281" first discovered by Plaintiff in the GoFundMe affidavit), a low-end estimate of Defendant's net worth on September 10, 2020 was as follows:

<u>ACCOUNT OR PROPERTY</u>	<u>ESTIMATED VALUE ON SEPTEMBER 10, 2020</u>
5600 Westbury Court, Fredericksburg, Virginia 22407	<b>\$439,300.00 AT LEAST</b>
20611 Morningside Terrace, Sterling, Virginia 22407	<b>\$420,000.00 AT LEAST</b>
Charles Schwab Investment Acct # [REDACTED] 7054	<b>\$255,256.00 AT LEAST</b>
Wells Fargo Acct Balance on 9/10/20 # [REDACTED] 4020	<b>\$20,299.93</b>
Edward Jones Investment Portfolio, Consisting of four separate accounts	<b>\$412,363.07 APPROX</b>
<b><u>TOTALS WITHOUT INCLUDING ADDITIONAL PROPERTIES OR ACCOUNTS</u></b>	<b><u>\$1,547,291 AT LEAST</u></b>

**CLAIMS ABOUT LOST COLLEGE FUND OF DEFENDANT'S DAUGHTER, EMILY ASHTON LAWLER DUE TO PLAINTIFF'S ALLEGED ACTIONS**

82. Plaintiff incorporates herein by reference the allegations at paragraphs #1 through #81 inclusive of this Complaint as though fully set forth herein.

83. Defendant published the following: "Unfortunately, it's been raining for almost 4 years now and I'm almost broke. *I just can't keep up and depleted just about everything down to a few dollars. SADLY, EVEN MY DAUGHTERS COLLEGE FUND.*" (emphasis added)

84. Plaintiff is uncertain about Kevin Lawler's claims that he had to use his daughter Emily Ashton Lawler's college funds to pay his bills, but she does assert that, since Emily dropped out of high school, was 21 years old at the time of publication, has claimed to have started a couple unregistered companies that she has claimed on her Facebook profile for photography and interior decorating, Kevin Lawler probably simply either gave her those funds or simply cashed them in, as she did not seem to be in need of them.

85. To Plaintiff's knowledge, Emily Lawler has no intent to go to college whatsoever, and the one school she ever expressed interest in attending, the Savannah College of Art & Design (or "SCAD"), to learn photography. Defendant wholesale refused to allow her to attend (as Plaintiff witnessed herself on thanksgiving 2016), as the already saved "Virginia 529 account funds will not cover out of state tuition," and "I will not pay SCAD's high tuition."

86. To the extent that there is any truth whatsoever that Defendant used his daughter's college fund to fund his own legal fees, Plaintiff demands to see the tax records proving that he cashed out the accounts, one of which was held at Edward Jones, with account number [REDACTED] 94-1-0.<sup>7</sup>

87. Plaintiff maintains that, if there is any truth to the claim that Defendant ever used any of Emily Lawler's long held college fund, to which Plaintiff and many of the other members of her family had contributed since her birth, he did so only out of greed, refusing to use his own substantial funds to pay for his criminal, civil, probate, domestic, etc legal fees.

88. Plaintiff asserts that Kevin Lawler knew the falsity of this comment when he published it.

**LACK OF MITIGATION/REFUSAL TO REMOVE REQUEST TO REMOVE THE PUBLICATION, AND FAILURE TO APOLOGIZE**

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<sup>7</sup> This is the only college fund that Plaintiff is aware of. To the extent that another exists, Plaintiff demands full proof that Defendant cashed out ANY of Emily Lawler's college funds and moreover, that he did so to pay his own legal fees for something that Plaintiff filed against him, and not for any of matter of his own doing, including but not limited to the four counts of fraud he has been charged with since July 2019.

89. Plaintiff incorporates herein by reference the allegations at paragraphs #1 through #88 inclusive of this Complaint as though fully set forth herein.

90. Shortly after Defendant published the GoFundMe page, Plaintiff notified Defendant's counsel that he must immediately cease and desist, and must remove the post. He did not.

91. One month after publication, on **October 14, 2020**, the GoFundMe page was first addressed under oath directly by Defendant after his counsel sought sanctions in a late filed Answer and Grounds of Defense in Loudoun Circuit Court Case CL00115910-00<sup>8</sup> on September 10, 2020 on the very same day Kevin Lawler published the defamatory comments. In that motion, Defendant filed as Exhibits billing records that proved Defendants claims, made the very same day that "I've been forced to pay out to date \$301, 000 while still owing \$67,000," WERE INTENTIONALLY FRAUDULENT.

- a. Defendant affirmed under oath that he had read every pleading before it was filed, which implies that he read his own billing statements at least before they were filed the very same day of the GoFundMe page, and one would assume he read them before he allegedly paid them.
- b. He stated the following as well under oath, a mere 33 days after publishing the GoFundMe page:

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<sup>8</sup> On September 10, 2020, when Defendant's Counsel filed the aforementioned Answer and Grounds of Defense, to which these billing statements were attached as "Exhibit 11" and "Exhibit #12", along with his original of two Motion for Leave to File Late Definsive Pleadings, Defendant had been in default since October of 2019 in CL00115910-00.

14 Q. You don't know? Let me try to refresh  
15 your memory then. Oh, what other, did you put  
16 anything about these cases on social media?

17 A. I believe I mentioned one time I'm  
18 sorry if my sister ever sues you because when I  
19 looked up all your lawsuits I saw ...

20 Q. Oh, one time? Just one time?

21 A. I don't remember.

Deposition of Robert K. Lawler October 14, 2020 VR # 9070-35

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2 A. Oh, yeah.

3 Q. And you haven't posted anything else  
4 about me?

5 A. I don't know. I don't pay attention to  
6 all my social media stuff. I just answered your  
7 question.

8 Q. Okay. What are your email addresses,  
9 all of your active email addresses?

10 A. One, I have one, kevlawler@aol.com.  
Verizon.net does no longer exist.

1 account?

2 A. No.

3 Q. Instagram?

4 A. No.

5 Q. Any other social media account? You  
6 just use Facebook? Okay. So \$301,000 you say  
7 are still owing in your legal fees.

8 A. Say it again?

9 Q. Three hundred and one thousand dollars  
10 still owed in legal fees.

11 A. Is that a question?

12 Q. Mm-hmm (Indicating affirmatively).

13 A. How is that a question?

14 MR. GREGG: What's the question?

15 Q. You claim that you owe \$301,000 in  
16 legal fees.

17 A. I never said I currently owe 301,000 in  
18 legal fees.

19 Q. Have you been forced to pay \$301,000 in  
20 legal fees?

21 A. In total with paying the mortgage,  
22 property taxes, back property taxes ...

23 Q. Legal fees. What is your cost in legal  
24 fees?

25 A. I don't know exactly, but it's a lot.

8 CONTINUATION OF DIRECT EXAMINATION

9 BY MS. LAWLER:

10 Q. So you still owe \$67,000 in court  
11 proceedings.

12 A. I have no idea what it is now.

13 Q. What was it on September 10th?

14 A. I don't know, Robin. I'm doing my best  
15 to pay it.

16 Q. Well, Kevin, on that day ...

17 A. I try not to be buried by it.

18 Q. On that day ...

19 MR. GREGG: Let's take a break.

20 DEPONENT: I need a break, ma'am.

21 MS. LAWLER: On the ...

22 MR. GREGG: We're taking a break.

23 MS. LAWLER: On that day ...

24 MR. GREGG: We're taking a break.

25 DEPONENT: Ma'am, Court Reporter,

VETERAN



855.667.0077



92. On February 17, 2021, after finding that the site was still open to be read by those who had contributed to it. Plaintiff sent the following to Defendant's Counsel Jason Collins, the entire thread of which is attached as Exhibit #17:

February 17, 2021

Mr Collins:

Attached is a link to a defamatory and fraudulent GoFundMe page Kevin Lawler started on September 10, 2020.

His own sworn testimony of October 14 2020 proves that the claims he made about me, about his health, and about his finances were false and fraudulent.

This site is still online, both on GoFundMe and, upon information and belief, Facebook. People I have known for 43 years donated to this and can still read it.

His prior counsel was warned about it, yet it still exists. It appears that the only change to it is that it cannot be viewed openly by all of the public (me, the State Police, etc). but can by the people who donated to it.

While the live link is attached below, so is a screenshot, taken moments ago, showing that "donors" can still actively sign in to read the false information.

<image002.png>

<https://www.gofundme.com/f/legal-amp-medical-aid?qid=c324c6dff5134cba2ee9397f2202aeb8>

The pdf is also attached. The VSP are in possession of this:

The Virginia State Police assured me that this is a computer crime, as well as obtaining funds by false pretenses, in violation on Va Code 18.2-178. It stayed below the felony threshold for sometime after I warned Johnston and Gregg of the posting.

Then, after they were notified and did nothing to take the site down, it appears that one of my oldest friends put the donations over \$1,000. Which put the fraud over the felony threshold.

As you can see by the screenshot, \$1,145 was donated.

§ 18.2-152.3. Computer fraud: penalty.

Any person who uses a computer or computer network, without authority and:

1. Obtains property or services by false pretenses;
  2. Embezzles or commits larceny; or
  3. Converts the property of another;
- is guilty of the crime of computer fraud.

If the value of the property or services obtained is \$1,000 or more, the crime of computer fraud shall be punishable as a Class 5 felony. Where the value of the property or services obtained is less than \$1,000, the crime of computer fraud shall be punishable as a Class 1 misdemeanor.

That's two felonies.

He is currently on a plea deal for his October 2020 conviction. He faces a mandatory 30 days in jail. Here is the decision:

<image003.png>

If that site is not removed from GoFundMe, Facebook, and all social media **BY CLOSE OF BUSINESS TODAY**, I will be pressing charges.

I have a telephone conference scheduled for tomorrow morning at 9:00am with the Special Agent.

<image004.png>

For reference, here are just a couple screenshots from Facebook provided to me on September 10, 2020 when he posted it. Your client is a pathological liar, and many openly called him such on Facebook...after all, he was capable of faking pancreatic cancer for many years.

<image005.jpg>

<image006.jpg>

**YOUR CLIENT MUST IMMEDIATELY CEASE AND DESIST, REMOVING THAT PAGE FROM ALL SOCIAL MEDIA BY THE END OF TODAY.**

If I do not receive an affidavit that it has been fully removed, I will press charges tomorrow.

93. The publication was not removed from the GoFundMe site after that warning, leading to the filing of this instant lawsuit.
94. In serving the required paperwork to Defendant and his counsel on April 17, 2021 (in addition to placing the required copy in the mail and having it served by the sheriff), Plaintiff sent attached **Exhibit #18** to Defendant (since he had no representation in this instant case) and to Sean Gregg and Jason Collins at 11:35pm on April 17, 2021, stating "I warned you repeatedly to take down that fraud." Plaintiff hoped that by filing the Warrant in Debt, Defendant would demand that GoFundMe remove the site, preventing anyone from seeing it, as the donors who can see it are primarily people Plaintiff has known most of her life.
95. As of the drafting of this Complaint, on May 16, 2021, the site still exists and states: This fundraiser is no longer accepting donations. If you are the organizer, beneficiary, team member, or donor, sign in to see additional information." See **attached Exhibit #19**.
96. In May 2017, Plaintiff quit actively using Facebook for any purpose other than the separate Messenger application on her phone, if needed, to communicate with people for whom she otherwise had no contact information. Any knowledge by third parties who may have read of any of the topics discussed by Defendant in his GoFundMe page and republishing to Facebook came directly from Defendant Kevin Lawler.

**COUNT #1: DEFAMATION**

97. Plaintiff incorporates herein by reference the allegations at paragraphs #1 through #96 inclusive of this Complaint as though fully set forth herein.
98. As outlined herein, Plaintiff is a private individual.
99. As outlined herein, during the morning of September 10, 2020, Defendant Robert Kevin Lawler republished the aforementioned defamatory GoFundMe donation page DIRECTLY TO A NEW AUDIENCE ON FACEBOOK, in an effort by a practiced criminal to obtain \$10,000.00 under false pretenses, in violation of at least one Virginia criminal code, namely Va. Code §18.2-178.
100. The aforementioned GoFundMe publication referred to Plaintiff by reference throughout, was made of and concerning Plaintiff, and was so understood by those who read both the GoFundMe page and its subsequent posting to Facebook to be about Plaintiff. Specifically, many of the people who donated to the site knew Plaintiff and her family for decades, going back to 1978. Of just a sampling of the people who donated, Plaintiff and Defendant personally knew Jason Caroon since September of 1978, Barbara Hopkins and Jeff Hopkins since approximately September 1979, and many others since grade school in the 1970-1980's.
101. In addition to the fact that almost none of the general statements (not pertaining directly to Plaintiff) are even partially true, as outlined herein, every and all of the published statements about Plaintiff are false.
102. All of the published comments by Defendant are intentionally worded in manner to be perceived by the reader as fact, and not as the opinion of an upset brother.
103. The entire September 10, 2020 GoFundMe publication is defamatory on its face. It clearly exposes plaintiff to hatred, contempt, ridicule and obloquy.

104. There is actually no indication whatsoever, obtained through extensive discovery in prior court cases, that during any of prior "four years"<sup>9</sup> that Defendant Kevin Lawler cites in his publication, that he paid for any of his own **multiple** criminal, civil, domestic relations, bankruptcy, or probate legal fees (most of which have nothing to do with Plaintiff<sup>10</sup>) **AT ALL** from his own funds, **much less the \$301,000.00 that he claimed to have paid**. In fact, certified records from multiple banks, including but not limited to Edward Jones Financials and Wells Fargo Bank, prove that Defendant instead abused his fiduciary role as alleged attorney-in-fact for Robert William Lawler.

105. Both the GoFundMe and the Facebook publications, each starting on September 10, 2020, were seen and read by thousands of people on those sites while it was still fully active.

106. The publications were made specifically out of hatred and malice, with the absolute intent to have anyone reading them believe Defendant over Plaintiff, lest he need them as witnesses. Spotsylvania County Sheriff Department Major Troy Skebo, an admitted high school friend of Defendant's who spoke to him over 300 times since the cases were filed, according to his own sworn testimony on April 7, 2021 and certified phone records supplied by Defendant himself, emphatically stated under oath that Kevin Lawler hates Plaintiff.

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<sup>9</sup> Of note, even the "four years" Defendant cites is incorrect: The first case that was filed amongst any Lawler relation was when Plaintiff filed a premises liability suit in November 2017 that settled in her favor against her parents in Spotsylvania. Therefore, litigation had only been active for three years.

<sup>10</sup> In fact, while acting as a fiduciary for Robert William Lawler, criminal Kevin Lawler had disgraced attorney Laura Johnston file a multimillion dollar medical malpractice claim **on his own behalf** in Fredericksburg Circuit Court on July 23, 2018, and he reimbursed her for the cash payment she made for the filing fees with a \$350.00 check drawn of Robert William Lawler's Edward Jones account. That check, attached as **Exhibit #20**, is represented in discovery provided by Defendant in Loudoun Circuit Court Case NO CL00115910-00, a case in which he is default since October 2019, and that he was ruled to be in default for on August 21, 2020, approximately three weeks before he published the defamatory comments.

107. Further, the defamatory comments were made fraudulently, with the malicious intent to defraud others out of money, as yet another of Defendant's endless illegal scams to obtain money and avoid the consequences of his own actions. For instance, in August 2020, Plaintiff filed a Motion for Contempt in the Bankruptcy Court in Alexandria, Virginia, against Defendant, and his counsel, Sean Gregg, Laura Johnston, and Johnston & Gregg (a now defunct law firm started while the named partner, Laura Johnston, was suspended from practicing law)

108. These statements are defamatory because they harmed Plaintiff's reputation, caused her to be held up to public ridicule and contempt to people she had cared about and had close relationships with for decades, and deterred others from associating with her.

109. The deliberately false statements injured Plaintiff in her community standing and lowered her in the estimation of the community, which, given that they were published to an international online forum, constitutes the whole world.

110. At the time Defendant published these statements to third parties, as he himself has already admitted under oath, he knew the statements were false when he published them.

111. Defendant's unlawful action against Plaintiff was taken in malicious, willful, wanton, reckless indifference to, deliberate indifference to, and/or reckless disregard of Plaintiff's rights as guaranteed by laws prohibiting defamation. The evidence already presented and that will be presented prove that Defendant's acts were a deliberate effort to expressly harm Plaintiff immensely, while simultaneously serving as a medium for which Defendant could also:

a. Narcissistically make himself to falsely appear as a martyr while "gaslighting;" and

b. Illegally obtain \$10,000.00 at Plaintiff's expense for funds he clearly and absolutely did not need

112. Since their posting, the false and defamatory statements published by Defendant regarding Plaintiffs have remained available to millions of Internet users, many of whom may have made copies of the false and defamatory statements and/or distributed them by electronic mail or other means and/or re-posted them to other blogs, Internet forums, and message boards, and Plaintiff has no means of removing these false and defamatory statements from the Internet.

113. As a direct, foreseeable, and proximate result of Defendant "Kevin" Lawler's intentional illegal conduct complained of herein, Plaintiff suffered injuries and damages, including but not limited to mortification, shame, anger, nightmares, damage to her reputation, extreme embarrassment, and extreme emotional distress. These injuries and damages continue into the present and will continue into the foreseeable future.

114. Many of the relationships Plaintiff had had, at the very least, with those who donated to Defendant's GoFundMe, are probably now irretrievably broken.

115. The above-described publication was not privileged because it was published by Defendant with actual malice, hatred and ill will toward Plaintiff and the desire to injure her.

116. Because of Defendant's malice in publishing, plaintiff seeks punitive damages for this Count.

117. Plaintiff's further request relief is hereinafter provided.

**COUNT #2: FORESEEABLE REPUBLICATION BY APPROXIMATELY DOZENS OF PEOPLE OF DEFAMATORY GOFUNDME PAGE**

118. Plaintiff incorporates herein by reference the allegations at paragraphs #1 through #117 inclusive of this Complaint as though fully set forth herein.

119. Plaintiff is not “friends” with Defendant on Facebook or any other social media, nor are the people who notified Plaintiff of the defamatory posting on the evening of September 10, 2020. In fact, Plaintiff has not been active on Facebook, other than to use the separate Facebook Messenger app on her iPhone, since May 2017. As such, even if she were active on Facebook, the only way the publication could have been brought to Plaintiff’s attention was due to foreseeable republication.

a. Upon information and belief, parties who either notified Plaintiff of the publication or parties who Plaintiff knows saw the publication saw it both from Defendant’s Facebook page as well as/or only via the link to the direct GoFundMe page.

120. The parties who notified Plaintiff had been sent screenshots and links from the GoFundMe page from other parties, some of whom are friends with Defendant on social media and others who are not.

121. As one example of a republication, Karen Parr Bates,<sup>11</sup> whom Plaintiff has had no contact with in approximately 10 years, and certainly since Plaintiff left Facebook in 2017, republished to at least one other person, Sherri Schwalm Goldsmith (whom Plaintiff also had not had contact since Defendant published similar defamatory comments about her to Facebook in 2009-2010.

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<sup>11</sup> Subpoenaed GoFundMe records also prove that a person that Plaintiff believes to be Karen Parr Bates confidentially reported the publication as fraud directly to GoFundMe on September 10, 2020, hours before Plaintiff even knew of its existence.

122. As another example of republication, upon information and belief, another unknown third party republished Defendant's defamatory GoFundMe publication to a person by the name of Michael Brancolini. It is Plaintiff's understanding that Defendant and Mr Brancolini are also not "friends" on any social media that would have allowed Brancolini to see the publication without third party republication.<sup>12</sup>

123. As another example of republication, yet another third party, whose name is still unknown to Plaintiff,<sup>13</sup> republished the GoFundMe publication to Catherine Elizabeth Kourouklis and her partner in the late afternoon of September 10, 2020, who then sent it to Plaintiff between 5pm and 6pm on September 10, 2020. Neither of those ladies are a "friend" with Defendant on any social media, and could not have seen it independently, but for third party republication.

124. Upon information and belief, in addition to those republications already listed, the GoFundMe page was republished by dozens, if not hundreds, of third parties.

125. The very nature of GoFundMe, which has been a prevalent way for people in actual need to raise necessary funds from sources worldwide, is that the information is shared on all forms of media by friends and strangers, in order to maximize

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<sup>12</sup> Plaintiff has no independent knowledge that Mr Brancolini saw the GoFundMe publication, but Plaintiff was informed by third parties that Mr. Brancolini had published comments about it on Facebook.

<sup>13</sup> As explained to Plaintiff by Ms. Kourouklis, the person who republished the GoFundMe defamation to her wanted to remain anonymous, given Defendant's proclivity for nonstop public retribution campaigns. By process of elimination and context clues, however, Plaintiff believes, and therefore alleges, that the person who both read and republished the defamatory GoFundMe publication to Ms. Kourouklis and her partner was Melissa Diamond Kozloff, the sister of Tammy Diamond, who donated to Defendant TWICE.



the chance that the stated monetary goal of charity organizer, in this case \$10,000.00 for Kevin Lawler for medical and legal aid, is reached.

126. Therefore, it was completely and utterly foreseeable by Defendant that third parties would republish the content of the GoFundMe page. In fact, arguably, that was precisely Defendant's intent.

127. Under a longstanding decision, Defendant is liable for each republication. Weaver v. Beneficial Fin. Co., 199 Va. 196, 98 S.E.2d 687 (1957) (Author of defamation is liable for republication by third persons if it is natural and probable consequence of his act; or, he has presumptively or actually authorized its republication. This republication constitutes new cause of action against original publisher).

128. As a direct, foreseeable, and proximate result for the foreseeable **republication by third parties** of Defendant "Kevin" Lawler's defamatory statements complained of herein, Plaintiff suffered injuries and damages, including but not limited to mortification, shame, anger, nightmares, damage to her reputation, extreme embarrassment, and extreme emotional distress. These injuries and damages continue into the present and will continue into the foreseeable future.

129. Because of Defendant's malice GIVEN HIS SPECIFIC INTENT THAT HIS GOFUNDME DEFAMATORY STATEMENTS BE REPUBLISHED BY THIRD PARTIES IN ORDER TO MAXIMIZE HIS CHANCES OF REACHING HIS STATED GOAL OF \$10,000,000 IN CHARITABLE PROCEEDS, plaintiff seeks punitive damages for this Count.

130. Plaintiff's further request relief is hereinafter provided.

**WHEREFORE**, Plaintiff Peyton Ashleigh, *pro se*, demands judgment against Defendant Robert “Kevin” Lawler for \$25,000.00 for the following:

1. Actual damages according to proof:
2. Presumed damages:
3. Nominal damages:
4. Punitive damages:
5. Interest as allowed by law:
6. All applicable attorneys’ fees allowed by law
7. Costs of suit, including but not limited to filing fees and all service fees; and
8. Such other and further relief as this court may deem just and proper.

**CERTIFICATION/VERIFICATION PURSUANT TO VIRGINIA CODE § 8.01-4.3**

On July 6, 2021, under penalty of perjury pursuant to Virginia Code § 8.01-4.3, I, Peyton Ashleigh (also known as Robin Lawler), certify that I am of sound mind and body, am not currently on any drug that would alter my ability to think or sign this statement, and am the Plaintiff in the above entitled action. I have read the foregoing and know the contents thereof. The same is true of my own knowledge, except as to those matters which are therein alleged on information and belief, and as to those matters, I believe it to be true. I declare under penalty of perjury that, to the best of my current knowledge, understanding, and belief, the foregoing is true and correct and that this declaration was executed in

Sterling, Virginia

  
Peyton Ashleigh (F/K/A Robin Lawler)

Respectfully submitted this 6<sup>th</sup> day of July, 2021



Peyton Ashleigh

20611 Morningside Terrace

Sterling, Virginia 20165

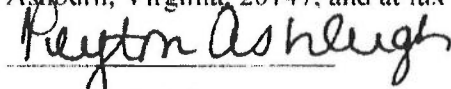
Tel: (571) 762-9602

Email: [hubba1bubba2@icloud.com](mailto:hubba1bubba2@icloud.com)

Plaintiff *pro se*

**CERTIFICATE OF SERVICE**

I certify that on or before July 6, 2021, I forwarded a true copy of the foregoing to Kevin Lawler's counsel Jason Collins, of Daisy & Collins, LLP, 19775 Belmont Executive Plaza, Suite 500, Ashburn, Virginia, 20147, and at fax 703-584-7354 and [Jason.collins@daisylaw.com](mailto:Jason.collins@daisylaw.com).



Peyton Ashleigh



HP Color LaserJet MFP M281fdw

# Fax Confirmation

Jul 6 2021 5:29PM

Job	Date	Time	Type	Identification	Duration	Pages	Result
1213	7/ 6/2021	5:09:56PM	Send	7035847354	19:15	53	OK

Copy

VIRGINIA:  
 IN THE GENERAL DISTRICT COURT FOR THE COUNTY OF LOUDOUN

PEYTON ASHLEIGH  
 20614 Morningside Terrace  
 Sterling, Virginia 20165

Plaintiff,

v.

ROBERT KEVIN LAWLER  
 5600 Westbury Court  
 Fredericksburg, Virginia 22407

Defendant.

Case No. #GV21008066

LOUDOUN COUNTY  
 CLERK OF COURT  
 JUL 9 9 30 AM '21

**VERIFIED BILL OF PARTICULARS COMPLAINT FOR DEFAMATION**  
 for  
**AN INTENTIONAL FACEBOOK REPLICATION OF A "GOFUNDME" CHARITY**  
**REQUEST PUBLISHED ON SEPTEMBER 10, 2020**

COMES NOW the Plaintiff, Peyton Ashleigh, pro se, complains, and for causes of action, alleges/certifies under penalty of perjury pursuant to Virginia Code § 8.01-4.1 the following:

1. A separate lawsuit, GV21008063, was filed simultaneously against Defendant. The defamatory allegations that are the subject of that lawsuit, namely a fraudulently GofundMe charity created and published by Defendant on September 10, 2020, are the same in this instant lawsuit. HOWEVER, THIS LAWSUIT IS CENTERED ON THE FACT THAT, AFTER DEFENDANT FIRST INTENTIONALLY PUBLISHED SAID ALLEGATIONS DIRECTLY UPON GOFUNDME'S PLATFORM, DEFENDANT IMMEDIATELY THEREAFTER INTENTIONALLY REPUBLISHED THE SAME CONTENT DIRECTLY TO FACEBOOK.

# **EXHIBIT # 1**



COMMONWEALTH of VIRGINIA

DEPARTMENT OF STATE POLICE

Colonel Gary T. Settle  
Superintendent  
(804) 674-2000

Lt. Col. Tracy S. Russillo  
Deputy Superintendent

P. O. BOX 27472, RICHMOND, VA 23261-7472

August 23, 2019

Hon. Gary M. Clemons, Clerk  
Loudon County Circuit Court  
Post Office Box 550  
Leesburg, Virginia 20178

FILED  
2019 AUG 26 AM 11:38  
CIRCUIT COURT  
CLERK'S OFFICE  
LOUDON COUNTY, VA  
D.C.

Re: Criminal Record Search  
Case No: CL115910-00

Dear Mr. Clemons:

The above-captioned Subpoena Duces Tecum was received in this office on August 15, 2019.

A search was conducted and produced the enclosed certified record.

Robert Kevin Lawler                      DOB: [REDACTED] /72

This response is based on a name search only and has not been substantiated by fingerprint comparison. Criminal history record information may exist in repositories maintained by other local, state or federal criminal justice agencies. Criminal history record information provided shall not be further disseminated and shall be destroyed after it has served the purpose for which it was requested.

For further assistance, please contact Brian Lacks, Criminal Records Manager, at (804) 674-6724.

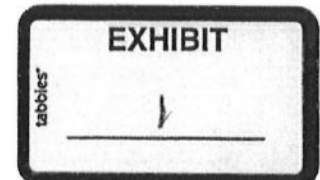
Sincerely,

*Chadwick D. Rogers*

Chadwick D. Rogers, Lieutenant  
Criminal Justice Information Services Division

CDR/lf  
Enclosure(s)

Date	10/14/20	Exhibit #	36
No. of Pgs	2	Case Ref #	9070-35
Case	Lawler		
Deponent	Kevin Lawler		
Reporter	Tammy Kockler		



Aug 15, 2019 3:42:01 PM

VCIN REPLY

VAVSP00V2

THE FOLLOWING RECORD PERTAINS TO SID/VA822011

VIRGINIA CRIMINAL RECORD

08/15/2019 PART 1

SID: VAB22011 FBI: 206486NA1

NAMES RECORDED IN VIRGINIA FILES:

NAMES RECORDED IN VIRGINIA FILES:				SEX	RACE	DATE OF BIRTH
LAWLER	ROBERT	KEVIN		M	W	█/1973
LAWLER	ROBERT	K		M	W	█/1972
LAWLER	ROBERT	KEVIN		M	W	█/1972
LAWLER	ROBERT	K		M	W	█/1972

HEIGHT	WEIGHT	EYES	HAIR	SCARS/MARKS/TATTOOS
5'11"	200	BRO	BRO	TAT R SHLD

LAST REPORTED ADDRESS: 5600 WESTBURY CT  
FREDERICKSBURG, VA 22407

PLACE OF BIRTH: FAIRFAX CO

SOCIAL SECURITY NO(S): █-8803  
█-8883

CONTRIBUTOR/CASE	DATE	CHARGE/DISPOSITION
SO SPOTSYLVANIA CO ORI:VA0880000	06/07/1991	FINGERPRINTED OCA:91396 CHARGED WITH #001 FELONY CREDIT CARD FRAUD
SPOTSYLVANIA GENDIS ORI:VA088013J CCN:NOT RECORDED DCN:E298605	08/06/1991	GUILTY MSDMNR LARCENY 0584/2465 0670/1207
SO SPOTSYLVANIA CO ORI:VA0880000	06/24/1992	FINGERPRINTED OCA:92462 CHARGED WITH #001 FELONY BREAK AND ENTER
SPOTSYLVANIA GENDIS ORI:VA088013J CCN:NOT RECORDED DCN:E633896	07/21/1992	GUILTY MSDMNR TRESPASSING 0806/1944 0829/1893
SO SPOTSYLVANIA CO ORI:VA0880000	06/24/1992	FINGERPRINTED OCA:92462 CHARGED WITH #002 FELONY LARCENY
SPOTSYLVANIA GENDIS ORI:VA088013J	07/21/1992	GUILTY MSDMNR



Aug 15, 2019 3:42:01 PM  
CCN:NOT RECORDED  
DCN:E633897

LARCENY  
0806/1943 0829/1892

SO SPOTSYLVANIA CO 08/21/1992 FINGERPRINTED  
ORI:VA0880000 OCA:92707

CHARGED WITH  
#001 FELONY  
LARCENY  
SPOTSYLVANIA CO 08/16/1992

SPOTSYLVANIA GENDIS 10/26/1992 GUILTY  
ORI:VA088013J MSDMNR  
CCN:NOT RECORDED LARCENY  
DCN:E464422 0831/0623 0871/2839

PD FREDERICKSBURG 08/10/2003 FINGERPRINTED PHOTO:Y  
ORI:VA1090000 OCA:9951

CHARGED WITH  
#001 MSDMNR 18.2-57 (A)  
ASSAULT & BATTERY  
FREDERICKSBURG 08/10/2003

FRDRICKSBRG CIRCUIT 01/05/2004 GUILTY  
ORI:VA109025J MSDMNR 18.2-57  
CCN:630CR0300091400\* ASSAULT & BATTERY  
90 DAYS IMPOSED  
90 DAYS SUSPENDED JAIL  
NOT IMPNLD RETAINED ATTY  
DCN:J485740 322B/1344

PD FREDERICKSBURG 08/10/2003 FINGERPRINTED PHOTO:Y  
ORI:VA1090000 OCA:9951

CHARGED WITH  
#002 MSDMNR 18.2-57 (A)  
ASSAULT & BATTERY  
FREDERICKSBURG 08/10/2003

FRDRICKSBRG CIRCUIT 01/05/2004 NOLLE PROSSED  
ORI:VA109025J  
CCN:630CR0300091500  
DCN:J485741 322B/1344

SO SPOTSYLVANIA CO 03/27/2004 FINGERPRINTED  
ORI:VA0880000

CHARGED WITH  
#001 MSDMNR 18.2-57  
ASSAULT & BATTERY  
SPOTSYLVANIA CO 03/26/2004

SPOTSYLVANIA CO JDR 03/07/2007 DISMISSED  
ORI:VA088023J  
CCN:177JA0091530011  
DCN:823848A

SO SPOTSYLVANIA CO 11/17/2004 FINGERPRINTED  
ORI:VA0880000

CHARGED WITH  
#001 MSDMNR 18.2-456  
CONTEMPT OF COURT  
SPOTSYLVANIA CO 11/09/2004

SPOTSYLVANIA CO JDR 02/02/2005 NOLLE PROSSED  
ORI:VA088023J  
CCN:177JA0091530602\*

RETAINED ATTY

Aug 15, 2019 3:42:01 PM  
DCN: 874681A

-----  
SO SPOTSYLVANIA CO 08/03/2005 FINGERPRINTED  
ORI:VA0880000

CHARGED WITH  
#001 FELONY 18.2-108  
RECEIVING STOLEN GOODS  
SPOTSYLVANIA CO 06/04/2005

SPOTSYLVANIA GENDIS 10/24/2005 NOLLE PROSSED  
ORI:VA088013J  
CCN:177GC0501470600\*

RETAINED ATTY

DCN: 838229A  
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SO SPOTSYLVANIA CO 10/17/2005 FINGERPRINTED  
ORI:VA0880000

CHARGED WITH  
#001 MSDMNR 18.2-119 TRS-5709-M1  
TRESPASSING  
SPOTSYLVANIA CO 10/11/2005

SPOTSYLVANIA CO JDR 03/01/2006 DISMISSED  
ORI:VA088023J  
CCN:177JA0091531600\*

TRS-5709-M1

RETAINED ATTY

DCN: 883177A  
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SO SPOTSYLVANIA CO 10/17/2005 FINGERPRINTED  
ORI:VA0880000

CHARGED WITH  
#002 MSDMNR 18.2-137 VAN-2922-M1  
DESTRUCTION OF PROPERTY, MONUMENT  
SPOTSYLVANIA CO 10/15/2005

SPOTSYLVANIA CO JDR 03/01/2006 DISMISSED  
ORI:VA088023J  
CCN:177JA0091531700\*

VAN-2922-M1

RETAINED ATTY

DCN: 883178A  
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SO SPOTSYLVANIA CO 10/17/2005 FINGERPRINTED  
ORI:VA0880000

CHARGED WITH  
#003 MSDMNR 18.2-60.3 STK-2109-M1  
STALKING  
SPOTSYLVANIA CO 08/14/2005

SPOTSYLVANIA CO JDR 03/01/2006 DISMISSED  
ORI:VA088023J  
CCN:177JA0091531500\*

STK-2109-M1

RETAINED ATTY

DCN: 883179A  
-----

SO SPOTSYLVANIA CO 12/19/2005 FINGERPRINTED  
ORI:VA0880000

CHARGED WITH  
#001 FELONY 18.2-137 VAN-2956-F6  
DESTRUCTION OF PROPERTY, MONUMENT -VALUE >=\$1000  
SPOTSYLVANIA CO 12/13/2005

SPOTSYLVANIA GENDIS 02/02/2006 NOT GUILTY  
ORI:VA088013J  
CCN:177GC0502427400\*

VAN-2956-F6

RETAINED ATTY

DCN: 870438A

Aug 15, 2019 3:42:01 PM

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SO SPOTSYLVANIA CO 12/19/2005 FINGERPRINTED  
ORI:VA0880000

CHARGED WITH  
#002 MSDMNR 18.2-60.4 STK-2114-M1  
OTN:177JM3300502532 VIOLATION OF STALKING PROTECTIVE ORDER  
SPOTSYLVANIA CO 12/18/2005

SPOTSYLVANIA CO JDR 03/01/2006 DISMISSED  
ORI:VA088023J STK-2114-M1  
CCN:177JA0091531800\*

RETAINED ATTY

DCN:870439A  
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SO SPOTSYLVANIA CO 04/10/2006 FINGERPRINTED PHOTO:Y  
ORI:VA0880000 OCA:06-47038

CHARGED WITH  
#001 FELONY 18.2-95 LAR-2359-F9  
OTN:177GM0850601015 GRAND LARCENY  
SPOTSYLVANIA CO 04/10/2006

SPOTSYLVANIA CIR CT 02/26/2007 GUILTY  
ORI:VA088015J MSDMNR 18.2-96  
CCN:177CR0600116100\* PETIT LARCENY  
6 MOS IMPOSED  
6 MOS SUSPENDED JAIL  
NOT IMPNLD RETAINED ATTY

DCN:K030114  
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SO SPOTSYLVANIA CO 04/10/2006 FINGERPRINTED PHOTO:Y  
ORI:VA0880000 OCA:06-47038

CHARGED WITH  
#002 MSDMNR 18.2-119  
TRESPASSING  
SPOTSYLVANIA CO 04/10/2006  
\*\*\*\*\* DISPOSITION NOT RECEIVED

DCN:K030115  
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PD FREDERICKSBURG 08/01/2006 FINGERPRINTED PHOTO:Y  
ORI:VA1090000 OCA:20041103

CHARGED WITH  
#001 MSDMNR 18.2-60.3 STK-2109-M1  
OTN:630GM0850602184 STALKING: REASONABLE FEAR OF DEATH/ASSAULT/ETC  
FREDERICKSBURG 07/22/2006

FREDRICKSBURG GENDIST 11/16/2006 GUILTY  
ORI:VA109011J MSDMNR 18.2-60.3 STK-2109-M1  
CCN:630GC0600625500\* STALKING: REASONABLE FEAR OF DEATH/ASSAULT/ETC  
12 MOS IMPOSED  
12 MOS SUSPENDED

RETAINED ATTY

DCN:K067036  
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PD FREDERICKSBURG 08/22/2006 FINGERPRINTED PHOTO:Y  
ORI:VA1090000 OCA:20041103

CHARGED WITH  
#001 MSDMNR 19.2-306  
OTN:177JA0091531101 PROBATION: VIOLATION ON MISDEMEANOR OFFENSE  
SPOTSYLVANIA CO 07/28/2006  
\*\*\*\*\* DISPOSITION NOT RECEIVED

DCN:K067713  
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PD FREDERICKSBURG 08/22/2006 FINGERPRINTED PHOTO:Y  
ORI:VA1090000 OCA:20041103

Aug 15, 2019 3:42:01 PM

CHARGED WITH  
#002 MSDMNR 16.1-253.2 PRT-5007-M1  
OTN:630GM5020601446 PROTECTIVE ORDER: VIOLATION  
FREDERICKSBURG 08/11/2006  
FREDRICKSBERG GENDIST 11/16/2006 NOLLE PROSSED  
ORI:VA109011J PRT-5007-M1  
CCN:630GC0600693100\*  
RETAINED ATTY  
DCN:K067714

SO SPOTSYLVANIA CO 09/27/2006 FINGERPRINTED PHOTO:Y  
ORI:VA0880000 OCA:20041103  
09/24/2006 CHARGED WITH  
#001 MSDMNR 16.1-253.2 PRT-5007-M1  
OTN:177GM4680603066 PROTECTIVE ORDER: VIOLATION  
SPOTSYLVANIA CO 09/27/2006  
SPOTSYLVANIA GENDIS 10/19/2006 DISMISSED  
ORI:VA088013J PRT-5007-M1  
CCN:177GC0602026400\*  
RETAINED ATTY  
DCN:K068869

SO SPOTSYLVANIA CO 11/27/2006 FINGERPRINTED PHOTO:Y  
ORI:VA0880000  
CHARGED WITH  
#001 FELONY 18.2-106 LAR-2817-F6  
OTN:177CR0600127800 RECEIVING STOLEN GOODS  
SPOTSYLVANIA CO 04/10/2006  
SPOTSYLVANIA CIR CT 02/26/2007 NOLLE PROSSED  
ORI:VA088015J LAR-2817-F6  
CCN:177CR0600127800\*  
NOT IMPNLD RETAINED ATTY  
DCN:K040524

SO STAFFORD CO VA 05/27/2009 FINGERPRINTED PHOTO:Y  
ORI:VA0890000 OCA:20041103  
05/26/2009 CHARGED WITH  
#001 MSDMNR 18.2-60.3  
OTN:179GM0830901863 STALKING: REASONABLE FEAR OF DEATH/ASSAULT/ETC  
SPOTSYLVANIA CO 05/15/2009  
STAFFORD CO GENDIST 10/21/2009 NOLLE PROSSED  
ORI:VA089013J  
CCN:179GC0901177800\*  
RETAINED ATTY  
DCN:M606967

SO SPOTSYLVANIA CO 05/05/2010 FINGERPRINTED PHOTO:Y  
ORI:VA0880000 OCA:20041103  
05/05/2010 CHARGED WITH  
#001 MSDMNR 18.2-60.3 STK-2109-M1  
OTN:177GM0711001046 STALKING: REASONABLE FEAR OF DEATH/ASSAULT/ETC  
SPOTSYLVANIA CO 04/19/2010  
SPOTSYLVANIA GENDIS 06/18/2010 NOLLE PROSSED  
ORI:VA088013J STK-2109-M1  
CCN:177GC1001063800\*  
RETAINED ATTY  
DCN:M619437

SO SPOTSYLVANIA CO 01/18/2012 FINGERPRINTED PHOTO:Y

Aug 15, 2019 3:42:01 PM  
ORI:VA0880000

OCA:20041103  
01/18/2012 CHARGED WITH  
#001 MSDMNR 18.2-57.2 ASL-1315-M1

OTN:177JM1200000639

ASSAULT: ON FAMILY MEMBER  
SPOTSYLVANIA CO 01/18/2012

SPOTSYLVANIA CO JDR 02/22/2012

GUILTY  
MSDMNR 18.2-57.2 ASL-1315-M1

ORI:VA088023J

CCN:177JA0091532000\*

ASSAULT & BATTERY - FAMILY MEMBER  
6 MOS IMPOSED  
5 MOS 26 DAYS SUSPENDED  
RETAINED ATTY

DCN:Y510651

SO SPOTSYLVANIA CO 07/09/2019 FINGERPRINTED  
ORI:VA0880000

CHARGED WITH  
#001 MSDMNR 18.2-187.1 FRD-2690-M1  
OBTAIN PUBLIC UTILITY W/O PAYMENT: FRAUD <\$500  
SPOTSYLVANIA CO 07/05/2019  
\*\*\*\*\* DISPOSITION NOT RECEIVED

DCN:K034980

END OF PART 1 - PART 2 TO FOLLOW  
MRI 468753 IN: CCH1 12331 AT 15AUG2019 15:45  
OUT: CCR3 124 AT 15AUG2019 15:45

VCIN REPLY

VAVSP00V2

THE FOLLOWING RECORD PERTAINS TO SID/VAB22011

VIRGINIA CRIMINAL RECORD 08/15/2019 PART 2

SID: VAB22011 FBI: 206486NA1

CONTRIBUTOR/CASE DATE CHARGE/DISPOSITION  
SO SPOTSYLVANIA CO 07/24/2019 FINGERPRINTED  
ORI:VA0880000

CHARGED WITH  
#001 MSDMNR 19.2-128 FTA-5020-M1  
FAILURE TO APPEAR: ON MISDEMEANOR OFFENSE  
SPOTSYLVANIA CO 07/24/2019  
\*\*\*\*\* DISPOSITION NOT RECEIVED

DCN:K034996

\*DISPOSITION ELECTRONICALLY TRANSFERRED BY COURT OF JURISDICTION

RECORD AUTOMATED: 07/12/1991 LAST RECORD UPDATE: 07/24/2019

ALL ARREST ENTRIES CONTAINED IN THIS RECORD ARE BASED ON FINGERPRINT COMPARISON  
AND PERTAIN TO THE SAME INDIVIDUAL.

THIS INFORMATION MAY NOT CONTAIN THE CHARGE DATE AND/OR CHARGE ORI FOR FILES  
SUBMITTED THROUGH THE SUPREME COURT OF VIRGINIA EMAGISTRATE INTERFACE.

Aug 15, 2019 3:42:01 PM

\*\*\* CAUTION \*\*\*

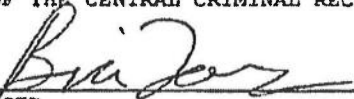
THIS RESPONSE IS BASED ON COMPARISON OF REQUESTOR FURNISHED INFORMATION AGAINST DATA CONTAINED IN THE FILES OF THE VIRGINIA STATE POLICE CRIMINAL RECORDS EXCHANGE ONLY AND DOES NOT PRECLUDE THE EXISTENCE OF OTHER CRIMINAL HISTORY INFORMATION WHICH MAY BE CONTAINED IN THE REPOSITORY OF OTHER LOCAL, STATE OR FEDERAL CRIMINAL JUSTICE AGENCIES.

CHANGES TO THIS RECORD MAY BE IN PROCESS. A NEW INQUIRY SHOULD BE MADE FOR SUBSEQUENT USE. THE CRIMINAL HISTORY RECORD INFORMATION CONTAINED IN THIS RESPONSE IS DISSEMINATED FOR CRIMINAL JUSTICE PURPOSES ONLY. THE INQUIRER IS RESPONSIBLE FOR MAINTAINING AN AUDIT TRAIL ON ALL SECONDARY DISSEMINATION OF ANY OF THIS INFORMATION.

\*\*\* UNAUTHORIZED DISSEMINATION WILL SUBJECT THE DISSEMINATOR TO CRIMINAL AND CIVIL PENALTIES. \*\*\*

THIS IS A SINGLE-SOURCE RECORD. NO ADDITIONAL CRIMINAL HISTORY INFORMATION IS INDEXED IN NCIC-III FOR OTHER STATE OR FEDERAL OFFENSES.

THIS IS TO CERTIFY, ATTEST AND AUTHENTICATE THAT THIS IS A TRUE REPRODUCTION FROM THE RECORD OF LAWLER, ROBERT K CCRE 822011, AS CONTAINED IN THE FILES OF THE CENTRAL CRIMINAL RECORDS EXCHANGE.

  
\_\_\_\_\_  
MANAGER  
CENTRAL CRIMINAL RECORDS EXCHANGE

  
\_\_\_\_\_  
DIVISION COMMANDER

END OF RECORD

MRI 468754 IN: CCH1 12332 AT 15AUG2019 15:45  
OUT: CCR3 125 AT 15AUG2019 15:45

# **EXHIBIT #2**



May 5th, 2021

**VIA EMAIL PDF (bubba1bubba2@icloud.com)**

Peyton Ashleigh:

Pursuant to your recent subpoena duces tecum, below please find records in GoFundMe's possession, custody or control relating to the GoFundMe campaign entitled "Legal & Medical Aid" created by R. Kevin Lawler on September 10th, 2020. For bank account and related information, please contact our third-party payment processor, Adyen.

Please do not hesitate to be in touch should you have any questions.

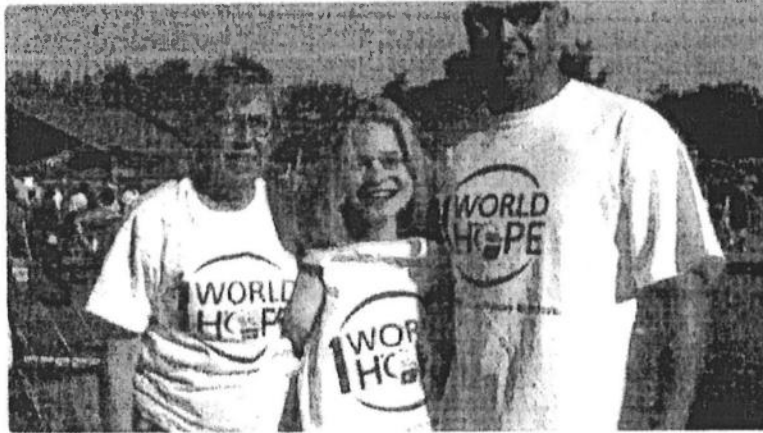
Sincerely,

Alex Wardle






# Legal & Medical Aid



**\$1,145** raised


 **Share**


This fundraiser has been deactivated by the organizer.

 R. Kevin Lawler is organizing this fundraiser.


Hello. I'm so ashamed and embarrassed it has come to this for me but I could use some help. I've been working since I was 8 years old. I've been running my own business for 18 years and fortunate enough to be blessed with success. I've always made it a mission to put away funds for a rainy day. Unfortunately, it's been raining for almost 4 years now and I'm almost broke. I just can't keep up and depleted just about everything down to a few dollars. Sadly, even my daughters college fund. For the last 4 years, my family and I have been in a civil court battle with another family member. I was my parents caretaker for years moving them home with me to assist my Dad with dementia and my Mom with a host of ailments. We were prepared for that but God brought both my parents home to Heaven within 6 months of each other last year. Since then, I've inherited all these frivolous petty

 **Heather Hepburn**  
**\$50** 7 mos


 **Jason Caroon**  
**\$100** 7 mos

 **Anonymous**  
**\$20** 7 mos

 **Lethia Jackson**  
**\$50** 7 mos

 **Anonymous**  
**\$100** 7 mos

**See all**

 **See top donations**

Since then, I've initiated all these frivolous, petty lawsuits against my family. In almost 4 years, I've been forced to pay out to date \$301,000 while still owing \$67,000 and these court proceedings are still going on. In the last 4 years, my health has deteriorated with pancreatic issues & surgeries and yesterday I was diagnosed with a heart condition. I've always been fortunate enough to recover, build my strength back, and start over. I'm scared as Hell and never been this nervous in my life. I've never received a penny of government assistance in my life. I believe that's for people that really need it. I don't qualify for any grants because my assets used somewhat in check. I was raised to help others and now I'm in a seriously bad place and asking for some help. Friends have been pushing me for years to start a Go Fund Me but my pride and upbringing wouldn't allow me. I was determined to work my tail off, sell off as many assets as possible, clip coupons, stretch my savings, what have you to endure this battle. With my medical diagnosis yesterday, I felt it necessary to use a large chunk of what little I have left to pay my future health insurance premiums at \$726 a month so that I'm covered for 6 months. I was advised to take it easy and lay-off work for a while but I can't. Life keeps going and I take my responsibilities very seriously and can't let down my clients. Plus I have no choice, I need the income no matter the circumstances. We win every lawsuit but it takes so much time, energy, and of course, a ton of attorneys fees. It just never stops. The family member suing me has been deemed a vexatious litigant in 2 Va jurisdictions but it hasn't stopped the lawsuits currently on the dockets. We've come so far. The end is hopefully near. Hopefully. Once I win my parents house back, I maybe able to recover a large portion of the loss when I can sell it. But that's still some time away and I'm still responsible for the mortgage, home owners insurance, hoa fees, and property taxes in a affluent area of Northern Virginia. Plus my own

luent area of northern Virginia. Plus my own regular living expenses but I've learned to live as small as possible. All our savings are gone. My plan is to hopefully pay every one back one day if possible. I never wanted to put this hardship on anyone. It's been a 4 year nightmare but I made a promise to my parents and I have to see it through. I honestly have no choice now. I'm praying the day will come when I can finally spread their ashes in the 3 places they want their eternal rest. But I can't until this is over. They deserve it

People that know me know I must have hit an all time low to even consider this. I'm doing everything possible I promise but just feel so utterly defeated and sadly depressed. It kills me on the inside to ask anyone for help. I've always prided myself on helping others. I gave up my life for my parents well being. It was an honor and I'd do it again in a flash if I could but God had other plans to bring them home. I've helped friends, family, my community, friends and total strangers with fund raisers and kids events. Proud Wounded Warrior volunteer. Donating my time and services to cancer patients deliberately on fixing their house with necessary repairs or paying for prescriptions. It was a no brainer- help them because I could and it was the right thing to do. This isn't some woe is me. give me a trophy for helping others thing either. It's just a little insight if you never met me

i feel awful for asking but if you could help me out, I promise I will never forget it and be indebted, I'm hoping to refund every penny back if I can recover, or we can barter it for my services. I'd rather go that route for my own pride but I can't exactly guarantee that in the short term

I'm trying to keep my head up but just asking for help due to the core reasons is a big gut punch. I'm dealing with someone that I can't explain. Mostly legal reasons but I'm not a certified professional in that area. This person is out for blood and ruin

... that completely ... it. There have been

anyone that supposedly crosses it. There have been countless victims for over a decade unfortunately and the civil court system lets it continue on and on and on. My parents were so ashamed and felt responsible like they failed in some fashion. It broke their hearts and one of only 5 times in my life I ever saw my Dad cry. They supported this person, gave this person every tool and resource for life and intelligence. And they were paid back with countless bogus lawsuits. Normally, deep pocket organizations/businesses are targeted but if a regular individual of regular means is targeted, it's one incredible and unimaginable hardship to endure. I've said this a million times- my family apologizes immensely and repeatedly if you were ever victimized by this person. I promise we weren't raised that way.

Love you all and sincerely appreciate everyone's support over the years. Many of you inspire me to keep moving and I can't put into words how grateful I am. If you are not in a position to donate please send prayers. And also, sign any petitions that may help change the law in people taking advantage of the legal/civil justice system. It's the righteous thing to do

## Organizer




R. Kevin Lawler  
Organizer  
Fredericksburg, VA

Contact

Created September 10, 2020

| Medical, Illness & Healing

 [Report fundraiser](#)



**#1  
FUNDRAISING  
PLATFORM**

More people start fundraisers on GoFundMe than on any other platform.

[Learn more](#)



**GOFUNDME  
GUARANTEE**

In the rare case something isn't right, we will work with you to determine if misuse occurred.

[Learn more](#)




**EXPERT  
ADVICE,  
24/7**

Contact us with your questions and we'll answer, day or night.

[Learn more](#)



Choose your language

English (  )

**FUNDRAISE FOR**

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- [Emergency](#)
- [Memorial](#)
- [Education](#)
- [Nonprofit](#)

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All times listed are in Pacific Standard Time (PST).

**Legend**

<b>Failed (Donation History)</b>	A donation did not successfully process; this can occur for a variety of reasons, ranging from: entering wrong account information, the credit card company failed the transaction, payment processor failed the transaction, or technical difficulties.
<b>Captured (User Information: Withdrawals)</b>	The transfer transaction successfully went through to the receiving bank/organization.
<b>KYC (Know Your Customer)</b>	A payment processor's process of verifying customer information by requiring them to enter in their personal information, such as: name, DOB, SSN, and address.
<b>MFA (Multi-Factor Authentication)</b>	A security measure for customers where they must enter in a telephone number or other personally identifiable data.
<b>Admin</b>	GoFundMe.
<b>Campaign Organizer</b>	The person who created the GoFundMe account.
<b>Beneficiary</b>	The person who was granted access to the account's funds. If there is no beneficiary, the campaign organizer is the person with access to the funds.

**Campaign Information**

<b>GoFundMe URL</b>	<a href="https://www.gofundme.com/f/legal-and-medical-aid">https://www.gofundme.com/f/legal-and-medical-aid</a>
---------------------	---

**Campaign Organizer Information**

<b>GoFundMe ID</b>	51243922
<b>Current Email</b>	Kevlawler1@aol.com
<b>Current First Name</b>	R.
<b>Current Last Name</b>	Kevin Lawler
<b>MFA Phone Number</b>	+15407605384
<b>Created At (PST)</b>	September 10th, 2020 8:19 AM

**Payment Information**

<b>Adyen Information</b>	<p>The User used Adyen as a payment account</p> <p>Adyen Email: Kevlawler1@aol.com                  Adyen User ID: GFM-W-51243922</p> <p>KYC Name: Robert Kevin Lawler</p> <p>\$1,107.89 withdrawn on November 12th, 2020 4:39 PM                  Status: paid, Type: ach                  Bank: WELLS FARGO BANK ending in 0281</p>
--------------------------	---

**Activity Log [+]**

Date	User	Change	Ip Address
3 mins ago on May 5 11:16 am	<u>Admin</u>	Subpoena received (8109150). DO NOT ACTION campaign without	0.0.0.0

		checking w Alex or lead	
5 months ago on November 24 9:22 am	<u>Campaign Organizer</u>	User Cancelled Account	
5 months ago on November 12 10:54 am	<u>Admin</u>	Transfers enabled by ADYEN	127.0.0.1
5 months ago on November 12 10:54 am	<u>Admin</u>	Action Deadline updated by processor ADYEN to value : null	127.0.0.1
5 months ago on November 12 10:48 am	<u>Campaign Organizer</u>	User Did KYC	173.72.191.154
5 months ago on November 12 10:44 am	<u>Admin</u>	Action Deadline updated by processor ADYEN to value : 2021-01-08 16:00:32.0	127.0.0.1
5 months ago on November 7 1:23 am	<u>Admin</u>	Skipped deadline email send PAYM-7308 (payments.generic_kyc.required_or_inactivate)	0.0.0.0
6 months ago on November 4 1:49 am	<u>Admin</u>	Skipped deadline email send PAYM-7308 (payments.generic_kyc.required_or_inactivate)	0.0.0.0
6 months ago on November 1 2:19 am	<u>Admin</u>	Skipped deadline email send PAYM-7308 (payments.generic_kyc.required_or_inactivate)	0.0.0.0
6 months ago on October 31 2:28 am	<u>Admin</u>	Skipped deadline email send PAYM-7308 (payments.generic_kyc.required_or_inactivate)	0.0.0.0
6 months ago on October 28 2:57 am	<u>Admin</u>	Skipped deadline email send PAYM-7308 (payments.generic_kyc.required_or_inactivate)	0.0.0.0
7 months ago on September 11 10:44 am	<u>Admin</u>	Beneficiary Auto Outreach sent at \$1000 <a href="#">Ticket Link</a>	0.0.0.0
7 months ago on September 10 1:28 pm	<u>Campaign Organizer</u>	ACCOUNT_HOLDER_STATUS_CHANGE - Account Status: ACTIVE -> ACTIVE (Processing tier updated), Charges: false -> false (n/a), Transfers: false -> false (n/a)	82.199.90.162
7 months ago on September 10 1:28 pm	<u>Admin</u>	Action Deadline updated by processor ADYEN to value : 2020-11-09 15:28:38.0	127.0.0.1
7 months ago on September 10 10:07 am	<u>Campaign Organizer</u>	ACCOUNT_HOLDER_VERIFICATION - {}	82.199.90.162
7 months ago on September 10 10:07 am	<u>Campaign Organizer</u>	ACCOUNT_HOLDER_STATUS_CHANGE - Account Status: ACTIVE -> ACTIVE (Processing tier updated), Charges: false -> false (n/a), Transfers: false -> false (n/a)	82.199.90.162
7 months ago on September 10 10:07 am	<u>Admin</u>	Action Deadline updated by processor ADYEN to value : 2020-11-09 12:07:21.0	127.0.0.1
7 months ago on September 10 9:33 am	<u>Campaign Organizer</u>	ACCOUNT_HOLDER_STATUS_CHANGE - Account Status: ACTIVE -> ACTIVE (Account holder has been updated), Charges: false -> false (n/a), Transfers: false -> false (n/a)	82.199.90.162
7 months ago on	<u>Campaign Organizer</u>	ACCOUNT_HOLDER_VERIFIC	82.199.90.162



September 10 9:33 am		ATION -	
7 months ago on September 10 9:33 am	<u>Campaign Organizer</u>	User launched Personal fund: Legal & Medical Aid (responsive campaign create on tablet).	173.72.191.154
7 months ago on September 10 9:33 am	<u>Campaign Organizer</u>	User launched fund (customize complete!).	173.72.191.154
7 months ago on September 10 8:25 am	<u>Campaign Organizer</u>	User uploaded media for fund: Legal & Medical Aid (responsive campaign create on tablet).	173.72.191.154
7 months ago on September 10 8:22 am	<u>Campaign Organizer</u>	User created Personal fund: Legal & Medical Aid (responsive campaign create on tablet).	173.72.191.154
7 months ago on September 10 8:19 am	<u>Campaign Organizer</u>	User Signed Up	173.72.191.154

**Donation History**

Created At (PST)	Donor Name	Email	Amount	Postal Code	Country	WePay Check Out ID	IP Address	Status
09/12/20 5:50 AM	Heather Hepburn	hdkurz@aol.com	\$50.00	22408	US		174.226.7.194	Success
09/11/20 10:44 AM	Jason Caroon	roomiroon@msn.com	\$100.00	88310	US		69.128.212.232	Success
09/10/20 3:11 PM	Kendra LaMonte	khamonte73@gmail.com	\$20.00	11787	US		68.198.153.185	Success
09/10/20 2:30 PM	Lethia Jackson	BoOreo@aol.com	\$50.00	22407	US		108.44.170.188	Success
09/10/20 1:21 PM	jeff hopkins	jeff@jhopkinsco.com	\$100.00	22405	US		68.100.150.180	Success
09/10/20 12:59 PM	Courtney Horsemann	julybaby21@comcast.net	\$100.00	22407	US		174.251.67.109	Success
09/10/20 11:42 AM	Barbara Hopkins	brucehopkins@verizon.net	\$200.00	22553	US		24.185.1.108	Success
09/10/20 11:37 AM	Chris Conley	ccon99@aol.com	\$100.00	20169	US		166.137.175.59	Success
09/10/20 10:56 AM	Glenda Smith	bendinsticks@gmail.com	\$50.00	32656	US		172.56.27.174	Failed
09/10/20 10:48 AM	Tammy Diamond	tdiamond05@yahoo.com	\$50.00	22553	US		73.31.10.47	Success
09/10/20 10:46 AM	Tammy Diamond	tdiamond05@yahoo.com	\$50.00	22553	US		73.31.10.47	Failed
09/10/20 10:44 AM	Pamela Bennett	pbennett72@comcast.net	\$100.00	22553	US		174.196.138.130	Success
09/10/20 10:44 AM	Chris Seats	seatse@yahoo.com	\$100.00	22408	US		73.147.211.127	Success
09/10/20 10:38 AM	Natalie Woodward	Italian170@msn.com	\$50.00	22405	US		173.72.164.176	Success
09/10/20 10:03 AM	Kellie Amberger	jnkamberger@msn.com	\$125.00	22407	US		107.77.204.185	Success

[+]

**Comment History**

User did not receive any comments for this campaign

**Accusations**

Created At (PST)	Accuser Name	Accuser Email	Accuser Phone	Message
09/10/20 8:18 PM	Robin Lawler	bubba1bubba2@icloud.com	15717629602	He is faking. His own daughter posted on Facebook tonight that there is no medical issue. He faked pancreatic cancer for two years. He's defaming me on your site to get money, while he just drained \$100s of \$1000s out of my parents accounts. The Va State Police are currently investigating him for embezzlement and I reported this account to them earlier
09/10/20 1:54 PM	Bella Bella	kkbates1@comcast.net	15407869390	Okay. This is just heads up. This man is a pathological liar! He has lied and cheated his way all through life. He has lied about dying with all kinds of medical disorders (like 10 years ago) and he is fine! ALL LIES! This is fraud. Many people need help right now, but not this person! You seriously need to research the person, cause etc. I AM TO REMAIN anonymous!

**Fund Edit History**

Showing 2 of 2 Campaign Edits

Created At (PST)	Description
09/10/20 9:33 AM	<p>Hello, I'm so ashamed and embarrassed it has come to this for me but I could use some help. I've been working since I was 8 years old. I've been running my own business for 18 years and fortunate enough to be blessed with success. I've always made it a mission to put away funds for a rainy day. Unfortunately, it's been raining for almost 4 years now and I'm almost broke. I just can't keep up and depleted just about everything down to a few dollars. Sadly, even my daughters college fund. For the last 4 years, my family and I have been in a civil court battle with another family member. I was my parents caretaker for years moving them home with me to assist my Dad with dementia and my Mom with a host of ailments. We were prepared for that but God brought both my parents home to Heaven within 6 months of each other last year. Since then, I've inherited all these frivolous, petty lawsuits against my family. In almost 4 years, I've been forced to pay out to date \$301,000 while still owing \$67,000 and these court proceedings are still going on. In the last 4 years, my health has deteriorated with pancreatic issues &amp; surgeries and yesterday I was diagnosed with a heart condition. I've always been fortunate enough to recover, build my strength back, and start over. I'm scared as Hell and never been this nervous in my life. I've never received a penny of government assistance in my life. I believe that's for people that really need it. I don't qualify for any grants because my assets used somewhat in check. I was raised to help others and now I'm in a seriously bad place and asking for some help. Friends have been pushing me for years to start a Go Fund Me but my pride and upraising wouldn't allow me. I was determined to work my tail off, sell off as many assets as possible, clip coupons, stretch my savings, what have you to endure this battle. With my medical diagnosis yesterday, I felt it necessary to use a large chunk of what little I have left to pay my future health insurance premiums at \$726 a month so that I'm covered for 6 months. I was advised to take it easy and lay-off work for a while but I can't. Life keeps going and I take my responsibilities very seriously and can't let down my clients. Plus I have no choice, I need the income no matter the circumstances. We win every lawsuit but it takes so much time, energy, and of course, a ton of attorneys fees. It just never stops. The family member suing me has been deemed a vexatious litigant in 2 Va jurisdictions but it hasn't stopped the lawsuits currently on the dockets. We've come so far. The end is hopefully near. Hopefully. Once I win</p>

my parents house back. I maybe able to recover a large portion of the loss when I can sell it. But that's still some time a way and I'm still responsible for the mortgage, home owners insurance, hoa fees, and property taxes in a fluent area of Northern Virginia. Plus my own regular living expenses but I've learned to live as small as possible. All our savings are gone. My plan is to hopefully pay every one back one day if possible. I never wanted to put this hardship on anyone. I f's been a 4 year nightmare but I made a promise to my parents and I have to see it through. I honestly have no choice now. I'm praying the day will come when I can finally sprend their ashes in the 3 places they want their eternal rest. But I can't until this is over. They deserve it

People that know me know I must have hit an all time low to even consider this. I'm doing everything possible I promise but just feel so utterly defeated and sadly depressed. It kills me on the inside to ask anyone for help. I've always pride d myself on helping others. I gave up my life for my parents well being. It was an honor and I'd do it again in a flash if I could but God had other plans to bring them home. I've helped friends, family, my community, friends and total strangers with fund raisers and kids events. Proud Wounded Warrior volunteer. Donating my time and services to cancer pati ents deliberately on fixing their house with necessary repairs or paying for prescriptions. It was a no brainer- help them because I could and it was the right thing to do. This isn't some woe is me, give me a trophy for helping others thing eit her. It's just a little insight if you never met me

i feel awful for asking but if you could help me out, I promise I will never forget it and be indebted, I'm hoping to refun d every penny back if I can recover, or we can barter it for my services. I'd rather go that route for my own pride but I c an't exactly guarantee that in the short term

I'm m trying to keep my head up but just asking for help due to the core reasons is a big gut punch. I'm dealing with so meone that I can't explain. Mostly legal reasons but I'm not a certified professional in that area. This person is out for b loxod and ruin anyone that supposedly crosses it. There have been countless victims for over a decade unfortunately and the civil court system lets it continue on and on and on. My parents were so ashamed and felt responsible like they taile d in some fashion. It broke their hearts and one of only 5 times in my life I ever saw my Dad cry. They supported this p erson, gave this person every tool and resource for life and intelligence. And they were paid buck with countless bogus l aw suits. Normally, deep pocket organizations/businesses are targeted but if a regular individual of regular means is targ eted, it's one incredible and unimaginable hardship to endure. I've said this a million times- my family apologizes im mensely and repeatedly if you were ever victimized by this person. I promise we weren't raised that way.

Love you all and sincerely appreciate everyone's support over the years. Many of you inspire me to keep moving and I can't put into words how grateful I am. If you are not in a position to donate please send prayers. And also, sign any pet itions that may help change the law in people taking advantage of the legal/civil justice system. It's the righteous thing t o do

09/10/20 8:25 AM

**Fund Updates**

No Campaign updates found.

This report was created at: May 5th, 2021 11:19 AM



Trust & Safety Department  
legal@gofundme.com  
www.gofundme.com/safety

GOFUNDME, INC. CERTIFICATE OF RECORDS

I, Alex Wardle, hereby certify and affirm that the attached is a true and complete copy of the documents and records related to the fundraiser titled, "Legal & Medical Aid" held by GoFundMe, Inc. I certify that I am employed by GoFundMe and, by virtue of my duties and responsibilities, am familiar with the manner and process in which these records are created and maintained.

I further certify that the attached records are in the custody and control of GoFundMe, Inc. These records were made and kept in the course of regularly conducted business activity and were made at the time of the events, transactions, or occurrences to which they refer, or within a reasonable time thereafter.

Signed on this 5 day of May, 2021

Alex Wardle  
Custodian of Records

# **EXHIBIT #3**

7/8/2021

iCloud Mail

# Re: CEASE AND DESIST Fundraiser by R. Kevin Lawler : Legal & Medical Aid AND AMENDED COMPLAINT IF LEAVE TO FILE LATE IS GRANTED

February 17, 2021 at 4:23 PM

From ROBIN LAWLER

To Jason Collins

Cc Sean Gregg , Brandy Pierce

Received: from st43p00im-zfb10071701.me.com ([17.58.63.173])  
Original-recipient: rfc822;bubba1bubba2@icloud.com  
Return-path: <bubba1bubba2@icloud.com>  
DKIM-Signature: v=1; a=rsa-sha256; c=relaxed/relaxed; d=icloud.com; s=1a1hai;  
Received: from [192.168.1.162]  
Content-type: multipart/alternative;  
Content-transfer-encoding: 7bit  
MIME-version: 1.0 (1.0)  
Subject: Re: CEASE AND DESIST Fundraiser by R. Kevin Lawler : Legal & Medical  
From: ROBIN LAWLER <bubba1bubba2@icloud.com>  
Date: Wed, 17 Feb 2021 15:23:11 -0500  
Cc: Sean Gregg <sgregg@johnstongregg.com>, Brandy Pierce <ws3@johnstongregg.com>  
Message-id: <C12B3359-63CE-4A74-A67A-9B03CCDEF2D7@icloud.com>  
To: Jason Collins <jason.collins@daisylaw.com>  
X-Mailer: iPhone Mail (i8D52)  
X-Proofpoint-Spam-Details: rule=notspam policy=default score=0 mixscore=0

Sir, I just responded to your first email. Please refer to it.

Again, though, I appreciate your assistance

Sent from my iPhone

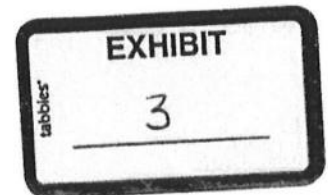
On Feb 17, 2021, at 3:14 PM, Jason Collins <jason.collins@daisylaw.com> wrote:

Ms. Lawler:

I represent Mr. Lawler in the 5910 matter. That is a civil matter in Loudoun County Circuit Court. I will forward your correspondence to Mr. Lawler but I do not represent him in such matters.

Jason R. Collins  
Daisy & Collins, LLP  
19775 Belmont Executive Plaza, Suite 500  
Ashburn, Virginia 20147  
Phone: (571) 262-2710, ext. 201 | Fax: (703) 584-7354  
[jason.collins@daisylaw.com](mailto:jason.collins@daisylaw.com)  
[www.daisylaw.com](http://www.daisylaw.com)

<image001.png>



**PRIVILEGED & CONFIDENTIAL**  
Attorney-Client Communication  
Attorney Work Product

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7/8/2021

iCloud Mail

If you are the intended recipient, please be advised that the content of this message is subject to access, review and disclosure by the sender's Email System Administrator.

**From:** ROBIN LAWLER [mailto:bubba1bubba2@icloud.com]  
**Sent:** Wednesday, February 17, 2021 10:55 AM  
**To:** Jason Collins  
**Cc:** Sean Gregg; Brandy Pierce  
**Subject:** CEASE AND DESIST Fundraiser by R. Kevin Lawler : Legal & Medical Aid AND AMENDED COMPLAINT IF LEAVE TO FILE LATE IS GRANTED

February 17, 2021

Mr Collins:

Attached is a link to a defamatory and fraudulent GoFundMe page Kevin Lawler started on September 10, 2020.

His own sworn testimony of October 14 2020 proves that the claims he made about me, about his health, and about his finances were false and fraudulent.

This site is still online, both on GoFundMe and, upon information and belief, Facebook.

People I have known for 43 years donated to this and can still read it.

His prior counsel was warned about it, yet it still exists. It appears that the only change to it is that it cannot be viewed openly by all of the public (me, the State Police, etc), but can by the people who donated to it.

While the live link is attached below, so is a screenshot, taken moments ago, showing that "donors" can still actively sign in to read the false information.

<image002.png>

<https://www.gofundme.com/f/legal-amp-medical-aid?qid=c324c6dff5134cba2ee9397f2202aeb8>

The pdf is also attached. The VSP are in possession of this:

The Virginia State Police assured me that this is a computer crime, as well as obtaining funds by false pretenses, in violation on Va Code 18.2-178. It stayed below the felony threshold for sometime after I warned Johnston and Gregg of the posting.

Then, after they were notified and did nothing to take the site down, it appears that one of my oldest friends put the donations over \$1,000. Which put the fraud over the felony threshold.

As you can see by the screenshot, \$1,145 was donated.

### **§ 18.2-152.3. Computer fraud; penalty.**

Any person who uses a computer or computer network, without authority and:

1. Obtains property or services by false pretenses;

7/8/2021

iCloud Mail

2. Embezzles or commits larceny; or

3. Converts the property of another;

is guilty of the crime of computer fraud.

If the value of the property or services obtained is \$1,000 or more, the crime of computer fraud shall be punishable as a Class 5 felony. Where the value of the property or services obtained is less than \$1,000, the crime of computer fraud shall be punishable as a Class 1 misdemeanor.

That's two felonies.

He is currently on a plea deal for his October 2020 conviction. He faces a mandatory 30 days in jail. Here is the decision:

<image003.png>

If that site is not removed from GoFundMe, Facebook, and all social media BY CLOSE OF BUSINESS TODAY, I will be pressing charges.

I have a telephone conference scheduled for tomorrow morning at 9:00am with the Special Agent.  
<image004.png>

For reference, here are just a couple screenshots from Facebook provided to me on September 10, 2020 when he posted it. Your client is a pathological liar, and many openly called him such on Facebook...after all, he was capable of faking pancreatic cancer for many years.  
<image005.jpg>

<image006.jpg>

YOUR CLIENT MUST IMMEDIATELY CEASE AND DESIST, REMOVING THAT PAGE FROM ALL SOCIAL MEDIA BY THE END OF TODAY.

If I do not receive an affidavit that it has been fully removed, I will press charges tomorrow.

Further, if your motion for leave to file late is granted, I intend to amend my complaint immediately to add this defamation claim. Further, as established by their billing records, the entire \$3 million lawsuit Gregg and Johnston conspired to write against me in March-April 2020 (while Johnston was NOT AN ATTORNEY) was knowingly fraudulent and based upon absolutely no fact whatsoever. It is the very definition of abuse of process. Further, as it was resolved in my favor with a nonsuit, the argument can also be made for civil malicious prosecution.

Johnston was not an attorney. The acts they sued me for were actually provably for acts taken or omitted by Johnston herself.

As such, she was not legally his agent and could not even legally be working for Gregg or representing herself as an attorney

Both Gregg and Kevin confirmed they reviewed the pleadings before they were filed. And Kevin stated under oath that Laura told him she was suspended.



7/8/2021

iCloud Mail

Therefore, conspiracy claims can and will be added.

All of that is subject for another email, however.

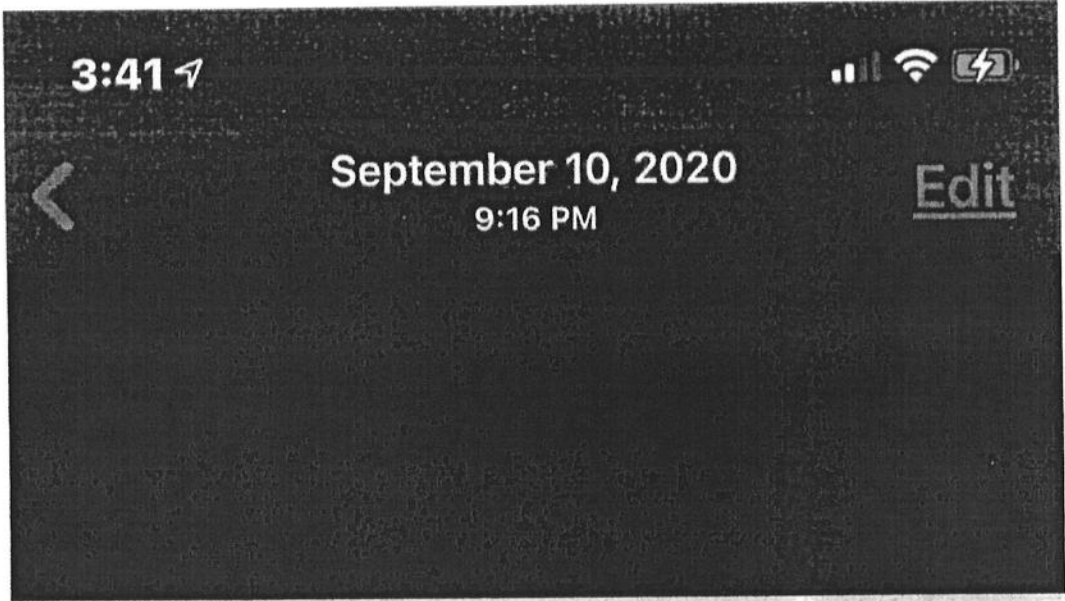
I want to reiterate that Kevin Lawler must remove the GoFundMe page and all references to it from all social media TODAY, February 17, 2021, or face severe immediate criminal and civil issues.

Thank you for your attention to this matter.

Robin

Sent from my iPhone

# **EXHIBIT #4**



Photos

Life Events



Sherri Schwalm Goldsmith

1h ·

I was just told about someone asking for donations for legal and medical assistance. Please beware. This person has lied so many times about their health to gain pity from others over the years. Trust me, I could tell you many lies this person put out on Facebook and so many people falling victim to these lies. He would underpay his workers and take advantage of them and their loyalty to him for his own personal gain. It sickened me then and this sickens me now that he would do this. Sad...very sad!!! Please beware!!! He feels no pity for others. He truly cares for no one but himself!!!

4

15 Comments

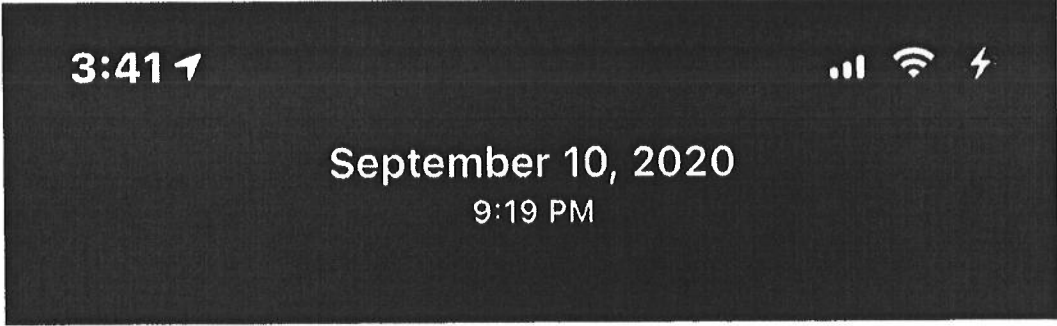
Like

Page 1 of 2

Comment



EXHIBIT A TO DECLARATION OF NATHANIEL BROWN



**Emily Lawler** · 2h



I understand what he put you through but it's been a very two difficult years and this is coming from his daughter who has seen proof of everything. He's put me through a lot of shit and I'm his daughter.. his only kid but a lot has changed and you know I always loved and adored you and ALWAYS wanted better for you. But before writing things I think know the truth before hand. It has nothing to do with medical reasons.



Like



Reply



**Sherri Schwalm Goldsmith** · 2h



I never mentioned any names...and he mentioned medical as well as legal in the public post. There usually is no truth when it comes to him. I learned from believing in him for many years and finally seeing him for who he truly was. And yes, he did put you through a lot...things he should not have put his own daughter through. I love you too death Em...always have. Truth be known, you were one of the reasons I tolerated the crap I did from him for so long. I used to talk to your mom many nights about it. I thought of you as a daughter. It crushed me to have to walk away from you. I'm glad you understood and we have been able to remain friends ❤️



Like



Reply

1 🗨️

# **EXHIBIT #5**

**VIRGINIA:**

**IN THE CIRCUIT COURT OF LOUDOUN COUNTY**

**ROBERT KEVIN LAWLER,**

**Plaintiff,**

**v.**

**Case No.: CL00116767-00**

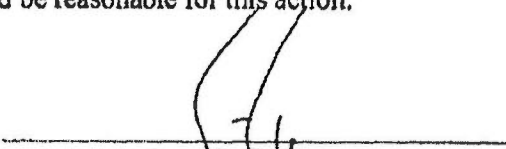
**ROBIN LAWLER,**

**Defendant.**

**AFFIDAVIT**

I, Sean D. Gregg, Counsel for Plaintiff, who after being sworn according to law, states as follows:


1. I submit this Affidavit to provide the Court with information necessary to evaluate the reasonableness of the requested attorney's fees.
2. As of this date, our records demonstrate that Robert Kevin Lawler incurred \$47,351.25 in attorney's fees on this litigation at Johnston & Gregg; \$2,492.00 in court reporter fees; and \$42,966.00 in attorney's fees at Plaintiff's prior law firm, Getty & Associates, beginning on February 26, 2019, after her bankruptcy discharge.
3. The total amount incurred up to the trial was \$92,809.25.
4. I respectfully request that the Court determine a total award of \$92,809.25 in attorney's fees to Robert Kevin Lawler would be reasonable for this action.

  
Sean D. Gregg



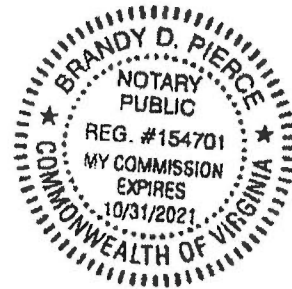
COMMONWEALTH OF VIRGINIA  
COUNTY OF ORANGE, to-wit:

Sworn and subscribed before me this 16<sup>th</sup> day of November, 2020, by SEAN D. GREGG.

  
\_\_\_\_\_  
Notary Public

My Commission Expires: 10/31/2021

My Registration No.: 154701



**ROBERT KEVIN LAWLER V. ROBIN M. LAWLER  
 LOUDOUN COUNTY CIRCUIT COURT  
 CASE NO. CL11-6767**

**JOHNSTON & GREGG ATTORNEY'S FEES**

<b>Date</b>	<b>Document</b>	<b>Amount</b>
02/03/2020	Drafted Motion for Protective Order to quash notice of deposition. Traveled to Court and filed the same. Traveled back.	\$975.00
02/03/2020	Met with K. Lawler to prepare for deposition should it occur on Monday and informed him of the Protective Order we were required to file with regard to Saturday depositions.	\$325.00
02/05/2020	Received and reviewed documents sent to Getty from Loudoun Circuit Court for recusal of judges in Case 6767.	\$130.00
02/07/2020	Continued to work on Motions for Sanctions.	\$390.00
02/10/2020	Received email from R. Lawler that she qualified as Administrator of estates in Loudoun and that she fired all counsel. Began drafting Petition to remove. Gathered documents for exhibits.	\$1,332.50
02/11/2020	Drafted Petitions to Remove R. Lawler as Administrator of the Estates of Robert and Linda Lawler. Mailed the same to court and to R. Lawler.	\$2,275.00
02/13/2020	Traveled to and from Court. Made appointment, waited and then met with probate clerk to retrieve court's portion of file that is not public to determine representations made by Lawler to Court regarding estate. Worked on sanctions motions in all case.	\$1,527.50
02/18/2020	Communications with court and R. Lawler to schedule various hearings. Received and reviewed documents from F. Moghul regarding the Fairfax cases.	\$487.50
02/18/2020	Work on sanctions motions.	\$650.00
02/24/2020	Communication with court regarding hearings.	\$65.00
02/24/2020	Work on sanction motions.	\$325.00
03/02/2020	Prepare Motion for Sanctions.	\$243.75
03/04/2020	Worked on Binders and reviewing motions that will need to be filed prior to trials.	\$812.50
03/04/2020	Communication with R. Lawler and Court regarding upcoming motions.	\$292.50



03/05/2020	Communications with court, R. Lawler and various counsel regarding cases. Reviewed documents for hearing on 3/6.	\$325.00
03/10/2020	Communications with attorneys regarding hearing on 3/13. Communication with witnesses who have been subpoenaed. Prepared for hearing. Communication with Court regarding same.	\$650.00
03/17/2020	Communications with other counsel who have been subpoenaed or represent a witness who has been subpoenaed to hearings.	\$60.00
03/19/2020	Received Order from B. Mitchell from last week's hearing. Received and reviewed transcription from this case hearing and reviewed the same for any issues that need to be still addressed by motion. Completed separating attorney fees affidavit for the Order.	\$150.00
04/29/2020	Revised and sent letter to client regarding case.	\$65.00
04/30/2020	Trial preparation for additional motions that need to be placed on docket.	\$162.50
05/01/2020	Review of court files to determine hearing dates.	\$32.50
05/04/2020	Praccipe to change law firm name. Drafted Motion for Guidance for Court regarding previous pleading.	\$195.00
05/05/2020	Finalized Motion for Guidance.	\$195.00
05/13/2020	Drafted pleadings.	\$585.00
06/09/2020	6767 Drafted Motion for Protective Order. Traveled to Loudoun and filed the same.	\$650.00
07/02/2020	Made notes for each of the motions to be heard in preparation for hearing on 7-6-20.	\$812.50
07/06/2020	Hearing with Judge Farris. Received and reviewed multiple pleadings from R Lawler.	\$2,600.00
07/09/2020	Revise motion to increase bond	\$1,218.75
07/14/2020	Received transcript from hearing. Reviewed the same for drafting the Order. Began drafting the Order.	\$812.50
07/17/2020	Receipt and review of Emergency Motion by R Lawler	\$130.00
07/20/2020	Review motions re: sanctions	\$162.50
07/21/2020	Received and reviewed email from Court and Motion from R Lawler attempting to set an emergency motion.	\$195.00

07/22/2020	Drafted Memorandum to support sanctions with attached exhibits. Traveled to and from Court to file the same and file Opposition to Plea in Bar. Filed Memo to Increase Bond. Sent Client copy of deed. Received and Reviewed New RL Motions – to schedule Plea in Bar, Motion to Strike. Communications from R Lawler.	\$2,600.00
07/23/2020	Finalized revisions to pleadings regarding Requests for Admission. Traveled to Loudoun Circuit Court and filed the same. Coordinated sending same to R Lawler. Prepared for hearing on the same for next week.	\$1,300.00
07/23/2020	Receive and Review email pleading from R Lawler attempting to transfer venue.	\$390.00
07/24/2020	Received and reviewed RL Newest Motion on Requests for Admissions to Deem Admitted.	\$650.00
07/28/2020	Review Court Transcript. Draft Order Reflecting Court's rulings. Travel to Loudoun County to file the same and coordinated emailing to Amy Bain and R Lawler. Began preparing for the hearing on sanctions.	\$1,787.50
07/28/2020	Received and Reviewed Motions filed by R Lawler.	\$325.00
07/29/2020	Court hearing to discuss sanctions motions. Gathered documents for use in Sanctions hearing.	\$975.00
07/29/2020	Received and Reviewed Motions filed by R Lawler on 7/28.	\$325.00
07/30/2020	Court hearing on Sanctions and Requests for Admissions.	\$2,600.00
07/31/2020	Coordinated calls to courthouses to set up the deposition of Kevin Lawler. Began drafting pleadings based upon Court ruling. Ordered transcript.	\$162.50
07/31/2020	Received and reviewed and responded to harassment emails from R Lawler – regarding matters that were already covered by the Court's Order on 7-30 and having non-witnesses attend the deposition.	\$325.00
08/06/2020	Began reviewing transcript for Order and discovery responses.	\$487.50
08/07/2020	Reviewed Hearing Transcript (250 pages) Respond to discovery per Court's Order per transcript.	\$2,275.00
08/10/2020	Finalized and transmitted additional discovery responses per Court Order.	\$780.00
08/11/2020	Communication with R Lawler to schedule a new deposition date for 8/18. Communication with client regarding deposition schedule.	\$195.00

08/12/2020	Received and reviewed numerous documents to be used in deposition of client	\$552.50
08/13/2020	Received and reviewed numerous deposition exhibits for upcoming deposition of KL; communication with Vivona.	\$650.00
08/14/2020	Received and reviewed numerous deposition exhibits for upcoming deposition of KL; communication with Vivona	\$487.50
08/17/2020	Communication from R Lawler canceling depositions. Communications with Vivona. Communications with client re new dates for depositions and cancelation of 8/18 depo. Coordinate obtaining court transcript.	\$585.00
08/18/2020	Communications with R Lawler re new depo dates. Communication with Vivona. Communication with K Lawler re depositions. Provided documents to Vivona regarding 6767 and bankruptcy.	\$487.50
08/20/2020	Provided additional documents to Vivona. Communication with R Lawler on yet more depo dates. Received and reviewed Motion for Guidance for continuance from R Lawler.	\$487.50
08/25/2020	Communication with Bk attorney regarding R Lawler demand to depose all cases at once. Communications with R Lawler regarding depositions.	\$292.50
08/26/2020	Received and reviewed multiple motions for continuances from R Lawler. Worked on Orders from previous hearing.	\$1,462.50
08/27/2020	Prepared for and attended hearing for trial prep. Made notes to draft order from hearing.	\$1,202.50
08/27/2020	Receive and review witness subpoenas from R. Lawler	\$97.50
08/28/2020	Work on Orders from hearings.	\$650.00
09/10/2020	Review documents for sanctions exhibits and motions.	\$975.00
09/11/2020	Travel to and from Court to file exhibits.	\$975.00
09/15/2020	Reviewed 6-hour transcript for sanctions motion and drafted motion.	\$942.50
09/16/2020	Met with client to prepare for sanctions motion.	\$650.00
09/16/2020	Met with client to prepare for unlawful detainer.	\$243.75
09/17/2020	Attend Trial	\$2,600.00
Total		\$47,351.25

**COURT REPORTER FEES**

07/09/20	Casamo & Associates	\$ 255.78
08/14/20	Veteran Reporters	\$1422.20
08/31/20	Veteran Reporters	\$ 392.30
09/11/20	Veteran Reporters	<u>\$ 422.60</u>
	<b>Total:</b>	<b>\$2,492.00</b>

Date: 3/25/19  
Time 4:08 pm

GETTY & ASSOCIATES, P. C.  
Client Billing Worksheet

Page 14

17-0496 :Kevin Lawler (continued)

<u>Date/Slip#</u>	<u>Description</u>	<u>HOURS/RATE</u>	<u>AMOUNT</u>	<u>TOTAL</u>
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2/26/19	Laura / Civil Litigatio	0.50	175.00	
#56231	Communication with client and bankruptcy attorney; revise letter to opposing	350.00		

3/11/19	Laura / Civil Litigatio	2.20	770.00	
56573	Draft and trip to and Loudoun and filed for motion to quash subpoenas	350.00		

Date - 3/25/19  
 Time 4:08 pm

GETTY & ASSOCIATES, P. C.  
 Client Billing Worksheet

Page 14

17-0496 :Kevin Lawler (continued)

<u>Date/Slip#</u>	<u>Description</u>	<u>HOURS/RATE</u>	<u>AMOUNT</u>	<u>TOTAL</u>
3/14/19	Laura / Civil Litigatio	1.60	560.00	
#56662	Work on motions; received and reviewed new motions; communication with Robin regarding 3/18 scheduling conference and her new motion for sanctions; communication with client regarding the same	350.00		
3/16/19	Laura / Civil Litigatio	3.00	1,050.00	
#56744	Trip to and from court; court; discussions with client	350.00		
3/25/19	Brian / Civil Litigatio	0.30	90.00	
#56906	Discuss with Laura; review code sections regarding jury trial and research on waiving a jury	300.00		

Date 5/21/19  
 Time 12:18 pm

GETTY & ASSOCIATES, P. C.  
 Client Billing Worksheet

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Highname 1 : 17-0496 Nickname 2: Lawler  
 Address : Kevin Lawler  
 5000 Westbury Court  
 Fredericksburg, VA 22407  
 17-0496

In reference to: Civil  
 Rounding : None  
 Full Precision : No

Last bill : 4/25/19  
 Last charge : 5/6/19  
 Last payment : 4/17/19 Amount :\$11,000.00  
 Arrangement : Time Charges: From slips.  
 Expenses: From slips.

<u>Date/Slip#</u>	<u>Description</u>	<u>HOURS/RATE</u>	<u>AMOUNT</u>	<u>TOTAL</u>
3/22/19	Laura / Civil Litigatio	0.30	105.00	
#57048	Communication with Leila Kilgore	350.00		
3/23/19	Laura / Civil Litigatio	2.50	875.00	
#57054	Communication with court regarding death of Bob; communication with Moghul; trip to and from Loudoun to retrieve copies of deed to Sterling property	350.00		
3/27/19	Laura / Civil Litigatio	4.50	1,575.00	
#57301	Coordinated videographer for depositions; prepared for the same; trip to and from court for filing; communication with Robin Lawler	350.00		

Date 5/21/19  
 Time 12:18 pm

GETTY & ASSOCIATES, P. C.  
 Client Billing Worksheet

Page 157

17-0496 : Kevin Lawler (continued)

<u>Date/Slip#</u>	<u>Description</u>	<u>HOURS/RATE</u>	<u>AMOUNT</u>	<u>TOTAL</u>
3/28/19 #57011	Brian / Civil Litigatio Discuss unlawful detainer case with Laura and possible responses to her motions; research on accrual bond and ability to increase bond	1.10 300.00	330.00	
3/28/19 #57015	Laura / Civil Litigatio Trip to and from court; prepare for depositions; met with client and prepared her for the same; depositions; communications with Moghul and Vivona	5.00 350.00	1,750.00	
3/29/19 #57377	Laura / Civil Litigatio Received emails and faxes from Robin; trip to and from court to retrieve separate file orders	4.60 350.00	1,610.00	
4/1/19 .7097	Brian / Civil Litigatio Research on impact of will that was improperly executed but containing language that prior wills revoked on prior validly executed will	0.50 300.00	150.00	
4/1/19 #57513	Laura / Civil Litigatio Reviewed deposition transcripts for motion for protective order	2.50 350.00	875.00	
4/2/19 #57137	Laura / Civil Litigatio Consulted with Brian regarding upcoming motions and responses and legal requirements; draft response to bill of particulars and Grave Oyer	0.50 350.00	175.00	
4/2/19 #57544	Brian / Civil Litigatio Discuss case with Laura and possible responses to her motions; research on accrual bond and ability to increase bond	1.10 300.00	330.00	
4/5/19 1222	Laura / Civil Litigatio Motions in Loudoun; review file	6.50 350.00	2,275.00	
4/8/19 #57318	Laura / Civil Litigatio Sceduling motions in Loudon;	1.90 350.00	665.00	



Date 5/21/19  
 Time 12:18 pm

GETTY & ASSOCIATES, P. C.  
 Client Billing Worksheet

Page 158

17-0496 : Kevin Lawler (continued)

<u>Date/Slip#</u>	<u>Description</u>	<u>HOURS/RATE</u>	<u>AMOUNT</u>	<u>TOTAL</u>
4/9/19 #57322	Laura / Civil Litigatio Scheduling motions in Fairfax	2.50 350.00	875.00	
4/12/19 #57330	Laura / Civil Litigatio Reviewed transcripts and communication with bankruptcy attorney	2.00 350.00	700.00	
4/18/19 #57424	Laura / Civil Litigatio Prepared for hearing; draft additional pleadings	3.00 350.00	1,050.00	
4/29/19 #57783	Laura / Civil Litigatio Trip to and from court to schedule hearing; discussions with opposing and with Moghul; communication and emails from Robin (Kevin's portion)	2.60 350.00	910.00	
4/30/19 7803	Laura / Civil Litigatio Communication with Moghul	0.20 350.00	70.00	
5/1/19 #57824	Laura / Civil Litigatio Communication with court clerk regarding scheduling of motions	0.30 350.00	105.00	
5/2/19 #57766	Laura / Civil Litigatio Communication with Moghul and Vivona	0.30 350.00	105.00	
5/6/19 #57773	Laura / Civil Litigatio Draft additional pleadings for court; trip to and from court; file pleadings; discuss scheduling matters with clerk	3.80 350.00	1,330.00	

Date 1/13/20  
 Time 11:10 am

GETTY & ASSOCIATES, P. C.  
 Client Billing Worksheet

Page 4

Nickname 1 : 17-0496 Nickname 2: Lawler  
 Address : Kevin Lawler  
 5800 Westbury Court  
 Fredericksburg, VA 22407  
 17-0496  
 In reference to: Civil - Unlawful Detainer - Loudoun  
 Rounding : None  
 Full Precision : No  
 Last bill : 11/4/19  
 Last charge : 11/25/19  
 Last payment : 11/6/19 Amount :\$13,000.00  
 Arrangement : Time Charges: From slips.  
 Expenses: From slips.

<u>Date/Slip#</u>	<u>Description</u>	<u>HOURS/RATE</u>	<u>AMOUNT</u>	<u>TOTAL</u>
7/10/19	Brian / Civil Litigatio	0.80	240.00	
#52951	Discuss discovery with Laura Johnston and review documents and request for discovery; discuss possibility of pre-filing injunction preventing new filing without leave of court; review rules regarding objections and responses to admissions	300.00		
7/11/19	Brian / Civil Litigatio	0.40	120.00	
#52943	Discussion with Laura Johnston; review rules	300.00		
7/11/19	Laura / Civil Litigatio	0.40	140.00	
#53129	Conference with BJC regarding discovery responses	350.00		
7/11/19	Laura / Civil Litigatio	0.40	140.00	
#53123	Communication with R. Lawler	350.00		
7/11/19	Laura / Civil Litigatio	1.00	350.00	
3123	Finalized and transmitted discovery responses	350.00		

Date 1/13/20  
 Time 11:10 am

GETTY & ASSOCIATES, P. C.  
 Client Billing Worksheet

Page 5

17-0496 :Kevin Lawler (continued)

<u>Date/Slip#</u>	<u>Description</u>	<u>HOURS/RATE</u>	<u>AMOUNT</u>	<u>TOTAL</u>
7/18/19 #53252	Brian / Civil Litigatio Discuss with LJ; begin reviewing motions	1.80 300.00	540.00	
7/19/19 3258	Brian / Civil Litigatio Work on response to their motion to determine sufficiency; research for response	2.20 300.00	660.00	
7/19/19 #53310	Laura / Civil Litigatio Retrieve orders from Fairfax; finalize motions; file same in Loudon	3.00 350.00	1,050.00	
7/22/19 #53276	Brian / Civil Litigatio Begin drafting response to their motion to deem answers insufficient; research on VRLTA code provisions	4.30 300.00	1,290.00	
7/22/19 #53369	Laura / Civil Litigatio Discuss issues with Brian Choisser	0.80 350.00	280.00	
7/23/19 #53267	Brian / Civil Litigatio Continue drafting response to motion to determine sufficiency of admissions; review pleadings; research for response	4.00 300.00	1,200.00	
7/23/19 #53375	Laura / Civil Litigatio Conference with Brian regarding	0.90 350.00	315.00	

Date 1/13/20  
 Time 11:10 am

GETTY & ASSOCIATES, P. C.  
 Client Billing Worksheet

Page 6

17-0436 :Kevin Lawlor (continued)

<u>Date/Slip#</u>	<u>Description</u>	<u>HOURS/RATE</u>	<u>AMOUNT</u>	<u>TOTAL</u>
#53375	.. motions			
7/24/19	Brian / Civil Litigatio	4.00	1,200.00	
#53344	Attend and finalize response to motion to determine sufficiency of admissions; research for response; discuss with Laura Johnston; review orders; review pleadings	300.00		
7/24/19	Laura / Civil Litigatio	1.20	420.00	
#53404	Conference with Brian regarding motions	350.00		
7/26/19	Laura / Civil Litigatio	2.90	1,015.00	
#53417	Review and revise opposition to motion regarding RFAs. Travel to and from court to file the same	350.00		

Date 1/13/20  
 Time 11:10 am

GETTY & ASSOCIATES, P. C.  
 Client Billing Worksheet

Page 7

17-0496 Kevin Lawler (continued)

<u>Date/Slip#</u>	<u>Description</u>	<u>HOURS/RATE</u>	<u>AMOUNT</u>	<u>TOTAL</u>
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8/12/19	Laura / Civil Litigatio	0.40	140.00	
#53641	Conference with Brian Choisser on discovery rules and issues	350.00		
8/12/19	Brian / Civil Litigatio	0.40	120.00	
***3735	Review discovery rules and discussion with Laura Johnston; check for remedy for abusive	300.00		

Date 1/13/20  
 Time 11:10 am

GETTY & ASSOCIATES, P. C.  
 Client Billing Worksheet

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17-0495 :Kevin Lawler (continued)

<u>Date/Slip#</u>	<u>Description</u>	<u>HOURS/RATE</u>	<u>AMOUNT</u>	<u>TOTAL</u>
#53725	discovery			
8/19/19	Laura / Civil Litigatio	8.00	2,800.00	
#53777	Hearing in Loudoun County Circuit Court	350.00		
8/20/19	Laura / Civil Litigatio	0.90	315.00	
#53947	Filed responses; motion for protective order for RFAs in case 6767	350.00		
8/22/19	Clerical / Civil Litigatio	0.20	26.00	
#53797	Email and mail Requests for Admissions from Plaintiff, Linda Lawler	130.00		
8/22/19	Laura / Civil Litigatio	2.00	700.00	
#53961	Discovery	350.00		
8/23/19	Laura / Civil Litigatio	2.00	700.00	
#53837	Discovery	350.00		
8/26/19	Laura / Civil Litigatio	0.50	175.00	
#53967	Communication with court reporter and Fairfax counsel	350.00		
8/27/19	Laura / Civil Litigatio	0.20	70.00	
#53972	Retrieve documents from court (for hearing)	350.00		
8/28/19	Laura / Civil Litigatio	1.90	665.00	
#53988	Appearan in Court for motions to increase accrual bond	350.00		
9/1/19	Laura / Civil Litigatio	5.90	2,065.00	
#54144	Prepared for Motions to Dismiss	350.00		

Date 1/13/20  
 Time 11:10 am

GETTY & ASSOCIATES, P. C.  
 Client Billing Worksheet

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17-0496 :Kevin Lawler (continued)

<u>Date/Slip#</u>	<u>Description</u>	<u>HOURS/RATE</u>	<u>AMOUNT</u>	<u>TOTAL</u>
9/3/19 #34119	Laura / Civil Litigatio Travel to and from Court; hearing on Pleas in Bar; Summary Judgment	5.60 350.00	1,960.00	
9/4/19 #54252	Brian / Civil Litigatio Discuss new filing with Laura Johnston; research	0.30 300.00	90.00	
9/19/19 #54393	Clement / Civil Litigatio Sanctions file transfers	1.00 150.00	150.00	
9/25/19 #54694	Laura / Civil Litigatio Meeting with Kevin; review of	3.50 350.00	1,225.00	

Date 1/13/20  
 Time 11:10 am

GETTY & ASSOCIATES, P. C.  
 Client Billing Worksheet

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17-0496 Kevin Lawler (continued)

<u>Date/Slip#</u>	<u>Description</u>	<u>HOURS/RATE</u>	<u>AMOUNT</u>	<u>TOTAL</u>
9/25/19 #54929	Brian / Civil Litigatio Discussion with Laura Johnston; review statutes regarding ability for administrator to continue litigation	0.50 300.00	150.00 300.00	
9/26/19 #54941	Brian / Civil Litigatio Check code for possible provisions that can be used to prevent incident at funeral; review dead man's statute and research on possible application in these cases	0.50 300.00	150.00 300.00	
10/1/19 #54952	Brian / Civil Litigatio Begin reviewing her motion to strike and emergency motion for injunction; research for response; discussion with Laura Johnston	1.50 300.00	450.00 300.00	



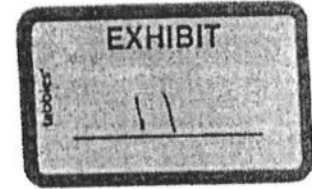
Date 1/13/20  
 Time 11:10 am

GETTY & ASSOCIATES, P. C.  
 Client Billing Worksheet

Page 11

17-0496 :Kevin Lawler (continued)

<u>Date/Slip#</u>	<u>Description</u>	<u>HOURS/RATE</u>	<u>AMOUNT</u>	<u>TOTAL</u>
10/2/19 #54968	Brian / Civil Litigatio Research for our response to her motions; continue reviewing motions and exhibits	2.50 300.00	750.00	
10/3/19 #54918	Brian / Civil Litigatio Review her motions and exhibits; begin draft of response for motion for emergency hearing; research for response; research on argument for response	5.00 300.00	1,500.00	
10/9/19 #54876	Joanna / Civil Litigatio Review, revise and sign Praecipe	0.40 300.00	120.00	
10/10/19 #55927	Joanna / Civil Litigatio Review and sign Praecipe	0.20 300.00	60.00	
11/19/19 #55834	Brian / Civil Litigatio Review their emergency motion and exhibits; discussion with Laura Johnston; review code sections cited in letter	1.40 300.00	420.00	
11/23/19 #55727	Fred / Civil Litigatio Meeting with Judge Rigual	2.00 350.00	700.00	



GETTY & ASSOCIATES, P. C.  
Post Office Box 1040  
Locust Grove VA 22508  
540-972-7600

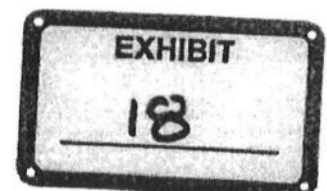
Invoice submitted to:  
Kevin Lawler  
5600 Westbury Court  
Fredericksburg VA 22407  
17-0496

January 24, 2020  
In Reference To: Civil - Unlawful Detainer - Loudoun  
Invoice # 37394

	<u>Amount</u>
Previous balance	\$47,369.79
1/31/20 Payment - credit card	(\$32,691.13)
1/31/20 Credit applied toward bill	(\$14,678.66)
	<hr/>
Total payments	(\$47,369.79)
	<hr/>
Balance due	\$0.00
	<hr/>

Payment is due within ten (10) days of the date of invoice. Bills not paid within ten (10) days will incur interest at the rate of 18% per year.

We now accept VISA, Mastercard, Discover, and American Express debit/credit cards for payment. Please stop by the office so we may process the required transaction, or if this is not convenient, please call the office with the debit/credit card information. Thank you!



GETTY & ASSOCIATES, P. C.

Post Office Box 1040  
Locust Grove VA 22508  
540-972-7600

Invoice submitted to:  
Kevin Lawler  
5600 Westbury Court  
Fredericksburg VA 22407  
17-0496

*F 65/600*  
*B 16 245.00*  
*Copy*  
*48.00*  
*50*  
*98*

January 13, 2020  
In Reference To: Civil - Unlawful Detainer - Loudoun  
Invoice # 37367

*MAI*  
*14.03*

Professional services

- 7/8/19- Interrogatories
  - Typed Interrogatories
- 7/9/19- Draft responses to discovery
- 7/10/19- Discuss discovery with Laura Johnston and review documents and request for discovery; discuss possibility of pre-filing injunction preventing new filing without leave of court; review rules regarding objections and responses to admissions
- 7/11/19- Discussion with Laura Johnston; review rules
  - Conference with BJC regarding discovery responses
  - Communication with R. Lawler
  - Finalized and transmitted discovery responses
- 7/12/19- Work on Motions
- 7/15/19- Communication with court reporter
- 7/16/19- Worked on motions
- 7/17/19- Typed Plaintiff's responses
- 7/18/19- Made copies; prepare binder for Laura Johnston
  - Discuss with LJ; begin reviewing motions
- 7/19/19- Work on response to their motion to determine sufficiency; research for response
  - Retrieve orders from Fairfax; finalize motions; file same in Loudon
- 7/22/19- Begin drafting response to their motion to deem answers insufficient; research on VRLTA code provisions

Kevin Lawler

Page 2

- 7/22/19- Discuss issues with Brian Choisser
- 7/23/19- Continue drafting response to motion to determine sufficiency of admissions; review pleadings; research for response
  - Conference with Brian regarding motions
- 7/24/19- Amend and finalize response to motion to determine sufficiency of admissions; research for response; discuss with Laura Johnston; review orders; review pleadings
  - Conference with Brian regarding motions
  - Work on second request for document production
- 7/25/19- Review her motion for partial summary judgment and begin outline of counter-argument
- 7/26/19- Review and revise opposition to motion regarding RFAs. Travel to and from court to file the same
- 7/29/19- Continue working on defenses for motion for partial summary judgment; begin drafting response; research
- 7/30/19- Continue drafting response to motion for partial summary judgment; review pleadings; research; discussion with Laura Johnston
- 7/31/19- Research and work on response to motion for partial summary judgment
- 8/2/19- Traveled to and from Court; hearing on discovery
- 8/5/19- Drafted Motin to Quash and filed in Circuit Court
- 8/6/19- Binder and exhibits preparation
  - Communication with R. Lawler, other counsel
- 8/7/19- Finalized and edited pleadings
  - Finalize response to her motion for partial summary judgment; research; discussion with Laura Johnston
- 8/8/19- Traveled to and from Court to file pleadings
- 8/9/19- Obtaining filings in Court
- 8/12/19- Binder
  - Travel to and from Court appearance to schedule subpoena hearings
  - Conference with Brian Choisser on discovery rules and issues
  - Review discovery rules and discussion with Laura Johnston; check for remedy for abusive discovery
- 8/19/19- Hearing in Loudoun County Circuit Court
- 8/20/19- Filed responses; motion for protective order for RFAs in case 6767
- 8/22/19- Email and mail Requests for Admissions from Plaintiff, Linda Lawler

Kevin Lawler

Page 3

- 8/22/19- Discovery
- 8/23/19- Discovery
- 8/26/19- Communication with court reporter and Fairfax counsel
- 8/27/19- Retrieve documents from court for hearing
- 8/28/19- Types Responses to Request for Admissions
  - Appear in Court for motions to increase accrual bond
- 8/29/19- Typed responses to admissions for Laura Johnston
  - Draft RFA's
- 9/1/19- Prepared for Motions to Dismiss and responses to Robin's Motions
- 9/3/19- Travel to and from Court; hearing on Please in Bar; Summary Judgment
- 9/4/19- Discuss new filing with Laura Johnston; research
- 9/11/19- Scanned documens into folders for Laura Johnston; made new binder for pleadings; cut fax paper for pleadings; made more binders; scanned more folders
- 9/12/19- Folders for Laura Johnston; scanned documents; labeled filed; moved files
- 9/13/19- Draft letter
- 9/17/19- Table of Contents Sanctions
- 9/18/19- Scanned documents; put in folders; renamed online; email to Laura Johnston
  - Reivew file regarding pleadings to be emails to Laura Johnston
- 9/19/19- Sanctions file transfers
- 9/24/19- Travel to and from Loudoun to file; showed Rachel how to put documents in respective folders
- 9/25/19- Meeting with Kevin; review of documents supplied by client; drafted letter to probate clerk in SPotsylvania to get date for probate; communication with court; review of statutes to determine whether a specific staute needs to be used for administration and continued litigation
  - Discussion with Laura Johnston; review statutes regarding ability for administrator to continue litigation
- 9/26/19- Check code for possible provisions that can be used to prevent incident at funeral; review dead man's statte and research on possible application in these cases
- 9/27/19- Assemble binder pleadings
  - Research on dead man's statute and how it can be applied against her causes of action
- 9/30/19- Scan and send documents to Laura Johnston
- 10/1/19- Copied 96 pages for Laura Johnston; whole punched the same

Kevin Lawler

Page 4

- 10/1/19- Begin reviewing her motion to strike and emergency motion for injunction; research for response; discussion with Laura Johnston
- 10/2/19- Scanned documents for Laura Johnston
  - Research for our response to her motions; continue reviewing motions and exhibits
- 10/3/19- Review her motions and exhibits; begin draft of response for motion for emergency hearing; research for response; research on argument for response
- 10/9/19- Review, revise and sign Praecipe
  - Searched for case numbers for Kelli and documents for Christine
- 10/10/19- Assisted Kelli with Praecipos
  - Review and sign Praecipe
- 11/19/19- Review case
  - Review their emergency motion and exhibits; discussion with Laura Johnston; review code sections cited in letter
- 11/20/19- Meeting with Judge Rigual
- 11/25/19- Traveled to and from Court for hearing on withdrawal of attorney

	Amount
For professional services rendered	\$44,995.00
Additional charges:	
9/24/19 Mileage	72.76
10/1/19 Copies	48.00
Total costs	\$120.76
Total amount of this bill	\$45,115.76
Previous balance	\$2,254.03
Balance due	\$47,369.79

Kevin Lawler

Page 5

Payment is due within ten (10) days of the date of invoice. Bills not paid within ten (10) days will incur interest at the rate of 18% per year.

We now accept VISA, Mastercard, Discover, and American Express debit/credit cards for payment. Please stop by the office so we may process the required transaction, or if this is not convenient, please call the office with the debit/credit card information. Thank you!

Date 1/13/20  
 Time 11:10 am

**GETTY & ASSOCIATES, P. C.**  
**Client Billing Worksheet**

Page 4

Nickname 1 : 17-0496 Nickname 2: Lawler  
 Address : Kevin Lawler  
 5600 Westbury Court  
 Fredericksburg, VA 22407  
 17-0496  
 In reference to: Civil - Unlawful Detainer - Loudoun  
 Rounding : None  
 Full Precision : No  
  
 Last bill : 11/4/19  
 Last charge : 11/25/19  
 Last payment : 11/6/19 Amount : \$13,000.00  
 Arrangement : Time Charges: From slips.  
 Expenses: From slips.

<u>Date/Slip#</u>	<u>Description</u>	<u>HOURS/RATE</u>	<u>AMOUNT</u>	<u>TOTAL</u>
7/8/19 #52922	Clerical / Civil Litigatio Interrogatories	2.50 130.00	325.00	
7/8/19 #53048	Clerical / Civil Litigatio Typed Interrogatories	2.50 130.00	325.00	
7/9/19 #53036	Laura / Civil Litigatio Draft responses to discovery	2.50 350.00	875.00	
7/10/19 #52951	Brian / Civil Litigatio Discuss discovery with Laura Johnston and review documents and request for discovery; discuss possibility of pre-filing injunction preventing new filing without leave of court; review rules regarding objections and responses to admissions	0.80 300.00	240.00	
7/11/19 #52943	Brian / Civil Litigatio Discussion with Laura Johnston; review rules	0.40 300.00	120.00	
7/11/19 #53119	Laura / Civil Litigatio Conference with BJC regarding discovery responses	0.40 350.00	140.00	
7/11/19 #53122	Laura / Civil Litigatio Communication with R. Lawler	0.40 350.00	140.00	
7/11/19 3123	Laura / Civil Litigatio Finalized and transmitted discovery reponses	1.00 350.00	350.00	



Date 1/13/20  
 Time 11:10 am

**GETTY & ASSOCIATES, P. C.**  
**Client Billing Worksheet**

Page 5

17-0496 :Kevin Lawler (continued)

<u>Date/Slip#</u>	<u>Description</u>	<u>HOURS/RATE</u>	<u>AMOUNT</u>	<u>TOTAL</u>
7/12/19 #53129	Laura / Civil Litigatio Work on Motions	2.00 350.00	700.00	
7/15/19 #53309	Laura / Civil Litigatio Communication with court reporter	0.20 350.00	70.00	
7/16/19 #53312	Laura / Civil Litigatio Worked on motions	2.20 350.00	770.00	
7/17/19 #53146	Clerical / Civil Litigatio Typed Plaintiff's responses	2.00 130.00	260.00	
7/18/19 #53149	Clerical / Civil Litigatio Made copies; prepare binder for Laura Johnston	0.70 130.00	91.00	
7/18/19 #53252	Brian / Civil Litigatio Discuss with LJ; begin reviewing motions	1.80 300.00	540.00	
7/19/19 3258	Brian / Civil Litigatio Work on response to their motion to determine sufficiency; research for response	2.20 300.00	660.00	
7/19/19 #53316	Laura / Civil Litigatio Retrieve orders from Fairfax; finalize motions; file same in Loudon	3.00 350.00	1,050.00	
7/22/19 #53276	Brian / Civil Litigatio Begin drafting response to their motion to deem answers insufficient; research on VRLTA code provisions	4.30 300.00	1,290.00	
7/22/19 #53389	Laura / Civil Litigatio Discuss issues with Brian Choisser	0.80 350.00	280.00	
7/23/19 #53267	Brian / Civil Litigatio Continue drafting response to motion to determine sufficiency of admissions; review pleadings; research for response	4.00 300.00	1,200.00	
7/23/19 #53375	Laura / Civil Litigatio Conference with Brian regarding	0.90 350.00	315.00	

Date 1/13/20  
 Time 11:10 am

GETTY & ASSOCIATES, P. C.  
 Client Billing Worksheet

Page 6

17-0496 :Kevin Lawler (continued)

<u>Date/Slip#</u>	<u>Description</u>	<u>HOURS/RATE</u>	<u>AMOUNT</u>	<u>TOTAL</u>
#53375..	motions			
7/24/19	Brian / Civil Litigatio	4.00	1,200.00	
#53344	Amend and finalize response to motion to determine sufficiency of admissions; research for response; discuss with Laura Johnston; review orders; review pleadings	300.00		
7/24/19	Laura / Civil Litigatio	1.20	420.00	
#53404	Conference with Brian regarding motions	350.00		
7/24/19	Laura / Civil Litigatio	0.30	105.00	
#53407	Work on second request for document production	350.00		
7/25/19	Brian / Civil Litigatio	1.30	390.00	
#53370	Review her motion for partial summary judgment and begin outline of counter-argument	300.00		
7/26/19	Laura / Civil Litigatio	2.90	1,015.00	
#53417	Review and revise opposition to motion regarding RFAs. Travel to and from court to file the same	350.00		
7/29/19	Brian / Civil Litigatio	1.80	630.00	
#53564	Continue working on defenses for motion for partial summary judgment; begin drafting response; research	350.00		
7/30/19	Brian / Civil Litigatio	6.20	1,860.00	
#53546	Continue drafting response to motion for partial summary judgment; review pleadings; research; discussion with Laura Johnston	300.00		
7/31/19	Brian / Civil Litigatio	4.50	1,575.00	
#53553	Research and work on response to motion for partial summary judgment	350.00		

Date 1/13/20  
 Time 11:10 am

GETTY & ASSOCIATES, P. C.  
 Client Billing Worksheet

Page 7

17-0496 :Kevin Lawler (continued)

<u>Date/Slip#</u>	<u>Description</u>	<u>HOURS/RATE</u>	<u>AMOUNT</u>	<u>TOTAL</u>
8/2/19 #53580	Laura / Civil Litigatio Traveled to and from Court; hearing on discovery	4.20 350.00	1,470.00	
8/5/19 #53577	Laura / Civil Litigatio Drafted Motin to Quash and filed in Circuit Court	1.40 350.00	490.00	
8/6/19 #53529	Clerical / Civil Litigatio Binder and exhibits preparation	1.90 130.00	247.00	
8/6/19 #53624	Laura / Civil Litigatio Communication with R. Lawler, other counsel	0.40 350.00	140.00	
8/7/19 #53633	Laura / Civil Litigatio Finalized and edited pleadings	0.70 350.00	245.00	
8/7/19 #53712	Brian / Civil Litigatio Finalize response to her motion for partial summary judgment; research; discussion with Laura Johnston	1.60 300.00	480.00	
8/8/19 #53637	Laura / Civil Litigatio Traveled to and from Court to file pleadings	4.20 350.00	1,470.00	
8/9/19 #53627	Laura / Civil Litigatio Obtaining filings in Court	4.00 350.00	1,400.00	
8/12/19 #53604	Clerical / Civil Litigatio Binder	0.50 130.00	65.00	
8/12/19 #53640	Laura / Civil Litigatio Travel to and from Court appearance to schedule subpoena hearings	4.00 350.00	1,400.00	
8/12/19 #53641	Laura / Civil Litigatio Conference with Brian Choisser on discovery rules and issues	0.40 350.00	140.00	
8/12/19 3735	Brian / Civil Litigatio Review discovery rules and discussion with Laura Johnston; check for remedy for abusive	0.40 300.00	120.00	

Date 1/13/20  
 Time 11:10 am

GETTY & ASSOCIATES, P. C.  
 Client Billing Worksheet

Page 8

17-0496 :Kevin Lawler (continued)

<u>Date/Slip#</u>	<u>Description</u>	<u>HOURS/RATE</u>	<u>AMOUNT</u>	<u>TOTAL</u>
#53735..	discovery			
8/19/19	Laura / Civil Litigatio	8.00	2,800.00	
#53777	Hearing in Loudoun County Circuit Court	350.00		
8/20/19	Laura / Civil Litigatio	0.90	315.00	
#53947	Filed responses; motion for protective order for RFAs in case 6767	350.00		
8/22/19	Clerical / Civil Litigatio	0.20	26.00	
#53797	Email and mail Requests for Admissions from Plaintiff, Linda Lawler	130.00		
8/22/19	Laura / Civil Litigatio	2.00	700.00	
#53961	Discovery	350.00		
8/23/19	Laura / Civil Litigatio	2.00	700.00	
#53827	Discovery	350.00		
8/26/19	Laura / Civil Litigatio	0.50	175.00	
#53967	Communication with court reporter and Fairfax counsel	350.00		
8/27/19	Laura / Civil Litigatio	0.20	70.00	
#53972	Retrieve documents from court for hearing	350.00		
8/28/19	Clerical / Domestic Relati	1.00	130.00	
#53981	Types Responses to Request for Admissions	130.00		
8/28/19	Laura / Civil Litigatio	1.90	665.00	
#53988	Appearen in Court for motions to increase accrual bond	350.00		
8/29/19	Clerical / Domestic Relati	3.20	416.00	
#53985	Typed responses to admissions for Laura Johnston	130.00		
8/29/19	Clerical / Civil Litigatio	2.60	338.00	
#54001	Draft RFA's	130.00		
9/1/19	Laura / Civil Litigatio	5.90	2,065.00	
#54144	Prepared for Motions to Dismiss	350.00		

Date 1/13/20  
 Time 11:10 am

GETTY & ASSOCIATES, P. C.  
 Client Billing Worksheet

Page 9

17-0496 :Kevin Lawler (continued)

<u>Date/Slip#</u>	<u>Description</u>	<u>HOURS/RATE</u>	<u>AMOUNT</u>	<u>TOTAL</u>
#54144..	and responses to Robin's Motions			
9/3/19	Laura / Civil Litigatio	5.60	1,960.00	
#54119	Travel to and from Court; hearing on Please in Bar; Summary Judgment	350.00		
9/4/19	Brian / Civil Litigatio	0.30	90.00	
#54252	Discuss new filing with Laura Johnston; research	300.00		
9/11/19	Clerical / Civil Litigatio	2.60	338.00	
#54295	Scanned documens into folders for Laura Johnston; made new binder for pleadings; cut fax paper for pleadings; made more binders; scanned more folders	130.00		
9/12/19	Clerical / Civil Litigatio	3.70	481.00	
#54325	Folders for Laura Johnston; scanned documents; labeled filed; moved files	130.00		
9/13/19	Clerical / Civil Litigatio	0.10	13.00	
#54334	Draft letter	130.00		
9/17/19	Clerical / Civil Litigatio	1.20	156.00	
#54355	Table of Contents Sanctions	130.00		
9/18/19	Clerical / Civil Litigatio	3.10	403.00	
#54408	Scanned documents; put in folders; renamed online; email to Laura Johnston	130.00		
9/18/19	Joanna / Civil Litigatio	0.30	90.00	
#54512	Reivew file regarding pleadings to be emails to Laura Johnston	300.00		
9/19/19	Clerical / Civil Litigatio	1.00	150.00	
#54393	Sanctions file transfers	150.00		
9/24/19	Clerical / Civil Litigatio	4.50	585.00	
#54607	Travel to and from Loudoun to file; showed Rachel how to put documents in respective folders	130.00		
9/25/19	Laura / Civil Litigatio	3.50	1,225.00	
#54694	Meeting with Kevin; review of	350.00		

Date 1/13/20  
 Time 11:10 am

GETTY & ASSOCIATES, P. C.  
 Client Billing Worksheet

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17-0496 :Kevin Lawler (continued)

<u>Date/Slip#</u>	<u>Description</u>	<u>HOURS/RATE</u>	<u>AMOUNT</u>	<u>TOTAL</u>
#54694..	documents supplied by client; drafted letter to probate clerk in SPotsylvania to get date for probate; communication with court; review of statutes to determine whether a specific staute needs to be used for administration and continued litigation			
9/25/19	Brian / Civil Litigatio	0.50	150.00	
#54929	Discussion with Laura Johnston; review statutes regarding ability for administrator to continue litigation	300.00		
9/26/19	Brian / Civil Litigatio	0.50	150.00	
#54941	Check code for possible provisions that can be used to prevent incident at funeral; review dead man's statte and research on possible application in these cases	300.00		
9/27/19	Clerical / Civil Litigatio	1.60	208.00	
#54701	Assemble binder pleadings	130.00		
9/27/19	Brian / Civil Litigatio	1.40	420.00	
#54952	Research on dead man's statute and how it can be applied against her causes of action	300.00		
9/30/19	Clerical / Civil Litigatio	0.20	26.00	
#54714	Scan and send documents to Laura Johnston	130.00		
10/1/19	Clerical / Civil Litigatio	0.20	26.00	
#54726	Copied 96 pages for Laura Johnston; whole punched the same	130.00		
10/1/19	Brian / Civil Litigatio	1.50	450.00	
#54958	Begin reviewing her motion to strike and emergency motion for injunction; research for response; discussion with Laura Johnston	300.00		

Date 1/13/20  
 Time 11:10 am

GETTY & ASSOCIATES, P. C.  
 Client Billing Worksheet

Page 11

17-0496 :Kevin Lawler (continued)

<u>Date/Slip#</u>	<u>Description</u>	<u>HOURS/RATE</u>	<u>AMOUNT</u>	<u>TOTAL</u>
10/2/19 #54781	Clerical / Civil Litigatio Scanned documents for Laura Johnston	0.70 130.00	91.00	
10/2/19 #54968	Brian / Civil Litigatio Research for our response to her motions; continue reviewing motions and exhibits	2.50 300.00	750.00	
10/3/19 #54918	Brian / Civil Litigatio Review her motions and exhibits; begin draft of response for motion for emergency hearing; research for response; research on argument for response	5.00 300.00	1,500.00	
10/9/19 #54876	Joanna / Civil Litigatio Review, revise and sign Praecipe	0.40 300.00	120.00	
10/9/19 #54892	Clerical / Civil Litigatio	0.00 350.00	0.00	
10/9/19 #54895	Clerical / Civil Litigatio Searched for case numbers for Kelli and documents for Christine	0.30 130.00	39.00	
10/10/19 #54905	Clerical / Civil Litigatio Assisted Kelli with Praecipes	0.20 130.00	26.00	
10/10/19 #55327	Joanna / Civil Litigatio Review and sign Praecipe	0.20 300.00	60.00	
11/19/19 #55724	Fred / Civil Litigatio Review case	0.70 350.00	245.00	
11/19/19 #55834	Brian / Civil Litigatio Review their emergency motion and exhibits; discussion with Laura Johnston; review code sections cited in letter	1.40 300.00	420.00	
11/20/19 #55727	Fred / Civil Litigatio Meeting with Judge Rigual	2.00 350.00	700.00	
1/25/19 #5916	Laura / Civil Litigatio Traveled to and from Court for hearing on withdrawal of attorney	3.20 350.00	1,120.00	

Date 1/13/20  
 Time 11:10 am

GETTY & ASSOCIATES, P. C.  
 Client Billing Worksheet

Page 12

17-0496 :Kevin Lawler (continued)

TC L BILLABLE TIME CHARGES	157.30	\$44,995.00
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<u>Date/Slip#</u>	<u>Description</u>	<u>QTY/PRICE</u>	
9/24/19	Clerical / \$Mileage	136	72.76
#54611	Mileage	0.535	
10/1/19	Clerical / \$Copies	96	48.00
#54727	Copies	0.50	

TOTAL BILLABLE COSTS	\$120.76
----------------------	----------

TOTAL NEW CHARGES	\$45,115.76
-------------------	-------------

PREVIOUS BALANCE

120 days overdue	2,254.03
------------------	----------

TOTAL PREVIOUS BALANCE	\$2,254.03
------------------------	------------

TOTAL overdue: \$2,254.03

NEW BALANCE

New 120 days overdue	2,254.03
New Current period	45,115.76

TOTAL NEW BALANCE	\$47,369.79
-------------------	-------------

TOTAL overdue: \$2,254.03



GETTY & ASSOCIATES, P. C.

Post Office Box 1040  
Locust Grove VA 22508  
540-972-7600

Invoice submitted to:  
Kevin Lawler  
5600 Westbury Court  
Fredericksburg VA 22407  
17-0706

January 24, 2020  
In Reference To: Civil - Landlord / Tenant - Loudoun  
Invoice # 37396

	<u>Amount</u>
Previous balance	\$20,058.40
1/31/20 Payment - credit card	(\$5,481.40)
1/31/20 Credit applied toward bill	(\$14,577.00)
	<hr/>
Total payments	(\$20,058.40)
	<hr/>
Balance due	\$0.00
	<hr/>

Payment is due within ten (10) days of the date of invoice. Bills not paid within ten (10) days will incur interest at the rate of 18% per year.

We now accept VISA, Mastercard, Discover, and American Express debit/credit cards for payment. Please stop by the office so we may process the required transaction, or if this is not convenient, please call the office with the debit/credit card information.  
Thank you!

GETTY & ASSOCIATES, P. C.  
Post Office Box 1040  
Locust Grove VA 22508  
540-972-7600

Invoice submitted to:  
Kevin Lawler  
5600 Westbury Court  
Fredericksburg VA 22407  
17-0706

*F936.00  
B 4541.00  
440 Acw*

January 13, 2020  
In Reference To: Civil - Landlord / Tenant - Loudoun  
Invoice # 37369

Professional services

- 7/11/19- Legal Research
- 7/16/19- Work on motions
- 7/19/19- Finalize motion; file in Loudoun
- 8/1/19- Setup binders
- 8/28/19- Draft Defendant's responses to Pleadings
- 8/30/19- Draft RFA's
- 10/10/19- Fax and email Praecepte to Loudoun County Circuit Court;  
copy mailed and emailed to Robin Lawler
- 12/19/19- Scanned documents and put in folders

	<u>Amount</u>
For professional services rendered	\$2,404.00
Previous balance	\$17,654.40
Balance due	<u>\$20,058.40</u>

Payment is due within ten (10) days of the date of invoice. Bills not paid within ten (10) days will incur interest at the rate of 18% per year.

We now accept VISA, Mastercard, Discover, and American Express

Kevin Lawler

Page 2

debit/credit cards for payment. Please stop by the office so we may process the required transaction, or if this is not convenient, please call the office with the debit/credit card information. Thank you!

Date 1/13/20  
 Time 11:10 am

GETTY & ASSOCIATES, P. C.  
 Client Billing Worksheet

Page 14

Nickname 1 : 17-0706 Nickname 2: Lawler  
 Address : Kevin Lawler  
 5600 Westbury Court  
 Fredericksburg, VA 22407  
 17-0706  
 Phone 1 : 540-760-5384  
 In reference to: Civil - Landlord / Tenant - Loudoun  
 Rounding : None  
 Full Precision : No

Last bill : 7/1/19  
 Last charge : 12/19/19  
 Last payment : 8/6/18 Amount : \$3,144.00  
 Arrangement : Time Charges: From slips.  
 Expenses: From slips.

Date/Slip#	Description	HOURS/RATE	AMOUNT	TOTAL
7/11/19 #53125	Laura / Civil Litigatio Legal Research	1.90 350.00	665.00	
7/16/19 #53314	Laura / Civil Litigatio Work on motions	1.00 350.00	350.00	
7/19/19 #53317	Laura / Civil Litigatio Finalize motion; file in Loudon	2.00 350.00	700.00	
8/1/19 #53471	Clerical / Civil Litigatio Setup binders	0.40 130.00	52.00	
8/28/19 #53976	Clerical / Civil Litigatio Draft Defendant's responses to Pleadings	0.60 130.00	78.00	
8/30/19 #54017	Clerical / Civil Litigatio Draft RFA's	3.60 130.00	468.00	
10/10/19 #54885	Clerical / Civil Litigatio Fax and email Praeipce to Loudoun County Circuit Court; copy mailed and emailed to Robin Lawler	0.50 130.00	65.00	
12/19/19 #56270	Clerical / Civil Litigatio Scanned documents and put in folders	0.20 130.00	26.00	
<b>TC L BILLABLE TIME CHARGES</b>		<b>10.20</b>	<b>\$2,404.00</b>	
<b>TOTAL BILLABLE COSTS</b>			<b>\$0.00</b>	

Date 1/13/20  
Time 11:10 am

GETTY & ASSOCIATES, P. C.  
Client Billing Worksheet

Page 15

17-0706 :Kevin Lawler (continued)

TOTAL NEW CHARGES

\$2,404.00

PREVIOUS BALANCE

120 days overdue

17,654.40

TOTAL PREVIOUS BALANCE

\$17,654.40

TOTAL overdue: \$17,654.40

NEW BALANCE

New 120 days overdue

17,654.40

New Current period

2,404.00

TOTAL NEW BALANCE

\$20,058.40

TOTAL overdue: \$17,654.40

GETTY & ASSOCIATES, P. C.  
Post Office Box 1040  
Locust Grove VA 22508  
540-972-7600

Invoice submitted to:  
Kevin Lawler  
5600 Westbury Court  
Fredericksburg VA 22407  
17-0706

July 1, 2019  
In Reference To: Civil  
Invoice # 36928

*Landlord/Tenant*      *Labour*

Professional services

- 6/5/19- Draft opposition to Robin's motion to amend; travel to and from court to file same
- 6/7/19- Trip to and from court on plaintiff's motion to amend

	<u>Amount</u>
For professional services rendered	\$2,205.00
Previous balance	\$15,449.40
Balance due	<u>\$17,654.40</u>

Payment is due within ten (10) days of the date of invoice. Bills not paid within ten (10) days will incur interest at the rate of 18% per year.

We now accept VISA, Mastercard, Discover, and American Express debit/credit cards for payment. Please stop by the office so we may process the required transaction, or if this is not convenient, please call the office with the debit/credit card information.  
Thank you!

Date 6/25/19  
 Time 8:25 am

GETTY & ASSOCIATES, P. C.  
 Client Billing Worksheet

Page 154

Nickname 1 : 17-0706 Nickname 2: Lawler  
 Address : Kevin Lawler  
 5600 Westbury Court  
 Fredericksburg, VA 22407  
 17-0706  
 Phone 1 : 540-760-5384  
 In reference to: Civil  
 Rounding : None  
 Full Precision : No  
  
 Last bill : 5/28/19  
 Last charge : 6/7/19  
 Last payment : 8/6/18 Amount : \$3,144.00  
 Arrangement : Time Charges: From slips.  
 Expenses: From slips.

Date/Slip#	Description	HOURS/RATE	AMOUNT	TOTAL
6/5/19	Laura / Civil Litigatio	2.50	875.00	
#52798	Draft opposition to Robin's motion to amend; travel to and from court to file same	350.00		
6/7/19	Laura / Civil Litigatio	3.80	1,330.00	
2861	Trip to and from court on plaintiff's motion to amend	350.00		
<b>TOTAL BILLABLE TIME CHARGES</b>		<b>6.30</b>		<b>\$2,205.00</b>
<b>TOTAL BILLABLE COSTS</b>				<b>\$0.00</b>
<b>TOTAL NEW CHARGES</b>				<b>\$2,205.00</b>
<b>PREVIOUS BALANCE</b>				
60 days overdue			12,684.40	
Current period			2,765.00	
<b>TOTAL PREVIOUS BALANCE</b>				<b>\$15,449.40</b>
TOTAL overdue: \$12,684.40				
<b>NEW BALANCE</b>				
New 60 days overdue			12,684.40	
New Current period			4,970.00	
<b>TOTAL NEW BALANCE</b>				<b>\$17,654.40</b>
TOTAL overdue: \$12,684.40				

GETTY & ASSOCIATES, P. C.

Post Office Box 1040  
Locust Grove VA 22508  
540-972-7600

Invoice submitted to:  
Kevin Lawler  
5600 Westbury Court  
Fredericksburg VA 22407  
17-0706

May 28, 2019  
In Reference To: Civil  
Invoice # 36863

Professional services

3/28/19- Depositions; communication with client  
4/23/19- Received motion from Robin; reviewed same; calendar date  
4/29/19- Trip to and from court to schedule hearing; discussions  
with opposing and with Moghul; communication and emails  
from Robin (Linda's portion)  
5/1/19- Communication with Moghul and Vivona  
5/2/19- Draft motion for summary judgment; research  
5/6/19- Complet motion for summary judgment

	<u>Amount</u>
For professional services rendered	\$2,765.00
Previous balance	\$12,684.40
Balance due	<u>\$15,449.40</u>

Payment is due within ten (10) days of the date of invoice. Bills not paid within ten (10) days will incur interest at the rate of 18% per year.

We now accept VISA, Mastercard, Discover, and American Express



Kevin Lawler

Page 2

debit/credit cards for payment. Please stop by the office so we may process the required transaction, or if this is not convenient, please call the office with the debit/credit card information. Thank you!

Date 5/21/19  
 Time 12:18 pm

GETTY & ASSOCIATES, P. C.  
 Client Billing Worksheet

Page 191

Nickname 1 : 17-0706 Nickname 2: Lawler  
 Address : Kevin Lawler  
 5600 Westbury Court  
 Fredericksburg, VA 22407  
 17-0706  
 Phone 1 : 540-760-5384  
 In reference to: Civil  
 Rounding : None  
 Full Precision : No  
  
 Last bill : 4/2/19  
 Last charge : 5/6/19  
 Last payment : 8/6/18 Amount : \$3,144.00  
 Arrangement : Time Charges: From slips.  
 Expenses: From slips.

<u>Date/Slip#</u>	<u>Description</u>	<u>HOURS/RATE</u>	<u>AMOUNT</u>	<u>TOTAL</u>
3/28/19 #57016	Laura / Civil Litigatio Depositions; communication with client	2.50 350.00	875.00	
4/23/19 #57435	Laura / Civil Litigatio Received motion from Robin; reviewed same; calendar date	1.20 350.00	420.00	
4/29/19 #57784	Laura / Civil Litigatio Trip to and from court to schedule hearing; discussions with opposing and with Moghul; communication and emails from Robin (Linda's portion)	1.50 350.00	525.00	
5/1/19 #57826	Laura / Civil Litigatio Communication with Moghul and Vivona	0.20 350.00	70.00	
5/2/19 #57767	Laura / Civil Litigatio Draft motion for summary judgment; research	1.00 350.00	350.00	
5/6/19 #57774	Laura / Civil Litigatio Compleat motion for summary judgment	1.50 350.00	525.00	
<b>TOTAL BILLABLE TIME CHARGES</b>		<b>7.90</b>	<b>\$2,765.00</b>	
<b>TOTAL BILLABLE COSTS</b>			<b>\$0.00</b>	
<b>TOTAL NEW CHARGES</b>			<b>\$2,765.00</b>	

Date 5/21/19  
Time 12:18 pm

GETTY & ASSOCIATES, P. C.  
Client Billing Worksheet

Page 192

17-0706 :Kevin Lawler (continued)

PREVIOUS BALANCE

30 days overdue	12,684.40	
<hr/>		
TOTAL PREVIOUS BALANCE		\$12,684.40
TOTAL overdue: \$12,684.40		

NEW BALANCE

New 30 days overdue	12,684.40	
New Current period	2,765.00	
<hr/>		
TOTAL NEW BALANCE		\$15,449.40
TOTAL overdue: \$12,684.40		

GETTY & ASSOCIATES, P. C.

Post Office Box 1040  
Locust Grove VA 22508  
540-972-7600

Invoice submitted to:  
Kevin Lawler  
5600 Westbury Court  
Fredericksburg VA 22407  
17-0706

April 2, 2019  
In Reference To: Civil  
Invoice # 36707

Professional services

- 4/3/18- Print out e-mails from client; separate the same
- 4/4/18- Review records from Terry Cognata
- 4/12/18- Review video charts
  - Check status of opposing party's bankruptcy petition and review recent filings in case for any potential impact on our case or for any order of dismissal
- 6/26/18- Discuss potential arguments for dismissing appeal; research
- 6/29/18- Trip to and from court to file a motion to dismiss appeal
  - Received and reviewed interrogatories filed in circuit court and began drafting response
- 7/3/18- Discuss possible defenses and check for guidance
- 7/5/18- Prepared exhibits for hearing
  - Review complaint and check for possible demurrers, summary judgment motions, plea in bars
- 7/6/18- Trip to and from court; court
  - Research for demurrer and plea in bar; began drafting demurrer and plea in bar
- 7/9/18- Research; continue drafting plea in bar and demurrer; review complaint for other potential grounds and statute of limitations arguments
- 7/10/18- Review and amend draft of demurrer
- 7/11/18- Trip to and from court; court

Kevin Lawler

Page 2

7/11/18-	Discuss with Laura; review federal procedure regarding subpoenas for argument against her witness subpoenas against us; review subpoenas	
7/12/18-	Research for other grounds for demurrer and amend demurrer and plea in bar	
7/18/18-	Research on judicial estoppel; review case law for needed parallel citations; amend and finalize demurrer and bar; research on ability of court to require appeal bond of indigent defendant for unlawful detainer	
8/3/18-	Trip to and from court; court; draft order	
8/10/18-	Trip to and from court; court;	
8/27/18-	Review plaintiff's bill of particulars; draft answer and grounds of defense; trip to and from court to file	
9/6/18-	Trip to and from court to retrieve order	
10/15/18-	Communication with client	
2/22/19-	Communication with Robin Lawler	
2/25/19-	Trip to and from court; set motion to dismiss	
2/27/19-	Research for motion to dismiss	
3/15/19-	Drafted motion to quash and trip to and from court to file	
3/18/19-	Trip to and from court; court; phone call with client	
		<u>Amount</u>
	For professional services rendered	\$14,133.00
	Previous balance	(\$1,448.60)
	Balance due	<u>\$12,684.40</u>

Payment is due within ten (10) days of the date of invoice. Bills not paid within ten (10) days will incur interest at the rate of 18% per year.

We now accept VISA, Mastercard, Discover, and American Express debit/credit cards for payment. Please stop by the office so we may process the required transaction, or if this is not convenient, please call the office with the debit/credit card information. Thank you!

Date 3/25/19  
 Time 4:08 pm

GETTY & ASSOCIATES, P. C.  
 Client Billing Worksheet

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Nickname 1 : 17-0706 Nickname 2: Lawler  
 Address : Kevin Lawler  
 5600 Westbury Court  
 Fredericksburg, VA 22407  
 17-0706  
 Phone 1 : 540-760-5384  
 In reference to: Civil  
 Rounding : None  
 Full Precision : No

Last bill : 7/30/18  
 Last charge : 3/18/19  
 Last payment : 8/6/18 Amount : \$3,144.00  
 Arrangement : Time Charges: From slips.  
 Expenses: From slips.

Date/Slip#	Description	HOURS/RATE	AMOUNT	TOTAL
4/3/18	Clerical / Civil Litigatio	0.60	78.00	
#49226	Print out e-mails from client; separate the same	130.00		
4/4/18	Clerical / Civil Litigatio	1.00	130.00	
#49246	Review records from Terry Cognata	130.00		
4/12/18	Clerical / Civil Litigatio	0.30	39.00	
#49508	Review vidoe charts	130.00		
4/12/18	Brian / Civil Litigatio	0.50	145.00	
#49627	Check status of opposing party's bankruptcy petition and review recent filings in case for any potential impact on our case or for any order of dismissal	290.00		
6/26/18	Brian / Civil Litigatio	0.40	120.00	
#51201	Discuss potential arguments for dismissing appeal; research	300.00		
6/29/18	Laura / Civil Litigatio	2.00	700.00	
#51176	Trip to and from court to file a motion to dismiss appeal	350.00		
6/29/18	Laura / Civil Litigatio	0.50	175.00	
#51178	Received and reviewed interrogatories filed in circuit court and began drafting response	350.00		
7/3/18	Brian / Civil Litigatio	0.40	120.00	
#51243	Discuss possible defenses and check for guidance	300.00		

Date 3/25/19  
 Time 4:08 pm

GETTY & ASSOCIATES, P. C.  
 Client Billing Worksheet

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17-0706 : Kevin Lawler (continued)

<u>Date/Slip#</u>	<u>Description</u>	<u>HOURS/RATE</u>	<u>AMOUNT</u>	<u>TOTAL</u>
7/5/18 #51100	Laura / Civil Litigatio Prepared exhibits for hearing	0.50 350.00	175.00	
7/5/18 #51253	Brian / Civil Litigatio Review complaint and check for possible demurrers, summary judgment motions, plea in bars	1.10 300.00	330.00	
7/6/18 #51105	Laura / Civil Litigatio Trip to and from court; court	3.50 350.00	1,225.00	
7/6/18 #51408	Brian / Civil Litigatio Research for demurrer and plea in bar; began drafting demurrer and plea in bar	3.30 300.00	990.00	
7/9/18 #51413	Brian / Civil Litigatio Research; continue drafting plea in bar and demurrer; review complaint for other potential grounds and statute of limitations arguments	5.50 300.00	1,650.00	
7/10/18 #51416	Brian / Civil Litigatio Review and amend draft of demurrer	0.30 300.00	90.00	
7/11/18 #51364	Laura / Civil Litigatio Trip to and from court; court	2.50 350.00	875.00	
7/11/18 #51428	Brian / Civil Litigatio Discuss with Laura; review federal procedure regarding subpoenas for argument against her witness subpoenas against us; review subpoenas	1.10 300.00	330.00	
7/12/18 #51440	Brian / Civil Litigatio Research for other grounds for demurrer and amend demurrer and plea in bar	1.20 300.00	360.00	
7/18/18 #51639	Brian / Civil Litigatio Research on judicial estoppel; review case law for needed parallel citations; amend and finalize demurrer and bar;	1.40 290.00	406.00	

Date 3/25/19  
 Time 4:08 pm

GETTY & ASSOCIATES, P. C.  
 Client Billing Worksheet

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17-0706 :Kevin Lawler (continued)

Date/Slip#	Description	HOURS/RATE	AMOUNT	TOTAL
#51639..	research on ability of court to require appeal bond of indigent defendant for unlawful detainer			
8/3/18	Laura / Civil Litigatio	4.00	1,400.00	
#51996	Trip to and from court; court; draft order	350.00		
8/10/18	Laura / Civil Litigatio	3.40	1,190.00	
#52156	Trip to and from court; court;	350.00		
8/27/18	Laura / Civil Litigatio	3.50	1,225.00	
#53823	Review plaintiff's bill of particulars; draft answer and grounds of defense; trip to and from court to file	350.00		
9/6/18	Laura / Civil Litigatio	1.90	665.00	
#53835	Trip to and from court to retrieve order	350.00		
10/15/18	Laura / Civil Litigatio	0.20	70.00	
#53356	Communication with client	350.00		
2/22/19	Laura / Civil Litigatio	0.20	70.00	
#56544	Communication with Robin Lawler	350.00		
2/25/19	Laura / Civil Litigatio	1.00	350.00	
#56208	Trip to and from court; set motion to dismiss	350.00		
2/27/19	Laura / Civil Litigatio	1.20	420.00	
#56260	Research for motion to dismiss	350.00		
3/15/19	Laura / Civil Litigatio	1.40	490.00	
#56719	Drafted motion to quash and trip to and from court to file	350.00		
3/18/19	Laura / Civil Litigatio	0.90	315.00	
#56745	Trip to and from court; court; phone call with client	350.00		
<b>TOTAL BILLABLE TIME CHARGES</b>		<b>43.80</b>		<b>\$14,133.00</b>
<b>TOTAL BILLABLE COSTS</b>				<b>\$0.00</b>
<b>TOTAL NEW CHARGES</b>				<b>\$14,133.00</b>



Date: 3/25/19  
Time 4:08 pm

GETTY & ASSOCIATES, P. C.  
Client Billing Worksheet

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17-0706 : Kevin Lawler (continued)

PREVIOUS BALANCE

Current period	(1,448.60)	
<hr/>		
TOTAL PREVIOUS BALANCE		(\$1,448.60)

NEW BALANCE

New Current period	12,684.40	
<hr/>		
TOTAL NEW BALANCE		\$12,684.40

GETTY & ASSOCIATES, P. C.  
Post Office Box 1040  
Locust Grove VA 22508  
540-972-7600

Invoice submitted to:  
Kevin Lawler  
5600 Westbury Court  
Fredericksburg VA 22407  
17-0706

July 30, 2018  
In Reference To: Civil  
Invoice # 36182

	<u>Amount</u>
Previous balance	\$1,695.40
8/6/18 Payment - thank you	(\$3,144.00)
Balance due	<u>(\$1,448.60)</u>

Amount held on account.

Payment is due within ten (10) days of the date of invoice. Bills not paid within ten (10) days will incur interest at the rate of 18% per year.

We now accept VISA, Mastercard, Discover, and American Express debit/credit cards for payment. Please stop by the office so we may process the required transaction, or if this is not convenient, please call the office with the debit/credit card information.  
Thank you!

GETTY & ASSOCIATES, P. C.

Post Office Box 1040  
Locust Grove VA 22508  
540-972-7600

Invoice submitted to:  
Kevin Lawler  
5600 Westbury Court  
Fredericksburg VA 22407  
17-0706

May 22, 2018  
In Reference To: Civil  
Invoice #36049

	<u>Amount</u>
Previous balance	\$5,695.40
5/22/18 Payment - thank you	(\$4,000.00)
Balance due	<u>\$1,695.40</u>

Payment is due within ten (10) days of the date of invoice. Bills not paid within ten (10) days will incur interest at the rate of 18% per year.

We now accept VISA, Mastercard, Discover, and American Express debit/credit cards for payment. Please stop by the office so we may process the required transaction, or if this is not convenient, please call the office with the debit/credit card information. Thank you!

GETTY & ASSOCIATES, P. C.  
Post Office Box 1040  
Locust Grove VA 22508  
540-972-7600

Invoice submitted to:  
Kevin Lawler  
5600 Westbury Court  
Fredericksburg VA 22407  
17-0706

April 2, 2018  
In Reference To: Civil  
Invoice # 35929

Professional services

- 1/24/18- Discuss with LJ; research on bankruptcy automatic stay; research on impact of failure to list pending lawsuit as a possible asset in bankruptcy petition; PACER looking up bankruptcy filings
- 1/25/18- Research on whether filing sanction in suit filed after bankruptcy violates stay
- 1/31/18- Draft Interrogatories and Request for Admissions; review various e-mails from Plaintiff
- 2/1/18- Review new fax from Plaintiff; draft second request for admissions;
- 2/8/18- Continue to copy file and send to Tom Palmer; organize discovery file; prepare file folders for correspondence
- 2/22/18- Phone call with client; scan Power of Attorney for father and for mother;
- 3/7/18- Trip to and from court to file motion
- 3/12/18- Trip to and from court; prepared for hearing; met with State Farm counsel; discussed warrant in detinue with client
- 3/13/18- Communication with client
- 3/14/18- Copied, scanned and e-mailed documents to client

	<u>Amount</u>
For professional services rendered	\$3,890.00

Kevin Lawler

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Additional charges:

	<u>Amount</u>
1/24/18 PACER fees	4.40
Total costs	<u>\$4.40</u>
Total amount of this bill	<u>\$3,894.40</u>
Previous balance	\$1,801.00
Balance due	<u><u>\$5,695.40</u></u>

Payment is due within ten (10) days of the date of invoice. Bills not paid within ten (10) days will incur interest at the rate of 18% per year.

We now accept VISA, Mastercard, Discover, and American Express debit/credit cards for payment. Please stop by the office so we may process the required transaction, or if this is not convenient, please call the office with the debit/credit card information. Thank you!

GETTY & ASSOCIATES, P. C.

Post Office Box 1040  
Locust Grove VA 22508  
540-972-7600

Invoice submitted to:  
Kevin Lawler  
5600 Westbury Court  
Fredericksburg VA 22407  
17-0706

January 23, 2018  
In Reference To: Civil  
Invoice # 35783

Professional services

- 12/6/17- Met with client and fiance regarding the protective order and eviction of sister from parent's home; review documents brought in by client
- 12/8/17- Open file; phone call to two Loudoun County Deputies
- 12/11/17- Prepare retainer and letter
  - Reviewed records from client; documented phone call with officer
- 12/12/17- Instructions to Abby for subpoena to Sheriff for hearing
- 12/13/17- Began preparation of witness subpoena
- 12/14/17- Phone call to Sheriff and client; finish preparation of subpoena; draft letters to the Sheriff's Office and to the court; prepare unlawful detainer
- 12/15/17- Prepare witness subpoena and letters to be submitted; gave copies to all parties; e-mail subpoena to deputy and to client; phone call to court
  - Review and revise subpoena, unlawful detainer; trip to and from court to file subpoena
- 12/18/17- Phone calls to Sheriff's Offices; draft new letter to court; finish unlawful detainer and corresponding documents; made copies for all parties.
  - Hand delivered subpoena to deputy's supervisor for hearing tomorrow
- 12/19/17- Trip to and from court; court; met with client regarding unlawful detainer matter

Kevin Lawler

Page 2

12/20/17- Revise unlawful detainer; revise letter to court and make  
copies

1/4/18- Worked on responses to lawsuits

Amount

For professional services rendered

\$4,301.00

12/19/17 Retainer applied toward bill

(\$2,500.00)

Balance due

\$1,801.00

Payment is due within ten (10) days of the date of invoice. Bills not paid within ten (10) days will incur interest at the rate of 18% per year.

We now accept VISA, Mastercard, Discover, and American Express debit/credit cards for payment. Please stop by the office so we may process the required transaction, or if this is not convenient, please call the office with the debit/credit card information.  
Thank you!

A COPY-TESTE  
Gary M. Clemens, Clerk  
By *G. Clemens*  
Deputy Clerk

# **EXHIBIT #6**



**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

In re:

Robin May Lawler,

Case No. 18-10021-KHK

(Chapter 7)

Debtor.

**ORDER GRANTING MOTION TO REOPEN AND SETTING STATUS HEARING**

This matter was before the Court on August 25, 2020 for a hearing on (i) the Debtor's Motion to Reopen Case (Docket No. 232); and (ii) the Debtor's Motion for Contempt (Docket No. 233) and responses thereto (Docket Nos. 243, 244 and 246). It appearing necessary to do so, and for the reasons stated on the record, it is

**ORDERED:**

1. The Debtor's Motion to Reopen (Docket No. 232) is **GRANTED**.
2. No trustee will be appointed in this case because there are no assets to administer.
3. The reopening of this case does not vacate or in any way interfere with any prior orders of this Court granting relief from the automatic stay.
4. A telephonic Status Hearing on the Debtor's Motion for Contempt (Docket No. 233) will be held through CourtSolutions on **September 8, 2020 at 9:30 a.m.**
5. Parties who wish to appear and participate in the hearing must do so through CourtSolutions by visiting <https://www.Court-Solutions.com> to create an account and then registering for the hearing. *Pro se* debtors may have the CourtSolutions fee waived by certifying that they are not a licensed attorney and are indigent at the bottom of the signup page. Approved participants must log into their Court Solutions account prior



~~EXHIBIT A TO DECLARATION OF NATHANIEL BROWN~~

to the hearing for dial-in instructions.

6. The Clerk will provide copies of this order and cm-ecf notice of its entry to the parties listed below.

Date: Aug 27 2020

/s/ Brian F. Kenney

Brian F. Kenney  
United States Bankruptcy Judge

Entered on Docket: August 28, 2020

Copies to:

Office of the U.S. Trustee - Region 4  
1725 Duke St., Suite 650  
Alexandria, VA 22314

Robin May Lawler  
20611 Morningside Terr  
Sterling, VA 20165  
*Debtor*

Jonathan B. Vivona  
Vivona Pandurangi ,PLC  
601 King Street, Suite 400  
Alexandria, Virginia 22314  
*Counsel for Respondents*

# **EXHIBIT #7**

**UNITED STATES BANKRUPTCY COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA**

Alexandria Division

In re:

Robin May Lawler

Debtor

Case No. 18-10021-KHK

(Chapter 7)

**ORDER GRANTING MOTION FOR CONTEMPT AND ORDERING PAYMENT**

Before the Court is the Debtor's Motion for Contempt (Docket No. 233) against Robert Kevin Lawler and his counsel, Laura Johnston, Johnston & Gregg and Sean D. Gregg (the "Respondents"), who are alleged to have violated the discharge injunction by (i) filing a motion to increase accrual bond in the Loudoun County unlawful detainer; and (ii) filing the counterclaim in Spotsylvania. An evidentiary hearing was held on November 13, 2020. Based on the record before the Court and for the reasons stated on the record at the December 3, 2020 hearing, it is

**ORDERED:**

1. The Motion for Contempt is GRANTED with respect to the Respondents' actions in filing a motion to increase accrual bond in the Loudoun County unlawful detainer;
2. The Respondents are hereby ORDERED, jointly and severally, to pay to the Debtor, the sum of \$260, which represents the fee for reopening this case; and
3. The Clerk shall provide a copy of this order or CM-ECF notice of its entry to the parties listed below.

Date: Dec 30 2020

/s/ Klinette H Kindred

Klinette H. Kindred  
United States Bankruptcy Judge

Entered On Docket: December 31, 2020

Copy electronically to:



# **EXHIBIT #8**

**EXHIBIT A TO DECLARATION OF NATHANIEL BROWN**

**WIRELINE**

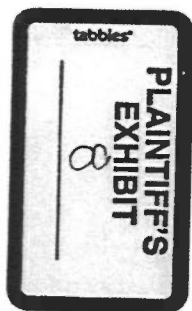


2883194  
12/30/2019

AT&T has queried for records from 10/01/2016 12:00:00am to 12/06/2019 11:59:59pm  
AT&T has queried for records using Eastern Time Zone. AT&T's records are stored and provided in UTC.

Run Date: 01/15/2020  
Run Time: 14:45:58  
Voice Usage For: (540)760-5384

Item	ConnDateTime (UTC)	Originating Number	Sec. Orig.	Terminating Number	Dialed Number	Elapsed Time	CIC	Call Code	Orig. Acc.
1	02/28/18 12:54:19	5407605384		8002690271	8002690271	1:12	288	141	
2	02/28/18 12:54:19	5407605384		8002690271	8002690271	1:12	9	720	
3	02/28/18 12:54:20	5407605384		3711997007	8002690271	1:13	288	325	
4	02/28/18 13:25:22	5407605384		8002690271	8002690271	0:18	288	141	
5	02/28/18 13:25:22	5407605384		8002690271	8002690271	0:18	9	720	
6	02/28/18 13:25:23	5407605384		5685787007	8002690271	0:19	288	325	



AT&T Proprietary

The information contained here is for use by authorized persons only and is not for general distribution.

# **EXHIBIT #9**

DuPlEx

Social Security Administration  
Retirement, Survivors and Disability Insurance



ROBIN MAY LAWLER  
20611 MORNINGSIDE TERR  
STERLING VA 20165-3566

We recently reviewed the evidence in your Social Security disability claim and find that your disability is continuing. Any special situation involving your claim will be indicated by one of more of the blocks checked below. We have also enclosed information about working that explains some of the terms we use.

- 1.  The doctors and other trained staff who decided that you are disabled expect your health to improve. Therefore, we will review your case in. We will send you a letter before we start the review.
  - 2.  You have worked in some months of the trial work period, but you were unable to continue working. We counted as your trial work months.
  - 3.  The way we count your trial work months has changed because the law has changed. Under the new law, effective in 1992, only trial work months in a period of 60 months in a row count. You have worked at least month(s) of the 9-month trial work period. We counted as trial work months.
  - 4.  We have scheduled your claim for review in since it appears your 9th month of trial work will end at that time, according to the information reported to us.
  - 5.  You have completed your trial work period. We counted as your trial work months. Although you are now working (or have recently worked and stopped), we find that the work you have been doing does not show that you can do substantial work.
  - 6.  Your claim will be reviewed from time to time to see if you are still eligible for benefits based on disability or blindness. When your claim is reviewed, you will be contacted if there is any question as to whether your eligibility continues.
- If you are receiving Supplemental Security Income payments, any decision about that claim will be sent to you in a separate notice.
- Suspect Social Security Fraud?**

If you suspect Social Security fraud, please visit <http://oig.ssa.gov> or call the Inspector General's Fraud Hotline at 1-800-269-0271 (TTY 1-866-501-2101).

XXX-XX-7732 LAWLER, ROBIN MAY



**EXHIBIT A TO DECLARATION OF NATHANIEL BROWN**

4. ( ) We have scheduled your claim for review in since it appears your 9th month o will end at that time, according to the information reported to us.
5. ( ) You have completed your trial work period. We counted as your trial work mon Although you are now working (or have recently worked and stopped), we find that the have been doing does not show that you can do substantial work.
6. (X) Your claim will be reviewed from time to time to see if you are still eligible for t based on disability or blindness. When your claim is reviewed, you will be contacted if tl question as to whether your eligibility continues.

If you are receiving Supplemental Security Income payments, any decision about that clai sent to you in a separate notice.

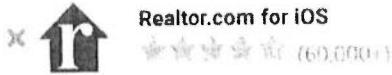
**Suspect Social Security Fraud?**

If you suspect Social Security fraud, please visit <http://oig.ssa.gov/r> or call the Inspector Ge Fraud Hotline at 1-800-269-0271 (TTY 1-866-501-2101).

XXX-XX-7732

LAWLER, ROBIN MAY

# **EXHIBIT #10**



Open in App

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Rent

Mortgage

Find Realtors®

My Home

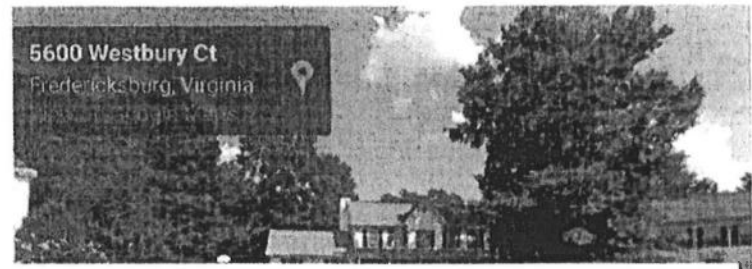
News & Insights



Advertise

< Fredericksburg, VA x Q

Public Owner



< Back >



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Off Market

PLAINTIFF'S EXHIBIT 10


### Interested in selling your home?

Estimated home value\*

**\$417,600**

See your selling options

\*Estimation is calculated based on tax assessment records, recent sale prices of comparable properties, and other factors.

**6** **4.5** **3,969** **0.55**  
beds baths sq ft  acres lot

5600 Westbury Ct, Fredericksburg, VA 22407

Commute Time

Ask an agent


 Share

 Edit Facts

**Property Overview** - 5600 Westbury Ct, Fredericksburg, VA 22407 is a single family home built in 1992. This property was last sold for \$285,000 in 2014 and currently has an estimated value of \$417,600.

Read More 


7.35%

More expensive than nearby properties 

\$2,159

Rental Estimate 

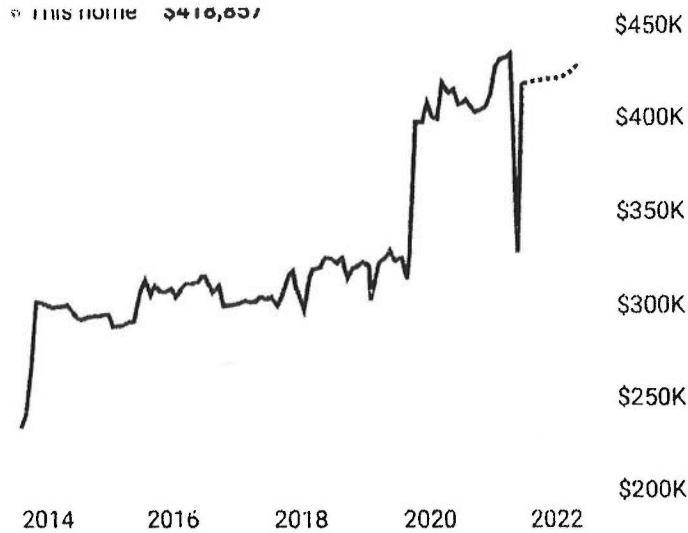
### Own this home?

Learn More 

Claim your home

## Home Value

5600 Westbury Ct is likely to appreciate by 3% in the next year, based on the latest home price index. In the last 8 years, this home has increased its value by 78%.



Estimated values are not a substitute for professional expertise. Contact your REALTOR® for a market assessment.



### See how other providers value this home

Get a better idea of this home's value by comparing valuations from multiple providers.

[See more valuations](#)

## Similar Homes For Sale

Comparison of 5600 Westbury Ct, Fredericksburg, VA 22407 with Nearby Homes:

<b>Contingent</b>	<b>Contingent</b>		<b>C</b>
<b>\$395,000</b>	<b>\$349,900</b>	<b>\$355,000</b>	<b>\$:</b>
4 bd, 4 ba, 3,033 sq ft 6409 Prospect St	4 bd, 3 ba, 2,020 sq ft 11215 Piedmont Landing Dr	5 bd, 3 ba, 1,492 sq ft 704 Shamrock Dr	4 l 71
↓ 19% more expensive	↓ 6% more expensive	↓ 7% more expensive	↓
↓ 91 sq ft smaller	↓ 1,104 sq ft smaller	↓ 1,632 sq ft smaller	↓
↑ 1 year newer	↑ 7 years newer	↓ 3 years older	↓

Interested in any of these homes? Have a local agent show you around.





Contact Agent



## Homes around Westbury Ct

## **Property History**

This property was sold twice in the last 17 years.

- Today  **Estimated at \$417,600**
  - 301148  **Sold for \$285,000**
  - May 23  **Listed for \$299,900**
- [See More](#) 

History data displayed is obtained from public records and/or MLS feeds from the local jurisdiction. Contact your REALTOR® directly in order to obtain latest information.

## **Property Details**



Status

**Off Market**



Price/Sq Ft

**\$105**



Type

**Single Family Home**



Built

**1992**



### **Public Records**

- Beds: 6
- House size: 3,969 sq ft
- Stories: 2
- Lot size: 23869

- Garage: Attached Garage
- Heating: Yes
- Cooling: Central
- Year built: 1992
- Property type: Single family
- Date updated: 09/12/2020
- Fireplace: Two Story

Request a FREE Analysis

## Nearby Schools

Rating*	School Name
6	Battlefield Elementary School
3	Battlefield Middle School
5	Courtland High School

See More 

\* School data provided by National Center for Education Statistics, Pitney Bowes, and GreatSchools. Intended for reference only. The GreatSchools Rating is based on a variety of school quality indicators, including test scores, college readiness, and equity data. To verify enrollment eligibility, contact the school or district directly.

## Neighborhood

5600 Westbury Ct is located in the city of Fredericksburg, VA.

<b>\$389,000</b>	<b>\$380,000</b>	<b>39</b>	<b>\$166</b>
Median Listing Price	Median Sales Price	Median Days on Market	Price Per Sq Ft

Popular searches in Fredericksburg include: Newest Listings, Open Houses, Price Reduced.



Request a FREE Analysis

Explore The Neighborhood

Learn more about the flood risk of this property

## Price & Tax History

### Property Price

Date	Event	Price
Today	Estimated	\$417,600
07/28/2014	Sold	\$285,000
05/23/2014	Listed	\$299,900
08/29/2013	Listed	\$309,900
03/29/2004	Sold	\$275,000

**Property Tax**




Year	Taxes	Total Assessment
2020	\$2,788	\$344,500
2019	\$2,765	\$326,300
2018	\$2,297	\$275,800
2017	\$2,155	\$253,500
2016	\$2,155	\$253,500
2015	\$2,043	\$237,600
2014	\$1,921	\$223,400
2013	\$1,817	\$201,000

See More ▾

About History & Taxes Data

The price and tax history data displayed is obtained from public records and/or MLS feeds from the local jurisdiction. Contact your REALTOR® directly in order to obtain the most up-to-date information available.



 **Recently Sold Homes Near 5600 Westbury Ct**

 <div style="background-color: black; color: white; padding: 5px; font-weight: bold; font-size: 1.2em;">\$292,000</div> <p>11314 Wytheville Ln, Fredericksbur...                  2 bd • 2+ ba • 2,340 sq ft</p>	 <div style="background-color: black; color: white; padding: 5px; font-weight: bold; font-size: 1.2em;">\$221,000</div> <p>5273 Daffodil Dr, Fredericksburg, V...                  3 bd • 2+ ba • 1,620 sq ft</p>	 <div style="background-color: black; color: white; padding: 5px; font-weight: bold; font-size: 1.2em;">\$250,000 <span style="float: right;">&gt;</span></div> <p>10521 Greta Lynn                  2 bd • 3+ ba • 1,98</p>
--	--	--

View all


**\$\$\$ Nearby Home Values**


Address	Estimate	Bed	Bath
---------	----------	-----	------


Homes near 22407	\$		
This Home	Est. \$417,600	6	4+
5605 Westbury Ct	\$329,100	5	N/A
5604 Westbury Ct	\$359,100	4	N/A
5603 Westbury Ct	\$432,400	4	N/A
6705 Willcher Ct	\$434,500	5	N/A
9918 Box Oak Ct	\$532,700	5	N/A


See More 

### What is Your Home Worth?

 robin lawler

 bubba1bubba2@gmail.com

 Phone

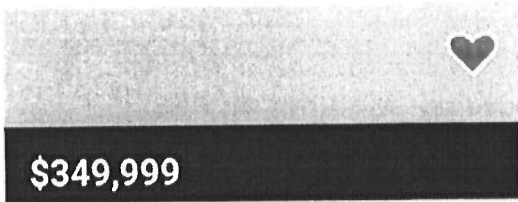
Looking to sell in ... 

**Request a FREE Analysis**

By proceeding, you consent to receive calls and texts at the number you provided, including marketing by autodialer and prerecorded and artificial voice, and email, from realtor.com and others about your inquiry and other home-related matters, but not as a condition of any purchase. More..

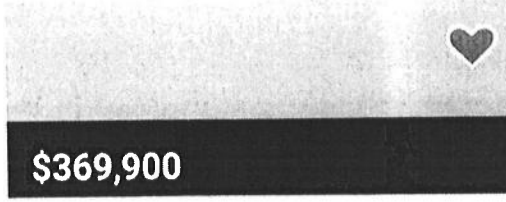
## Homes Around \$417,600

- New
- New
- New




Property listing card for 11716 Enchanted Woods Way. The card features a heart icon in the top right corner. The price is \$349,999.

11716 Enchanted Woods Way  
5 bd • 2+ ba • 2,408 sq ft



Property listing card for 9905 Shadowridge Ct. The card features a heart icon in the top right corner. The price is \$369,900.

9905 Shadowridge Ct  
3 bd • 2+ ba • 2,504 sq ft

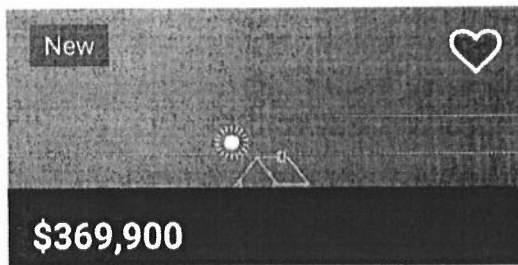


Property listing card for 6320 Prospect St. The card features a right arrow icon in the top right corner. The price is \$415,000.

6320 Prospect St  
3 bd • 2+ ba • 2,000 sq ft

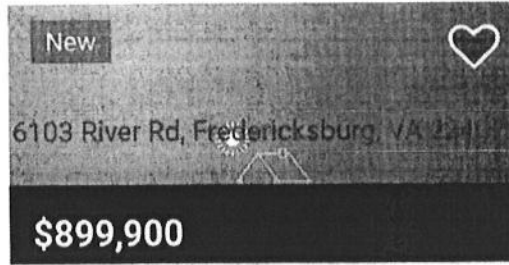
Homes near 5600 Westbury Ct have a median list price of \$399,900 and a median price per square foot of \$170.

### Nearby Homes with Pools around 22407



Property listing card for 10804 Woodland Dr. The card features a 'New' badge in the top left and a heart icon in the top right. The price is \$369,900.

10804 Woodland Dr  
3 bd • 2 ba • 1,600 sq ft



Property listing card for 6103 River Rd. The card features a 'New' badge in the top left and a heart icon in the top right. The price is \$899,900.

6103 River Rd  
4 bd • 3+ ba • 4,247 sq ft



Property listing card for 7313 Beechplum. The card features a 'Pending' badge in the top left and a right arrow icon in the top right. The price is \$440,000.

7313 Beechplum  
4 bd • 2+ ba • 3,400 sq ft

There are 13 homes with pools near 5600 Westbury Ct.

Virginia > Spotsylvania County Fredericksburg Westbury Ct

#### Additional Information About 5600 Westbury Ct, Fredericksburg, VA 22407

Are you hunting for property records for the home located at 5600 Westbury Ct, Fredericksburg, VA 22407? If so, we can help you easily find crucial details for the property as well as other Fredericksburg property records, Virginia public records, and other vital real estate details that can help you simplify the moving process. At this moment the home at 5600 Westbury Ct is

See More v

#### Nearby Cities

- Houses for Sale in Stafford
- Houses for Sale in Spotsylvania
- Houses for Sale in King George
- Houses for Sale in Locust Grove
- Houses for Sale in Woodbridge
- See More v

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[AD CHOICES](#)      [ADVERTISE WITH US](#)      [AGENT SUPPORT](#)

[PRIVACY / WEBSITE TERMS OF USE](#)      [SITEMAP](#)

[DO NOT SELL MY PERSONAL INFORMATION](#)

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# **EXHIBIT #11**



20190620-0033130

Loudoun County, VA Pgs:2  
6/20/2019 12:40:20 PM  
Gary N. Clemens, Clerk

Tax Map No.: /81/V/8///9/ Parcel ID: 011376841000  
Return to: Getty & Associates, P.C.

This Deed of Gift is exempt from recordation taxes pursuant to § 58.1-811 (D) of the Code of Virginia, 1950, as amended. This deed was prepared without the benefit of a title examination.

THIS DEED OF GIFT, made and entered into this 17<sup>th</sup> day of June, 2019, by and between LINDA A. LAWLER, widow of ROBERT W. LAWLER, deceased, surviving tenant by the entirety, party of the first part, hereinafter called Grantor, and LINDA A. LAWLER and ROBERT KEVIN LAWLER, parties of the second part, hereinafter called Grantees, whose address is 20611 Morningside Terrace, Sterling, Virginia 20165.

WHEREAS, Robert W. Lawler and Linda A. Lawler, husband and wife, took title to the hereinafter described property as tenants by the entirety with the common law right or survivorship, by Deed dated June 25, 1997, and recorded in Deed Book 1506 at Page 1238 among the land records of Loudoun County, Virginia; and

WHEREAS, the said Robert W. Lawler departed this life on March 15, 2019, thereby vesting title in and to the hereinafter described property to his widow, Linda A. Lawler, by operation of law; and,

WHEREAS, the said Linda A. Lawler, does now desire to convey the hereinbelow described property to the aforementioned Grantees;

WITNESSETH:

THAT for and in consideration of the love and affection which the Grantor has and bears for the Grantees, the Grantor does hereby give, grant and convey with GENERAL WARRANTY and with ENGLISH COVENANTS OF TITLE, except as hereinafter



mentioned, to the Grantees, all her right title and interest, in and to the hereinafter described property, as joint tenants with the right of survivorship, to-wit:

Lot 9, Section Eleven-B (11-B), POTOMAC LAKES, as the same appears duly dedicated, platted and recorded in Deed Book 1319 at Page 957, among the land records of Loudon County, Virginia.

THIS CONVEYANCE is made subject to the restrictions, conditions, rights of way, agreements and declarations contained in the instruments forming the chain of title to this property.

WITNESS the following signatures and seals.

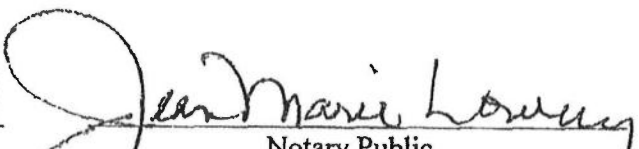
  
LINDA A. LAWLER (SEAL)



STATE OF VIRGINIA,  
COUNTY OF Spotsylvania to-wit:

The foregoing instrument was acknowledged before me this 17<sup>th</sup> of June, 2019, by Linda A. Lawler, who personally appeared before me on said date in the county and state aforesaid.



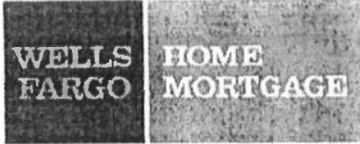
  
Notary Public  
Jean Marie Lowery

My Commission Expires: 04/30/2023

PREPARED BY:  
Frederick J. Getty, Esq.  
Virginia Bar No. 37338  
PO BOX 1040  
LOCUST GROVE, VA  
22508  
640-972-7800



# **EXHIBIT #12**



Subpoena Processing Department  
1 Home Campus  
MAC F2302-04T  
Des Moines, IA 50328-0001

**AFFIDAVIT**

I, Adria Wilson, state:

1. I am a Vice President Loan Documentation for Wells Fargo Bank N.A. and an authorized custodian of the mortgage records for Wells Fargo Home Mortgage, servicer for the loan, and I have authority to certify such records.
2. The attached hereto is a true copy of the certain loan records described in the Legal Order, pertaining to Robert W and Linda A Lawler which will complete our compliance with the Legal Order or Request for Production of Records, served upon the custodian of records.
3. The foregoing documents are true and correct copies. These records were made and kept in the regular course of business at or near the time of the acts, conditions and or events recorded, and were made by persons having knowledge of the information set forth.

I declare under penalty of perjury that the foregoing is true and correct and that this Affidavit is executed this 1<sup>st</sup> day of April, 2021, at San Antonio, Texas.

Adria Wilson  
Vice President Loan Documentation  
Wells Fargo Bank, N.A.  
Date: 4/1/21

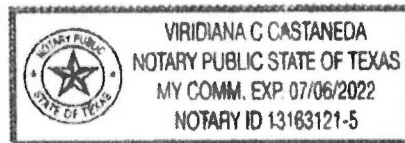
State of Texas  
County of Bexar

Sworn and subscribed to before me this 1<sup>st</sup> day of April, 2021, by Adria Wilson Vice President Loan Documentation, Wells Fargo Bank, N.A.

Notary Public's Signature:

My Commission Expires:

Personalized Seal



# **EXHIBIT #13**



**Home Mortgage**

Return Mail Operations  
 PO Box 14411  
 Des Moines IA 50306-3411

Statement date 08/21/20  
 Loan number 1261  
 Payment due date 10/01/20  
 Total amount due \$878.37  
 After 10/16/20 a late charge may apply \$43.92

Property address 20611 MORNINGSIDE TER  
 STERLING, VA 20165

The COVID-19 situation is rapidly evolving and Wells Fargo is committed to helping you navigate through these unprecedented times. Our resource page found on [wellsfargo.com/coronavirus](http://wellsfargo.com/coronavirus) continually updated to provide the information you need to quickly and easily manage your mortgage. Thank you for being our customer, we are here to support you any way we can.

ROBERT W LAWLER  
 LINDA A LAWLER  
 5600 WESTBURY CT  
 FREDERICKSBURG, VA 22407-1273

**Customer Service**

- Correspondence  
PO Box 10335  
Des Moines IA 50306
- Telephone\*  
1-866-234-8271
- Fax  
1-866-278-1179
- Hours of operation  
Mon - Fri 6 a.m. - 10 p.m.  
Sat 8 a.m. - 2 p.m. CT
- Purchase or refinance  
1-800-554-2880

\*We accept telecommunications relay service calls.

**Enjoy convenience and peace of mind with automatic payments.**

Set up automatic payments (monthly, twice a month, every two weeks, or weekly) from your checking or savings account(s).  
 Call 1-866-234-8271 or enroll at [wellsfargo.com](http://wellsfargo.com).

**Other Quick and easy ways to pay**

- Online at [wellsfargo.com](http://wellsfargo.com).
- Mobile using the Wells Fargo mobile application.
- Mail a payment payable to Wells Fargo Home Mortgage using the coupon attached below.
- Phone 1-866-234-8271, 24/7 access.
- In person at a Wells Fargo bank branch near you.

**Explanation of amount due**

**Account summary**

**Past payments breakdown**

Explanation of amount due		Account summary		Past payments breakdown		
Principal	\$518.68	Unpaid principal balance	\$53,123.21	Since last statement		
Interest	\$359.69	<i>(This is not a pay-off amount.)</i>		Total received*	\$878.37	Year-to-date
Current payment	\$878.37	Interest rate	8.125%	Principal	\$515.19	\$4,025.82
Total amount due 10/01/20	\$878.37	Maturity date (month/year)	07/27	Interest**	\$363.18	\$1,001.14

\*This total may exclude the Unassigned Funds balance from the Account summary section.  
 \*\*This information should not be used for tax purposes. If you have tax related questions, please contact your tax advisor.

**Activity since your last statement**

Date	Description	Total	Principal	Interest	Escrow	Other
08/31	Payment	\$878.37	\$515.19	\$363.18		

**For your consideration**

We thank you for your business and look forward to serving you and your future home financing needs. Let us give you a quick complimentary review of your Wells Fargo home loan to ensure that it continues to meet your current and future needs. Whether you're planning a move, wondering if now is a good time to refinance or have other home financing needs, we are happy to help you explore options and answer any questions. If you apply for new financing, we'll help you save time on your application by uploading your Wells Fargo account information for you.

Call 1-888-633-8662 or contact your local home mortgage consultant. If you are on active military duty, please consult your legal advisor regarding the relief you may be eligible for under the Servicemembers Civil Relief Act or state law.



ROBERT W LAWLER  
 LINDA A LAWLER  
 5600 WESTBURY CT  
 FREDERICKSBURG, VA 22407

Loan number 1261  
 Current payment due 5878.37  
 Total amount due 10/01/20 5878.37  
 After 10/16/20 a late charge may apply 543.92  
 Online payments - wells Fargo.com

Check here and see reverse for address corrections.

WELLS FARGO HOME MORTGAGE  
 PO BOX 105632  
 ATLANTA GA 30348-5632

Please specify additional funds

Payment amount	A	\$	
Additional principal	B	\$	
Late charges	C	\$	
Other fees	D	\$	
Additional escrow (if applicable)	E	\$	
Total amount enclosed (Please do not send cash)	F	\$	

708 1261 5 1000087837009222900878370000000 00000000000000000000 8

# **EXHIBIT #14**

4/28/2021

20611 Morningside Ter, Sterling, VA 20165 - realtor.com®

realtor.com®



Est. **\$484,900** ⓘ

View up to 3 home estimates

**3.5** **2,166** **1,742**  
 Map baths sq ft sqft lot

Commute Time **20611 Morningside Ter,**  
 Sterling, VA 20165

FEMA  
 Zone  
 X  
 (est.)  
 Flood  
 Factor  
 ⓘ  
 1/10



**Property Overview** - 20611 Morningside Ter, Sterling, VA 20165 is a multl family home built in 1995. This property was last sold for \$169,000 in 1997 and currently has an estimated value of \$484,900. The median sales price for the Cascades area is \$480,000. The \$484,900 estimated value is 2.64% greater than the median listing price of \$472,450 for the Cascades area.

According to the Sterling public records, the property at 20611 Morningside Ter, Sterling, VA 20165 has approximately 2,166 square feet, with a lot size of 1,742 square feet. Nearby schools include Horizon Elementary School, River Bend Middle School and Potomac Falls High School.



4/28/2021

20611 Morningside Ter, Sterling, VA 20165 | MLS# LO2165686 | Redfin

← Search

← Search

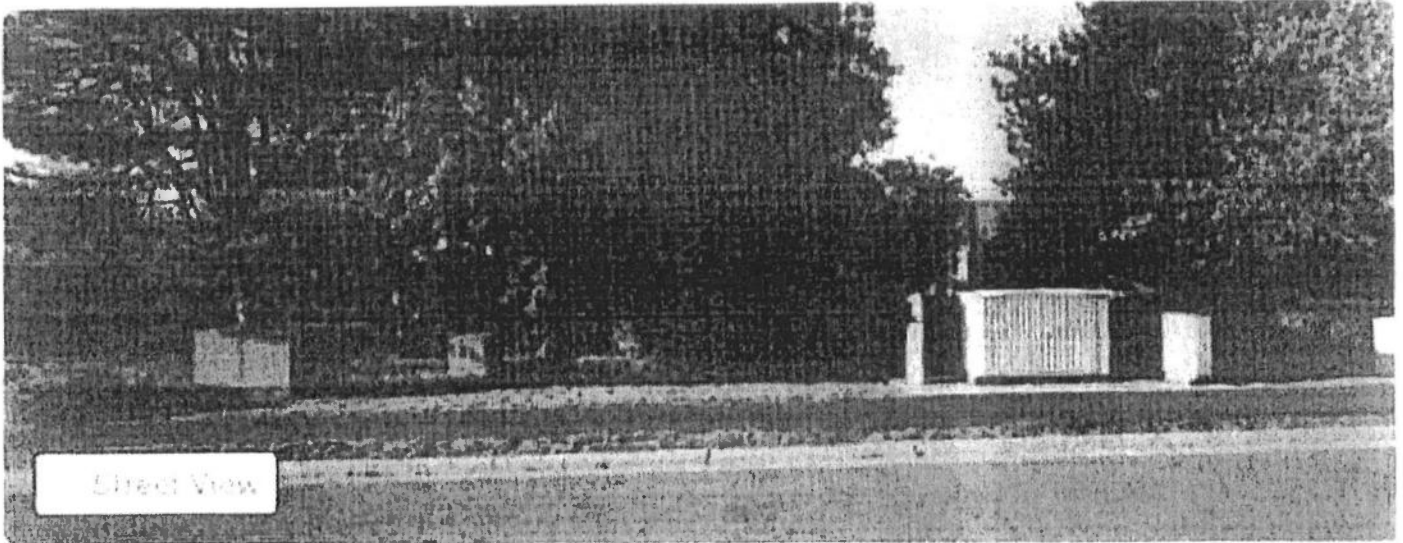
Overview

Public Facts

Listing Details

Sale & Tax History

Schools



🔒 Local rules require you to be signed in to see all of the details.  
Sign In or Join for free with no obligation.

20611 Morningside Ter, Sterling, VA 20165

<b>\$463,731</b>	—	<b>3.5</b>	<b>2,166</b>
Redfin Estimate	Beds	Baths	Sq Ft



Off Market

This home last sold on Jun 26, 1997.

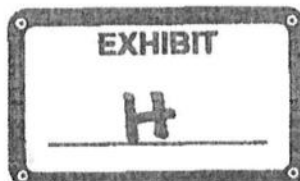
### Redfin Estimate for 20611 Morningside Ter

Edit Home Facts to improve accuracy.

Create an Owner Estimate

**\$463,731**

April 2021



Track This Estimate

1 year 5 years

4/28/2021

20811 Morningside Ter, Sterling, VA 20165 | MLS# LO2105098 | Redfin



Track your estimate and nearby sale activity.

## Sale Proceeds

Home Sale Price  
\$463,731

Outstanding Mortgage  
\$115,000

	Selling with Traditional Agent	Selling with Redfin Agent
<u>Your Total Sale Proceeds</u>	\$315,391	\$322,347
<u>Seller Agent Commission</u>	3% (\$13,912)	15% (\$6,956)

Compare Agent Services



Show Taxes and Fees



Get \$6,956 More Selling Your Home with a Redfin Agent

Schedule Selling Consultation



8/28/2021

20611 Morningside Ter, Sterling, VA 20165 | MLS# LO2185698 | Redfin

'Should I refinance?'

## Rental Estimate for 20611 Morningside Ter

Edit Home Facts to improve accuracy.

**\$2,164 - \$2,473 / mo**

Rental estimate based on recent rentals.

## About This Home



Local rules require you to be signed in to view this home's listing description.  
Sign In or Join for free with no obligation.

Redfin last checked: over 7 days ago Source: Public Records

### Price Insights

Redfin Estimate	\$463,731
Price/Sq.Ft.	\$214

### Home Facts

Status	Sold
Property Type	Townhouse
Year Built	1995
Lot Size	1,742 Sq. Ft.

# **EXHIBIT #15**

September 30, 2020 • Page 2 of 5



**Overdraft Protection**

This account is not currently covered by Overdraft Protection. If you would like more information regarding Overdraft Protection and eligibility requirements please call the number listed on your statement or visit your Wells Fargo branch.

**Transaction history**

Date	Check Number	Description	Deposits/ Credits	Withdrawals/ Debits	Ending daily balance
9/2		Schwab Brokerage Moneylink [REDACTED] 7054 R Kevin Lawler		1,000.00	10,908.00
9/3		Edeposi IN Branch/Store 09/03/20 12:24:26 Pm 10424 Courthouse Rd Spotsylvania VA 4020	2,386.00		13,304.00
9/4		American Express ACH Pmt 200904 W3938 Robert K Lawler		168.00	13,138.00
9/8		Edeposi IN Branch/Store 09/06/20 11:03:50 Am 10424 Courthouse Rd Spotsylvania VA 4020	1,100.00		
9/8		Edeposi IN Branch/Store 09/08/20 03:37:27 Pm 10424 Courthouse Rd Spotsylvania VA 4020	8,006.93		
9/8	1146	Check		400.00	19,844.93
9/9		Parera, LLC Tbd 200909 Supplier_Connec 19078*19078	455.00		20,299.93
9/11		Parera, LLC Tbd 200911 Supplier_Connec 19078	90.00		
9/11		Edeposi IN Branch/Store 09/11/20 11:38:05 Am 10424 Courthouse Rd Spotsylvania VA 4020	3,192.00		23,561.93
9/14	1147	Check		120.00	23,461.93
9/18		Edeposi IN Branch/Store 09/18/20 01:03:48 Pm 10424 Courthouse Rd Spotsylvania VA 4020	1,188.00		24,630.93
9/22		Parera, LLC Tbd 200922 Supplier_Connec 19087*18917	440.00		
9/22		Edeposi IN Branch/Store 09/22/20 09:15:00 Am 10424 Courthouse Rd Spotsylvania VA 4020	1,215.00		
9/22		Schwab Brokerage Moneylink [REDACTED] 7054 R Kevin Lawler		2,000.00	24,285.93
9/23	1148	Check		7,916.93	16,369.00
9/25		Parera, LLC Tbd 200925 Supplier_Connec 19088*19088	160.00		
9/25	1149	Check		256.50	16,272.50
9/28		Deposit Made In A Branch/Store	1,733.00		18,005.50
9/29		Parera, LLC Tbd 200929 Supplier_Connec 19090	95.00		
9/29	1150	Check		330.00	17,770.50
9/30		Edeposi IN Branch/Store 09/30/20 03:57:31 Pm 10424 Courthouse Rd Spotsylvania VA 4020	701.00		18,471.50
<b>Ending balance on 9/30</b>					<b>18,471.50</b>
<b>Totals</b>			<b>\$18,752.93</b>	<b>\$12,188.43</b>	

The Ending Daily Balance does not reflect any pending withdrawals or holds on deposited funds that may have been outstanding on your account when your transactions posted. If you had insufficient available funds when a transaction posted, fees may have been assessed.

**Summary of checks written (checks listed are also displayed in the preceding Transaction history)**

Number	Date	Amount	Number	Date	Amount	Number	Date	Amount
1146	9/8	400.00	1148	9/23	7,916.93	1150	9/29	330.00
1147	9/14	120.00	1149	9/25	256.50			

**Monthly service fee summary**



# **EXHIBIT #16**

EXHIBIT A TO DECLARATION OF NATHANIEL BROWN



Portfolio for Robert K Lawler

Financial Advisor Ben Maxwell, 540-507-8818  
9110 Old Battlefield Blvd, Suite 100, Spotsylvania, VA 22553

Statement Period Nov 30 - Dec 31, 2019

Page i of ii

ROBERT K LAWLER  
5600 WESTBURY COURT  
FREDERICKSBURG VA 22407-1273

**Your 2019 Tax Forms from Edward Jones**

Edward Jones will furnish all Forms 1099-R and 1099-Q by Jan. 31 and all Consolidated 1099 Tax Statements by Feb. 15, per IRS requirements. Your Consolidated 1099 Tax Statement may not be final as of Feb. 15 if we have not received final information from issuers. All forms will be finalized by March 15. To learn more about your Edward Jones tax forms, visit us at [edwardjones.com/taxcenter](http://edwardjones.com/taxcenter).

**Portfolio Summary**

Total Portfolio Value	
<b>\$412,363.07</b>	
1 Month Ago	\$409,013.68
1 Year Ago	\$15,809.25
3 Years Ago	\$13,796.38
5 Years Ago	\$12,453.68

**Stay on Track in 2020**

The start of a new year is a great time to reflect on where you've been and think about where you're headed - especially with your finances. Your financial advisor is there to help. Call him or her to check your progress and ensure you're on the right track.

Overview of Accounts				
Accounts	Account Holder	Account Number	Value 1 Year Ago	Current Value
Individual Retirement Account Select	Robert K Lawler	██████████81-1-2	\$6,213.62	\$13,092.67
Single Account	Robert K Lawler	██████████42-1-6	\$0.00	\$103,936.86
Single Account Advisory Solutions Fund Model	Robert K Lawler	██████████43-1-5	\$0.00	\$283,423.21
529 College Savings Plan	Robert K Lawler	██████████94-1-0	\$9,595.63	\$11,910.33
<b>Total Accounts</b>			<b>\$15,809.25</b>	<b>\$412,363.07</b>

Although account information is provided on this page, it does not guarantee an actual statement was produced. Refer to your account statement for the exact registration and more specific details regarding each account.



**EXHIBIT A TO DECLARATION OF NATHANIEL BROWN**



**Portfolio for Robert K Lawler**

**Financial Advisor** Ben Maxwell, 540-507-8818  
9110 Old Battlefield Blvd, Suite 100, Spotsylvania, VA 22553

**Statement Period** Nov 30 - Dec 31, 2019



**Financial Foundation**

Reaching your personal financial goals depends on a strong foundation. At Edward Jones, we believe that foundation consists of regular reviews of your goals and their time frames, your comfort with risk (such as market volatility) and the way assets are allocated within your portfolio. Following is a summary of your financial foundation based on your discussions with your financial advisor.

**Retirement Goal for Kevin Lawler**

<b>Preparing for Retirement</b>	<b>Risk Tolerance</b>	<b>Planned Retirement</b>	<b>Desired Annual Spending</b>	<b>Retirement Portfolio Objective</b>
	Robert Medium to High	Robert to Retire at Age 65	\$40,000	Growth Focus

The Desired Annual Spending amount does not include variable expenses or debt payments you may have discussed with your financial advisor.

**Accounts Assigned to your Retirement Goal**

Accounts	Account Holder	Account Number	Portfolio Objective - Account
Individual Retirement Account Select	Robert K Lawler	XXX-XX081-1-2	Growth Focus
Single Account	Robert K Lawler	XXX-XX442-1-6	Growth Focus
Single Account Advisory Solutions Fund Model	Robert K Lawler	XXX-XX443-1-5	Growth Focus

Note: It is important to review your account(s) to keep your investments aligned with your risk tolerance and positioned to achieve your goal. Any Review Due dates above refer to dates by which you must complete your next annual review. Please contact your financial advisor to update any missing or outdated Financial Foundation information or to schedule your next annual review.

**Overview of Other Products and Services**

Loans and Credit	Account Number	Balance	Approved Credit	Available Credit	Interest Rate
Amount of money you can borrow for Robert K Lawler	██████████42-1-6	\$0.00	\$50,572*	\$50,572	6.00%

\* Your approved credit is not a commitment to loan funds. It is based on the value of your investment account which could change daily. The amount you may be eligible to borrow may differ from your approved credit. Borrowing against securities has its risks and is not appropriate for everyone. If the value of your collateral declines, you may be required to deposit cash or additional securities, or the securities in your account may be sold to meet the margin call. A minimum account value is required if you have loan features on your account. Your interest will begin to accrue from the date of the loan and be charged to the account. Your interest rate will vary depending on the assets under care of your Edward Jones Pricing Group. For more information on how your interest rate is calculated, contact your financial advisor or please visit: [www.edwardjones.com/disclosures/marginloans](http://www.edwardjones.com/disclosures/marginloans)

Important disclosures; such as Statement of Financial Condition, Conditions that Govern Your Account, Account Safety, Errors, Complaints, Withholding, Free Credit Balance, Fair Market Value or Terminology; relating to your account(s) are available on the last page of this package or at [www.edwardjones.com/statementdisclosures](http://www.edwardjones.com/statementdisclosures).



Account Holder(s) Robert K Lawler  
 Account Number 775-93081-1-2  
 Financial Advisor Ben Maxwell, 540-507-8818  
 9110 Old Battlefield Blvd, Suite 100, Spotsylvania, VA 22553



Statement Date Nov 30 - Dec 31, 2019

Page 1 of 3

Edward D Jones & Co Custodian  
 FBO Robert K Lawler IRA

**Protect Yourself Against Fraud**

Anyone can become a target for fraud. That's why it's important to stay updated on common scams and learn how to avoid becoming a victim. Edward Jones offers a Fraud Awareness and Prevention web page with a list of common scams and tips on protecting yourself against them. Visit [edwardjones.com/fraud](http://edwardjones.com/fraud) to help avoid becoming a victim of fraud.

**Traditional Individual Retirement Account - Select**  
**Custodian: Edward D. Jones & Company**  
**Portfolio Objective - Account: Growth Focus**

Account Value	
<b>\$13,092.67</b>	
1 Month Ago	\$12,815.95
1 Year Ago	\$6,213.62
3 Years Ago	\$5,495.14
5 Years Ago	\$5,045.81

Value Summary		
	This Period	This Year
Beginning value	\$12,815.95	\$6,213.62
Assets added to account	0.00	6,000.00
Assets withdrawn from account	0.00	0.00
Fees and charges	0.00	0.00
Change in value	276.72	879.05
<b>Ending Value</b>	<b>\$13,092.67</b>	

For more information regarding the Value Summary section, please visit [www.edwardjones.com/mystatementguide](http://www.edwardjones.com/mystatementguide).

Rate of Return					
Your Personal Rate of Return for Assets Held at Edward Jones	This Quarter	Year to Date	Last 12 Months	3 Years Annualized	5 Years Annualized
	5.50%	12.65%	12.65%	8.55%	6.89%

**Your Personal Rate of Return:** Your Personal Rate of Return measures the investment performance of your account. It incorporates the timing of your additions and withdrawals and reflects commissions and fees paid. Reviewing Your Personal Rate of Return is important to help ensure you're on track to achieving your financial goals.

The performance of your investments is tracked since they have been held in the current account, but no earlier than Jan.1, 2009. This also includes investments you owned during this time period but have since sold. Certain events, including a transfer of an investment between accounts, share class conversion, or change in an investment's identification code (CUSIP) caused by a corporate action, will impact the time frame over which the investment's rate of return is calculated.

Information used to calculate performance may have been obtained from third parties and Edward Jones cannot guarantee the accuracy of such information.

For the most current information, contact your financial advisor or visit [www.edwardjones.com/rateofreturn](http://www.edwardjones.com/rateofreturn).

**EXHIBIT A TO DECLARATION OF NATHANIEL BROWN**



Account Holder(s) Robert K Lawler  
 Account Number 775-93081-1-2  
 Financial Advisor Ben Maxwell, 540-507-8818  
 9110 Old Battlefield Blvd, Suite 100, Spotsylvania, VA 22553



Statement Date Nov 30 - Dec 31, 2019

Page 2 of 3

**Asset Details** (as of Dec 31, 2019)

additional details at [www.edwardjones.com](http://www.edwardjones.com) access

**Assets Held At Edward Jones**

					<b>Balance</b>
Cash					<b>\$33.15</b>
				<b>Unrealized</b>	
<b>Stocks</b>	<b>Price</b>	<b>Quantity</b>	<b>Cost Basis</b>	<b>Gain/Loss</b>	<b>Value</b>
Amazon.Com Inc	1,847.84	3	5,835.60	-292.08	<b>5,543.52</b>
Visa Inc Cl A	187.90	40	7,325.42	190.58	<b>7,516.00</b>
<b>Total Account Value</b>					<b>\$13,092.67</b>

Cost basis is the amount of your investment for tax purposes and is used to calculate gain or loss upon sale or other disposition of a security. It is not a measure of performance. The cost basis amounts on your statement should not be relied upon for tax preparation purposes. Cost basis information may be from outside sources and has not been verified for accuracy. Refer to your official tax documents for information about reporting cost basis. Consult a qualified tax advisor or an attorney regarding your situation. If you believe the cost basis information is inaccurate, contact Client Relations.

**Retirement Summary**

	<b>This Period</b>	<b>Cumulative</b>
2019 Contributions	\$0.00	\$6,000.00
2018 Contributions	0.00	0.00

**Your Relationship and Mailing Group(s)**

**Relationship** - You have asked us to combine the accounts listed below for planning purposes as we work with you to achieve your financial goals. This means that information about these accounts and your goals and objectives may be shared with and accessible by each owner and authorized party in the relationship, including through Edward Jones Online Access and Edward Jones reports.

**Mailing Group** - You have also asked us to combine certain information about the accounts listed below into the mailing group(s) below for delivery purposes. Information for accounts within the same mailing group may be included in one envelope and mailed to the mailing group address. We may still send certain information directly to the account owners, as we believe appropriate.

Account Number	Account Owner(s)	Account Type	Mailing Group Address
XXX-XX081-1-2	Robert K Lawler	Individual Retirement Account Select	ROBERT K LAWLER 5600 WESTBURY COURT FREDERICKSBURG VA 22407-1273
XXX-XX442-1-6	Robert K Lawler	Single Account	
XXX-XX443-1-5	Robert K Lawler	Single Account Advisory Solutions Fund Model	



**EXHIBIT A TO DECLARATION OF NATHANIEL BROWN**



Account Holder(s) Robert K Lawler  
Account Number 775-93081-1-2  
Financial Advisor Ben Maxwell, 540-507-8818  
9110 Old Battlefield Blvd, Suite 100, Spotsylvania, VA 22553



Statement Date Nov 30 - Dec 31, 2019

Page 3 of 3

**Your Relationship and Mailing Group(s) (continued)**

Account Number	Account Owner(s)	Account Type	Mailing Group Address
XXX-XX094-1-0	Robert K Lawler Owner	529 College Savings Plan	

For more information on this relationship or mailing group(s), please visit [www.edwardjones.com/disclosures](http://www.edwardjones.com/disclosures). If you wish to make changes to either the relationship(s) or mailing group(s), please contact your financial advisor.

# **EXHIBIT #17**

7/8/2021

iCloud Mail

# Re: CEASE AND DESIST Fundraiser by R. Kevin Lawler : Legal & Medical Aid AND AMENDED COMPLAINT IF LEAVE TO FILE LATE IS GRANTED

February 17, 2021 at 4:23 PM

From ROBIN LAWLER

To Jason Collins

Cc Sean Gregg, Brandy Pierce

Received: from st43p00im-ztfo10071701.me.com ([17.58.63.173]);  
Original-recipient: rrc822;bubba1bubba2@icloud.com  
Return-path: <bubba1bubba2@icloud.com>  
DKIM-Signature: v=1; a=rsa-sha256; c=relaxed/relaxed; d=icloud.com; s=1a1ha;  
Received: from [192.168.1.162];  
Content-type: multipart/alternative;  
Content-transfer-encoding: 7bit  
MIME-version: 1.0 (1.0)  
Subject: Re: CEASE AND DESIST Fundraiser by R. Kevin Lawler : Legal & Medical  
From: ROBIN LAWLER <bubba1bubba2@icloud.com>  
Date: Wed, 17 Feb 2021 15:23:11 -0500  
Cc: Sean Gregg <sgregg@johnstongregg.com>, Brandy Pierce <ws3@johnstongregg.com>  
Message-id: <C12B3359-63CE-4A74-A67A-9B03CCDEF2D7@icloud.com>  
To: Jason Collins <jason.collins@daisylaw.com>  
X-Mailer: iPhone Mail (12D52)  
X-Proofpoint-Spam-Details: rule=notspam policy=default score=0 mxscore=0

Sir, I just responded to your first email. Please refer to it.

Again, though, I appreciate your assistance

Sent from my iPhone

On Feb 17, 2021, at 3:14 PM, Jason Collins <jason.collins@daisylaw.com> wrote:

Ms. Lawler:

I represent Mr. Lawler in the 5910 matter. That is a civil matter in Loudoun County Circuit Court. I will forward your correspondence to Mr. Lawler but I do not represent him in such matters.

Jason R. Collins  
Daisy & Collins, LLP  
19775 Belmont Executive Plaza, Suite 500  
Ashburn, Virginia 20147  
Phone: (571) 262-2710, ext. 201 | Fax: (703) 584-7354  
[jason.collins@daisylaw.com](mailto:jason.collins@daisylaw.com)  
[www.daisylaw.com](http://www.daisylaw.com)

<image001.png>



PRIVILEGED & CONFIDENTIAL  
Attorney-Client Communication  
Attorney Work Product

This email message is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited.

If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message.

7/8/2021

iCloud Mail

If you are the intended recipient, please be advised that the content of this message is subject to access, review and disclosure by the sender's Email System Administrator.

**From:** ROBIN LAWLER [mailto:bubba1bubba2@icloud.com]  
**Sent:** Wednesday, February 17, 2021 10:55 AM  
**To:** Jason Collins  
**Cc:** Sean Gregg; Brandy Pierce  
**Subject:** CEASE AND DESIST Fundraiser by R. Kevin Lawler : Legal & Medical Aid AND AMENDED COMPLAINT IF LEAVE TO FILE LATE IS GRANTED

February 17, 2021

Mr Collins:

Attached is a link to a defamatory and fraudulent GoFundMe page Kevin Lawler started on September 10, 2020.

His own sworn testimony of October 14 2020 proves that the claims he made about me, about his health, and about his finances were false and fraudulent.

This site is still online, both on GoFundMe and, upon information and belief, Facebook.

People I have known for 43 years donated to this and can still read it.

His prior counsel was warned about it, yet it still exists. It appears that the only change to it is that it cannot be viewed openly by all of the public (me, the State Police, etc), but can by the people who donated to it.

While the live link is attached below, so is a screenshot, taken moments ago, showing that "donors" can still actively sign in to read the false information.

<image002.png>

<https://www.gofundme.com/f/legal-amp-medical-aid?qid=c324c6dff5134cba2ee9397f2202aeb8>

The pdf is also attached. The VSP are in possession of this:

The Virginia State Police assured me that this is a computer crime, as well as obtaining funds by false pretenses, in violation on Va Code 18.2-178. It stayed below the felony threshold for sometime after I warned Johnston and Gregg of the posting.

Then, after they were notified and did nothing to take the site down, it appears that one of my oldest friends put the donations over \$1,000. Which put the fraud over the felony threshold.

As you can see by the screenshot, \$1,145 was donated.

### § 18.2-152.3. Computer fraud; penalty.

Any person who uses a computer or computer network, without authority and:

1. Obtains property or services by false pretenses;

7/8/2021

iCloud Mail

2. Embezzles or commits larceny; or
3. Converts the property of another;

is guilty of the crime of computer fraud.

If the value of the property or services obtained is \$1,000 or more, the crime of computer fraud shall be punishable as a Class 5 felony. Where the value of the property or services obtained is less than \$1,000, the crime of computer fraud shall be punishable as a Class 1 misdemeanor.

That's two felonies.

He is currently on a plea deal for his October 2020 conviction. He faces a mandatory 30 days in jail. Here is the decision:

<image003.png>

If that site is not removed from GoFundMe, Facebook, and all social media BY CLOSE OF BUSINESS TODAY, I will be pressing charges.

I have a telephone conference scheduled for tomorrow morning at 9:00am with the Special Agent.  
<image004.png>

For reference, here are just a couple screenshots from Facebook provided to me on September 10, 2020 when he posted it. Your client is a pathological liar, and many openly called him such on Facebook...after all, he was capable of faking pancreatic cancer for many years.  
<image005.jpg>

<image006.jpg>

YOUR CLIENT MUST IMMEDIATELY CEASE AND DESIST, REMOVING THAT PAGE FROM ALL SOCIAL MEDIA BY THE END OF TODAY.

If I do not receive an affidavit that it has been fully removed, I will press charges tomorrow.

Further, if your motion for leave to file late is granted, I intend to amend my complaint immediately to add this defamation claim. Further, as established by their billing records, the entire \$3 million lawsuit Gregg and Johnston conspired to write against me in March-April 2020 (while Johnston was NOT AN ATTORNEY) was knowingly fraudulent and based upon absolutely no fact whatsoever. It is the very definition of abuse of process. Further, as it was resolved in my favor with a nonsuit, the argument can also be made for civil malicious prosecution.

Johnston was not an attorney. The acts they sued me for were actually provably for acts taken or omitted by Johnston herself.

As such, she was not legally his agent and could not even legally be working for Gregg or representing herself as an attorney

Both Gregg and Kevin confirmed they reviewed the pleadings before they were filed. And Kevin stated under oath that Laura told him she was suspended.

7/8/2021

iCloud Mail

Therefore, conspiracy claims can and will be added.

All of that is subject for another email, however.

i want to reiterate that Kevin Lawler must remove the GoFundMe page and all references to it from all social media TODAY, February 17, 2021, or face severe immediate criminal and civil issues.

Thank you for your attention to this matter.

Robin

Sent from my iPhone

# **EXHIBIT #18**

7/8/2021


iCloud Mail

# GoFundMe defamation warrant in debt Kevin Lawler

April 17, 2021 at 11:35 PM

From ROBIN LAWLER

To Kevin Lawler , Sean Gregg , Jason Collins

📎  GoFundMe d...t in debt .pdf 2.04 MB

Received: from st43p00lm-ztbu10063701.me.com ([1758.63.178])  
Original-recipient: rfc822;bubba1bubba2@icloud.com  
Return-path: <bubba1bubba2@icloud.com>  
DKIM-Signature: v=1; a=rsa-sha256; c=relaxed/relaxed; d=icloud.com; s=1a1hai;  
Received: from [192.168.1.162]  
Content-type: multipart/mixed;  
Content-transfer-encoding: 7bit  
From: ROBIN LAWLER <bubba1bubba2@icloud.com>  
MIME-version: 1.0 (1.0)  
Date: Sat, 17 Apr 2021 23:35:24 -0400  
Subject: GoFundMe defamation warrant in debt Kevin Lawler  
Message-id: <A945387E-E333-47F6-A8FA-F59A988F9745@icloud.com>  
To: Kevin Lawler <kevlawler1@aol.com>, Sean Gregg <sgregg@johnstongregg.com>,  
X-Mailer: iPhone Mail (18D70)  
X-Proofpoint-Spam-Details: rule=notspam policy=default score=0 adultscore=0

I warned you repeatedly to take down that fraud.

Sent from my iPhone





# **EXHIBIT #19**

Search  
How it works

Start a GoFundMe



Sign in

# Legal & Medical Aid



R. Kevin Lawler is organizing this fundraiser.

Created September 10, 2020

Medical, Illness & Healing



**\$1,145** raised

## Organizer

R. Kevin Lawler  
Organizer  
Fredericksburg, VA

Contact

This fundraiser is no longer accepting donations. If you are the organizer, beneficiary, team member, or donor, [sign in](#) to see additional



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GoFundMe

[Terms](#)

[Privacy](#)

[Legal](#)



# **EXHIBIT #20**

04/26/2012 23:24 FAX

Page 4 of 4

Check Image System - Check Printing Window

ATTN: Kelly

5/3/2019 10:32 AM

**ROBERT W LAWLER**  
 7 FOXHALL CIRCLE  
 FREDERICKSBURG, VA 22407

7761000010  
 8/20/2018

1449  
 02-10311

Pay to the Order of LAURA Johnston \$ 350.00  
Three Hundred Fifty Dollars

Edward Jones  
 For: Legal Filing E.D.J. POA

⑆ [REDACTED] ⑆ [REDACTED] 2196 1449

0817  
 Bank of Charles Town

109-138  
 Regional Credit Union

DO NOT WRITE IN MOBILE DEPOSIT  
 DO NOT WRITE IN MOBILE DEPOSIT

0880 14524

Account	Serial	Sequence	Paid Date	Amount
[REDACTED] 2196	1449	2000313003	08/20/2018	\$350.00

Page 4 of 4



# **EXHIBIT #21**

# **EXHIBIT #22**



WARRANT OF ARREST - MISDEMEANOR (STATE)

COMMONWEALTH OF VIRGINIA Va. Code § 19.2-71, -72

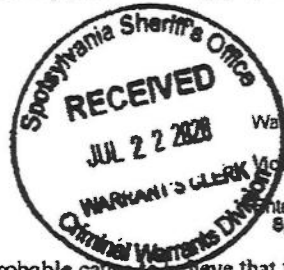
Spotsylvania CITY OR COUNTY

General District Court Criminal Traffic Juvenile and Domestic Relations District Court

TO ANY AUTHORIZED OFFICER:

You are hereby commanded in the name of the Commonwealth of Virginia forthwith to arrest and bring the Accused before this Court to answer the charge that the Accused, within this city or county, on or about 07/18/2020 did unlawfully in violation of Section

18.2-162.1 Code of Virginia: willfully and maliciously divert or waste any public water supply by tampering with a fire hydrant.



Warrant # 20-5691 204430371 Entered By: [Signature] Spotsylvania Criminal Warrants Division

I, the undersigned, have found probable cause to believe that the Accused committed the offense charged, based on the sworn statements of

Deputy Barto, A 487 Spotsylvania SO, Complainant.

Execution by summons permitted at officer's discretion. not permitted.

07/22/2020 03:38 PM DATE AND TIME ISSUED

[Signature] Jane E. Tomiko CLERK MAGISTRATE JUDGE

SUMMONS (If authorized above and by serving officer)

You are hereby commanded to appear before this court located at 9111 Courthouse Rd, 1st Floor Spotsylvania, VA 22553-0339 on Monday / September 21 - 2020 8:30 AM/PM.

I promise to appear in accordance with this Summons and certify that my mailing address as shown at right is correct.

[Signature] ACCUSED

CCRE/Fingerprinting Required

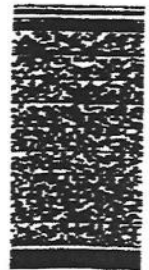
WARNING TO ACCUSED: You may be tried and convicted in your absence if you fail to appear in response to this Summons. Willful failure to appear is a separate offense. SIGNING THIS NOTICE DOES NOT CONSTITUTE AN ADMISSION OF GUILT.

Case No. C20-1257 ACCUSED: Lawler, Robert Kevin 5600 Westbury Ct Fredericksburg, VA 22407 To be completed upon service as Summons Mailing address Same as above RACE SEX BORN HT. WGT. EYES HAIR CLASS 2 MISDEMEANOR EXECUTED by arresting the Accused named above on this day: EXECUTED by summoning the Accused named above on this day: For legal entities other than individuals, service pursuant to Va. Code § 19.2-76. 07-23-2020 11:30 AM C. C. Washington, ARRESTING OFFICER 414 Spotsylvania for Sheriff Attorney for the Accused: Gregg Short Offense Description (not a legal definition): PUBLIC WATER: TAMPER W/ FIRE HYDRANT Offense Tracking Number: 177GM2000008309 FOR ADMINISTRATIVE USE ONLY Virginia Crime Code: VAN-2944-M2

EXHIBIT 22

M 9/21/20 Hearing Date/Time 10-8-20 10:30

I certify that the document to which this authorization is affixed is a true copy of a record in the Spotsylvania General District Court, that I have custody of the record, and that I am the custodian of that record. [Signature] Date 9/20/20



STATE

The Accused was this day:

tried in absence  present

**EXHIBIT A TO DECLARATION OF NATHANIEL BROWN**

Tracking Number: 177GM2000008309

PROSECUTING ATTORNEY PRESENT (NAME)

DEFENDANT'S ATTORNEY PRESENT (NAME)

NO ATTORNEY  ATTORNEY WAIVED  
 If convicted, no jail sentence will be imposed.

INTERPRETER PRESENT

Certified pursuant to § 19.2-190.1.

Plea of Accused:

not guilty  Witnesses sworn  
 nolo contendere  
 guilty  Plea voluntarily and intelligently entered after the defendant was apprised of his right against compulsory self-incrimination and his right to confront the witnesses against him.

Plea and Recommendation

And was TRIED and FOUND by me:

not guilty  guilty as charged  
 guilty of

VPC

facts sufficient to find guilt but defer adjudication/ disposition to

DATE AND TIME  
and place accused on probation, §§ 4.1-305, 18.2-57.3, 18.2-251, 19.2-303.2, or 19.2-303.6.

A separate order for First Offender is attached and incorporated in this order.

Costs imposed upon defendant.

DATE

JUDGE

And was FOUND by me to be:

driving a commercial motor vehicle  
 carrying hazardous materials

I ORDER a nolle prosequi on prosecution's motion

I ORDER the charge dismissed  with prejudice

conditioned upon payment of costs and  
 successful completion of  traffic school  
 mature driver school, § 16.1-69.48.1.

accord and satisfaction, § 19.2-151.

under §§ 4.1-305, 18.2-57.3, 18.2-251, 19.2-303.2 or 19.2-303.6.

I impose the following Disposition:

FINE  CIVIL PENALTY of \$ 500

with \$ \_\_\_\_\_ suspended

JAIL SENTENCE of 30 days

imposed,  of which \_\_\_\_\_ days mandatory minimum, with 30 days suspended

for a period of 3 years conditioned upon being of good behavior, keeping the peace, obeying this order and paying fines and costs.

Credit is allowed pursuant to § 53.1-187 for time spent in confinement.

Serve jail sentence beginning \_\_\_\_\_  
 on weekends only

Work release  authorized if eligible  required  
 not authorized

Public work force  authorized  not authorized

on PROBATION for  
 VASAP  local community-based probation agency

Monitoring by GPS/other tracking device  
 DRIVER'S LICENSE suspended for \_\_\_\_\_

Restricted Driver's License per attached order  
 Ignition Interlock for \_\_\_\_\_

RESTITUTION order incorporated  
 Restitution payment is a condition of suspended sentence

COMMUNITY SERVICE \_\_\_\_\_ hours to be completed by \_\_\_\_\_ and supervised by \_\_\_\_\_

to be credited against fines and costs

Contact prohibited between defendant and victim/victim's family or household members

Reimburse Commonwealth for investigatory medical fees  
 Pay \$50 fee to the Court for Trauma Center Fund

Other: pay \$769.28 to debt's current account

Submit to FINGERPRINTING and photograph per attached order

Remanded for  FINGERPRINTING/CCRE Report

DNA order incorporated  
 Bail on Appeal \$ \_\_\_\_\_

DATE

JUDGE

10-8-20  
Arthurly 2nd offender

FINE

LOCALITY

COSTS

461 FIXED MISD FEE

462 FIXED DRUG MISD FEE

001 INT CRIM CHILD FEE

113 WITNESS FEE

113 IGNITION INTERLOCK

113 DUI FEE

113

120 CT. APPT. ATTY

121 TRIAL IN ABSENCE FEE

125 WEIGHING FEE

133 BLOOD TEST FEE

137 TIME TO PAY

192 TRAUMA CENTER FEE

228 COURTHOUSE CONSTRUCTION FEE

234 JAIL ADMISSION FEE

243 LOCAL TRAINING ACADEMY FEE

244 COURTHOUSE SECURITY FEE

OTHER (SPECIFY)

OTHER (SPECIFY)

OTHER (SPECIFY)

OTHER (SPECIFY)

OTHER (SPECIFY)

OTHER (SPECIFY)

OTHER (SPECIFY)

OTHER (SPECIFY)

OTHER (SPECIFY)

OTHER (SPECIFY)

OTHER (SPECIFY)

OTHER (SPECIFY)

OTHER (SPECIFY)

OTHER (SPECIFY)

OTHER (SPECIFY)

TOTAL

\$ 500

DATE

JUDGE

10-8-20  
never warned pre conviction

DATE

JUDGE

DATE

1 Okay.

2 CONTINUATION OF DIRECT EXAMINATION

3 BY MS. LAWLER:

4 Q. So with regard to the reviewing the  
5 documents you all provided a criminal history.  
6 It wasn't the certified criminal history that I  
7 had asked for, but I previously provided you with  
8 one. We can come back to this, but you were  
9 recently convicted of a crime, were you not?

10 A. Yes.

11 Q. Can you explain what that was?

12 A. Unauthorized use. I believe. I  
13 believe that's all.

14 MR. GREGG: That was tampering  
15 with firearms.

16 A. Oh, tampering.

17 Q. And the charge for fraud was dropped?

18 A. Yes.

19 MR. GREGG: They were dismissed.  
20 By the Judge after trial.

21 A. Dismissed after trial.

22 Q. Okay. Wasn't there a plea?

23 A. No. There was no plea.

24 Q. Give me just one moment, please. Was  
25 it nolo contendere?

VETERAN  
REPORTERS



855.667.0077  
VETERANREPORTERS.COM

1 MR. GREGG: I'm sorry, what was  
2 the question?

3 Q. Was it a nolo contendere?

4 MR. GREGG: No, it was tried, we  
5 pleaded not guilty and it was dismissed.

6 MS. LAWLER: Oh, I'm sorry. You  
7 don't need to get upset at me, Mr. Gregg. I'm  
8 not ...

9 MR. GREGG: I'm not upset but I  
10 want to make sure you can hear. I'm not sitting  
11 beside the microphone.

12 MS. LAWLER: I can hear you fine.

13 MR. GREGG: I don't know if the  
14 Court Reporter can. Okay, thank you.

15 MS. LAWLER: She's indicated she  
16 can. I'm going to come back to this. You know  
17 what, yeah, I'll come back to it.

18 CONTINUATION OF DIRECT EXAMINATION

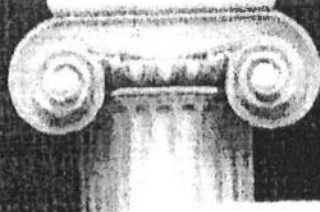
19 BY MS. LAWLER:

20 Q. Are you familiar with the allegations  
21 in this case?

22 MR. GREGG: Which case?

23 MS. LAWLER: The case that we're  
24 here on, Mr. Gregg. The ...

25 MR. GREGG: So case number ending



# GENERAL DISTRICT COURT ONLINE CASE INFORMATION SYSTEM

**Spotsylvania General District Court** 📍 ?

**Court**  
 Spotsylvania General District Court

**Traffic/Criminal**  
 Name Search  
 Case Number Search  
 Hearing Date Search  
 Service/Process Search

**Civil**  
 Name Search  
 Case Number Search  
 Hearing Date Search  
 Service/Process Search

## Traffic/Criminal Case Details

### Case/Defendant Information

Case Number : GC20007257-00      Filed : 07/24/2020      Locality : COMMONWEALTH OF VA

Name : LAWLER, ROBERT KEVIN      Status : Other      Defense Attorney : GREGG

Address : FREDERICKSBURG, VA 22407      AKA1 :      AKA2 :

Gender : Male      Race : White      DOB : [REDACTED]\*\*\*\*

### Charge Information

Charge : TAMPER W/FIRE HYDRANT

Code : 18.2-162.1      Case Type : Misdemeanor      Class : 2

Section :      Arrest Date : 07/23/2020      Complainant : BARTO

Offense Date : 07/18/2020

Amended Charge :      Amended Code :      Amended Case Type :

### Hearing Information

Date	Time	Result	Hearing Type	Courtroom	Plea	Continuance Code
09/21/2020	08:30 AM	Continued	Arraignment			
10/08/2020	10:30 AM	Finalized	Adjudicatory			

### Service/Process

### Disposition Information

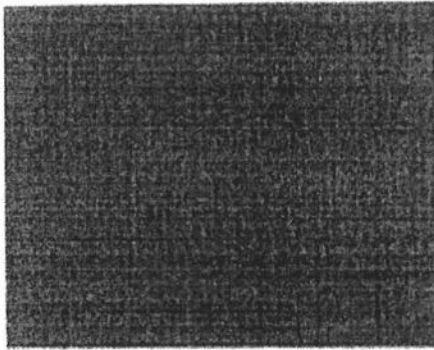
Final Disposition : GUILTY

Sentence : 00Months 030Days 00Hours      Suspended Sentence : 00Months 030Days 00Hours

Time : 030Days 00Hours

Probation Type :      Probation Time : 00Years 00Months 000Days      Probation Starts :

Operator License Suspension : 00Years 00Months 000Days      Restriction Effective Date :



Time :  
Operator  
License  
Restriction  
Codes :  
Fine : \$500.00                      Costs : \$86.00                      Fine/Costs  
Due :  
Fine/Costs Paid                      Fine/Costs 10/08/2020                      VASAP :  
Paid :

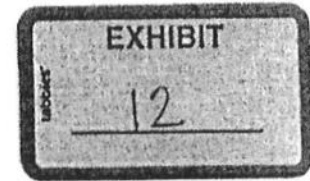
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Johnston & Gregg PLC  
 111 East Main Street  
 P.O. Box 1300  
 Orange, Virginia 22960  
 540.672.7070.

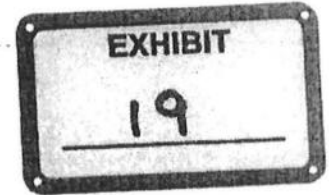
Johnston & Gregg PLC



Robert Kevin Lawler  
 5600 Westbury Court  
 Fredericksburg, VA 22407  
 United States

Balance \$33,840.53  
 Invoice # 01515  
 Invoice Date September 3, 2020  
 Payment Terms Due on Receipt  
 Due Date September 03, 2020

Lawler, Robert - MISC (BILLING FILE) (G2001-004)  
 For services rendered between  
 August 01, 2020 and August 31, 2020



Securely pay online with your credit card  
<https://the-law-offices-of-sean-gregg.mycase.com/x65ynd27>



**Time Entries**

Date	EE	Activity	Description	Rate	Hours	Line Total
08/06/2020	LJ	Review	6767 Began reviewing transcript for Order and discovery responses.	\$325.00	1.50	\$487.50
08/07/2020	LJ	Attention Provided	6767 Reviewed Hearing Transcript (250 pages) Respond to discovery per Court's Order per transcript.	\$325.00	7.00	\$2,275.00
08/10/2020	LJ	Document Finalization	6767 Finalized and transmitted additional discovery responses per Court Order.	\$325.00	2.40	\$780.00
08/10/2020	LJ	Court Preparation	20-963 Prepared for and attended hearing to dismiss case in Spotsy.	\$325.00	5.80	\$1,885.00
08/11/2020	LJ	Communication	6767 Communication with R Lawler to schedule a new deposition date for 8/18. Communication with client regarding deposition schedule.	\$325.00	0.60	\$195.00
08/12/2020	LJ	Review	6767 received and reviewed numerous documents to be used in deposition of client	\$325.00	1.70	\$552.50
08/13/2020	LJ	Review	6767 Received and reviewed numerous deposition exhibits for upcoming deposition of KL; communication with Vivona	\$325.00	2.00	\$650.00
08/14/2020	BP	Communication	Phone call to Kevin regarding deposition on 8/18/20.	\$60.00	0.13	\$8.00
08/14/2020	PP	Attention Provided	6767 Conference with Vivona. Communication with B Mitneil. Received and reviewed additional exhibits for K Lawler deposition.	\$60.00	1.50	\$90.00

08/17/2020	BP	Communication	Phone call to Kevin regarding deposition being cancelled.	\$60.00	0.10	\$6.00
08/17/2020	LJ	Attention Provided	6767 Communication from R Lawler cancelling depositions. Communications with Vivona. Communications with client re new dates for depositions and cancelation of 8/18 depo. Coordinate obtaining court transcript.	\$325.00	1.80	\$585.00
08/18/2020	LJ	Attention Provided	6767 Communications with R Lawler re new depo dates. Communication with Vivona. Communication with K Lawler re depositions. Provided documents to Vivona regarding 6767 and bankruptcy.	\$325.00	1.50	\$487.50
08/20/2020	LJ	Attention Provided	6767 Provided additional documents to Vivona. Communication with R Lawler on yet more depo dates. Received and reviewed Motion for Guidance for continuance from R Lawler.	\$325.00	1.50	\$487.50
08/21/2020	LJ	Appear in Court	5810 Prepared for motion. Attended motion by video.	\$325.00	4.50	\$1,462.50
08/25/2020	LJ	Communication	6767 Communication with Bk attorney regarding R Lawler demand to depose all cases at once. Communications with R Lawler regarding depositions.	\$325.00	0.90	\$292.50
08/26/2020	LJ	Attention Provided	6767 Received and reviewed multiple motions for continuances from R Lawler. Worked on Orders from previous hearing.	\$325.00	4.50	\$1,462.50
08/27/2020	LJ	Appear in Court	6767 Prepared for and attended hearing for trial prep. Made notes to draft order from hearing.	\$325.00	3.70	\$1,202.50
08/27/2020	LJ	Review	6767 receive and review witness subpoenas from R. Lawler	\$325.00	0.30	\$97.50
08/28/2020	PP	Attention Provided	Work on Orders from hearings.	\$60.00	2.00	\$120.00
<b>Totals:</b>				<b>43.43</b>	<b>\$13,126.50</b>	

**Expenses**

Date	Activity	Description	Cost	Quantity	Line Total
08/04/2020	Postage	Certified Mailing to Robin Lawler	\$7.05	1.0	\$7.05
08/04/2020	Postage	Certified Mailing to Robin Lawler	\$14.85	1.0	\$14.85
08/14/2020	Advanced Cost	Check # 34452 - Veteran Reporting, Inc.	\$1,422.20	1.0	\$1,422.20
08/31/2020	Advanced Cost	Check # 34474 - Eccleston & Wolf, P.C.	\$5,000.00	1.0	\$5,000.00
08/31/2020	Advanced Cost	Check # 34478 - Veteran Reporters	\$392.30	1.0	\$392.30

Expense Total: **\$6,836.20**

**Unpaid Invoice Balance Forward**

Invoice #	Invoice Total	Amount Paid	Due Date	Balance Forward
01417	\$41,075.83	\$22,198.00	08/21/2020	\$18,877.83

Balance Forward: **\$18,877.83**

**Adjustments**



Item	Applied To	Type	Description	Basis	Percent	Line Total
Discount	Flat Fees	\$ - Amount	Professional Credit			(\$5,000.00)

Discount Total: (\$5,000.00)

Time Entry Sub-Total:	\$13,126.50
Expense Sub-Total:	\$6,836.20
<b>Sub-Total:</b>	<b>\$19,962.70</b>
Balance Forward:	\$18,877.83
Discounts:	(\$5,000.00)
<b>Total:</b>	<b>\$33,840.53</b>
Amount Paid:	\$0.00
<b>Balance Due:</b>	<b>\$33,840.53</b>

**Account Summary**

**Robert Kevin Lawler's Credit Balance**

Balance As Of 09/03/2020:  
 \$0.00

**Johnston & Gregg PLC**  
 111 East Main Street  
 P.O. Box 1300  
 Orange, Virginia 22960  
 540.672.7070

**Johnston & Gregg PLC**

**Robert Kevin Lawler**  
 5600 Westbury Court  
 Fredericksburg, VA 22407  
 United States

**Balance** \$18,877.83  
**Forwarded** to #01515  
**Invoice #** 01417  
**Invoice Date** August 6, 2020  
**Payment Terms** Net 15  
**Due Date** August 21, 2020

**Lawler, Robert - MISC (BILLING FILE) (G2001-004)**

For services rendered between  
 June 29, 2020 and July 31, 2020

**Time Entries**

Date	EE	Activity	Description	Rate	Hours	Line Total
07/02/2020	LJ	Attention Provided	6767 Made notes for each of the motions to be heard in preparation for hearing on 7-6-20	\$325.00	2.50	\$812.50
07/06/2020	LJ	Appear in Court	6767 Hearing with Judge Farris. Received and reviewed multiple pleadings from R Lawler. Received and reviewed settlement offer from counsel in 20-963	\$325.00	8.00	\$2,600.00
07/08/2020	BP	Communication	Call to Veteran Court Reporters to order expedited transcript from Zoom hearing.	\$60.00	0.25	\$15.00
07/09/2020	SDG	Attention Provided	Case no. 6767: Revise motion to increase bond	\$325.00	3.75	\$1,218.75
07/14/2020	LJ	Attention Provided	6767 Received transcript from hearing. Reviewed the same for drafting the Order. Began drafting the Order.	\$325.00	2.50	\$812.50
07/15/2020	LJ	Communication	2586 Discussions with M Jesse re trial strategy.	\$325.00	0.30	\$97.50
07/17/2020	BP	Court Preparation	20-963 Asalated LJ with preparation for Spotsy Term Day	\$60.00	1.00	\$60.00
07/17/2020	LJ	Attention Provided	6767 Receipt of Emergency Motion by R Lawler	\$325.00	0.40	\$130.00
07/20/2020	SDG	Attention Provided	Case no. 6767: Review motions re: sanctions	\$325.00	0.50	\$162.50
07/20/2020	LJ	Appear in Court	20-963 Traveled to and from Spotsylvania Court to schedule motions and trial in the matter. Discussed matter with co-counsel.	\$325.00	4.50	\$1,462.50
07/21/2020	LJ	Attention Provided	6767 Received and reviewed email from Court and Motion from R Lawler attempting to set an emergency motion.	\$325.00	0.60	\$195.00

07/22/2020	LJ	Attention Provided	6767 Drafted Memorandum to support sanctions with attached exhibits. Traveled to and from Court to file the same and file Opposition to Plea in Bar. Filed Memo to Increase Bond. Sent Client copy of deed. Received and Reviewed New RL Motions – to schedule Plea in Bar, Motion to Strike. Communications from R Lawler.	\$325.00	8.00	\$2,600.00
07/23/2020	BP	File with Court	6767 Assisted LJ with preparing pleadings and exhibits for filing with the Court; scanned and emailed to the Court and Robin Lawler; made copies for Robin Lawler and our file; mailed copy to Robin Lawler via certified mail; filed and indexed our copy in pleadings binder.	\$60.00	2.00	\$120.00
07/23/2020	LJ	Attention Provided	6767 Finalized revisions to pleadings regarding Requests for Admission. Traveled to Loudoun Circuit Court and filed the same. Coordinated sending same to R Lawler. Prepared for hearing on the same for next week.	\$325.00	4.00	\$1,300.00
07/23/2020	LJ	Attention Provided	6767 Receive and Review email pleading from R Lawler attempting to transfer venue.	\$325.00	1.20	\$390.00
07/24/2020	BP	File with Court	6767 Assisted LJ with preparing pleading and exhibits for filing with the Court; scanned and emailed to the Court and Robin Lawler; made copies for Robin Lawler and our file; mailed copy to Robin Lawler via certified mail; filed and indexed our copy in pleadings binder.	\$60.00	2.00	\$120.00
07/24/2020	LJ	Attention Provided	20-963 Reviewed co-defendant motion for sanctions. Began drafting motion and reviewing documents for exhibits for motion.	\$325.00	2.50	\$812.50
07/24/2020	LJ	Attention Provided	6767 Received and reviewed RL Newest Motion on Requests for Admissions to Deem Admitted.	\$325.00	2.00	\$650.00
07/27/2020	LJ	Document Draft	20-963 Drafted Motion for Sanctions, Memorandum for Sanctions and exhibits for the same. Coordinated getting the same filed with the circuit court clerk.	\$325.00	8.00	\$2,600.00
07/28/2020	BP	File with Court	6767 Assisted LJ with preparing Order and exhibits for filing with the Court; scanned and emailed to the Court and Robin Lawler; made copies for Robin Lawler and our file; mailed copy to Robin Lawler via certified mail; filed and indexed our copy in pleadings binder.	\$60.00	2.00	\$120.00
07/28/2020	BP	Court Preparation	6767 Assisted LJ with preparation for Zoom hearings	\$60.00	1.00	\$60.00
07/28/2020	LJ	Attention Provided	6767 Review Court Transcript. Draft Order Reflecting Court's rulings. Travel to Loudoun County to file the same and coordinated emailing to Amy Bain and R Lawler. Began preparing for the hearing on sanctions.	\$325.00	5.50	\$1,787.50
07/28/2020	LJ	Attention Provided	20-963 Receive and Review OC's Motion to withdraw and Praecipe removing matters from the calendar.	\$325.00	0.50	\$162.50
07/28/2020	LJ	Attention Provided	6767 Received and Reviewed Motions filed by R Lawler.	\$325.00	1.00	\$325.00

07/29/2020	BP	Attention Provided	20-963 Filed pleadings and exhibits received from various defense counsel in pleadings binder and updated index.	\$60.00	1.00	\$60.00
07/29/2020	LJ	Appear in Court	6767 Court hearing to discuss sanctions motions. Gathered documents for use in Sanctions hearing.	\$325.00	3.00	\$975.00
07/29/2020	LJ	Attention Provided	6767 Received and Reviewed Motions filed by R Lawler on 7/28.	\$325.00	1.00	\$325.00
07/30/2020	BP	Attention Provided	Filed pleadings and exhibits received from Robin Lawler in pleadings binder and updated index.	\$60.00	1.00	\$60.00
07/30/2020	BP	Communication	Call to Veteran Court Reporters to order expedited transcript from today's hearing.	\$60.00	0.25	\$15.00
07/30/2020	LJ	Appear in Court	6767 Court hearing on Sanctions and Requests for Admissions.	\$325.00	8.00	\$2,600.00
07/31/2020	BP	Communication	Calls to Fairfax Library, Fairfax CC; Orange CC and Spotsy CC regarding room for depositions	\$60.00	0.50	\$30.00
07/31/2020	LJ	Attention Provided	6767 Coordinated calls to courthouses to set up the deposition of Kevin Lawler. Began drafting pleadings based upon Court ruling. Ordered transcript.	\$325.00	0.50	\$162.50
07/31/2020	LJ	Attention Provided	6767 Received and reviewed and responded to harassment emails from R Lawler - regarding matters that were already covered by the Court's Order on 7-30 and having non-witnesses attend the deposition.	\$325.00	1.00	\$325.00
07/31/2020	LJ	Attention Provided	20-963 Receive and review Motion for Continuance. Draft and file Opposition to Motion for Continuance with exhibits.	\$325.00	1.60	\$520.00

Totals: 81.85 \$23,686.25

**Expenses**

Date	Activity	Description	Cost	Quantity	Line Total
07/02/2020	Postage	Certified mailing to Robin Lawler	\$9.20	1.0	\$9.20
07/09/2020	Advanced Cost	Check # 34381 - Casamo & Associates	\$255.78	1.0	\$255.78
07/22/2020	Postage	Certified Mailing to Robin Lawler	\$15.10	1.0	\$15.10
07/23/2020	Postage	Certified Mailing to Robin Lawler	\$9.60	1.0	\$9.60
07/24/2020	Postage	Certified Mailing to Robin Lawler	\$7.05	1.0	\$7.05
07/27/2020	Postage	Mailing to Defense Counsel	\$8.25	1.0	\$8.25

Expense Total: \$304.98

**Unpaid Invoice Balance Forward**

Invoice #	Invoice Total	Amount Paid	Due Date	Balance Forward
01279	\$29,078.60	\$11,994.00	06/30/2020	\$17,084.60

Balance Forward: \$17,084.60

Time Entry Sub-Total:	\$23,686.25
Expense Sub-Total:	\$304.98
<b>Sub-Total:</b>	<b>\$23,991.23</b>
Balance Forward:	\$17,084.60
<b>Total:</b>	<b>\$41,075.83</b>
<b>Amount Paid:</b>	<b>\$22,198.00</b>
<b>Balance Due:</b>	<b>\$18,877.83</b>
Balance Forwarded to Invoice #01515	

**Payment History**

Activity	Date	Payment Method	Amount	Responsible User	Deposited Into
Balance Forwarded	Sep 3 2020, 1:08 pm	--	\$18,877.83	Sean D Gregg (Attorney)	--
Invoice Reopened	Sep 3 2020, 1:04 pm	--	--	Sean D Gregg (Attorney)	--
Balance Forwarded	Sep 1 2020, 12:24 pm	--	\$18,877.83	Sean D Gregg (Attorney)	--
Payment Received	Aug 21, 2020	Check	\$4,000.00	Sean D Gregg (Attorney)	Operating
Payment Received	Aug 11, 2020	Check	\$18,198.00	Sean D Gregg (Attorney)	Operating

**Account Summary**

**Robert Kevin Lawler's Credit Balance**

Balance As Of 08/04/2020:  
 \$0.00

**Johnston & Gregg PLC**  
 111 East Main Street  
 P.O. Box 1300  
 Orange, Virginia 22960  
 540.672.7070

**Johnston & Gregg PLC**

**Robert Kevin Lawler**  
 5600 Westbury Court  
 Fredericksburg, VA 22407  
 United States

**Balance** \$17,084.60  
**Forwarded** to #01417  
**Invoice #** 01279  
**Invoice Date** June 30, 2020  
**Payment Terms** Due on Receipt  
**Due Date** June 30, 2020

**Lawler, Robert - MISC (BILLING FILE) (G2001-004)**

**Time Entries**

Date	EE	Activity	Description	Rate	Hours	Line Total
06/01/2020	BP	Document Revision	20-983: Made SDG revisions to KL objections/answers to RL RFA	\$60.00	0.90	\$54.00
06/01/2020	SDG	Attention Provided	Case no. _____: Review discovery requests; draft responses to discovery; telephone call to co-counsel re: responses	\$325.00	4.25	\$1,381.25
06/01/2020	LJ	Attention Provided	5910 - document management	\$325.00	1.00	\$325.00
06/02/2020	SDG	Telephone conference	Case no. _____: Telephone call to Mr. Rucker; attention to scheduling issues and deposition issues	\$325.00	3.00	\$975.00
06/02/2020	BP	Document Finalization	20-983: Made SDG final revisions to KL objections/answers to RL RFA and printed for his signature; made copies for all parties; prepared envelopes for all parties; prepared certified mailing for RL; mailed to all parties and filed our copies.	\$60.00	1.50	\$90.00
06/02/2020	BP	Administrative Activity	20-983: Scanned in all pleadings from Rucker, Mitchell & Vivona and saved to computer; updated pleadings index and filed our copies.	\$60.00	1.50	\$90.00
06/03/2020	BP	Administrative Activity	Emailed all praecipes from Robin Lawler to SDG so he could send to Doug Rucker; called the court and confirmed there was nothing scheduled for 8/20.	\$60.00	0.75	\$45.00
06/04/2020	SDG	Attention Provided	Telephone call to Rucker; attention to praecipes	\$325.00	2.50	\$812.50
06/05/2020	SDG	Attention Provided	Review and respond to Lawler filings.	\$325.00	4.25	\$1,381.25
06/08/2020	SDG	Telephone conference	Telephone call to Mr. Rucker re: praecipes	\$325.00	0.50	\$162.50
06/09/2020	LJ	Document Draft	6767 Drafted Motion for Protective Order. Traveled to Loudoun and filed the same.	\$325.00	2.00	\$650.00

06/10/2020	SDG	Attention Provided	Attention to court hearing; telephone call to Mr. Rucker; review consent order re: deposition, etc.	\$325.00	2.00	\$650.00
06/11/2020	SDG	Attention Provided	Attention to hearing date; telephone call re: court reporter; terms of continuing the case	\$325.00	3.25	\$1,056.25
06/16/2020	SDG	Attention Provided	Case _____: Review Motion for Partial Summary Judgment	\$325.00	1.00	\$325.00
06/17/2020	SDG	Attention Provided	Case no: _____: Telephone call from Mr. Rucker re: outstanding discovery	\$325.00	0.25	\$81.25
06/29/2020	LJ	Attention Provided	Document Management with Orders.	\$325.00	1.00	\$325.00
<b>Totals:</b>					<b>29.65</b>	<b>\$8,404.00</b>

**Expenses**

Date	Activity	Description	Cost	Quantity	Line Total
06/15/2020	Advanced Cost	Circuit Court of Spotsylvania County - copies of documents (paid by cc)	\$2.06	1.0	\$2.06
<b>Expense Total:</b>					<b>\$2.06</b>

**Unpaid Invoice Balance Forward**

Invoice #	Invoice Total	Amount Paid	Due Date	Balance Forward
01092	\$20,933.40	\$260.86	06/02/2020	\$20,672.54
<b>Balance Forward:</b>				<b>\$20,672.54</b>

Time Entry Sub-Total:	\$8,404.00
Expense Sub-Total:	\$2.06
<b>Sub-Total:</b>	<b>\$8,406.06</b>
Balance Forward:	\$20,672.54
<b>Total:</b>	<b>\$29,078.60</b>
<b>Amount Paid:</b>	<b>\$11,994.00</b>
<b>Balance Due:</b>	<b>\$17,084.60</b>
Balance Forwarded to Invoice #01417	

**Payment History**

Activity	Date	Payment Method	Amount	Responsible User	Deposited Into
Balance Forwarded	Aug 7 2020, 1:23 pm	--	\$17,084.60	Sean D Gregg (Attorney)	--
Payment Received	Jul 9, 2020	Check	\$11,994.00	Sean D Gregg (Attorney)	Operating

**Johnston & Gregg PLC**  
 111 East Main Street  
 P.O. Box 1300  
 Orange, Virginia 22960  
 540.672.7070

**Johnston & Gregg PLC**

**Robert Kevin Lawler**  
 5600 Westbury Court  
 Fredericksburg, VA 22407  
 United States

**Balance** \$20,672.54  
**Forwarded** to #01279  
**Invoice #** 01092  
**Invoice Date** June 2, 2020  
**Payment Terms** Due on Receipt  
**Due Date** June 02, 2020

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**Lawler, Robert - MISC (BILLING FILE) (G2001-004)**

**Time Entries**

Date	EE	Activity	Description	Rate	Hours	Line Total
05/01/2020	LJ	Attention Provided	Case 8331: Review of court files to determine next hearing dates.	\$325.00	0.20	\$65.00
05/01/2020	LJ	Attention Provided	Case 6767: Review of court files to determine hearing dates.	\$325.00	0.10	\$32.50
05/01/2020	LJ	Attention Provided	Case 5910: Review of court files to determine hearing dates	\$325.00	0.10	\$32.50
05/04/2020	LJ	Attention Provided	Case 6767: Praecipe to change law firm name. Drafted Motion for Guidance for Court regarding previous pleading.	\$325.00	0.60	\$195.00
05/04/2020	LJ	Attention Provided	Case 5910: Praecipe to change law firm name.	\$325.00	0.10	\$32.50
05/04/2020	LJ	Communication	Communication with CNA.	\$325.00	0.30	\$97.50
05/04/2020	LJ	Attention Provided	Case 8331: Praecipe to change firm.	\$325.00	0.10	\$32.50
05/05/2020	LJ	Attention Provided	Case 6767: Finalized Motion for Guidance.	\$325.00	0.60	\$195.00
05/06/2020	LJ	Attention Provided	All cases: Worked on filing and document management.	\$325.00	2.00	\$650.00
05/06/2020	SDG	Attention Provided	Case No: 20-963: Review response to counterclaim/affirmative defenses	\$325.00	1.25	\$406.25
05/07/2020	LJ	Attention Provided	Case 2586: Receive and review the Final Judgment draft Order dismissing case with prejudice and enforcing; communication with counsel on case.	\$325.00	0.40	\$130.00
05/07/2020	LJ	Attention Provided	All Cases: Worked on filing and document management.	\$325.00	1.70	\$552.50



05/08/2020	BP	Administrative Activity	Case 20-963: Scanned in 4 new pleadings from Robin Lawler; saved to computer and emailed to Doug Rucker; uploaded the 4 pleadings along with all other documents saved in Spotsy 20-963 to MyCase.	\$60.00	0.55	\$33.00
05/08/2020	BP	Transcription	Case 20-963: Transcribed Kevin Lawler's Objection to Robin Lawler's Plea in Bar and printed for SDG review.	\$60.00	0.55	\$33.00
05/08/2020	PL	Administrative Activity	Organized computer files within MyCase.	\$60.00	1.32	\$79.00
05/08/2020	LJ	Attention Provided	All cases: Worked on filing and document management.	\$325.00	1.20	\$390.00
05/08/2020	SDG	Attention Provided	Case 20-963: Review response to counterclaim	\$325.00	2.00	\$650.00
05/11/2020	PL	Administrative Activity	Upload and organized MyCase files.	\$60.00	3.20	\$192.00
05/13/2020	LJ	Attention Provided	CL 20-963 Received and reviewed new pleadings from co-counsel on case.	\$325.00	1.00	\$325.00
05/13/2020	LJ	Attention Provided	6767 Drafting pleadings.	\$325.00	1.80	\$585.00
05/14/2020	BP	Administrative Activity	Case 20-963: Reorganized pleadings binder; updated pleadings index and filed new pleadings from William Mitchell in binder.	\$60.00	1.00	\$60.00
05/14/2020	BP	Administrative Activity	Case 20-963: Scanned in 8 new pleadings from Robin Lawler; saved to computer and uploaded to MyCase; updated pleadings index and filed pleadings in binder.	\$60.00	1.15	\$69.00
05/15/2020	BP	Administrative Activity	Case: 20-963: Scanned in 4 new pleadings from William Mitchell, saved to computer and uploaded to MyCase.	\$60.00	0.40	\$24.00
05/15/2020	PL	Administrative Activity	Case #5910: Converted Request for Production from PDF to Word format in preparation for response.	\$60.00	3.05	\$183.00
05/15/2020	BP	Administrative Activity	Case 20-963: Scanned in 2 new pleadings from Robin Lawler; saved to computer and uploaded to MyCase; updated pleadings index and filed pleadings in binder; put copy of pleadings in SDG chair.	\$60.00	0.38	\$23.00
05/15/2020	LJ	Attention Provided	Document management.	\$325.00	2.00	\$650.00
05/18/2020	PL	Scheduling	Case #20-963: Uploaded new Pleadings. Researched Motion Days to set Hearing. Called Court for availability. Emailed Robin Lawler for avoid dates x 2. Prepared Praecipe (Notice of Hearing for August 10, 2020). Organized computer files.	\$60.00	1.15	\$69.00
05/18/2020	BP	Administrative Activity	Scanned in multiple new pleadings; saved to computer and uploaded to MyCase; updated pleadings index and filed pleadings in binder.	\$60.00	1.90	\$114.00

05/18/2020	LJ	Attention Provided	20-963 -- received and reviewed emails from R Lawler. Coordinated getting hearing date for motions. Communication with B. Mitchell regarding dates for demurrer. Supervised changes to pleadings binders. Reviewed Praecipe to place all matters on the Court's docket for August 10.	\$325.00	2.50	\$812.50
05/18/2020	LJ	Attention Provided	Case 5910: Discovery.	\$325.00	0.70	\$227.50
05/18/2020	SDG	Document Draft	Case no: 20-963: Draft response to discovery request	\$325.00	1.50	\$487.50
05/19/2020	PL	Transcription	Case #20-963: Transcribed Nondisclosure Agreement. Transcribed letter to Robin Lawler requesting Nondisclosure Agreement. Made revisions. Attention to numerous emails from Robin Lawler.	\$60.00	1.60	\$96.00
05/19/2020	LJ	Attention Provided	Case 20-963: Received and reviewed demurrer and memo for demurrer from B. Mitchell. Coordinated date for hearing with B. Mitchell to praecipe his demurrer on same date as court granted us. Printed email attachments from R. Lawler that were attached via Icloud zip files.	\$325.00	1.60	\$520.00
05/19/2020	LJ	Attention Provided	Case 5910: Discovery.	\$325.00	0.80	\$260.00
05/19/2020	SDG	Attention Provided	Case no. 20-963: Prepare discovery/protective order agreement for Spotsylvania suit	\$325.00	1.75	\$568.75
05/21/2020	LJ	Attention Provided	20-963 Document management.	\$325.00	1.50	\$487.50
05/21/2020	LJ	Attention Provided	5910 -- Worked on Discovery responses.	\$325.00	2.00	\$650.00
05/22/2020	SDG	Attention Provided	Case no. 20-963: Attention to discovery and response	\$325.00	2.25	\$731.25
05/22/2020	LJ	Attention Provided	5910 Responded to requests for production of documents.	\$325.00	4.00	\$1,300.00
05/22/2020	LJ	Attention Provided	2586 Received email Motion from RL.	\$325.00	0.50	\$162.50
05/26/2020	LJ	Attention Provided	Document management. Reviewed orders in Fairfax case with Cognata. Retrieved documents to send to outside counsel in matter. Received and reviewed communications from RL. Communication with client.	\$325.00	4.50	\$1,462.50
05/27/2020	LJ	Attention Provided	20-963 Received and reviewed motion for physical exam of KL. Reviewed draft responses to RFAs and made revisions, provided additional information. Document management.	\$325.00	6.00	\$1,950.00
05/28/2020	BP	Administrative Activity	Case 20-963: Saved scanned pleadings to computer and emailed to SDG so he could forward to Doug Rucker.	\$60.00	1.05	\$63.00
05/28/2020	BP	Administrative Activity	Case 20-963: Emailed multiple pleadings, discovery requests and Kevin Lawler's deposition to Doug Rucker.	\$60.00	1.10	\$66.00
05/28/2020	SDG	Attention Provided	Case no. 20-963: Address discovery issue; read deposition transcript	\$325.00	3.50	\$1,137.50
05/28/2020	LJ	Attention Provided	Document management. Received motions in 2586. Retrieved documents to send to outside counsel in matter. Received and reviewed motions in various cases.	\$325.00	5.50	\$1,787.50

05/29/2020	TC	Administrative Activity	Phone message from Doug Rucker for SDG	\$60.00	0.10	\$6.00
05/29/2020	LJ	Attention Provided	20-963 Review Discovery Requests to KL and responded to same. Revised responses to RFAs. Conference with counsel J Vivona. Provided documents to him, discussed demurrer dates. Document management.	\$325.00	6.90	\$2,242.50
<b>Totals:</b>				<b>79.45</b>		<b>\$20,918.75</b>

**Expenses**

Date	Activity	Description	Cost	Quantity	Line Total
05/22/2020	Postage	Certified mailing to Robin Lawler	\$14.65	1.0	\$14.65
<b>Expense Total:</b>					<b>\$14.65</b>

Time Entry Sub-Total:	\$20,918.75
Expense Sub-Total:	\$14.65
<b>Sub-Total:</b>	<b>\$20,933.40</b>
<b>Total:</b>	<b>\$20,933.40</b>
<b>Amount Paid:</b>	<b>\$260.86</b>
<b>Balance Due:</b>	<b>\$20,672.54</b>
Balance Forwarded to Invoice #01279	

**Payment History**

Activity	Date	Payment Method	Amount	Responsible User	Deposited Into
Balance Forwarded	Jun 29 2020, 8:45 pm	--	\$20,672.54	Sean D Gregg (Attorney)	--
Payment Received	Jun 1, 2020	Non-Trust Credit Account	\$260.86	Sean D Gregg (Attorney)	

**Account Summary**

**Robert Kevin Lawler's Credit Balance**

Balance As Of 06/01/2020:  
 \$0.00

**Johnston & Gregg PLC**  
 111 East Main Street  
 P.O. Box 1300  
 Orange, Virginia 22960  
 540.672.7070

**Johnston & Gregg PLC**

**Robert Kevin Lawler**  
 5600 Westbury Court  
 Fredericksburg, VA 22407  
 United States

**Balance** \$0.00  
**Invoice #** 00942  
**Invoice Date** May 1, 2020  
**Payment Terms** Due on Receipt  
**Due Date** May 01, 2020

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**Lawler, Robert - MISC (BILLING FILE) (G2001-004)**

**Time Entries**

Date	EE	Activity	Description	Rate	Hours	Line Total
03/02/2020	SDG	Document Preparation	Prepare Motion for Sanctions in Case # 6767	\$325.00	0.75	\$243.75
03/03/2020	SDG	Document Revision	Revise Motion	\$325.00	1.75	\$568.75
03/04/2020	LJ	Attention Provided	Case No. 5910 and 6767: Worked on Binders and reviewing motions that will need to be filed prior to trials	\$325.00	2.50	\$812.50
03/04/2020	LJ	Attention Provided	Case No. 5910 and 6767: Communication with R Lawler and Court regarding upcoming motions	\$325.00	0.90	\$292.50
03/05/2020	PL	Administrative Activity	Prepared envelope for mailing.	\$60.00	0.10	\$6.00
03/05/2020	LJ	Attention Provided	Case No. 6767 and 5910: Communications with court, R. Lawler and various counsel regarding cases. Reviewed documents for hearing on 3/6	\$325.00	1.00	\$325.00
03/08/2020	LJ	Communication	Case No. 2586: Communication with co-counsel Getty and W. Mitchell. Traveled to and from Court. Appeared at hearing for Motion to Withdraw	\$325.00	3.00	\$975.00
03/08/2020	LJ	Communication	Spotay case: Communication and coordination with other attorneys regarding case	\$325.00	1.30	\$422.50
03/09/2020	SDG	Review	Review complaint; prepare answer; research re: abuse of process	\$325.00	3.75	\$1,218.75
03/09/2020	LJ	Communication	Case No. 2586: Communication with client. Received and reviewed communications with R. Lawler and Court regarding emergency motions and motions to transfer	\$325.00	1.00	\$325.00
03/09/2020	LJ	Communication	Case No. 8331: Travel to and from Court to attend hearing to schedule motions. Communication with co-counsel regarding the same	\$325.00	3.00	\$975.00

03/10/2020	SDG	Document Revision	Revise response	\$325.00	2.50	\$812.50
03/10/2020	LJ	Communication	Case No. 6767: Communications with attorneys regarding hearing on 3/13. Communication with witnesses who have been subpoenaed. Prepared for hearing. Communication with Court regarding same	\$325.00	2.00	\$650.00
03/11/2020	LJ	Conference	Spotsy case: Worked on new Spotsy case. Met with client to go over status of all cases	\$325.00	1.10	\$357.50
03/12/2020	TC	Document Draft	Draft Answer and Counter Claim	\$60.00	4.30	\$258.00
03/13/2020	TC	Document Draft	Revise Draft Answer and Counter Claim	\$60.00	3.00	\$180.00
03/15/2020	LJ	Attention Provided	Case No. 2586; Prepared for hearing on Defendant's demurror, Plaintiff's Motion to Transfer and Plaintiff's Motion for Continuance. Prepared exhibits for hearing. Met with co-counsel regarding the same. Traveled to and from Loudoun County Courthouse for hearing on Demurrers and appeared in court. Communication with client regarding the same. Coordinated with counsel for Dr. Maybach regarding subpoenas. Received and reviewed communications from R. Lawler	\$60.00	5.10	\$306.00
03/16/2020	LJ	Attention Provided	Case No. 5910: Received and reviewed Order from 2586. Separated attorney fees in 5910 from those incurred in 2586 to produce to the Court.	\$60.00	1.30	\$78.00
03/17/2020	LJ	Communication	Case No. 6767: Communications with other counsel who have been subpoenaed or represent a witness who has been subpoenaed to hearings.	\$60.00	1.00	\$60.00
03/19/2020	LJ	Attention Provided	Case No. 6767: Received Order from B. Mitchell from last week's hearing. Received and reviewed transcription from this case hearing and reviewed the same for any issues that need to be still addressed by motion. Completed separating attorney fees affidavit for the Order.	\$60.00	2.50	\$150.00
03/23/2020	LJ	Review	Received and reviewed pleadings from JAbe re subpoenas.	\$60.00	0.50	\$30.00
03/25/2020	LJ	Document Preparation	Motions and documents to be filed.	\$60.00	1.00	\$60.00
03/27/2020	LJ	Document Revision	Spotsy Case: Revise Responsive pleadings.	\$60.00	0.50	\$30.00
04/20/2020	BP	Document Revision	Made SDG revisions to Answer & Counterclaim, printed for LJ review	\$60.00	1.55	\$93.00
04/20/2020	PL	Document Revision	Revised Certificate of Mailing. Prepared mailing labels from Certificate of Mailing for Pleading.	\$60.00	0.45	\$27.00
04/20/2020	BP	Document Finalization	Made final revisions to Answer and Counterclaim, printed for SDG signature; printed exhibit A from LJ, labeled with exhibit sticker and attached to pleading; calculated filing fee on court's website and requested check; prepared cover letter to court and printed for SDG signature; made copies and mailed original to court and copies to Robin Lawler via regular mail and certified mail.	\$60.00	2.20	\$132.00
04/20/2020	SDG	Document Revision	Revise Answer and Counterclaim	\$325.00	2.25	\$731.25

04/21/2020	BP	Administrative Activity	Made 13 additional copies of answer and counterclaim, prepared envelopes and mailed to all parties; scanned and saved answer and counterclaim to computer and emailed copy to LJ;	\$60.00	1.50	\$90.00
04/23/2020	BP	Document Revision	Attention to emails from Spotsy Circuit Court, SDG & LJ regarding civil cover sheet for counterclaim; prepared civil cover sheet and printed for SDG signature; made SDG revisions to page 29 of answer and counterclaim; drafted letter to court regarding revised page 29 and printed for SDG review; made SDG revisions to letter and printed for SDG signature; scanned civil cover sheet, letter to court and revised page 29 and emailed to court; made copies for all parties and our file; replaced page 29 of our copy of the counterclaim with the new page 29; scanned and saved our copy of counterclaim to computer with the new page 29 and emailed to LJ.	\$60.00	2.50	\$150.00
04/23/2020	SDG	Attention Provided	Attention to filing issues	\$325.00	1.00	\$325.00
04/24/2020	TC	Communication	Respond to Facebook post by Robin Lawler on Johnston & Gregg PLC page; save screen shot for file; hide comment on page and report to Facebook; provide info to Sean and Laura	\$60.00	0.70	\$42.00
04/24/2020	BP	Administrative Activity	Prepared envelopes and mailed copy of letter to court with revised page 29 of counterclaim to all parties including Robin Lawler via regular and certified mail; made copy of Robin Lawler's envelopes with document for our file.	\$60.00	1.25	\$75.00
04/27/2020	SDG	Attention Provided	Review e-mail from Robin Lawler re: counterclaim	\$325.00	0.50	\$162.50
04/28/2020	LJ	Attention Provided	Case 20-963: Received and reviewed emails between R. Lawler and Spotsylvania Circuit court	\$325.00	0.10	\$32.50
04/29/2020	SDG	Attention Provided	Review postal certificate; calendar date on when to answer counterclaim	\$325.00	0.50	\$162.50
04/29/2020	LJ	Attention Provided	Case 6767: Revised and sent letter to client regarding case.	\$325.00	0.20	\$65.00
04/30/2020	SDG	Attention Provided	Forward complaint; calendar answer	\$325.00	0.25	\$81.25
04/30/2020	LJ	Attention Provided	Compiled all of Robin Lawler's other cases against co-defendants in this matter for exhibit to motions.	\$325.00	0.50	\$162.50
04/30/2020	LJ	Trial preparation	Case 6767: Trial preparation for additional motions that need to be placed on docket.	\$325.00	0.50	\$162.50

Totals: 59.80 \$11,630.75

**Expenses**

Date	Activity	Description	Cost	Quantity	Line Total
03/16/2020	Copy fee	Spotsylvania Circuit Court, Ch 34131	\$20.09	1.0	\$20.09
04/20/2020	Filing Fee	Answer & Counter Claim, Spotsylvania Circuit Court, Check #34209	\$346.00	1.0	\$346.00
04/20/2020	Postage	Mailing of Answer and Counterclaim - \$8.60 certified mailing to Robin Lawler; \$2.60 mailing to Spotsy CC; \$28.60 (\$2.20 x 13) mailing to all parties.	\$39.80	1.0	\$39.80

Expense Total: \$405.89

Time Entry Sub-Total:	\$11,630.75
Expense Sub-Total:	\$405.89
Sub-Total:	\$12,036.64
Total:	\$12,036.64
Amount Paid:	\$12,036.64
Balance Due:	\$0.00

**Payment History**

Activity	Date	Payment Method	Amount	Responsible User	Deposited Into
Payment Received	May 21, 2020	Check	\$11,739.14	Petra Lawson-Mullins (Paralegal)	Operating
Payment Received	May 1, 2020	Non-Trust Credit Account	\$297.50	Sean D Gregg (Attorney)	

**Account Summary**

**Robert Kevin Lawler's Credit History**

Balance As Of 05/21/2020: \$0.00

Date	Related To	Details	Amount	Balance
05/01/2020	00942	Credit withdrawal	-\$297.50	\$0.00
03/11/2020	--	Credit deposit	\$297.50	\$297.50
03/04/2020	00747	Credit withdrawal	-\$894.50	\$0.00
02/12/2020	--	Credit deposit	\$894.50	\$894.50

**Johnston & Gregg PLC**  
 111 East Main Street  
 P.O. Box 1300  
 Orange, Virginia 22960  
 540.672.7070

**Johnston & Gregg PLC**

**Robert Kevin Lawler**  
 5600 Westbury Court  
 Fredericksburg, VA 22407  
 United States

**Balance** \$0.00  
**Invoice #** 00747  
**Invoice Date** March 4, 2020  
**Payment Terms** Due on Receipt  
**Due Date** March 04, 2020

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**Lawler, Robert - MISC (BILLING FILE) (G2001-004)**

**Time Entries**

Date	EE	Activity	Description	Rate	Hours	Line Total
02/03/2020	LJ	Document Draft	Case 6767: Drafted Motion for Protective Order to quash notice of deposition. Traveled to Court and filed the same. Traveled back.	\$325.00	3.00	\$975.00
02/03/2020	LJ	Conference	Case 6767: Met with K. Lawler to prepare for deposition should it occur on Monday and informed him of the Protective Order we were required to file with regard to Saturday depositions.	\$325.00	1.00	\$325.00
02/03/2020	LJ	Review	Retrieved and reviewed documents from court to prepare for sanctions motions.	\$325.00	2.00	\$650.00
02/04/2020	LJ	Attention Provided	Case 5910: Worked with B. Pierce preparing pleadings files.	\$325.00	1.50	\$487.50
02/05/2020	LJ	Review	Case 6767: Received and reviewed documents sent to Getty from Loudoun Circuit Court for recusal of Judges in Case 6767.	\$325.00	0.40	\$130.00
02/05/2020	LJ	Attention Provided	Case 2588: Worked with B. Pierce preparing files from Fairfax, Loudoun and Spotsylvania for sanctions.	\$325.00	2.30	\$747.50
02/07/2020	LJ	Attention Provided	Case Probate: Gathered documents and traveled to Spotsylvania Probate Court to qualify client as Administrator. Mailed all appropriate notices to Robin Lawler. Traveled back.	\$325.00	2.00	\$650.00
02/07/2020	LJ	Other	Case 5910: Coordinated with B. Pierce on pleadings filings.	\$325.00	1.00	\$325.00
02/07/2020	LJ	Other	Case 6767: Continued to work on Motions for Sanctions.	\$325.00	1.20	\$390.00



02/10/2020	LJ	Other	Case 6767: Received email from R. Lawler that she qualified as Administrator of estates in Loudoun and that she fired all counsel. Began drafting Petition to remove. Gathered documents for exhibits.	\$325.00	4.10	\$1,332.50
02/11/2020	LJ	Document Draft	Case 6767 & 5910: Drafted Petitions to Remove R. Lawler as Administrator of the Estates of Robert and Linda Lawler. Mailed the same to court and to R. Lawler.	\$325.00	7.00	\$2,275.00
02/13/2020	LJ	Other	Case 6767: Traveled to and from Court. Made appointment, waited and then met with probate clerk to retrieve court's portion of file that is not public to determine representations made by Lawler to Court regarding estate. Worked on sanctions motions in all case.	\$325.00	4.70	\$1,527.50
02/18/2020	LJ	Other	Case 6767: Communications with court and R. Lawler to schedule various hearings. Received and reviewed documents from F. Moghul regarding the Fairfax cases.	\$325.00	1.50	\$487.50
02/18/2020	LJ	Other	Case 6767 & 5910: Work on sanctions motions.	\$325.00	2.00	\$650.00
02/24/2020	LJ	Other	Case 6767: Communication with court regarding hearings.	\$325.00	0.20	\$65.00
02/24/2020	LJ	Other	Case 6767: Work on sanction motions.	\$325.00	1.00	\$325.00
02/25/2020	LJ	Other	Case 2586: Communication with F. Getty regarding upcoming motions. Communicated with B. Mitchell, co-counsel regarding case.	\$325.00	0.30	\$97.50
02/25/2020	LJ	Other	Case 5910: Communication from client regarding subpoenas to Wells Fargo for daughter.	\$325.00	0.10	\$32.50
02/28/2020	PL	Document Finalization	Revisions to Motion to Quash. Finalized Motion. Prepared cover letters to all parties. Prepared fax cover letter to 2 parties. Faxed, copied and posted	\$60.00	1.85	\$111.00
02/28/2020	SDG	Document Preparation	Review subpoenas duces tecum; prepare Motions to Quash; correspondence to recipients of Motions	\$325.00	2.50	\$812.50
03/02/2020	PL	Transcription	Transcribed Motion for Rule to Show Cause and Affidavit.	\$60.00	0.48	\$29.00
<b>Non-billable Time Entries:</b>						
02/03/2020	BP	Administrative Activity	Worked with LJ on Lawler cases, emailed and spoke to Jamie in the Spotsy Circuit Court Clerk's Office regarding qualification and relayed info to LJ	\$60.00	5.00	\$300.00
02/04/2020	BP	Administrative Activity	Worked with LJ on Lawler cases	\$60.00	6.50	\$390.00
02/04/2020	LJ	Research	Case Probate: Research and review code sections required for qualification for the various types of litigation. Communication with probate clerk at Spotsylvania Court.	\$325.00	1.30	\$422.50
02/04/2020	LJ	Review	Case 2586: Received and reviewed documents from Spotsylvania Court which duplicate allegations in other cases and name all attorneys. Communication with F. Moghul regarding Spotsylvania case.	\$325.00	2.00	\$650.00

02/05/2020	BP	Administrative Activity	Worked with LJ on Lawler cases	\$60.00	3.50	\$210.00
02/06/2020	BP	Administrative Activity	Worked with LJ on Lawler cases	\$60.00	4.00	\$240.00
02/07/2020	PL	Administrative Activity	Prepared mailing envelopes. Brief with LJJ on cases.	\$80.00	0.25	\$15.00
02/07/2020	BP	Administrative Activity	Scanned in numerous discovery and pleadings for LJ to respond to; saved them to computer and imported them to My Case.	\$60.00	1.50	\$90.00
02/10/2020	BP	Administrative Activity	Additional indexing work on Lawler documents	\$60.00	2.00	\$120.00
02/11/2020	PL	Postage	Prepared UPS mailing to Loudoun CC. Prepared mailing to R. Lawler.	\$60.00	0.25	\$15.00
02/20/2020	PL	Document Preparation	Prepared 2 checks for filing fees for removal of Robin as Administrator. Prepared cover letter.	\$60.00	0.30	\$18.00
02/24/2020	LJ	Other	Case 2586: Gathered documents for meeting with co-counsel for upcoming motions. Prepared for meeting with B. Mitchell.	\$325.00	2.00	\$650.00
02/25/2020	LJ	Other	Case 6767: Received and reviewed email from Robin Lawler. Communication with court regarding scheduling.	\$325.00	3.10	\$1,007.50
02/26/2020	LJ	Other	Case 5910: Completed Motion to Quash Subpoena Duces Tecum to Wells Fargo. Traveled to and from Court to file the same. Communications with client.	\$325.00	3.10	\$1,007.50
02/28/2020	LJ	Other	Case 2586: Traveled to and from Fairfax to meet with co-counsel on the case. Discussed trial strategy and provided counsel with documents.	\$325.00	3.00	\$975.00
02/27/2020	BP	Administrative Activity	Phone calls with client; scanned and emailed name change document to client; scanned and emailed letters from Wells Fargo & Charles Schwab re SDT to LJ	\$60.00	0.50	\$30.00
02/28/2020	PL	Document Preparation	Transcribed Motion to Quash Subpoenas Duces Tecum. Revised Motion.	\$60.00	2.05	\$123.00
03/03/2020	PL	Document Revision	Revisions to Motion.	\$60.00	1.80	\$108.00
<b>Totals:</b>				<b>82.28</b>	<b>\$12,425.00</b>	

**Expenses**

Date	Activity	Description	Cost	Quantity	Line Total
02/20/2020	Filing Fee	Loudoun CC, Check 34107	\$86.00	1.0	\$86.00
02/20/2020	Filing Fee	Loudoun CC, Check 34016	\$86.00	1.0	\$86.00
<b>Expense Total:</b>				<b>\$172.00</b>	

Time Entry Sub-Total:	\$12,425.00
Expense Sub-Total:	\$172.00
Sub-Total:	\$12,597.00
Total:	\$12,597.00
Amount Paid:	\$12,597.00
<b>Balance Due:</b>	<b>\$0.00</b>

**Payment History**

Activity	Date	Payment Method	Amount	Responsible User	Deposited Into
Payment Received	Mar 11, 2020	Check	\$11,702.50	Brandy Pierce (Paralegal)	Operating
Payment Received	Mar 4, 2020	Non-Trust Credit Account	\$894.50	Sean D Gregg (Attorney)	

**Account Summary**

**Robert Kevin Lawler's Credit History**

Balance As Of 03/11/2020: \$0.00

Date	Related To	Details	Amount	Balance
03/04/2020	00747	Credit withdrawal	-\$894.50	\$0.00
02/12/2020	--	Credit deposit	\$894.50	\$894.50

**Johnston & Gregg PLC**  
 111 East Main Street  
 P.O. Box 1300  
 Orange, Virginia 22960  
 540.672.7070

**Johnston & Gregg PLC**

**Robert Kevin Lawler**  
 5600 Westbury Court  
 Fredericksburg, VA 22407  
 United States

**Balance** \$0.00  
**Invoice #** 00606  
**Invoice Date** February 4, 2020  
**Payment Terms** Due on Receipt  
**Due Date** February 04, 2020

**Lawler, Robert - MISC (BILLING FILE) (G2001-004)**

**Time Entries**

Date	EE	Activity	Description	Rate	Hours	Line Total
01/03/2020	PL	Open file	Opened files for current cases.	\$60.00	0.50	\$30.00
01/15/2020	PL	Telephone conference	Telephone call with Robin Lawler	\$60.00	0.25	\$15.00
01/20/2020	SDG	Research	Research regarding Vexatious Litigations	\$325.00	1.25	\$406.25
01/21/2020	BP	Administrative Activity	Faxed and mailed letter via certified mail to Rachel Hammer, Esq.	\$60.00	0.18	\$11.00
01/23/2020	LJ	Telephone conference	Telephone call with Cary Cucinelli regarding the subpoena. Telephone call with UVA General Counsel Lynne Fleming regarding the subpoena there for Kevin's medical records.	\$325.00	0.50	\$162.50
01/23/2020	LJ	Review	Received and reviewed emails from Robin.	\$325.00	1.20	\$390.00
01/23/2020	LJ	Document Preparation	Continued to work on documents pulled from Court to continue preparing for the Sanctions Motion and Motions for Protective Orders. Met with Getty Firm to determine if they received faxes.	\$325.00	4.00	\$1,300.00
01/23/2020	LJ	Research	Traveled to the Court and reviewed Court files to determine what had been filed and sent to Getty and to retrieve other cases which may be helpful to a sanctions matter.	\$325.00	5.50	\$1,787.50
01/24/2020	BP	Administrative Activity	Meeting with LJ regarding case.	\$60.00	0.50	\$30.00
01/24/2020	LJ	Attention Provided	Discussion with Getty Firm regarding cases and documents sent there. Received and reviewed emails from Court regarding the case and from Robin. Began reviewing discovery which must be responded to. Worked on pleading binders and communication binders.	\$325.00	3.00	\$975.00

01/28/2020	BP	Administrative Activity	Transferred pleadings to a larger binder.	\$60.00	0.25	\$15.00
01/29/2020	BP	Administrative Activity	Worked with LJ on Lawler cases	\$60.00	6.50	\$390.00
01/29/2020	LJ	Review	Case 5910: Reviewed documents previously retrieved from Court that we had not received and filed the same in our pleadings binders. Reviewed material in theses for Sanctions Motions.	\$325.00	5.00	\$1,625.00
01/30/2020	BP	Administrative Activity	Worked with LJ on Lawler cases	\$60.00	7.50	\$450.00
01/30/2020	LJ	Conference	Meeting with Brianna from Getty & Associates to determine what documents they received after I left the firm which needs a response filed.	\$325.00	1.00	\$325.00
01/30/2020	LJ	Telephone conference	Telephone calls with representatives of Dr. Mayback regarding hearing which has been cancelled. Responding to R. Lawler emails and attempts to schedule deposition of K. Lawler and other witnesses subpoenaed to Court on 2/3/2020. Informed R. Lawler that we will proceed to file a Motion for Protective Order regarding the deposition on Saturday at a place other than a courthouse.	\$325.00	0.60	\$195.00
01/31/2020	BP	Administrative Activity	Called Loudon Circuit Court with question about Proof of Service and advised LJ of conversation.	\$60.00	0.25	\$15.00
01/31/2020	BP	Administrative Activity	Made copies of Praecipe to note appearance for all cases and mailed to Robin Lawler; made copy of envelope for proof of mailing for our files.	\$60.00	0.43	\$26.00
01/31/2020	LJ	Document Draft	Case 6767: Drafted Motion for Protective Order to Quash Notice of Deposition. Traveled to Court and filed the same. Traveled back.	\$325.00	3.00	\$975.00
01/31/2020	LJ	Conference	Case 6767: Met with K. Lawler to prepare for deposition should it occur on Monday and informed him of the Protective Order we were required to file with regard to Saturday depositions.	\$325.00	1.00	\$325.00
01/31/2020	LJ	Review	Retrieved and reviewed documents from court to prepare for Sanctions Motions.	\$325.00	2.00	\$650.00

Totals: 44.42 \$10,098.25

**Expenses**

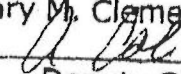
Date	Activity	Description	Cost	Quantity	Line Total
01/21/2020	Postage	Certified Mailing to Rachel Hammer, Esq.	\$6.80	1.0	\$6.80

Expense Total: \$6.80

Time Entry Sub-Total:	\$10,098.25
Expense Sub-Total:	\$6.80
<b>Sub-Total:</b>	<b>\$10,105.05</b>
<b>Total:</b>	<b>\$10,105.05</b>
<b>Amount Paid:</b>	<b>\$10,105.05</b>
<b>Balance Due:</b>	<b>\$0.00</b>

**Payment History**

Activity	Date	Payment Method	Amount	Responsible User	Deposited Into
Payment Received	Feb 12, 2020	Check	\$10,105.05	Petra Lawson-Mullins (Paralegal)	Operating

A COPY-TESTE  
Gary M. Clemens, Clerk  
By   
Deputy Clerk

# **EXHIBIT #3**

EXHIBIT A TO DECLARATION OF NATHANIEL BROWN

7/19/2021

iCloud Mail

# (legal-amp-medical-aid) Fraud Report

September 10, 2020 at 11:18 PM

From GoFundMe

To Robin Lawler

Received: from ms11p00im-qufv17083501.me.com ([1758.36.78])  
Original-recipient: rfc822;bubba1bubba2@icloud.com  
Return-path: <support@gofundme.com>  
Received: from outbyoip1.pod20.usw2.zdsys.com  
Authentication-results: dmarc.icloud.com; dmarc=pass header.from=gofundme.com  
x-dmarc-info: pass=pass; dmarc-policy=quarantine; s=r1; d=r0  
x-dmarc-policy: v=DMARC1; p=quarantine;  
Authentication-results: dkim-verifier.icloud.com; dkim=pass (2048-bit key)  
Authentication-results: spf.icloud.com; spf=pass (spf.icloud.com: domain of  
Received-SPF: pass (spf.icloud.com: domain of support@gofundme.com designates  
Received: from zendesk.com (unknown [10.219.91.125])  
Date: Fri, 11 Sep 2020 03:18:03 +0000  
From: "Support (GoFundMe)" <support@gofundme.com>  
Reply-to: GoFundMe <support@gofundme.com>  
To: Robin Lawler <bubba1bubba2@icloud.com>  
Message-id: <6LQ707PQ4L\_5f5aec6af1454\_595385b8370655\_sprut@zendesk.com>  
In-reply-to: <6LQ707PQ4L@zendesk.com>  
Subject: (legal-amp-medical-aid) Fraud Report  
MIME-version: 1.0  
Content-type: multipart/alternative;  
Content-transfer-encoding: 7bit  
X-Delivery-Context: event-id-1194897714311  
Auto-submitted: auto-generated  
X-Auto-Response-Suppress: All  
X-Mailer: Zendesk Mailer  
X-Zendesk-From-Account-Id: f093b34  
DKIM-Signature: v=1; a=rsa-sha256; c=relaxed/relaxed; d=zendesk.com;  
X-MANTSH: 1TEIXR1kbG1oaGkNHB1tTFwbGhsbGx4aGxEKTEMXGxoEGxsYBBsbGgQeGRABHho  
X-CLX-Shades: Grey  
X-ICL-SCORE: 3.3330330300

Thank you for bringing this to our attention. Our Trust & Safety team will be investigating the campaign and taking appropriate action.

If you donated to this campaign or should have received some or all of the money raised, please fill out the appropriate GoFundMe Guarantee claim form. If you know donors or individuals who should have received funds from this campaign, please ask them to submit claims or contact our team directly.

Please note that when a donation is refunded, the name used to donate is included in a notification email sent to the campaign organizer. All other information in Guarantee claims will remain confidential.

Claim forms for the GoFundMe Guarantee can be found here: <https://www.gofundme.com/guarantee>.

For general fraud reports, please note that:

1. We will be unable to disclose any details about our investigation.
2. Personal disputes will be ignored and should be settled outside of GoFundMe.
3. Your personal information will be kept confidential from the campaign organizer.

In addition to the report you have submitted, we encourage you to contact law enforcement officials in your area if you believe someone is committing fraud or breaking the law in any way.

Our team will reach out to you if we have any further questions.

If this is your campaign and you need assistance, please contact our support team here:

<https://support.gofundme.com/hc/en-us>.

(6LQ707PQ4L)







COMMONWEALTH of VIRGINIA

POST OFFICE BOX 2452

*Secretary of the Commonwealth*

RICHMOND, VIRGINIA 23218-2452

NOTICE OF SERVICE OF PROCESS

Go Fund Me, Inc.  
Serve RA: Cogency Global Inc.  
1325 J Street  
Suite 1550  
Sacramento, CA 95814

8/5/2021

Peyton Ashleigh

vs.

Go Fund Me, Inc.  
Serve RA: Cogency Global Inc.

**Summons and Complaint**

Dear Sir/Madam:

You are being served with the enclosed notice under section 8.01-329 of the Code of Virginia which designates the Secretary of the Commonwealth as statutory agent for Service of Process.

If you have any questions about the matter, PLEASE contact the CLERK of the enclosed/below mentioned court or any attorney of your choice. Our office does not accept payments on behalf of debts. The Secretary of the Commonwealth's ONLY responsibility is to mail the enclosed papers to you.

COURT:

Loudoun County Circuit Court  
18 East Market Street, 3rd Floor  
PO Box 550  
Leesburg, VA 20178

A handwritten signature in black ink, appearing to be "JJP".

Service of Process Clerk  
Secretary of the Commonwealth's  
Office

Clear All Data

EXHIBIT B TO DECLARATION OF NATHANIEL BROWN

AFFIDAVIT FOR SERVICE OF PROCESS ON THE SECRETARY OF THE COMMONWEALTH

Case No. CL 21-4145

Commonwealth of Virginia VA CODE §§ 8.01-301, -310, -329, 55-218.1, 57-51

Loudoun County Circuit Court

Peyton Ashleigh
20611 Morningside Terrace
Sterling, VA 20165

v. Go Fund Me, Inc
Serve RA: Coagency Global Inc
1325 J Street, Suite 550
Sacramento, CA 95814

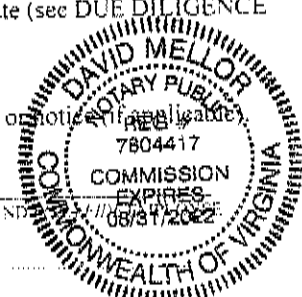
TO THE PERSON PREPARING THIS AFFIDAVIT: You must comply with the appropriate requirements listed on the back of this form.

Attachments: [X] Summons and Complaint [ ] Notice [ ]

I, the undersigned Affiant, state under oath that

- [X] the above-named defendant whose last known address is [ ] same as above [ ]
1. [X] is a non-resident of the Commonwealth of Virginia or a foreign corporation and Virginia Code § 8.01-328.1(A) applies (see NON-RESIDENCE GROUNDS REQUIREMENT on page 2).
2. [ ] is a person whom the party seeking service, after exercising due diligence, has been unable to locate (see DUE DILIGENCE REQUIREMENT ON BACK)

[ ] is the hearing date and time on the attached process or notice of application.



July 15, 2021 Peyton Ashleigh
[ ] PARTY [ ] PARTY'S ATTORNEY [ ] PARTY'S AGENCY [ ] PARTY'S REGULAR AND

State of Virginia [ ] City [X] County of Loudoun
Acknowledged, subscribed and sworn to before me this day by Peyton Ashleigh
PRINT NAME OF SIGNATORY

07/15/2021 DATE [ ] CLERK [ ] MAGISTRATE [X] NOTARY PUBLIC
Notary Registration No. 7804417 My commission expires 08/31/2022

[ ] Verification by the clerk of court of the date of filing of the certificate of compliance is requested. A self-addressed stamped envelope was provided to the clerk at the time of filing this Affidavit.

NOTICE TO THE RECIPIENT from the Office of the Secretary of the Commonwealth of Virginia:
You are being served with this notice and attached pleadings under Section 8.01-329 of the Code of Virginia which designates the Secretary of the Commonwealth as statutory agent for Service of Process. The Secretary of the Commonwealth's ONLY responsibility is to mail, by certified mail, return receipt requested, the enclosed papers to you. If you have any questions concerning these documents, you may wish to seek advice from a lawyer.
SERVICE OF PROCESS IS EFFECTIVE ON THE DATE WHEN SERVICE IS MADE ON THE SECRETARY OF THE COMMONWEALTH.

CERTIFICATE OF COMPLIANCE

- I, the undersigned, Clerk in the Office of the Secretary of the Commonwealth, hereby certify the following:
1. On JUL 30 2021, legal service in the above-styled case was made upon the Secretary of the Commonwealth, as statutory agent for persons to be served in accordance with Section 8.01-329 of the Code of Virginia, as amended.
2. On AUG 06 2021, papers described in the Affidavit and a copy of this Affidavit were forwarded by certified mail, return receipt requested, to the party designated to be served with process in the Affidavit.

[Signature]
SERVICE OF PROCESS CLERK, DESIGNATED BY THE AUTHORITY OF THE SECRETARY OF THE COMMONWEALTH

COMMONWEALTH OF VIRGINIA



LOUDOUN CIRCUIT COURT  
Civil Division  
18 E MARKET ST/PO BOX 550  
LEESBURG VA 20178-0550  
(703) 777-0270

Summons

To: GOFUNDME INC  
SERVE REGISTERED AGENT  
COGENCY GLOBAL INC  
1323 J STREET SUITE 1550  
SACRAMENTO CA 95814

Case No. 107CL21004145-00

The party upon whom this summons and the attached complaint are served is hereby notified that unless within 21 days after such service, response is made by filing in the clerk's office of this court a pleading in writing, in proper legal form, the allegations and charges may be taken as admitted and the court may enter an order, judgment, or decree against such party either by default or after hearing evidence.

Appearance in person is not required by this summons.

Done in the name of the Commonwealth of Virginia on, Wednesday, July 21, 2021

Clerk of Court: GARY M CLEMENS

by Demetri Beach  
(CLERK/DEPUTY CLERK)

Instructions:

Hearing Official:

Attorney's name: PRO SE, 571-762-9602

COMMONWEALTH OF VIRGINIA



LOUDOUN CIRCUIT COURT  
Civil Division  
18 E MARKET ST/PO BOX 550  
LEESBURG VA 20178-0550  
(703) 777-0270

Summons

To: FACEBOOK INC  
SERVE REGISTERED  
SERVICE CORPORATION  
100 SHOCKOE SLIP FLOOR 2  
RICHMOND VA 23219

Case No. 107CL21004145-00

The party upon whom this summons and the attached complaint are served is hereby notified that unless within 21 days after such service, response is made by filing in the clerk's office of this court a pleading in writing, in proper legal form, the allegations and charges may be taken as admitted and the court may enter an order, judgment, or decree against such party either by default or after hearing evidence.

Appearance in person is not required by this summons.

Done in the name of the Commonwealth of Virginia on, Wednesday, July 21, 2021

Clerk of Court: GARY M CLEMENS

by           Dennis Beach            
(CLERK/DEPUTY CLERK)

Instructions:

Hearing Official:

Attorney's name: PRO SE, 571-762-9602