

FIRST RESPONSE – MARCH 31, 2020

Introduction

- 21 Points of Complaint Condensed/Clarified
- Recommend **Reviewing Exhibits** First To Avoid Wasting Court's Time
- Defence Avoiding, Misrepresenting, and Conflating Issues in their Reply

Hearst Spins in Reply

≈ Various Hearst Spin Quotes from Reply

Some Introductory Basic Issues/Facts of Lawrence v. Altice USA

- Some Obvious Differences between Lawrence v. Altice and Lawrence v. Hearst
 - 2 Days compared to 2+ Years of various forms of Defamatory Coverage
 - Persistence knowing their original source (Altice) took down their coverage
 - Types and Number of ongoing Damages (see ECF 1 Complaint, see Exhibit W)
 - Parroting a police narrative that police intended/intend to keep from the public
 - Consistent irrefutable evidence of **Harassment** as a intentional and repeatedly or persistent or systematic Course of Conduct behavior (see Exhibits H-U)
- Some Basic Facts and Issues Being Contested Now in Lawrence v. Altice
 - Definitions of the words **stalk, stealth, quarry, prey**
 - *“popular acceptance” and “mind of average viewer”*
 - *“dulling the impact”, “mitigating the impact”, “outright false reporting”*
 - *“resolving all ambiguities”, etc ...* and other questionable, contradictory, and nonsensical quotes from Judge Underhill ECF 66 Decision
- Some of the Many New and Enhanced Arguments/Evidence
 - Reporting on **known** closed cases as criminal/Police Redaction Policies
 - Over 15 New Resources/Completed Dictionary Definitions of Relative Words
 - Newly Discovered Dictionary Idiom *“get into/invade personal space”*
American Psychological Association *“get into/invade personal space”*
(see Exhibit V)
 - Intercultural/Multi-lingual Evidence of *“popular acceptance”* of **stalking**
 - ETC ... This Case is Nowhere Near Over

CASE AT HAND: Lawrence v. Hearst

Again Introductory Facts:

- The Two Arrests
- Warrants (see Exhibits A, B)
- Westport News Articles with notes (see Exhibits E, F, G)
- The Fact Reporter Dubiously Ascertain and Reads First Arrest Warrant
- Westport Police Redaction Policies/Wendy Higgins Chambers (see Exhibit C)

- Westport Police Official Press Releases of Arrests (see Exhibits A, B)

My Official and Lack of Criminal History (see Exhibit D)

- Florida – NO Criminal History (see Exhibit D)
- FBI/California – One Conviction of Domestic Violence in 1996 (see Exhibit D)
- Connecticut – NO Criminal History with only the Feb. 6, 2019 false arrest for alleged Email Harassment pending which stands at a Nolle Prosequi (see Exhibit D)

Police Never Deploying the Harassing Language in Arrest Warrant # 1

- Introduction into the Language of **Harass** (see very telling Exhibits H - T)
- Introduction into the Language of **Haunt** (see very telling Exhibit U)
- Introduction into the Language *“follow” and/or “stare and get into personal space”* (see very telling Exhibit V)

Dissecting Article # 2 The Big Deuce

- Word by word and line by line analysis.

Dissecting Article # 3 Repeating Persisting Continuing The Big Deuce

- Word by word and line by line analysis.

Different Language in Ct. Statutes

- Second Degree Harassment use of the word **harass**
- Second Degree Stalking use of the word **harass**
- Third Degree Stalking use of the word **harass**
- Violation of a Restraining Order use of the word **harass**
- One Count of Second Degree Breach of Peace as code **orange**
- Disturbing the Peace Infraction as code **yellow**
- Any Incident Report Fully Investigated Resulting in NO Arrest as code **blue**

Conclusions – SEE EXHIBITS

- Overwhelming Undeniable Multi-source Definition of **Harass and Haunt** (see Exhibits H – U, see very telling Exhibit V)
- 99% of the material attempting to define **harass or harassment** shows it means **repeated, persistent, continual, systematic, more than one act toward someone.**
- Hearst NEVER addressing the numerous errors (unlike Altice/News 12) and persisted in poisoning the world at large for now over 2+ years with unproven and un-provable lies thereby responsible for ongoing Damages.

EXHIBITS

Exhibit A: March 5, 2018 Arrest Official Police Press Release 1 and Warrant 1.

Exhibit B: Feb. 6, 2019 Arrest Official Police Press Release 2 and Warrant 2 with highlighted in yellow Section 20 - no doxxing of past arrests devoid of conviction.

Exhibit C: Emails from lead Westport Police FOIA Officer Showing Police Redaction Policies, their Official Press Release of the first Arrest, and how News 12 and Westport News slanderous cohort Wendy Higgins Chambers has no individual police incident report after she visited them.

Exhibit D: Florida Printout Showing NO Criminal Record, FBI Printout Showing ONLY Conviction – 1996 California Domestic Violence, and Connecticut Criminal Background Check showing NO Criminal Record with the only pending case being the second false arrest for alleged Email harassment reported on by Westport News in Article #3 standing at a Nolle Prosequi.

Exhibit E: Article #1

Exhibit F: Article #2 - The Big Deuce – clean copy and copy with notes.

Exhibit G: Article #3 – clean copy and copy with notes.

TRULY UNDENIABLE EVIDENCE Exhibits H-W with even more to come.

**Legal and Everyday Dictionary Definitions of Harass, Harassment, Harry
Fact: “popular acceptance” of the word harass and harassment, harry.**

Exhibit H: Blacks Law Dictionary definition of **harass** – most popular law dictionary, Law.com Dictionary definition of **harass** – most popular online law dictionary, TheLawDictionary.org definition of **harass** – another most popular online law dictionary.

Exhibit I: Etymonline.com definition of **harass, harry** – largest most popular etymology source.

Exhibit J: Merriam Websters Law Dictionary definition of **harass, harry** – a law version from the most popular dictionary, Websters Dictionary definition of **harass, harry** – most popular everyday dictionary by history and sales.

Exhibit K: Dictionary.com definition of **harass, harry** – most popular online everyday dictionary.

Exhibit L: American Heritage Dictionary definition of **harass, harry** – a most popular everyday dictionary by history/sales.

Exhibit M: Collins Dictionary definition of **harass, harry** – a most popular everyday dictionary by history and sales.

Exhibit N: Longman Dictionary definition of **harass, harry** – a most popular everyday dictionary by history and sales.

Exhibit O: Macmillan Dictionary definition of **harass, harry** - a most popular everyday dictionary by history and sales.

Exhibit P: Oxford Dictionary definition of **harass, harry** - the most popular English language everyday dictionary by history and sales.

Exhibit Q: Cambridge Dictionary definition of **harass, harry** - a most popular everyday dictionary by history and sales.

Exhibit R: TheFreeDictionary.com/West Law Dictionary definition of **harass, harr**.

Exhibit S: Vocabulary.com Dictionary definition of **harass, harr**, etc...

Exhibit T: Wikipedia definition of **harass, harr** – largest most popular encyclopaedia in English speaking world, Wiktionary definition of **harass, harr** – dictionary of the largest encyclopaedia in the English speaking world .

Exhibit U: All Dictionaries on the word **Haunt**

Exhibit V: American Psychological Association, Webster’s Dictionary, and Collins Dictionary of the idiom/phrase “*getting into personal space*” and Internet Search Results of the phrase “*getting into personal space*” aka Arrest Warrant language and how these Dictionaries and Internet search results/articles/resources NEVER deploy the **stalking or harassment language** while discussing the issue of “*getting into personal space*”.

Exhibit W: Internet Search Engine Results for James Lawrence associating my arrest with **Sexual Harassment and Sex Offender Registry** because of the defaming unproven and unprovable **harassment** language deployed by Hearst.

Exhibit X: Internet Search Results of Westport News libel in Europe before 2019 vs. now – all accessed around the world via the Associated Press chaired by Hearst CEO Stephen Schwartz.

NOTE: I will distinguish the two parties in the following way.

James Lawrence – regular writing

Hearst – black and red Italic writing

NOTE: I sometimes use colored writing to make locating, discerning, and reading easier.

Red – refers to defamation of “Harassed Women for Years” and related terms to Harass.

Orange – refers to language within Arrest Warrant/Official Police Press Release.

Yellow – refers to an Infraction/s.

Blue – will symbolize any past police incident report that was fully investigated resulting in no probable cause for any arrest and “cases” that are known by reporter to be closed statute of limitations in effect.

Green – refers to relative Exhibits and previous ECF documents.

NOTE: I fully expect future Responses to be much shorter so long as Defence sticks to the issues. My experience is that my First Response will be the most challenging to read in respect to page number. I have attempted to stay within 15,000 words along with Exhibits that read very fast. Do not be intimidated with the page numbers of the Exhibits for they are merely pages with single sentences printed out from various Internet Dictionary resources. I choose to provide the undeniably numerous evidence so all involved can avoid any future misinterpretations of “*popular acceptance*”.

INTRODUCTION

I want to keep words to a minimum in this Response and let the Exhibits speak for themselves. **I stand by all 21 points of my Complaint and will now respond to Motion to Dismiss by initiating the process to show more facts to justify my Complaint seeking compensation for all the Damages I continue to experience.** Defence/Hearst makes a mistake attempting to equate my Complaint with my ongoing case against Altice USA/News 12 that is in the Second Court of Appeals with Brief filed in April and ready for Oral Argument hopefully by June. These cases have some similar types of issues around deployment of unproven and un-provable language like *"stalk"* and *"harass"*, and these cases are related when it comes to understanding the chain of events leading up to Hearst's numerous unique mistakes, but my Complaint against Hearst is different for the 21 reasons detailed in Complaint like the fact that unlike News 12 who removed their false (as Judge Underhill wrote *"outright false"*) coverage of me within 2 days and attempted to scrub their websites, (as Judge Underhill wrote *"dull the impact"* or *"mitigate the problem"* of the *"outright false coverage"*) the fact remains that Hearst never took down aka removed aka scrubbed their websites of their sordid special little hit job coverage of me and their libel has been living and breathing and wreaking havoc for over 2 years and counting. Let get real – a very very very big difference here.

The 21 Points of Complaint ECF 1 – Condensed:

I ask that these 21 points be re-read in [Complaint ECF 1](#). I know the Complaint can be lengthy but the mistakes by reporter Sophie Cecilia Vaughan are lengthy. I will now make a very simplified synopsis of the 21 points but would expect all 21 points of the Complaint to be responded to in a proper way from the ways I present them in Complaint in conjunction with the Exhibits I present here in Response.

Article #2 – The Big Deuce

- 1:** Deploying the *"harassing"* language despite the fact that the Arrest Warrant never deploys the *harassing language* for the police carefully choose distinct words *"getting into personal space"* and wording (to be presented in detail here in Response) so to **not** use the *harassing language*.
- 2:** Deploying the language *"haunting"*.
- 3:** Doxxing **known** closed *"cases"* incident reports as *"harassing women"* after police investigations that never saw any probable cause for *harassment* let alone anything else.
- 4:** Doxxing these known closed *"cases"* against Westport Police redaction policies and against the Official Police Press Release and Police Facebook Postings, to which this reporter Sophie Cecilia Vaughan has a history of fighting with the Westport Police's right to redact what they choose to redact.
- 5:** Doxxing alleged past incidents as *harassing* AFTER Due Process of Law aka investigations related to **Point 3** but also going beyond the Official Police Press Release and doing her own special story that deviates from all her other past reporting (let alone other reporter's coverage of my arrest let alone arrests in general) that never does any of what she does to me. See future Exhibits of all Sophie Cecilia Vaughan reporting on arrests in her career that never does this type of agenda-driven doxxing.

6: Doxxing the known closed “cases” as **harassing** all the while **knowing the cases are closed** and I have no criminal history in Ct. – Westport being the only place of alleged past incidents.

7: Deploying a libellous language of “**harassing women**” after **knowing** I was already harmed from News 12 taking down aka making efforts to “dull the impact” of their “stalking several women” language aka “outright false” reporting thereby showing more agenda-driven malice. Knowing her cohort Wendy Higgins Chambers’ “stalking and preying on women” language was scrubbed from News 12 reporting.

8: Doxxing a past arrest record against police redaction policies and not distinguishing between arrests and convictions. It is obvious this biased reporter had an agenda to paint a picture of her own opportunistic, sensationalistic, and unscientific ways.

9: Email Evidence I tried to help the Westport News editor of the time Jerrod Ferrari now gone from Hearst with necessary perspective to do what News 12 did – take down their “outright false” report only to be ghosted by this irresponsible incompetent coward.

10: Email Evidence I tried to help Hearst legal Stephen Yuhan with necessary perspective to do what News 12 did – take down their “outright false” report only to be threatened.

11: The right for Hearst/Westport News to deploy their cohort Wendy Higgins Chambers after knowing her actions with News 12 and language used “preying on women” was removed from News 12 in an effort to clean up their “outright false” mess aka effort at “dulling the impact”. The right of Westport News to deploy this woman after she went to police who investigated her complaint and she does not even have an individual police report nor was I ever called by police about this crazy woman. This is a serious issue to be taken up by the court – **a woman known to have visited police** yet deployed in a libellous story of “harassing women” despite police never seeing this woman’s story as harassment let alone anything criminal.

Article #3

12: Deploying the “**accused of harassing women**” language – plural. This is the only time – false arrest for email harassment where police allege probable cause of repeated or persistent course of conduct and harassing intent thus the only harassing arrest.

13: Fact that Westport News Article #2 contributed to the second false arrest via evidence of complainant’s false statements/perjury where complainant/tenant/ex-girlfriend mentions the Westport News Article #2 nine times in her sworn written statement.

14: Deploying the following:

"A local man alleged to have harrassed (sloppy very telling misspelling) women for years at area stores has once again been arrested."

Notice how the reporter now in this Article #3 uses the word "allege" unlike the first libelous report - Article #2, when she wrote "**man harassed women for years**" one year earlier thereby bring merit to my Complaints. This was also written despite police never deployed the harassing language for there was no proof of any past harassment hence no prior arrests after investigations and past ability to arrest me for something even without a sworn written statement for the March 5, 2018 arresting incident was without a sworn written statement aka complainant.

15: Repeating the same mistakes as **Point 3** from Article #2 but again in Article #3. See **Point 3**.

16: Repeating the same mistakes and more as **Point 8** from Article #2 but again in Article #3 and against the actual wording in the Arrest Warrant for Article #3. Yes Police do not mention these past arrests in this Warrant and Incident Report (which Hearst only shares). Reporter is parroting her narrative from Article #2 – Big Deuce. **See Point 8**.

17: Repeating again by doxxing me of material that is redacted from release according to

Westport Police (see all coming evidence/Exhibits of police redaction policies) out of the ordinary reporting against Official Police Press Releases and Police Facebook posts.

18: Introductory issues and evidence of reporter's obvious malice with coming detailed evidence of how she never does this to anyone in her past – doxxing people arrested of arrest records with actual criminal records.

19: Repeating I **harassed women**- plural yet with no past evidence.

20: The very important issue for the court to take up with the right of reporters to accuse of **harassing** despite not having actual names of accusers (happened in the MeToo type persecutions via the media devoid of police investigations) yet the issue that I had actually had past investigations of *“getting into personal space”* incidents that resulted in no proven crimes aka **harassment** thereby making my past even more hands off for there were actual police investigations.

21: An appeal to empathy –a still maintained clean criminal record - NOT GUILTY of the **Second Degree Breach of Peace** charge that started this mess (a charge that had nothing to do harassment) yet unlike News 12 whose “outright false” reporting being alive for only 2 days the Westport News wreaking havoc on my life to this day – 2+ years and counting ...

Defence Avoiding the Issues in Reply:

To make things easier I recommend now reviewing all the very telling Exhibits so not to be in denial spin mode through the rest of this and future Responses/Replies and wasting the court's time. Defence's flooding the court with meaningless case precedents and false interpretations of what has been submitted and under-informed interpretations of what has transpired is obviously an attempt to intellectually flood if not parrot that will confuse Judge. Anyone familiar with my only just begun legal efforts to clear my name knows that the case against Altice/News 12 is not only distinctly different in some ways, but was now temporarily decided based on a incomplete and subjective interpretation of language – dictionary definitions of words at issue – and not any kind of case precedents. Yes these cases will in the end come down to legal, everyday dictionary, and cultural definitions of the words deployed at me. Time to get real.

Defence flooding his response with what he thinks are relative case precedents only shows he knows next to nothing about my case with Altice/News 12 let alone the very distinct zeitgeist. The past year with Altice, I took the time to debate cases thrown at me to which led to my success to defeat initial Motion to Dismiss, cases Hearst parrots in their Reply but anyone with real knowledge of my Altice case proceedings and resulting Summary Judgment/temporary decision knows that the decision by Judge Underhill did not come down to any particular case precedent but on an analysis of language/linguistic definitions, and issues like the *“mind of the average viewer”* and *“popular acceptance”* and *“dulling of impact”* and *“mitigating the problem”* of the *“outright false”* reporting on me. Really. So I advise Defence to slow down and stick to the real issues at hand with their own case. Hearst will certainly be challenged to explain the Exhibits I present in this Response. I will certainly not make a mistake of feeling the need to respond to any more mentally abusive legal bullshit designed to allow media to weasel their way out of addressing the unproven and un-provable hype and lies they put out there, case precedents

that in the end will not be relative to any kind of proper Judgment.
SEE ALL EXHIBITS NOW.

HEARST SPINS IN REPLY – a few I can barely stomach.

≈ Hearst:

*“Since 2002 Lawrence was logged by Westport police in 10 incidents where women felt **harassed** by him, but in each case, they felt afraid to pursue charges against him for fear of retaliation, according to court documents; and Lawrence has a record of arrests outside of Connecticut, including resisting arrest and fleeing/eluding police in Florida and, in California, he was charged with petty theft, theft of personal property, stalking, inflicting corporal injury to spouse and battery of a spouse”.*

“First, the Complaint itself expressly refers to the Arrest Warrant Application as the basis for the Articles. (See Compl. at 4, 5, 8.) Second, it is apparent from the face of the Articles themselves that the facts concerning Lawrence’s arrests and history of law-enforcement encounters are based on the Westport Police Department’s allegations. For example, the March 12 Article expressly attributes the narrative of the Fresh Market Incident to the victim’s statement to officers. (Ex. B, at 1.) The March 23 Article expressly attributes Lawrence’s history of “10 incidents where women felt harassed by him” to “court documents,” including statements from Officer James Sullivan. (Ex. C, at 2, 3; see also Ex. E, at 2-3.)”

James Lawrence:

FACT: Yes the basis of the March 23, 2018 Hearst Big Deuce Article #2 is the dubiously ascertained Arrest Warrant. This is what the reporter read against police policies and intentions.

FACT: “Lawrence’s arrests and history of law enforcement encounters” is nothing but hype (see Exhibit D - Official Arrest History and lack of Criminal Conviction Record).

FACT: The Arrest Warrant itself says I have no criminal history in Ct – the place (Westport and only Westport) of alleged supermarket cases (devoid of any evidence like camera video in these supermarkets) that were fully investigated resulting in no probable cause to arrest/no arrests cases known by Hearst reporter to be long closed.

FACT: The “victim’s” statement are not the basis of the Westport News’ libel for she never used the word **harass** (See coming future Exhibit on the Dispatch Tapes of the arresting incident proved to be NOT Guilty where you will hear in the woman’s own words what she thought was going on.). And she never gives a sworn written statement. Once again, the issue is the Arrest Warrant wording that never deploys the **harassment** language.

FACT: The police never use the **harass/harassment** wording. Only Hearst/Westport News does this against the veritable legal and dictionary definitions of **harass**. The police carefully use the wording “*follow and get into personal space*” for a reason – to avoid contradicting their past actions of not finding probable cause for an arrest for anything let alone **harassment**, and to avoid contradicting the one arrest for one count of Second Degree Breach of Peace – the only cause of the Article #2 Big Deuce.

≈ Hearst:

“⁵ To the extent that Lawrence disagrees with Judge Underhill’s decisions in the Altice Action finding that Altice’s accounts were substantially true and privileged fair reports, he is barred from using this proceeding to mount a collateral attack on those decisions.”

James Lawrence:

The case at hand is easily seen as having distinct differences and it is really disgusting that Defense cannot even point to one obvious difference in their persistently dirty spins. HEARST DEPLOYS AN UNPROVEN AND UN-PROVABLE **HARASSMENT** LANGUAGE AND NEVER TOOK THEIR COVERAGE DOWN AKA “*dulled impact*” or “*mitigated the problem*” to which Judge Underhill claimed News 12 did. Hearst is guilty for 2+ years and counting of this obvious difference.

**Altice – 2 days reporting on me resulting in responsible measures to remove reports.
Hearst - 2+ years reporting on me hence irresponsible inaction and malice to persist!!!!
HUGE DIFFERENCE.**

FACT: Hearst created a cluster bomb and bio-weapon virus that persists to this day. News 12 did not do this kind of damage. News 12 did nowhere near as much damage as Hearst.

FACT: Altice/News 12 took down their coverage of me and the case is in front of the Second Circuit Court of Appeals with enhanced evidence in my corner like more informative and detailed dictionary definitions for the court review after Judge Underhill basing his decision not on any case precedent but on an undeveloped, incomplete dictionary definition of the word **stalk and stealth**. Unlike Altice News 12, Hearst Westport News never takes down their libel and it has been alive for over 2+ years. In addition, Hearst commits numerous different types of defamation and **obvious malice committing the defamation knowing News 12 took down their coverage** via their shared cohort/source Wendy Higgins Chambers – woman featured in Article #2 -The Big Deuce - who is without an individual police report/police action after visiting the police the day before she visited Westport News/Hearst. The cases are very different and I would advise the court to review the Brief submitted for this Appeal – Second Circuit Court of Appeal Case # 20-393 Lawrence v. Altice USA if there is a need to see the new and enhanced evidence in my corner. I will briefly address this case later within this Response.

≈ **Hearst:**

*“Hearst’s use of the terms “haunt” or “harass” does not, as Lawrence appears to argue, defeat application of the fair report privilege. Lawrence appears to claim that these statements are false because “there was never any repeated or persistent contacts with anyone from a supermarket incident.” (Compl. at 5.) In Burton, the court held that the fair report privilege will apply so long as the article “conveys to the persons who read it a substantially correct account of the proceedings.” 847 A.2d at 1119. “It is not necessary that it be exact in every immaterial detail or that it conform to that precision demanded in technical or scientific reporting.” Id.; see also Dellacamera, 2002 WL 31501855, at *3 (fair report privilege applied to report describing “plaintiff’s sitting in his car with his exposed erect penis in his hand as ‘masturbating’)”; Weber v. Lancaster Newspapers, Inc., 878 A.2d 63 (Pa. Super. Ct. 2005) (fair report privilege applied to report using term “threatened” instead of “harassed”). In the Altice Action, Judge Underhill specifically rejected Lawrence’s argument that “the November 5 Incident involved a one-time encounter, and so his behavior clearly was not stalking” (Altice Action, ECF No. 66, at 13), finding instead that the use of the term “stalk” or “stalking” was substantially true because, among other things, “the average person reading the [Altice] Articles would not have been*

affected differently if the headlines read, for instance, “Police: Westport man charged with breach of peace for following woman.” (Altice Action, ECF No. 66, at 20.⁶).”

James Lawrence:

AVOIDING THE ISSUES NOW BEFORE THEM.

And Judge Underhill’s decision now in Appeal was based on a subjective (under-informed) definition of language – stalking and stealth. Once again, these case precedents are irrelevant. I advise the court to review the entire case James Lawrence v. Altice USA and follow the developments if necessary.

Hearst writing - “In the Altice Action, Judge Underhill specifically rejected Lawrence’s argument that “the November 5 Incident involved a one-time encounter, and so his behavior clearly was not stalking” (Altice Action, ECF No. 66, at 13)” – **is false and intends to mislead the court.** The issue of James Lawrence v. Altice was the definition of stalk to which Judge Underhill feels stalk is not a repeated Course of Conduct in the dictionary. It was not Judge Underhill’s job to paint me let alone accuse me or even convict me as a stalker of any past alleged incident/“case” known to be fully investigated resulting in no probable cause for arrest ever cases long closed with statute of limitations in effect. Notice how Hearst refers to the arresting incident (found Not Guilty) – a single incident - all the while Altice reported “*stalked several women*” and Hearst reported “**Police: Man Harassed Women for Years**” thus once again utter simplistic interpretations and utter nonsense devoid of details so please stick to the case at hand.

Quote from Judge Underhill:

Judge Underhill: “It is an open question in the Second Circuit whether courts can take judicial notice of police incident reports, but it seems that many courts refrain from doing so. See, e.g., Alvarez v. County of Orange, N.Y., 95 F. Supp. 3d 385, 398 (S.D.N.Y. 2015); Bejaoui v. City of New York, 2015 WL 1529633, at *6 (E.D.N.Y. Mar. 21, 2015); Serrata v. Givens, 2019 WL 1597297, at *4 (E.D.N.Y. Apr. 15, 2019).” See [Lawrence v. Altice ECF 66 Page 2](#)

Thereby leaving the necessary evidence of any alleged **stalking** to be with the one and only arresting incident and only an arresting incident – one alleged person (never a sworn written statement) and not material devoid of actual arrests like the 4 Exhibits shared by Altice of past Incident Reports devoid of any probable cause for arrest that were unproven and are forever unprovable **stalking** let alone **harassment** - YES clearly shows there was not intent or probable cause for any **stalking/harassment** and there was **no evidence of harassment** and no probable cause to arrest for the police would have been in dereliction of duty if such intent, evidence, probable cause existed and they did nothing.

FACT: Judge Underhill based his decision on linguistic issues – an underdeveloped dictionary definition of **stalk** while avoiding the dictionary definitions of **stealth, quarry, and prey** when attempting to refute my arguments about the facts of the legal and yes dictionary definitions of **stalking being a course of conduct** of more than one act toward someone. The Arrest Warrant wording “**getting into personal space**” clearly attempts to avoid using **stalking or harassing** language for a reason – so to not end up getting sued for misrepresenting the arrest.

≈ Hearst:

“Just as Judge Underhill found in the Altice Action, it is “perfectly clear that the police did say the things that Lawrence disputes” in his Complaint against Hearst. Accordingly, his claims must be dismissed because the articles are protected under the fair report privilege.”

James Lawrence:

FACT: Once again, police never deploy the harassment language in the Arrest Warrant for obvious reasons. See Exhibit H-U, Exhibit V.

≈ Hearst:

“Here, there can be no doubt that Hearst’s Articles are protected by the fair report privilege. First, the Complaint itself expressly refers to the Arrest Warrant Application as the basis for the Articles. (See Compl. at 4, 5, 8.) Second, it is apparent from the face of the Articles themselves that the facts concerning Lawrence’s arrests and history of law-enforcement encounters are based on the Westport Police Department’s allegations.

James Lawrence:

YES we will analyze the facts of this Arrest Warrant and what it claims even if it was dubiously ascertained against police’s intentions aka redaction policies for it was not intended to be painting me in ways beyond the single count of Second Degree Breach of Peace behavior. We will also learn the facts of my “encounters with law enforcement” aka lack of criminal history.

≈ Hearst:

Arrest Warrant Application	Altice Reports	Hearst Article
“[T]he complainant stated that a white male . . . had followed her around the inside of the store . . . then followed her out to her car . . .” (Ex. A ¶ 2.)	“A Westport man is facing charges tonight for allegedly stalking several women around town.” (See Altice Action, ECF No. 13-2, at 4.)	“A Westport resident was arrested on charges of breach of peace after following a woman around a grocery store and then out to her car on Nov. 5, police said.” (Ex. B, at 1; Ex. E, at 2 (“Lawrence was also arrested in March after he allegedly followed a woman around Westport’s Fresh Market

James Lawrence:

“HEARST ARTICLE”? THERE ARE 3 OF THEM! NOTICE HOW HEARST IN THEIR COMPARISON TO NEWS 12 OMITTS THEIR WESTPORT NEWS ARTICLE #2 HEADLINES – **“Police: Man Harassed Women for Years”**. AND NOTICE HOW THEY SHOW A NEWS 12 OPENING LINE ABOUT STALKING AND OMIT THEIR OWN LIBEL OPENING LINE:

WESTPORT — Local women haunted for years by a man they say would aggressively approach them at local stores and cafes are speaking out after his arrest earlier this month.

Utterly disgusting attempt to confuse the court – again, let alone confusing the world at large for 2+ years and counting. These idiotic comparisons prove Hearst needs to recognize some particular aspects of my unique Complaint toward them and not conflate in such “privileged” ways. I ASK THE COURT TO READ THE ARTICLES TO SEE WHAT DEFENCE IS ATTEMPTING TO DO HERE. **WHERE IS ARTICLE #2 THE BIG DEUCE?**

FACT: I was in San Francisco from 2007-2017. Article #2 Big Deuce was March 23, 2018.

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ALSO NOTE: ≈ I do not know why Hearst when referring to Article #3 is insinuating as if I am denying that I was finally arrested for an alleged “harassment” (Second Degree Email Harassment case based on 1 Email standing at a Nolle Prosequi due to corruption). Once again, Hearst deflects and avoids the issues at hand. [Re-read Complaint – ECF 1. Read all Exhibits.](#)

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≈ **Hearst:**

As discussed above, the statements in the Articles are literally and substantially true. Thus, even if Lawrence’s subjective interpretations of the Articles could be credited (which they cannot), as a matter of law, he could not recover for their alleged defamatory implications because they are based on true facts.

James Lawrence:

“Subjective interpretations” “True”! . YOU ALL ARE DISGUSTING COWARDS WITH NO SENSE OF FAIRNESS LET ALONE SENSE OF TRUTH OF ANY KIND. **“HARASS WOMEN FOR YEARS”?**. PROVE IT! **YOU ARE REPORTING ON KNOWN CLOSED INVESTIGATIONS** (to which I am now emphasizing) AKA ESTABLISHED FACTS AS WARRANT AVOIDS USING ANY **HARASSING** LANGUAGE. PROVE IT!. NOW. PROVE WHAT YOU REPORT ON!

TRY LIVING A NORMAL LIFE WITH VERITABLE “SUBJECTIVE” AKA UNPROVEN AND UN-PROVABLE POISON OUT THERE IN THE AGE OF GOOGLE. THIS CASE WILL BE SETTLED FAIRLY! Nearly every word I have had to deal with in these disgusting processes over the past 2 years is nothing but mental abuse. You all submit a 15 page Response never processing, empathizing, let alone understanding basic arguments let alone abilities to read basic legal and cultural resources and you wonder why I can write for pages upon pages upon pages on every single word and sentence you spin. You all did nothing wrong? NOTHING? For I did nothing wrong aka NOT GUILTY of the arresting charge so somebody certainly did something beside peacefully give a business card to a woman at a market. Someone certainly did something given the facts of all my Damages!!!! [See ECF 1 – Introductory Damages](#)

FACT: THE GOOGLE ZEITGEIST MUST BE TAKEN INTO CONSIDERATION FOR THE NEED TO ESTABLISH FAIR PRECEDENTS WHEN USING UNPROVEN AND UN-PROVABLE LANGUAGE LIKE “HARASS WOMEN FOR YEARS” THAT HAS NOTHING TO DO A MAN’S ARREST NOR HISTORY!!!

FACT: The already investigated matters are unproven and un-provable. Reporter put slanderous and libelous words in the police mouths without even writing the necessary wording “allege”. Reporter was obviously reckless, agenda-driven, and malicious GIVEN THE FACT SHE KNEW OF PREVIOUS DAMAGES DONE TO ME BY NEWS 12. The spin here is utterly nauseous. READ MY CT. RECORD!!!!

FACT: This very same reckless Hearst reporter Sophie Cecilia Vaughan continued to be a pest to the Westport Police again, the next time with a lawsuit against them after my 2018 arrest where she attempted to get at another person’s Second Degree Breach of Peace Warrant against the wishes of the Westport Police to which will be presented in the future. It is no wonder that she then got demoted to being an “Education Reporter” after being a General Assignment Reporter, and now since February 2020 is a Wandering Freelance Journalist no longer with Hearst.

≈ **Hearst:**

(“Courts have consistently held that when an author fully sets forth the factual basis for a particular view (and that factual basis is not challenged as false), then the author’s conclusion constitutes nonactionable opinion.”); Milkovich v. Lorain Journal Co., 497 U.S. 1, 20 (1990).

James Lawrence:

HEARST REPORTER NEVER EVEN KNEW THE DIFFERENCE BETWEEN AN ARREST RECORD AND A CONVICTION RECORD LET ALONE DEFINITIONS OF THE WORDS SHE DEPLOYS AND THE TYPES OF ARRESTS SHE IS REPORTING ON. Reporter is unqualified which is why she was demoted to being an “Education Reporter” while formerly being a General Assignment Reporter for the Westport News – a 21 year-old formerly handling arrests of all kinds and then to a more specialized training ground, and now out in the wilderness where she belongs. Yes she needed some necessary “education” let alone conscious as does Defence. It is obvious reporter was devoid of facts, reckless, sensationalist, agenda-driven, and malicious. I need to shower for years to get all the filth off me from this experience. This summer I will be officially changing my name because of Sophie Cecilia Vaughan and Hearst’s inability to be fair and take down their unproven and un-provable hit job.

SOME BASIC ISSUES/FACTS OF LAWRENCE V. ALTICE

FACT: My case and enhanced evidence against Altice/News 12 is in the Second Circuit Court of Appeals that should have a decision by July 2020 that should be a month before a first hearing with Hearst around August 2020. These cases have distinct differences that Hearst refuses to address and they persist at their own peril to base their defence on my first round with Altice USA/News 12 over issues Hearst obviously knows very little about. The new evidence in relation to this case will be submitted in the process when and if the decision is overturned to which I am confident it will. No matter what, this case is unique in ways I am mentioning here in Response and deserves to be treated as such.

FACT: Judge Stefan Underhill wrote in Lawrence v. Altice I was “outright falsely” reported on by News 12 when they reported on me for 2 days (unlike Hearst’s over 750 days and counting) with written libel “Police: Westport Man Charged with Stalking Women” and broadcast slander “Man Facing Charges for Allegedly Stalking Several Women”. The issue of the Lawrence v Altice is the use of the word stalk. Judge Underhill came to a very controversial decision claiming the report was “substantially true”. He based his decision on a subjective interpretation of a minute dictionary definition of the word stalk that is

English: Stalk- 1. to pursue or track (quarry or prey) stealthily, thereby controversially concluding that the word - stalk - does not have to have repeated or persistent or systematic or multiple (2 or more acts) course of conduct against the clearly defined national/multi-state legal, let alone multiple dictionary, and cultural definitions. Keep in mind I was being reported on as “arrested for...” thereby demanding a purely legal definition of **stalking**, and the now completed scientifically presented everyday multiple dictionary definitions should overturn this under-informed decision for the Arrest Warrant does not have any veritable **quarry or prey** within it – these are hunting and killing terms. This is very controversial to say the least. Stalking laws from the 1990s were enacted based on serial killer cases! The facts are both the legal and everyday dictionary let alone cultural definitions of **stalk** and **harass** do not define the Arrest Warrant. Judge Underhill avoided the etymology, complete definition of **stealth**, and overwhelming evidence from multiple sources including Black’s Law Dictionary that only describes stealth as stealing. NO **stealth, hunting, killing, stealing, or secretive behavior** let alone **harassment** is evident in Arrest Warrant descriptions, and my Appeal Brief and coming Oral Argument in front of the Second Circuit Court of Appeals should clear up all of the very questionable aspects of Judge Underhill’s under-informed linguistic based decision. (see Exhibit Y)

Black’s Law Dictionary Definition of Stealth:

English: Stealth – Theft; an act or instance of stealing
I WAS NOT stealing anything.

Merriam Webster’s Dictionary Definition of Stalking, Stealth, Quarry, Prey:

English: Stalk –

1: to pursue quarry or prey stealthily??? (AS JUDGE UNDERHILL REFERS)

2: to walk stiffly or haughtily

1-2: I WAS NOT pursuing quarry or prey. This is a hunting and killing term hence new stalking laws in 1990 emanating from serial killer cases.

transitive verb

1: to pursue by stalking

2: to go through (an area) in search of **prey or quarry** stalk the woods for deer

3: to pursue obsessively and **to the point of harassment**

English: Obsessively - 1: persistent disturbing preoccupation with an often unreasonable idea or feeling; excessive often to an unreasonable degree

English: Quarry – 1: game specifically; game hunted with hawks

2: one that is sought and pursued: prey

3: a heap of game killed in a hunt

Prey – v. 1a: to seize and devour prey

1b: to commit violence or robbery or fraud

2: to have an injurious, destructive, or wasting effect

3: to make raids for the sake of booty

English: Stealth - 1a: a cautious, unobtrusive, and secretive way of moving or proceeding intended to avoid detection

2: bomber fighter airplanes designed to avoid detection

1: I WAS NOT approaching stealthily for I was in a public market, and merely walked from an entrance of a store to our cars in an effort to say “hello” and ask a question. This is hardly “stealthily” for I attempted to say “hello”. Stealth is a type of secretive behavior – hunting.

2: I WAS NOT searching prey or quarry aka hunting or killing – the root of this “stealth” definition is a hunting and killing term. Stalking laws came about from serial killer cases.

3: I WAS NOT harassing under the legal and dictionary definitions of harass.

Fact: Harassment has been and still is a Course of Conduct behavior within state laws like Connecticut. **Stalking** which is also undeniably a Course of Conduct behavior came about to address more types of persistent behaviors. As the Internet became more popular, the need for more electronic laws dealing with Course of Conduct **harassing** behavior were needed and many states like Connecticut opted to make Second Degree Harassment a electronic crime while new stalking laws like Third Degree Stalking (a misdemeanor) took on what was the former Course of Conduct laws that Harassment addressed. [See Exhibit T on a History of Stalking Laws.](#)

FACT: The Arrest Warrant never deploys the **stalking or harassing** language. The arresting officer OBVIOUSLY carefully chooses his words – *“follow and stare or get into personal space”* and does not describe me as **harassing or stalking**. If Officer Sullivan had seen intent for **stalking or harassing** he would have written these easily accessed and understood terms – **harass or stalk** and charged me with such Course of Conduct charges. But no – he choose a phrase to keep himself within the arresting one count charge of a single act of Second Degree Breach of Peace to which I was not even convicted of. I ask – who uses this phrase – *“get into personal space”*? Answer – the police for an obvious reason – so to not end up getting sued for misrepresenting the arrest to which Hearst so grossly did with their special hit jobs before Due Process of Law (unlike respectable media devoid of Wendy Higgins Chambers) and after Due

Process of Law (any reference to past known closed “cases”). How is as the Arrest Warrant states “*stare and get right into personal space*” attempting to avoid detection aka “stealth”?

English: Stare – 1: to look fixedly often with wide-open eyes

2: to show oneself conspicuously

Conspicuous - easily seen or noticed; readily visible or observable

WHERE IS THE STEALTH?

English: Stealth - 1a: a cautious, unobtrusive, and secretive way of moving or proceeding intended to avoid detection

2: bomber fighter airplanes designed to avoid detection

SEE EXHIBIT V on “personal space” language.

After a year of debates James Lawrence v Altice has narrowed the issues at hand and I am very grateful for the system we have so to be able to appeal this decision with new and more enhanced arguments addressing the narrowed issues to which Hearst themselves will start to experience here in details via Exhibits within this response. The facts of what Judge Underhill calls “*mind of the average viewer*” and “*popular acceptance*” of terms like stalk/stalking and for the case with Hearst – **harass/harassment** are clearly on my side from all the gathered evidence of how these terms are defined in top resources – law statutes, legal dictionaries, common dictionaries, etymology books, encyclopedias, search engines, etc... We all are in a process of a very unique and important case for the zeitgeist and the evidence will only grow in my favor.

FACT: Hearst wants may case against them to be viewed in the same way as Lawrence v. Altice and mentions similar arguments. However, one very important aspect of Judge Underhill’s decision was that he felt News 12 “*dulled the impact*” of their “*outright false*” report of me “Arrested for Stalking Several Women”. Judge Underhill concedes I was arrested for one count of Second Degree Breach of Peace. He concedes **Stalking** and **Second Degree Breach of Peace** are different arrests. He believes News 12 “*dulled the impact*” within the articles and broadcasts from the “*outright false*” headlines about me being “Arrested for Stalking Several Women”. This so called “*dulling of impact*” will be an issue for the Court of Appeals. Given all the convoluted reasoning, I believe that Judge Underhill’s opinion that News 12 “*dulled the impact*” is based in the fact that after a call from my lawyer News 12 took down all their “*outright false*” coverage of me and scrubbed their websites of all coverage of me and their “*outright false*” reporting that was only alive for only 2 days for there is no evidence of an “*dulling of impact*” in their reports whatsoever. Facts are these special hit jobs are obviously hyping and not dulling.

FACT: Hearst did not “dull any impact” – they took known impact and made even more permanent impact day after day, week after week, month after month, year after years.

Hearst/Westport News did the exact opposite of what News 12 did. Hearst never addressed any of their mistakes and are responsible for the ongoing Damages I have experienced because of their malicious stubbornness to formulate this special story away from the Official Police Press release (see Exhibit A) and against the police’s redacting practices (see Exhibit C) and against common journalist practices to afford someone Due Process of Law and Presumption of Innocence. Hearst will learn that their sensational and malicious spin coverage of me **based on**

known “outright false” coverage of me aka potentially defaming material **known** to be taken down and scrubbed from existence (News 12 reporting) is just as much and even more an issue of defamation.

FACT: This Hartford District Court will benefit from more and more evidence that was not originally submitted to the past Bridgeport District Court in Lawrence v. Altice.

Among the very questionable conclusions and line of reasoning Judge Underhill controversially wrote about was that

Judge Underhill: “*Man Arrested for Breach of Peace*” has similar connotations in “the mind of the average viewer” to “*Man Arrested for Stalking Several Women*”.

I will leave this utter assault on common sense and reason like all narrowed down issues to the coming enhanced evidence before the Court of Appeals. When Summary Judgment is in order with this case with Hearst there will be plenty of judges weighing in as to the various issues when looking into the veritable definitions of **stalking** and veritable definitions of **harassment**.

I also want to emphasize something – this is a very important case for the current zeitgeist that demands no judicial activism when interpreting common sense laws, dictionary definitions, and cultural definitions. Allowing for such gross conflations of laws and language will only diminish the importance/stigmas of actual **harassment or stalking behaviors** – people who are proven **harassers and stalkers**. A bend toward any special interest group to provide even more ways men can be persecuted free of evidence will lead to more people being accused of harassing and stalking and real **PROVEN** harassers and stalkers will blend into the increased fray and not receive the stigmas they should be given when they leave prison because the stalking or harassment parameters have been grossly widened to dangerous ways not in tune with the original intentions of harassment and stalking laws. What will inevitably result is more journalists deploying this conflation of laws and language in unrelated arrests, which will even result in police deploying this conflation of laws and language in their police reports in reckless ways that will inevitably lead to more lawsuits and more permanently damaged men free of any evidence or conviction let alone arrest. Yes – avoiding the legal definitions of the issues at hand will result in an increase in people (women) weaponizing these loose law and language definitions against people for personal, political, and career advancement gains.

I currently address in Appeal the following quotes from Judge Underhill's Lawrence v. Altice USA ECF 66 Decision:

The following are a few examples of very questionable, contradictory, nonsensical quotes from ECF 66.

Judge Underhill: “It is an open question in the Second Circuit whether courts can take judicial notice of police incident reports, but it seems that many courts refrain from doing so. See, e.g., Alvarez v. County of Orange, N.Y., 95 F. Supp. 3d 385, 398 (S.D.N.Y. 2015); Bejaoui v. City of New York, 2015 WL 1529633, at *6 (E.D.N.Y. Mar. 21, 2015); Serrata v. Givens, 2019 WL 1597297, at *4 (E.D.N.Y. Apr. 15, 2019).” ECF 66 Page 2

Thereby sticking to proven and provable material and not known closed cases fully investigated resulting in no probable cause and no arrest and no complainant with statute of limitations in effect. Thereby leaving the necessary evidence of any alleged **stalking or harassment** to be with the one and only arresting incident and only an arresting incident and not material devoid of actual arrests like 4 Exhibits shared by Altice of past Incident Reports devoid of an arrest that were unproven and are un-provable **stalking** which clearly shows there was not intent for and criminal behavior of any veritable **harassment**.

Judge Underhill: “resolving” – yes – “resolving all ambiguities” ECF 66 Page 3

Thereby making sure there is a thorough examination of all the facts of case and resources.

Judge Underhill: “The “substantially true” inquiry is heavily fact-dependent”, ECF 66 Page 14

Thereby asking that Judges be properly informed of all the facts – legal and cultural.

Judge Underhill: “the court must view it from the mind of the average reader, taken by its popular acceptance, not its technical meaning”” ECF 66 Page 14

Thereby reviewing and responding to all the evidence of “popular acceptance” of **stalking** or Hearst’s libel “**harassed women for years**” and allowing for a thorough analysis and study of the “minds of the average of reader”.

Judge Underhill: “in context, the actual truth would have no different effect on a reasonable reader”. ECF 66 Page 17

Thereby truly understanding the obvious differences between one count of Second Degree Breach of Peace and “**Arrested for Stalking/Stalking Several Women**”. Utterly dizzy logic.

Judge Underhill: “To be sure, the reports are not entirely correct. Recall that under Connecticut law, stalking implies a repeated behavior;⁹ breach of peace does not.

Additionally, both legally¹⁰ and in common parlance,¹¹ the term “breach of peace.” taken on its own, certainly does not conjure the same vision of sexual predation that the term “stalking”

does.¹² *Lawrence was never charged with the crime of stalking in Connecticut. For that reason, it was arguably inaccurate when all six reports said in their opening lines that Lawrence was “facing charges for allegedly stalking” women. For the same reason, it was arguably inaccurate to show graphics in TV Report 4 that read “STALKING ARREST” and “Stalking Charges.” Finally, it was arguably inaccurate when the headlines in Articles 1 and 2 reported “Police: Westport man charged with stalking women.” Stalking and breach of peace are not identical.”*

ECF 66 Page 17-18

Thereby obeying legal facts and completed and accurate dictionary definitions of **stalking** let alone all the multi-cultural definitions of **stalking** thus the “*the mind of the average viewer*” and irrefutable “*popular acceptance*”.

Judge Underhill: “*However, that difference does not make the statements at issue defamatory. When evaluating whether a statement is defamatory, “the court must view it from the mind of the average reader, taken by its popular acceptance, not its technical meaning.”*”

ECF 66 Page 18

Thereby truly knowing the “*mind of the average viewer*” and “*popular acceptance*” of **stalking** or Hearst’s libel “**harassed women for years**” in the forms of evidence, studies, surveys, polls, experts, linguists, psychologists, other judges, etc... common sense.

Judge Underhill: “*Importantly, in common usage, “stalking” does not mean, necessarily, repeated behavior. See Stalk, Random House Webster’s Unabridged Dictionary (2d ed. 1998) (“[T]o pursue (game, a person, etc.) stealthily.”); Stalk, The Merriam-Webster.com Dictionary, <https://www.merriam-webster.com/dictionary/stalk> (last visited Jan. 4, 2020) (“[T]o pursue obsessively and to the point of harassment.”*¹³ **ECF 66 Page 18-19**

Thereby having all the proper legal, dictionary, artistic, and multi-lingual/multi-cultural popular acceptance ways **stalking** is defined especially since 1990 when **stalking laws** started to become enacted that clearly show 99% of the time the popular acceptance is repeated behavior toward someone. And showing the complete definition of **stealth** which is a secretive hunting/killing term hence why new **stalking** laws based on serial killer cases where named **stalking** in the 1990s.

<https://www.merriam-webster.com/dictionary/stalk>

Webster’s Stalk - 1: to pursue quarry or prey stealthily

2: to walk stiffly or haughtily

1: to pursue by stalking

2: to go through (an area) in search of prey or quarry

3: to pursue obsessively and to the point of harassment

Quarry – 1: game specifically; game hunted with hawks

2: one that is sought and pursued: prey

3: a heap of game killed in a hunt

Prey – v. 1a: to seize and devour prey

1b: to commit violence or robbery or fraud

2: to have an injurious, destructive, or wasting effect

- 3: to make raids for the sake of booty**
Stealth - 1a: a cautious, unobtrusive, and secretive way of moving or proceeding **intended to avoid detection**
2: bomber fighter airplanes designed to avoid detection

Judge Underhill: How and if News 12 “dulled the impact” ECF 66 Page 19, See ECF 36 - DAMAGES.

Thereby knowing the actual impact after proper analysis of the Damages from the impact and providing proper examples of how this impact was actually dulled.

FACT: Hearst/Westport News’s impact is exponentially more serious than Altice/News 12.

Judge Underhill: “the segment, a reasonable reader would not have been affected differently had the graphics not appeared, or, instead, read “BREACH OF PEACE ARREST.” ECF 66 Page 19-20

Thereby bringing into question - Who in their right mind would believe this utter nonsense? What is next petty theft is the same as armed robbery? A flu the same as a pandemic virus? With all due respect – utter hogwash as shown in Appeal Brief.

Judge Underhill: “Police: Westport man charged with stalking women.” That is misleading if not outright false. But the remainder of the (News 12) Articles, again, mitigates (“dulls”) the problem. ECF 66 Page 20

Thereby being able to provide proper examples of this News 12 “mitigation of the problem”/“dulling the impact”.

Judge Underhill – ...“The same goes for (News 12) Articles 1 and 2. Their headlines read: “Police: Westport man charged with stalking women.” That is misleading if not outright false. But the remainder of the (News 12) Articles, again, mitigates (“dulls”) the problem.” ECF 66 Page 20

Thereby being able to provide proper examples of this News 12 “mitigation of the problem”/“dulling the impact”.

Judge Underhill: “The headlines (**Police: Westport Man Charged for Stalking Several Women**) are not defamatory because the average person reading the (News 12) Articles would not have been affected differently if the headlines read, for instance, “Police: Westport man charged with breach of peace for following woman. Thus, the headlines are substantially true.” ECF 66 Page 20

With all due respect, thereby again bringing into question the obvious issues now with this ECF 66 spin – Thus who in their right mind actually believes this nonsense clearly at odds with the “minds of the average viewer “and “popular acceptance”. How are headlines **“Man Charged for Stalking Several Women”** without any evidence of such stalking and any evidence of “dulling the impact” (outside of taking down aka scrubbing all their “outright false” coverage)

not defamatory? According to Judge Underhill – a dictionary definition of stalk (truncated, incomplete, subjective dictionary definition) that is now properly defined with multiple undeniable resources for the Second Circuit Court of Appeals.

Yes this case is nowhere near over. See Exhibit Y

BACK TO THE CASE AT HAND – LAWRENCE V. HEARST: LETS AGAIN REVIEW INTRODUCTORY FACTS

FACT: I was arrested twice -

March 5, 2018 for one count of Second Degree Breach of Peace FOUND NOT GUILTY.
Feb. 6, 2019 for Second Degree Email Harassment PENDING WITH NOLLE PROSEQUI
OFFER yet I am determined to hold police accountable and need a complete dismissal here.

Hearst reported on me 3 times.

Article #1 – article on my first arrest with a questionable headline. See Complaint

Article #2 – Big Deuce special hit job article before and after Due Process of Law filled with errors and libel. See Complaint.

Article #3 – article on second arrest that once again goes beyond the official Police Press Release (see Exhibit) regurgitating similar errors and libel from Article #2 aka first Arrest Warrant and with new forms of libel. The regurgitating of the first Arrest Warrant narrative while ignoring the police’s correcting of this narrative within the second Arrest Warrant of the this second false arrest. Yes Hearst responded by submitting the Incident Report for this arrest but conveniently did not submit the Arrest Warrant for this false arrest because it shows police’s redaction polices and not wanting any “Arrest Record” devoid of convictions to be doxxed from their reports!!!

See Exhibit B. See ECF 1 - Complaint.

I wish to set forth some facts so to receive proper perspective in the coming months because my experience with this utter fiasco perpetuated and intensified by Hearst is that those who do wrong and are called out for these numerous wrongs all too often in this overly free and privileged country double down like psychopaths never admitting the slightest of guilt, avoid arguments and supporting evidence, and attempt to pile on as much nonsense and disgusting spin as possible in an attempt to confuse the court.

Attached is **Exhibit D - Official Criminal Record/Lack of Criminal Record.**

FACT: To this very day my only conviction is a 1996 conviction of Domestic Violence in California. **Exhibit D** shows the **March 2020 Florida Department of Justice printout that shows no criminal history in Florida thus showing no conviction for fleeing/eluding police.** **Exhibit D** also shows a March 2020 FBI Criminal History printout that also shows the no Florida criminal history at all aka fleeing and eluding police and resisting arrest. **Exhibit D** also shows the **FBI Criminal History printout showing my only criminal conviction of Domestic Violence in 1996 within California, and shows I was never convicted of Stalking/Violation of Restraining Order - Dismissed, and never convicted for False Imprisonment – Dismissed, and shows a Petty Theft charge – fine aka infraction, and no mention of Battery of Spouse in 2013 which never amounted to any charge after arrest because I was the one who called the police to which was doxxed in a defaming criminal way by Hearst.** This March 2020 FBI Criminal History printout shows pending Connecticut charges (the two recent Ct. arrests reported on by Hearst) and does not have the updated resolution with the one count of

Second Degree Breach of Peace, a resolution that is also shown in [Exhibit D](#). **Exhibit D is completed by showing my recent resolution and not guilty of the Second Degree Breach of Peace charge and thus continued clean record here in the state of Connecticut that has one case pending** – the Feb. 6, 2019 second arrest for Second Degree Email Harassment to which Hearst reported on in the last of their 3 articles - Article #3 on Feb. 11, 2019. **NOTICE that there is no criminal conviction for the first arrest – charge of one count of Second Degree Breach of Peace to which Hearst hideously reported on me in Article #2 the Big Deuce.** This first arrest started the mad persecution against me is officially disposed of without a conviction of Second Degree Breach of Peace thus **nothing criminal happened** – again, thus asking the question why did Hearst choose to report on and hype me into something they can never prove, report on someone without a criminal Ct. record (written about within the Arrest Warrant and known by reporter). The only case pending now is the one and only Email harassment arrest to which will be completely disposed of after typical delay tactics to protect corrupt people, perjury by complainant, and the fact no harassing emails have been submitted as Discovery. [See Exhibit D on Criminal History.](#)

Yes the only case pending now is the one and only email harassment arrest to which many surprises after Due Process of law will be revealed – perjury from complainant, police knowing of the perjury, prosecutorial misconduct, Brady Rule violation by prosecutor while stonewalling my Franks Motion Hearing Request, all the while having no harassing emails under the rules for harassing emails. What exists as Discovery in this pathetic case is a solitary Email that reads **“Ana advice: Do not cause my beloved 77 year old parents any stress whatsoever. Take this advice.”** This email is quoted in the submitted Incident Report by Hearst and within the Arrest Warrant that is not yet submitted by Hearst asking the question how did the Westport News get past arrests (free of convictions) from Florida and California and past incidents without arrests in Westport Ct and only Westport Ct. from a Police Press Release of the second arrest or Incident Report of the second arrest that are devoid of that controversial material doxxed to the world from the first false Arrest Warrant? **Police know themselves I was unjustly doxxed of this material and purposely kept it out of the second Email Harassment Arrest Warrant so the same doxxing madness did not happen to me again.** The Westport News’ reporter Sophie Cecilia Vaughan proceeded to doxx me TWICE against all normal journalist practices and against her own past practices when reporting on people arrested with actual criminal conviction histories, doxx me in a dim, criminal, accusatory way devoid of proper evidence and against police practice to redact that kind of arrest record information she shares. [See Exhibit C on lead FOIA officer Emails on their redaction policies.](#)

FACT: Police claim that they only share actual criminal convictions and redact what Hearst doxxed to the world.

[See Exhibit C on lead FOIA officer Emails on their redaction policies.](#)

[See Exhibits A-B of Official Press Release of Arrest 1 and Arrest 2.](#)

SO no big bad guy exists to back up this disgusting Hearst reporter’s very special forever life damaging hit job that was far out of ordinary compared to other arrests she reports on. (See future Exhibits of all of Hearst reporter Sophie Cecilia Vaughan’s reporting on people with actual criminal records compared to how she reported on me). I am utterly disgusted with the types of people I had had to deal with the past 3 years to clear my good name and I would hope a proper Judge is able to process the details of how snowball effects of this unproven and un-

provable sort happen. **You would think with the way Hearst took the time and energy to rush out another truly gruesome hit job on me after the first false arrest (knowing I was already impacted by News 12 “outright false” reporting) that there would be hands down some kind of conviction and convictable evidence to justify their **perpetuated, continual, repeated hit job persecution**. No there is not. My clean Ct. record stands firm thereby obviously bringing so many questions as to the malicious tactics and agenda of the reporter and now the even more disturbing tactics of Hearst themselves who feel this article should still be alive. What is to be properly done now to address all the Damages given the age of Google? **Once again – these damages and mental anguish are issues distinct to Hearst and cannot be compared to News 12 who merely had their “outright false material” alive for 2 days. Hearst has their atrocious unproven and un-provable material alive for 2+ years and counting Altice put up a splash page “Our Apologies” while Hearst has not.****

FACT: The only arrest a reporter could use the “**harassing**” language is the Feb. 6, 2019 second arrest where there was a willing complainant with a sworn written statement and actual Ct. statute **harassing** arrest to back up the **harassing** claim. There was no complainant in the first arrest and the first arrest did not involve **harassment**. There were never any **harassment** complainants in the distant past and there was never any **harassment** and police never said there was **harassment** and any attempt to say there was would demand proof to which Hearst has none – no arrest, no intent, no repeated contacts/acts toward someone, and attempting to say police should have arrested me after investigations and saying the police did not do their job and saying police are saying I **harassed** despite them not seeing any criminal intent and probable cause for anything (like one count of Second Degree Breach of Peace) is libel. **But most significantly – police never deploy the **harassing** language in the first Arrest Warrant – among the issues at hand.**

See Exhibit A of first Arrest Warrant.

See again Exhibit A-B - Official Press Releases of Arrest 1 and Arrest 2.

Hearst before Due Process of Law and after Due Process of Law mentioned past incidents (that were fully investigated and never resulted in any arrests and that are cases known to be long closed) as “harassment of women for years**”.** These past incidents can only be legally viewed as incidents devoid of any criminal intent and probable cause worthy of an arrest.

Meaning the mention of KNOWN past unproven and un-provable incidents as “harassed women for years**” is a chief issue for the court to take up.** Hearst attempted to depict me as a “**harasser**” by attempting to tie the word “Police” to their libellous Article #2. Quote: headline in Article #2 - “**Police: Man Harassed Women for Years**”. Notice the article does not even say “allegedly” **harassed**. Police NEVER deploy the **harassing language** for obvious reasons.

See Exhibits H-V on undeniable evidence on the definition of Harass/Harassment/Haunt.

The complaint about Hearst not using the term “allegedly” in Article #2 and putting **harassing** language words in the police’s mouths **despite the fact police never deploying the **harassing language in the Arrest Warrant**** is clearly a first example of libel. The reporter never interviewed/quoted the arresting officer much like the reporter never had the courage and decency to interview me, for even the Altice/News 12’s slime ball reporter made an ambush effort to interview me before his hit job and resulting scrubbing of their websites of the yes

defamatory coverage of me!

Like most of Hearst's initial response to Complaint, Hearst council doubles down, deflects, avoids facts, conflates, and attempts to obfuscate via throwing around meaningless case precedents in an attempt to intimidate me and confuse the court. THIS IS A CASE ABOUT THE TYPE OF LANGUAGE DEPLOYED. Keep in mind Hearst reporter was reading a dubiously ascertained Arrest Warrant for the first arrest and read this Arrest Warrant and only this Arrest Warrant that clearly never deploys the "harassing" language. Fact: The officer carefully chooses his words – "*follow and get into personal space*" and NEVER says the word "*harass women for years*" – a word and law to which I will begin to go into detail in this Response.

FACT: POLICE NEVER DEPLOYING THE HARASSING LANGUAGE IN FIRST ARREST WARRANT.

Lets get to the very telling Exhibits of the “*popular acception*” of the word **harass and harassment**. I present here how the word **harass** is defined in the statutes, in the top legal dictionaries, in the top everyday dictionaries, in top etymology sources, and in top encyclopedias let alone common Google searches. I originally did this in the early stages of my case against Altice News 12 but did not show the weighty 99% of the resources in my favor evidence because it seemed to be a common sense agreed upon fact that all levels of **stalking statutes** like **harassment statutes** meant repeated persistent course of conduct behavior – most certainly in the statutes which should be the issue when reporting on an arrest like how News 12 reported - **Police: “Man Arrested for Stalking Several Women”**, and how Hearst reported – **Police: Man Harassed Women for Years**, and most certainly within the everyday dictionary definitions. **Harassment** poses the same issues and with just as much weighty evidence in my favor that shows **veritable Harassment is repeated, persistent, over time, systematic, involving courses of conduct – 2 or more acts.**

My false arrest for one count of Second Degree Breach of Peace (the Arrest Warrant read by Hearst reporter) never mentions the word **harass** for my arrest was a one-time now unproven act. **In the first Arrest Warrant when referring to any past closed case incident, the officer carefully uses the phrase “follow and get into personal space” despite the readily available, often deployed, and obviously popular word **harass**. I ask - Who uses this wording “get into personal space”?.** Who would say such a thing on a Warrant? Police could easily deploy this word as they do in other arrests. Why did Hearst not deploy the same wording as in the Arrest Warrant? Once again who uses this wording “*get into personal space*”? Answer – police. Police use this unique and carefully chosen wording for a reason. **The wording **harass** is not in the Arrest Warrant descriptions and not in the one count of Second Degree Breach of Peace statute – which is describing a single act and police would never set themselves up to be sued the way the 21 year old reporter did for Hearst.**

First Arrest Warrant – Section 11

11. That in checking this departments case history with Lawrence, I learned that there were ^{superlatives} 10 [?] case incidents logged from 2002 till present. In all of these complaints Lawrence was seen following the complainants around a store or coffee shop and then following them out to their cars where he would either stare at them or get right into their personal space. ^{Lies} In most of these ^{B.S.} cases, Lawrence was told that his actions scared the complainants to the point of them calling the police. He has even stated himself that he needed to rethink his approach with woman. That

Internet search aka Google the phrase “*get into personal space*” and see the “*popular acception*” and “*mind of the average viewer/reader*” of the phrase “*get into personal space*”. This carefully chosen wording used by the arresting officer in the Arrest Warrant clearly has different connotations to veritable let alone proven **stalking** or in relation to this case - **harassment**.

The American Psychological Association is the largest scientific and professional organization of psychologists in the United States, with over 121,000 members, including scientists, educators, clinicians, consultants, and students.



ABOUT APA TOPICS PUBLICATIONS & DATABASES PSYCHOLOGY HELP CENTER NEWS & EVENTS SCIENCE

APA Dictionary of Psychology

Search and select a Dictionary term



personal space invasion

the intrusion by one person into the personal space of another. The intruder inappropriately and uncomfortably crowds the other person. See [proxemics](#).



Definition that NEVER uses the wording – [stalk, stealth, prey, harass](#).

Why? Because [stalk and harass](#) involve Course of Conduct – repeated, more than one, persistent, systematic, chronic, and continual advances against someone while having been warned in some kind of way.

And keep in mind Arrest Warrant only said “get” into personal space and not “violate” or “invade” personal space as shown here which has more intrusive connotations in regards to intent.

Websters Dictionary – the most popular English dictionary in America.

Merriam-Webster SINCE 1828

GAMES | BROWSE THESAURUS | WORD OF THE DAY | WORDS AT PLAY

invade someone's space

DICTIONARY | THESAURUS

invade someone's space idiom

 Save Word

Definition of *invade someone's space*

: to place oneself too close to someone

// I felt uncomfortable with her so close, *invading my space*.

also : to be in the space where another person is or wants to be

// I went to study in the library so I wouldn't *invade my roommate's space*.

Definition that NEVER uses the wording – [stalk, stealth, prey, harass](#).

Collins Dictionary Collins Dictionary one of the world's largest publishing companies and is one of the Big Five English-language publishing companies.

English: to invade sb's personal space

Definition of 'to invade sb's personal space'

to invade sb's personal space

in British English

to come too close to somebody, so that they feel uncomfortable

I felt my body involuntarily stiffen against her invasion of my personal space.

See full dictionary entry for personal space

Collins English Dictionary. Copyright © HarperCollins Publishers

Definitions that NEVER use the wording – [stalk, stealth, prey, harass](#).

SEE VERY TELLING - EXHIBIT V.

FACT: This word *“follow”* and unique carefully chosen phrase *“and get into personal space”* was carefully used by Officer Sullivan in the Arrest Warrant for ONE COUNT OF SECOND DEGREE BREACH OF PEACE ARREST and in describing any alleged past incident devoid of arrest aka no criminal intent, no probable cause of an alleged behavior to which there are statutes on the books to arrest for.

English: Follow –

verb (used with object)

- 1: to come after in sequence, order of time, etc.: *The speech follows the dinner.*
- 2: to go or come after; move behind in the same direction: *Drive ahead, and I'll follow you.*
- 3: to accept as a guide or leader; accept the authority of or give allegiance to: *Many Germans followed Hitler.*
- 4: to conform to, comply with, or act in accordance with; obey: *to follow orders; to follow advice.*
- 5: to imitate or copy; use as an exemplar: *They follow the latest fads.*
- 6: to move forward along (a road, path, etc.): *Follow this road for a mile.*
- 7: to come after as a result or consequence; result from:
- 8: to go after or along with (a person) as companion.
- 9: to go in pursuit of: *to follow an enemy.*
- 10: to try for or attain to: *to follow an ideal.*
- 11: to engage in or be concerned with as a pursuit: *He followed the sea as his true calling.*
- 12: to watch the movements, progress, or course of: *to follow a bird in flight.*
- 13: to watch the development of or keep up with: *to follow the news.*
- 14: to keep up with and understand (an argument, story, etc.): *Do you follow me?*

verb (used without object)

- 15: to come next after something else in sequence, order of time, etc.
- 16: to happen or occur after something else; come next as an event: *After the defeat great disorder followed.*
- 17: to attend or serve.
- 18: to go or come after a person or thing in motion.
- 19: to result as an effect; occur as a consequence: *It follows then that he must be innocent*

Where is the word **“harass”** in the dictionary definition of **“follow”**, the actual language used by police in the Arrest Warrant let alone any long gone Incident Report?

The screenshot shows the Thesaurus.com website interface. At the top, there is a search bar with the word "follow" entered. Below the search bar, the word "follow" is displayed in a large font, followed by its phonetic transcription [fol-oh] and a speaker icon. To the right of the word, there is a link that says "SEE DEFINITION OF follow". Below this, there are four tabs for different parts of speech: "verb take the place of", "verb trail, pursue physically", "verb act in accordance with", and "verb understand". The "verb act in accordance with" tab is currently selected. Underneath the tabs, there is a section titled "Synonyms for follow" which contains a grid of 20 synonyms: pursue, chase, displace, ensue, postdate, replace, result, succeed, supersede, supervene, supplant, be subsequent to, come after, come from, come next, go after, go next, proceed from, and spring from.

YES MORE FACTS: There is no wording **stalk or harass** here in the substantial language of the language used in the Arrest Warrant - “follow” and “get into personal space”!!!
(SEE VERY TELLING EXHIBIT V)

CONNECTICUT LAW

SECOND DEGREE BREACH OF PEACE (FYI - NOT GUILTY)

a) A person is guilty of breach of the peace in the second degree when, with intent to cause inconvenience, annoyance or alarm, or recklessly creating a risk thereof, such person:

- (1) Engages in fighting or in violent, tumultuous or threatening behavior in a public place; or
- (2) assaults or strikes another; or
- (3) threatens to commit any crime against another person or such other person’s property; or
- 4) publicly exhibits, distributes, posts up or advertises any offensive, indecent or abusive matter concerning any person; or
- (5) in a public place, uses abusive or obscene language or makes an obscene gesture; or
- (6) creates a public and hazardous or physically offensive condition**

.. CREATES **A** ... SINGLE ALSO KNOWN AS **NOT REPEATED OR NOT PERSISTENT**
– WITH REPEATED AND PERSISTENCE AS THE KEY WORDS IN THE DEFINITION OF **HARASSMENT** IN THE DICTIONARY AND STATUTES.

WESTPORT NEWS March 23, 2018: BIG DEUCE

“Police: Westport Man Harassed Women for Years”

This is obvious libel. Officer Sullivan did not say I “harassed”.

Why? – There is no “persistently”, “tormenting”, or “continually”, “pester” let alone “persecution” nor “repeated attacks”, more than one alleged act, etc... toward anyone.
(See Exhibits H-T)

**English: Harass – 1: to disturb persistently; torment, as with troubles or cares; bother continually; pester; persecute
2: to trouble by repeated attacks, incursions, etc...
as in war or hostilities, harry, raid**

English: Repeatedly -

**English: Repeat- [from Latin repeterere to seek again, from re- + petere to seek]
1: to say or write (something) again either once or several times
restate or reiterate
2: to do or experience (something) again once or several times
3: (intr) to occur more than once the last figure repeats**

repeat oneself to say or do the same thing more than once,
esp so as to be tedious

English: Persistently – 1: persisting, especially in spite of opposition,
obstacles, discouragement, etc. persevering
2: lasting or enduring tenaciously
3: constantly repeated; continued

There was NO PERSISTENCE – NO opposition, NO discouragement, NO obstacles. There were NO warnings, never any words, only a single filing of a complaint of ONE ALLEGED INCIDENT. There were NO tenacious enduring approaches and NEVER words of opposition from the complainants. **The incidents NEVER involved any repeated or continued approaches.** I was warned by police and stayed away. And there was NO tenacity in any approach.

English: Torment – 1: to afflict with great bodily or mental suffering; pain
2: to worry or annoy excessively

There was NO bodily or mental suffering.

There was NO excessive worry or annoy.

Maybe worry – but NOT excessively hence

NEVER ARRESTED FOR ANY PAST INCIDENT MENTIONED BY OFFICER SULLIVAN.

English: Pester – to bother persistently with petty annoyances; trouble

Once again,

there was NO persistent behavior with a particular complainant,

there was no annoyances – plural. (merely listen to Dispatch Tapes of Complainant Lara Denbeck – arresting incident).

Westport News Article #2 Quote:

*“Local women **haunted women** for years by a man they say would aggressively approach them at local stores and cafes are speaking out after his arrest this month. Westporter Wendy Chambers said after reading reports of the arrest of James Lawrence in the media last week, she wanted to come forward with her story. ”*

English: Haunt – 1: to visit habitually or appear to frequently as a spirit or ghost
2: to recur persistently to the consciousness of; remain with
3: to visit frequently; go to often:
4: to frequent the company of, be often with

Once again bad libelous words,

there was NO habitually recurring frequent persistent behavior with a particular complainant.

(See Exhibit U)

Westport News Article #3 Quote:

*“A local man **alleged** (now using allege after not using allege in Article #2 The Big Deuce) **to have harrassed** (misspelled) **women for years at area stores has once again been arrested.**”*

Why is it now “*alleged*” to have “*harrassed*” (very telling misspelling) but when reported on a year earlier was “*Police: Westport Man Harassed Women for Years*”? Which is false also because police NEVER used the word “harass” in the police report. **Just the fact that I now at the time of this second arrest am “alleged” to have “harassed” (misspelled) and a year before written about as “Harassed Women for Years”, shows that Article #2 The Big Deuce was slander, libel, and defamation. (See Exhibits H-T)**

Westport News Quote: “*Since 2002, Lawrence was logged by Westport police in 10 incidents were women felt harassed by him, but in each case, they felt afraid to pursue charges against him for fear of retaliation, according to court documents.*” ...

FACT: This is not the language of any past incident report and the reporter is putting words in mouths of phantoms – no names and no interviews and no sworn written statements. The Arrest Warrant states alleged one-time acts of “*following and getting into personal space*”. Police did not characterize this as “harassed” for if I did “harass” then I would have been arrested and charged with veritable harassment for Harassment and Third Degree Stalking and Violation of Restraining Order are crimes where the harassing language is written in the Connecticut statutes. **FACT:** After an investigation I was not arrested for anything.

Westport News Quote: “*Lawrence was also arrested in March after he allegedly followed a woman around Westport’s Fresh Market grocery store and then to her car in November 2017. After Lawrence’s arrest report (link to first article) was released in March, several woman (very telling misspelling - several woman or several women? Hmmm – sloppy confused idiocy ...) came forward claiming they had experienced similar harassment (link to first article) from Lawrence at local shops.*”

WHO ARE THESE WOMEN? WHERE ARE THE NAMES? These types of hit jobs on men always have actual women/names coming forward to the press.

English: Persecutory – 1: to pursue with harassing or oppressive treatment, especially because of religious, political beliefs, ethnic or racial origin, gender identity, or sexual orientations

2: to annoy or trouble persistently

WHO ENDED UP VERITABLY HARASSING WHO? Hearst reporter Sophie Cecilia Vaughan harassed me with her **Big Deuce Article #2** special article before and after Due Processes of Law unlike any other article she has written about someone arrested with unproven and un-provable accusations – past thoroughly investigated alleged known closed “cases” resulting in no arrest aka no probable cause or intent for anything criminal and statute of limitations in effect. **HEARST REPORTER PERSISTED BY KNOWING NEWS 12 REMOVED THEIR “OUTRIGHT FALSE” REPORTING AND THEN PERSISTED AGAIN DOXXING THINGS SHE CAN NEVER PROVE IN WAYS SHE NEVER DOES TO ANY OTHER ARRESTED PERSON (even known criminals) THEREBY CAUSING NUMEROUS ONGOING DAMAGES TO AND FROM THE WORLD AT LARGE. PERSISTENTLY**

AFFECTING OTHERS EVERY DAY FOR THE PAST 2+ YEARS.
(See Complaint ECF 1 – Damages, see Exhibits H-W)

German: Mobbing – harassment

Mobbing

From Wikipedia, the free encyclopedia

This article is about mobbing in relation to human bullying behaviour. For mobbing as an antipredatory animal behaviour, see Mobbing (animal behavior). For mobbing as a crime in Scots law, see Mobbing (Scots law). For the software development technique, see Mob programming.

Mobbing, as a sociological term, means **bullying** of an individual by a group, in any context, such as a **family, peer group, school, workplace, neighborhood, community**, or online.

When it occurs as physical and **emotional abuse** in the workplace, such as "ganging up" by co-workers, **subordinates** or **superiors**, to force someone out of the workplace through **rumor, innuendo, intimidation, humiliation, discrediting**, and **isolation**, it is also referred to as malicious, nonsexual, non-racial/racial, general harassment.^[1]

-----harassment-----

FACT: My case had to with no persistence, never being warned, never any words, single act/s of “getting into personal space” that were not repeated let alone causing any harm that were non-sexual supermarket encounters. I was obviously conflated by Hearst with the MeToo Movement and Nasty Woman Movement zeitgeist by this opportunistic reporter Sophie Cecilia Vaughan that was a form of mobbing for I have irrefutable evidence of this mobbing happening to me because of the Westport News which will be submitted at time of Discussion of Damages because of Hearst Big Deuce Article #2. Unlike typical MeToo or Times Up stories, Sophie Cecilia Vaughan cannot name one name in her report outside of cohort mentioned in the Big Deuce Article #2 - Wendy Higgins Chambers, who herself has no individual police Incident Report aka “case” and never complained to police when we met (to which I have all the facts about to which reporter never had the decency to ask me) and Wendy Higgins Chambers never complained to market manager or even me for she had my business card. This one woman – Wendy Higgins Chambers – only approached police after her News 12 persecution (which was scrubbed from existence) and before visiting Hearst’s Sophie Cecilia Vaughan to which resulted in no police action – not even a call to me thereby showing police saw Sophie Cecilia Vaughan’s big scoop name to be a woman without any serious issue (giving someone a business card at a market – really – read this idiotic article!!!). Wendy Higgins Chambers is the “women/woman”. Where are the names to justify accusations of veritable harassment as opposed to what police wrote “getting into personal space” at a public market?

All the while Hearst little reporter is doing special stories on me by dubiously ascertaining an Arrest Warrant police themselves say they do not intend to be consumed in the way she writes aka police redaction policies, dubiously ascertaining an Arrest Warrant for someone with no Ct. criminal history and doing a special agenda-driven hit job by doxxing pasts like my guiltless arrests that she never does for other people (including people with criminal backgrounds!). Review everyday arrests and see how often this special doxxing of a person’s arrest record are shared. 99% of the time this does not happen with proper reporters.

Who is veritably HARASSING/STALKING/PERSECUTING who?

DISSECTING ARTICLE #2 - THE BIG DEUCE **Special hit job before and after Due Processes of Law.**

Police: Westport man harassed women for years

By [Sophie Vaughan](#)

NOT EVEN WRITTEN ALLEGEDLY HARASSED WOMEN ... !!!

ONCE AGAIN SHE DRAWS HER OWN CONCLUSIONS AFTER DUE PROCESS OF LAW.

FACT: POLICE NEVER DEPLOY THE HARASSING LANGUAGE IN THE ARREST WARRANT FOR OBVIOUS REASONS.

*WESTPORT — Local women **haunted for years** by a man they say would aggressively approach them at local stores and cafes are speaking out after his arrest earlier this month.*

“HAUNTED” WHILE I LIVED IN SAN FRANCISCO 2007-2017.

Westporter Wendy Chambers said after reading reports of the arrest of James Lawrence in the media last week, she wanted to come forward with her story.

OH ... HER. This busybody reading a news report has the right to persecute me from reading about me and after visiting the police who never even wrote a incident report or contact me of her shady (she was blacked out in News 12 report) feelings? And so goes the special subjective story and libelous hit job without a shred of proof of anything. This one woman – Wendy Higgins Chambers - the one who never made a complaint to anyone – police, store manager, or me – at the time we had a 10-15 minute conversation in a market (9 months before arrest) and now without even an individual police report or resulting arrest of me from her visit to police after she went to News 12 accusing me of **“preying on women”** (resulting in News 12 scrubbing their **“outright false”** coverage of me **“arrested for stalking several women”**) and before she went to reporter Sophie Cecilia Vaughan at the Westport News. Yes, this sick busybody attempting to hurt me via the press who is without any police report or police action against me. Sick culture. This is a sick Guilt by Accusation culture affording men no rights before or after Due Processes of Law. Just believe the woman insanity that creates unjust snowball effects given feminine behavior traits.

*Since 2002 Lawrence was logged by Westport police in 10 incidents where women **felt harassed** by him, but in each case, they felt afraid to pursue charges against him for fear of retaliation, according to court documents.*

FACT: This is not the language of any past incident report and the reporter is putting words in mouths of phantoms – no names and no interviews and no sworn written statements. Where is there evidence they felt harassed let alone were actually **harassed** (see definition of **harass**) and worthy of a special story since these incidents are already investigated resulting in no arrest as the reporter knows (hence more malice). She is controversially diving into the Arrest Warrant against police matters of practice to redact aka against police matters of practice to share (see [Exhibit C - FOIA Officer Emails](#)). Alleged yet never shown subjective fears (afraid) from ghosts with no names and no quotes and no sworn written statements are not grounds for a special report.

FACT: There is no need for pressing charges to arrest as evident in March 5, 2018 arrest where there was no sworn written statement or witness coming forward.

FACT: Not in one past incident report is it documented anyone was afraid to press charges. This does not give a reporter the right to put the **harassing** language into ghosts that was clearly avoided by the Arrest Warrant officer.

Lawrence has a record of arrests outside of Connecticut, including resisting arrest and fleeing/eluding police in Florida and, in California, he was charged with petty theft, theft of personal property, stalking, inflicting corporal injury to spouse and battery of a spouse.

This is a doxxing fiasco and utter failure to distinguish between arrests/charges and convictions. HYPING ALREADY DUE PROCESS OF LAW INTO SOMETHING IT WAS NOT – Any conviction of anything here? FACT – MY ONLY CONVICTION CAME FROM A 1996 DOMESTIC VIOLENCE CHARGE. Why is reporter choosing to report on an arrest record without sharing necessary results (in tune with **Exhibit C**)? Answer – malice – agenda driven bias let alone stupidity/incompetence/arrogance. Reporter clearly is reckless by insinuating these arrests were criminal, let alone past KNOWN closed cases never resulting in arrests as if they were criminal. Reporters if they dare to go beyond a Official Police Press Release (see **Exhibit A**) best know a few things about warrants, police procedures, let alone subjective language. **SEE EXHIBIT D.**

Recounting her encounter, Chambers said a man introduced himself to Chambers at Westport Stop and Shop around 7:30 p.m. in January as James Laurentis and gave her a card with his alleged name and a link to an “obscure” website, she told the Westport News.

Why is this obscure website (my writings on many topics much political) mentioned?

After leaving the Stop and Shop, Chambers said the man followed her to her car. “He showed up in front of my car and scared the crap out of me. He said he wanted to go out with me and I said I didn’t want to go out with him,” Chambers said, adding, “He’s a creep.”

Utterly false description of our 10-15 minute conversation in a market 9 months before where there was no complaint to store manager, no complaint to police, or even no complaint to me for she had my contact information. Reporter fails to vet this whacked woman and do a proper fair and balanced research – like interview me – to write some detailed facts. Police did not see her story as worthy of anything – no police report of this woman (see **Exhibit C**) not even a call to me, so why is this reporter jumping on this wicked women’s persistent slander (she is being sued now see Ct. Case: James Lawrence v. Wendy Higgins Chambers). Even News 12 reporter Mark Sudol who ambushed me at my very home, interviewed me before his outright false coverage. Where was reporter Sophie Cecilia Vaughan? This madness at worst was a one-time contact that never falls under any definition of any crime so how is this woman the motivating and chief witness to a hideous agenda-driven story on **harassing women for years** without a shred of proof of any **harassment** after investigations? FACT: NEVER WAS THERE PERSISTENT OR REPEATED CONTACT AND NEVER ANY COMPLAINTS. SHE WAS NOT **HARASSED**. And there are a lot of alleged “creeps” in the world so why this crazy special deuce story before and after Due Processes of Law?

On Feb. 15 Chambers said she saw the man again at the Westport Stop and Shop in the evening and the following day at the Whole Foods Market in Norwalk around lunchtime. On both occasions, Chamber says she avoided the man.

Once again showing I never approached her another time so why the fuss? This veritable Nasty

Woman MeToo wannabe is looking for attention going to the media and persecuting me devoid of any **harassment**. Reporter Sophie Cecilia Vaughan knows nothing about this person and together they slander and defame me a hippie at worst via some sick knee-jerk extreme feminist ways that are part of the sick time – 2018- after the election of President Trump where women march against sex harassment yet my history with incident reports let alone the sole arrest had nothing to do with **sex harassment or harassment** of any kind and I am being conflated with this persecutory zeitgeist. Once again - WHERE IS THE **REPEATED OR PERSISTENT OR MORE THAN ONE CONTACTS AFTER WARNING AKA “HARASS”**.

See Exhibit W.

Around the same time, Chambers’ said her trainer told her a man tried to pick her up at the Whole Foods Market in Darien. Chambers showed her trainer the LinkedIn photo associated with the business card of the man who followed her at Stop and Shop and the trainer confirmed it was the same man who followed her, Chambers said.

WHO? Gossip about “picking people up” – hardly **sex harassment** or proof of veritable **harassment**. Where are other women – names?. Still one woman – Wendy Higgins Chambers a woman who visited police BEFORE she visited Westport News and a woman with no individual police report. This is just an utterly unjust and sick time of Guilt by Accusation – a title of a recent book by Harvard law professor Alan Desrshowitz.

Chambers recognized the man in another photo, one published on the Westport News website on March 12 in conjunction with the arrest report for town resident James Lawrence.

Yes reading Article #1 – “Westport Man Allegedly Followed Woman Around”, that gives the reader the feeling of multiple locations while other more competent media reported in tune with the Official Police Press Release as “Man Allegedly Followed Woman at Local Market”. This obviously mentally imbalanced woman after reading this before Due Process of Law then makes a beeline to News 12 of all places (really!) and not the police. News 12 proceed to commit slander and libel aka outright false reporting of **“stalking several women” and “preying on women”** (scrubbed from their websites 2 days later) SHE THEN KNOWING THAT NEWS 12 TOOK DOWN THEIR FALSE REPORTING AND KNOWING I AM ALREADY DAMAGED FROM THEIR REPORTS MALICIOUSLY SEEKS ANOTHER MEDIA SOURCE – WESTPORT NEWS AND 21 YEAR OLD FEMINIST REPORTER SOPHIE CECILIA VAUGHAN FOR CHAMBERS TO PUSH HER SLANDER BY SHARING THE DUBIOUSLY ASCERTAINED ARREST WARRANT AGAINST POLCIE REDACTION POLICIES. THE WESTPORT NEWS JUMP AT THIS **KNOWING I WAS ALREADY HARMED**. WHO DOES THIS? THIS IS OBVIOUS MALICE. ALL BEFORE DUE PROESS OF LAW AND AFTER DUE PROCESSES OF LAW – MY PAST ARREST AND CONVICTION RECORD.

“He’s got a different name than on the card he gave me,” Chambers concluded.

It is called a pen name. An interview with me could have cleared that up too.

Lawrence, 52, was arrested on charges of breach of peace after he allegedly followed a woman around the Fresh Market on Post Road East and then out to her car on Nov. 5, police said.

YES A ONE TIME CONTACT (NOT REPEATED OR PERSISTENT) to which is the only proper story to report on as all media did 2 weeks before. Respect and allow for Due Process of

Law and have some respect for Presumption of Innocence (which I was eventually found to be – innocent of Second Degree Breach of Peace) AND NOT SOME SPECIAL HIT JOB WITH NO PROOF AND NEVER CAN BE ASCERTAINED PROOF. NO. We are in a sick time where women are persecuting men via the media – GUILT BY ACCUSATION. Just believe the woman nonsense. And here we have a man meeting women at markets in Westport and only Westport (no other incident report from anywhere else in the world) WITH NOT ONE VIDEO CAM OF ANY “HARASSMENT” IS BEING CONFLATED WITH SEX HARASSMENT METOO ZEITGEIST. UTTER SICK PERSECUTIONS WITH NUMEROUS ONGOING DAMAGES.

Police issued an arrest warrant for Lawrence and on March 5 he turned himself in to police and was released after posting a \$5,000 court set bond. He is next scheduled to appear in Norwalk Superior Court on May, 4. (see Exhibit E - Article #1)

Yes this is all that should have been reported like all other media did at the time of the arrest - “Man Arrested for Allegedly Following a Woman at a Market”. ALL OTHER MEDIA LEFT THE WARRANT ALONE AND ALLOWED PROSECUTORS, JUDGES AND POTENTIAL JURY TO SORT OUT THE POLICE INFORMATION THAT AS A “MATTER OF PRACTICE REDACTED FROM RELEASE” (see Exhibit C). Yes a low-end charge and need for allowing Due Process of Law of this one-count of Second Degree Breach of Peace for as Arrest Warrant states “*following and getting into personal space*” and not any count or counts (women) of Harassment (actual crimes in the statutes) or anything in my past – THE KNOWN NO CRIMINAL RECORD IN CT AS WARRANT CLEARLY STATES.

FACT: POLICE NEVER DEPLOY THE HARASSING LANGUAGE IN THE WARRANT FOR OBVIOUS REASONS AND CAREFULLY CHOOSE THEIR WORDING SO TO SHOW THERE WAS NO VERBAL BADGERING OR REPEATED CONTACTS AFTER WARNINGS.

In court documents, Officer James Sullivan, who was charged with investigating the case, writes Lawrence is cited in 10 other incidents logged in the Westport case history from 2002 until present. “In all of these complaints, Lawrence was seen following the complainants around a store or coffee shop and then following them out to their cars where he would either stare at them or get right into their personal space (FYI unproven and un-provable). In most of these cases, Lawrence was told his actions scared the complainants to the point of them calling the police,” Sullivan wrote.

If this reporter left well enough alone with Article #1 she would then learn through Due Process that there is not one video or any evidence of anything criminal from the past despite all markets wired inside and out AND OF COURSE THE RESULT OF THE ARREST – NOT GUILTY. She had not business doing this special article **KNOWING** I CAN NEVER BE ARRESTED AND CHARGED AND CONVICTED OF WHAT SHE WRITES ABOUT – ALLEGED PAST INCIDENTS - LEAVING THE PUBLIC UNINFORMED OF ALL THE ESTABLISHED AND NEVER ESTABLISHED TRUTH.

A criminal history search of Lawrence turned up no criminal history in Connecticut, but revealed Lawrence’s arrests in Florida and California.’

Reporter KNOWS I have no criminal record aka never arrested in Ct. the area (Westport and

only Westport) of alleged case known closed incidents WITH NO NAMES, NO CAMERA FOOTAGE (all alleged incidents at markets) yet this Hearst reporter goes on to report as if there was potentially criminal **harassing** behavior despite these alleged incidents were fully investigated resulting in no arrest cases known to be long closed with statute of limitations in effect.

FACT: THESE INVESTIGATIONS AND RESULTING NO POLICE ACTION ARE MORE CONCLUSIVE THEN COMPLAINTS WOMEN MAKE VIA THE MEDIA FREE OF POLICE INVESTIGATIONS. HERE YOU ACTUALLY HAVE INVESTIGATIONS ALREADY DONE. She knows there was no criminal behavior after investigations. “.... **but** ...” goes on to attempt to portray past arrests as if they are criminal – to which only one was – 1996 Domestic Violence. This reporter is obviously trying to convey there was criminal behavior from these arrests.

*A criminal history search of Lawrence turned up no criminal history in Connecticut, **but** revealed Lawrence’s arrests in Florida and California.*

SEE FACTS AT **EXHIBIT C** ON CRIMINAL PAST OR LACK OF CRIMINAL RECORD. REPORTER BEGS THE ISSUE WITH “**BUT**” BECAUSE OF THIS REPORTER I HAVE TO CARRY FBI DOCUMENTS OF MY ONE CONVICTION AND EVERY TIME I AM PROFILED HAVE TO HOPE THE PROFILERS WILL DO THE FURTHER RESEARCH TO CLARIFY THE CONFUSIONS WHICH THEY NEVER DO!!!.

In the Nov. 5 case, the complainant would not provide a sworn statement for fear that Lawrence would find her and retaliate, Sullivan wrote. “I also learned that in all the nine other cases that the complainants all felt the same way. That they all feared for their safety and because of this were reluctant to provide statements,” Sullivan wrote.

This is utter lies and never documented in any past Incident Report yet still it is not my fault not one ghost pressed a charge on me **and the police did not have a woman pressing a charge on me for the March 5, 2018 arrest** so they never needed a woman to press charges in the past to arrest me. I was not arrested because there was no probable cause for any crime especially **harassment**.

Once again a seasoned and experienced reporter would see the inconsistencies and refrain from begging the issue before and after Due Processes of Law but this reporter has her own libelous ways being totally drunk and enraptured with the current MeToo zeitgeist. I DID NOT NEED A SWORN WRITTEN STATEMENT AGAINST ME TO BE ARRESTED AS EVIDENT IN THE MARCH 5, 2018 ARREST SO ANY ALLUSION TO PAST INCIDENTS NOT BEING ARRESTED BECAUSE OF NO PRESSING OF CHARGES IS NONSENSE AND NOT MY FAULT IN ITSELF. The reporter should have interviewed the officer to get more perspective.

FACT: There are no actual quotes from past incident reports devoid of sworn written statements about this utter fabrication of fears of retaliation. All incident reports never document this and a proper reporter would have pressed the officer on this obvious nebulous information like where are actual names coming forward from the past? Just utter persecution devoid of evidence. Reporter should have stayed out of the warrant like Stamford Advocate, Daily Voice, Connecticut Post, etc....

The number of cases involving Lawrence isn't surprising, Chambers said. After the March 12 article about Lawrence's arrest was published she dropped the article off at the Whole Foods in Norwalk and said all the employees knew him. "A woman who saw me show the article to the manager said he's tried to pick her up twice at Darien Whole Foods," Chambers said.

I am not banned from Whole Foods Norwalk and in fact management and workers are on my side over this fiasco. I will be submitting letters from workers from these markets as to my standup deportment while being a consistent customer. I was not banned from Darien Whole Foods either! ONCE AGAIN, "number of cases" long gone closed and NEVER CAN BE PROVED OF ANYTHING so what gives this reporter the right to report on me as **harassing** against any conclusions from the police investigations of 6 not 10 innocuous completely harmless past run ins with Westport women and only Westport women?

FACT: FROM 2007-2017 I LIVED IN SAN FRANCISCO SO GO SCROUNGE THE POLICE RECORDS AND SEE IF THERE ARE ANY **"HAUNTINGS FOR YEARS"** THERE.

FACT – THERE ARE NO OTHER INCIDENTS ANYWHERE ELSE IN FAIRFIELD COUNTY, NEW YORK CITY TO WHERE I VIST EVERY WEEK, CALIFORNIA, NATION AS A WHOLE, AND EUROPE AS WELL. ALL ARE IN SNOWFLAKE TOWN WESTPORT.

Did Officer Sullivan write or say "harassed" women? NO. WE NEED A TRIAL TO CLEAR UP THE CONFUSION.

DISSECTING WESTPORT NEWS ARTICLE #3

Westport man accused of harassing women arrested

again (more taking liberty beyond official police press release)

By [Sophie Vaughan](#)

*WESTPORT — A local man **alleged** to have **harassed women for years** (Fact: lived in San Francisco from 2006-2016) **at area stores has once again been arrested.** (Once again – now it is “alleged” yet a year before there was no “alleged”. It is like this 21 year old reporter is learning on the job at my expense. Fact: There was no previous **harassment**)*

*Resident James Lawrence, 53, was arrested on charges of **second-degree harassment** after a victim told the Westport police on Sept. 18 that she was repeatedly harassed by Lawrence. The victim said she made multiple requests to Lawrence that he stop contacting her, but he continued to contact her through email, police said.*

Police submitted a warrant for Lawrence’s arrest, and on Feb. 6 he was taken into custody after an officer spotted him at a local gas station. Lawrence was brought to police headquarters and released after posting a \$25,000 bond. He is scheduled to appear in state Superior Court of Norwalk on Feb. 7.

The real truth of this crooked arrest standing at a Nolle Prosequi will fascinate you.

Fact: Complain/former girlfriend living in my very own home mentions Article #2 The Big Deuce 9 times in her Sworn Written Statement and commits multiple acts of perjury in a scorned attempt to get me arrested. I will be presenting all the evidence eventually as part of the Damages and effect of the Article #2 Big Deuce that hypes unproven and un-provable **harassment**.

*Lawrence was also arrested in March after he allegedly followed a woman around Westport’s Fresh Market grocery store and then to her car in November 2017 (once again NOT “followed around” but at least reporter this time keeps the alleged following around to one location - market for proper Arrest Warrant wording is “followed at a market and out to car”). After Lawrence’s arrest report was released (how and from whom?) in March, several woman (**very telling misspelling**) came forward claiming **they had experienced similar harassment** from Lawrence at local shops.*

*Since 2002, Lawrence was logged by Westport police in 10 incidents where women felt **harassed** by him, but in each case, they felt afraid to pursue charges against him for fear of retaliation, according to court documents. (Once again, Police never use the **harassment** language.)*

Lawrence has a record of arrests outside of Connecticut, including resisting arrest and fleeing/eluding police in Florida. In California, he was charged with petty theft, theft of personal property, stalking, inflicting corporal injury to spouse and battery of a spouse (doxxing material against Police redaction policies and not giving the audience any facts as to final dispositions. AND REPORTER FAILS TO SEE POLICE LEAVE THIS OUT OF THE WARRANT FOR THE FEB.6, 2019 ARREST FOR ALLEGED EMAIL HARASSMENT FOR A REASON – SO THE SAME DOXXING DOES NOT HAPPEN – See Exhibit B – Warrant Section 20. AND THIS DOXXING OF ARREST RECORD IS NOT WITHIN THE POLICE REPORT TO WHICH HEARST SUBMITS AS AN EXHIBIT – See Hearst ECF 14 #5-Exhibit D.

In court documents, officer James Sullivan, who was charged with investigating Lawrence in preparation for his March arrest, detailed the 10 incidents in which women reported Lawrence

to the Westport police. (When? Who? Such a narrative I deserved to have been quoted since it is obviously false, I had no criminal history in Ct., and a proper reporter (not biased feminist) would have interviewed the police or afforded me an interview for perspective.)

“In all of these complaints, Lawrence was seen following the complainants around a store or coffee shop and then following them out to their cars, where he would either stare at them or get right into their personal space (alleged one time acts that were fully investigated resulting in no arrest – unproven and un-provable anything with statute of limitations in effect. Past officers obviously saw no criminal intent and no breakage of any law for if they did find probable cause and thought I broke any law I would have been arrested.). *In most of these cases, Lawrence was told his actions scared the complainants to the point of them calling the police,” Sullivan wrote. In the Fresh Market case, the complainant would not provide a sworn statement for fear that Lawrence would find her and retaliate, Sullivan wrote.*

“I also learned that in all the nine other cases that the complainants all felt the same way. That they all feared for their safety and because of this were reluctant to provide statements,” he added. (Fact: the March 5, 2018 arresting incident of Second Degree Breach of Peace did not have a sworn written statement and there was no witness.)

DIFFERENT LANGUAGE IN CONNECTICUT STATUTES

CONNECTICUT LAW

THIRD DEGREE STALKING

The law defines **Third-Degree Stalking** as recklessly causing another person to reasonably fear for his or her physical safety by **willfully and repeatedly following** or lying in wait for that person (CGS § 53a-181e(a)). The offense is a class B misdemeanor, punishable by up to six months in prison, up to a \$ 1,000 fine, or both (CGS § 53a-181e(b)).

CONNECTICUT LAW

SECOND DEGREE STALKING

§ 53a-181d. Stalking in the second degree: Class A misdemeanor

(a) For the purposes of this section, “course of conduct” means two or more acts, including, but not limited to, acts in which a person directly, indirectly or through a third party, by any action, method, device or means, including, but not limited to, electronic or social media, (1) follows, lies in wait for, monitors, observes, surveils, threatens, **harasses**, communicates with or sends unwanted gifts to, a person, or (2) interferes with a person’s property, and “emotional distress” means significant mental or psychological suffering or distress that may or may not require medical or other professional treatment or counseling.

CONNECTICUT LAW

SECOND DEGREE HARASSMENT

Sec. 53a-183. Harassment in the Second Degree: Class C misdemeanor. (a) A person is guilty of harassment in the second degree when: (1) By telephone, he addresses another in or uses indecent or obscene language; or (2) with **intent** to **harass**, annoy or alarm another person, he communicates with a person by telegraph or mail, by electronically transmitting a facsimile through connection with a telephone network, by computer network, as defined in section 53a-250, or by any other form of written communication, in a manner likely to cause annoyance or alarm; or (3) with intent to **harass**, annoy or alarm another person, he makes a telephone call, whether or not a conversation ensues, in a manner likely to cause annoyance or alarm.

OFFICIAL PRESS RELEASE AND POLICE FACEBOOK POST FOR THE SECOND ARREST – SECOND DEGREE HARASSMENT FEB. 6, 2019
SEE EXHIBITS A-B



“ongoing ...” ... “multiple requests”.... “continued” ...

Connecticut General Statutes 53a-223 – Criminal violation of a protective order: Class D or class C felony

Current as of: 2018 | [Check for updates](#) | [Other versions](#)

(a) A **person** is guilty of criminal violation of a protective order when an order issued pursuant to subsection (e) of section 46b-38c, subsection (f) of section 53a-28, or section 54-1k or 54-82r has been issued against such person, and such person violates such order.

(b) No person who is listed as a protected person in such protective order may be criminally liable for (1) soliciting, requesting, commanding, importuning or intentionally aiding in the violation of the protective order pursuant to subsection (a) of section 53a-8, or (2) conspiracy to violate such protective order pursuant to section 53a-48.

(c) Criminal violation of a protective order is a class D **felony**, except that any violation of a protective order that involves (1) imposing any restraint upon the person or liberty of a person in violation of the protective order, or (2) threatening, harassing, assaulting, molesting, sexually assaulting or attacking a person in violation of the protective order is a class C felony.

NOTICE THE USAGE OF THE WORD HARASS.

THE MARCH 5, 2018 ONE COUNT CHARGE – FIRST ARREST.

Connecticut General Statutes 53a-181 – Breach of the peace in the second degree: Class B misdemeanor

Current as of: 2018 | [Check for updates](#) | [Other versions](#)

(a) A person is guilty of breach of the peace in the second degree when, with intent to cause inconvenience, annoyance or alarm, or recklessly creating a risk thereof, such person: (1) Engages in fighting or in violent, tumultuous or threatening behavior in a public place; or (2) assaults or strikes another; or (3) threatens to commit any crime against another person or such other person's property; or (4) publicly exhibits, distributes, posts up or advertises any offensive, indecent or abusive matter concerning any person; or (5) in a public place, uses abusive or obscene language or makes an obscene gesture; or (6) creates **a public** and hazardous or physically offensive condition by any act which such person is not licensed or privileged to do. For purposes of this section, "public place" means any area that is used or held out for use by the public whether owned or operated by public or private interests.

NOTICE NO USE OF THE WORD HARASS LIKE HOW THE ARREST WARRANT DOES NOT USE THE WORD HARASS. SEE EXHIBT A.

Connecticut General Statutes 53a-181a – Creating a public disturbance: Infraction - \$90 Fine

Current as of: 2018 | [Check for updates](#) | [Other versions](#)

(a) A person is guilty of creating a public disturbance when, with intent to cause inconvenience, annoyance or alarm, or recklessly creating a risk thereof, he (1) engages in fighting or in violent, tumultuous or threatening behavior; or (2) annoys or interferes with another person by offensive conduct; or (3) makes unreasonable noise.



§§YELLOW§§ Infractions are usually color coded in yellow §§YELLOW§§

NOTICE NO USE OF THE WORD HARASS LIKE HOW THE ARREST WARRANT DOES NOT USE THE WORD HARASS.

**NOW HOW ABOUT AN INCIDENT REPORT DEVOID OF AN ARREST?
ANY MENTIONED “CASE”/INCIDENT REPORT FULLY INVESTIGATED
RESULTING IN NO ARREST CASE KNOWN TO BE CLOSED.
INCIDENT REPORT FULLY INVESTIGATED RESULTING IN NO
ARREST**

AKA

NO STATUTE – 000 – NO PROBABLE CAUSE, NO CRIME.

Reference to a past incident that was fully investigated resulting in no arrest and known to be cases closed with statutes of limitations in effect thus police finding no criminal intent and there was no probable cause to arrest for anything.

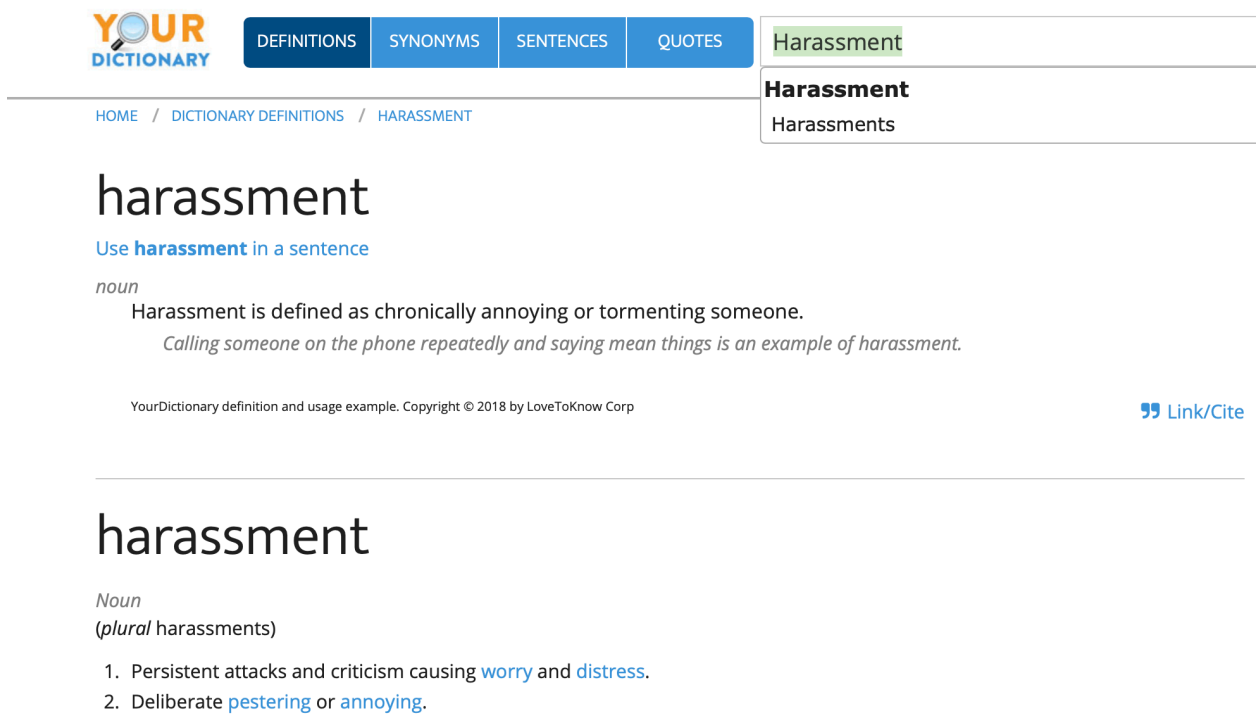
DEFINITELY NO USE OF THE WORD HARASS OR STALK.

*Judge Underhill: “It is an open question in the Second Circuit whether courts can take judicial notice of police incident reports, but it seems that many courts refrain from doing so. See, e.g., Alvarez v. County of Orange, N.Y., 95 F. Supp. 3d 385, 398 (S.D.N.Y. 2015); Bejaoui v. City of New York, 2015 WL 1529633, at *6 (E.D.N.Y. Mar. 21, 2015); Serrata v. Givens, 2019 WL 1597297, at *4 (E.D.N.Y. Apr. 15, 2019).” See Lawrence v. Altice ECF 66 Page 2*

△ BEGINNING CONCLUSIONS

OVERWHELMING UNDENIBLE MULTI-SOURCE EVIDENCE OF THE VERITABLE DEFINITION OF **HARASS/HARASSMENT**

Lets get to the very telling Exhibits (see Exhibits H-V) of the “*popular acceptance*” of the word **harass and harassment**. I present here how the word **harass** is defined in the statutes, in the top legal dictionaries, in the top everyday dictionaries, in top etymology sources, and in top encyclopedias let alone common Google searches. I originally did this in the early stages of my case against Altice News 12 but did not show the weighty 99% of the resources in my favor evidence because it seemed to be a common sense agreed upon fact that all levels of **stalking statutes** like **harassment statutes** meant repeated persistent behavior – most certainly in the statutes which should be the issue when reporting on an arrest like how News 12 reported - **Police: “Man Arrested for Stalking Several Women”**, and how Hearst reported – **Police: Man Harassed Women for Years**, and most certainly within the everyday dictionary definitions. **Harassment** poses the same issues and with just as much weighty evidence in my favor that shows **veritable Harassment is repeated, persistent, over time, systematic, involving courses of conduct – 2 or more acts.**



The screenshot shows the 'YourDictionary' website interface. At the top, there are navigation tabs for 'DEFINITIONS', 'SYNONYMS', 'SENTENCES', and 'QUOTES'. The search term 'Harassment' is entered in the search bar. Below the search bar, the word 'Harassment' is displayed in a large font, followed by the definition: 'Harassment is defined as chronically annoying or tormenting someone.' An example sentence is provided: 'Calling someone on the phone repeatedly and saying mean things is an example of harassment.' The page also includes a copyright notice for 2018 by LoveToKnow Corp and a 'Link/Cite' button.

harassment
Use **harassment** in a sentence
noun
Harassment is defined as chronically annoying or tormenting someone.
Calling someone on the phone repeatedly and saying mean things is an example of harassment.

YourDictionary definition and usage example. Copyright © 2018 by LoveToKnow Corp

Link/Cite

harassment
Noun
(plural harassments)

1. Persistent attacks and criticism causing **worry** and **distress**.
2. Deliberate **pestering** or **annoying**.

... chronically ... persistent ... deliberate ...

English: Chronic - something that lasts for a long time, keeps coming back or continues to happen.

harass

(either harris or huh-rass) v. systematic and/or continual unwanted and annoying pestering, which often includes threats and demands. This can include lewd or offensive remarks, sexual advances, threatening telephone calls from collection agencies, hassling by police officers or bringing criminal ch...

harassment

(either harris-meant or huh-rass-meant) n. the act of systematic and/or continued unwanted and annoying actions of one party or a group, including threats and demands. The purposes may vary, including racial prejudice, personal malice, an attempt to force someone to quit a job or grant sexual favors...

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Harassment*

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What is HARASSMENT?

Repeated conduct that is not wanted and is known to all parties as offensive. Refer to sexual harassment.

Once again - **persistent and repetitive.**

See consistent, undeniable, multi-source proof – Exhibits H-V

FACT: 99% of the resources describing harassment are describing harassment as repeated and persistent acts toward an individual. This behavior is never ever the case with my past arrests or associations with police. My clean record should be enough to allow this fact to be fully digested and accepted for any other attempt to say otherwise is un-provable and further resulting defamation. Read all these resources and ask yourself - is some subjective and unproven and un-provable needle in the haystack single act definition of **harassment** anywhere near as strong as the voluminous evidence I am showing here via the top legal resources, everyday dictionary resources, top encyclopaedia resources, top cultural resources, etc... like Googling harassment – see search results for the **“popular acceptance” and “mind of the average reader”**. **This linguistic evidence should not and cannot be ignored by any Judge.** As I previously stated, my enhanced arguments for the Court of Appeals is showing similar

results –99% of the resources describing stalking are describing stalking not only as acts of stealthy hunting but as repeated and persistent acts toward an individual and any issue of single acts of stealth would have to prove stealth (a hunting and killing term) exists within the first Arrest Warrant. Hearst themselves need to prove the presence of veritable harassment in the Arrest Warrant which is a more impossible a task given the officer never uses this popular word harass and the dubiously ascertained Arrest Warrant is referring to known closed cases that resulted in no arrests for anything let alone any harassment. The officer knows the Harassment statutes and most significantly knows the dictionary definitions of harass and that is why he never deploys the harassment language.

FACT: Westport News' persisted subjective spin/defamation of deploying the harass language after knowing the stalking language was pulled from News 12's websites is just as controversial and even more so since they knew I was already harmed and maliciously proceeded to concoct their special un-vetted lies and leave their hit job out for all to read for 2+ years and counting. They never wrote in Article #2 the Big Deuce "Police: man allegedly harassed ..." or "accused of harassing" like they did in the Article #3 which is still libel for there was no real veritable harassing accusations or proof after investigations let alone willing complainants - names. And once again, Hearst goes against police matters of practice to redact from release the hyped up and false interpretation of my arrest record and never makes proper efforts to ascertain and report upon a proper analysis of my Arrest Record that includes actual prior convictions. All the Damages they created would never have happened if they chose to leave the arrest alone after Article #1 and let Due Process work out the details instead of opportunistically looking for a story to hype and conflate with the MeToo times despite the fact my arrest had nothing to do with MeToo. IT IS TIME HEARST PAY FOR THE NUMEROUS DAMAGES FROM THEIR OBVIOUS ONGOING PERSECUTION.

Police: Westport man harassed women for years

By [Sophie Vaughan](#)

LIBEL. If police actually said this they would need to have actual evidence of veritable harassment via a conviction from a investigated incident and past arrest. Police never said this and would never say this and set themselves up for criticisms for not arresting past criminal behavior nor set themselves up for a lawsuit about unproven and un-provable alleged harassment.

FACT: Reporter Sophie Cecilia Vaughan came to this conclusion herself by dubiously ascertaining the Arrest Warrant (against police matters of practice to redact the material she attempts to play with). She never quotes the officer from a much needed interview. She quotes the arresting officer from the Arrest Warrant and grossly goes beyond the actual wording. The material she attempts to interpret - closed cases after Due Process of Law - is something she is fully aware of – closed cases. Police field complaints, do investigations, and decide on intent and probable cause and whether to arrest. By not arresting in the past makes Hearst/Westport News' libelous claim "Police: Westport Man harassed women for years" dependent on police actually saying this. But the fact is reporter Sophie Cecilia Vaughan is never properly quoting the officer's dubiously ascertained Arrest Warrant (against Police Matters of Practice to redact from release) and NEVER shares the wording "getting into personal space" (SEE very telling Exhibit

V). She never interviews the arresting officer who could never say any **harassment** happened in the past – only alleged unproven and never can be proven claims or “cases” long closed - as is KNOWN by the reporter – never arrested in Ct. as the Arrest Warrant tells her.

FACT: there were no past arrests aka no intent and no probable cause for such a accusation as **harassment** hence police carefully wording the alleged incidents without deploying the **harassment** language.

FACT: I have no criminal history in Ct. (the only place – Westport - of the alleged past incidents at markets the reporter attempts to report on after Due Process of law knowing the “cases” are closed). And this includes now the arrest she reported on thereby continuing my clean Ct. record of no criminal behavior. **You would think for all the hype and fuss there would have been a conviction – but NO. Never seen as criminal. Why the ht job?**

FACT: There are no arrests let alone convictions for anything mentioned by Hearst especially the one count of Second Degree Breach of Peace incident of March 5, 2018 hence why it is high time Hearst/Westport News to answer for not heeding my warnings 2 years ago to NOT publish their pack of lies before and after Due Process of Law affording me no Presumption of Innocence let alone being totally wrong interpreting the Arrest Warrant language.

WHO IS RESPONSIBLE FOR THEIR LIES/LIBEL SITTING OUT THERE FOR THE PAST 2 YEARS? NOT NEWS 12 CT. HEARST SHOULD HAVE REMOVED THEIR LIBEL AS WARNED FOR NOT HAVING THE FACTS BUT CHOSE TO DOUBLE DOWN AND NOW THEY MUST PROVE THIS **HARASSMENT TO WHICH THEY NEVER CAN.**

FACT: they should have left well enough alone with Article #1 and let the legal system to do their jobs but this sensationalist reporter obviously affected by the sick zeitgeist chose to persecute me the big bad supermarket guy as if there was some type of **sexual harassment** (see Exhibit W) let alone any kind of **harassment** at all, and Hearst is now clearly and undeniably responsible for a very damaging malicious hit job contrary to the facts of not only the fact of being NOT GUILTY of ONE count of Second Degree Breach of Peace but obviously also of any KN OWN past investigated “case” that never resulted in an probable cause for arrest of **harassing** behavior.

FACT: After corresponding with News 12 Ct. who agreed to take down their “*outright false*” mere 2 day reporting of me, I then weeks later was forced AGAIN to write a similar letter this time to former Westport News Editor Jared Ferrari (who knew of this previous “*outright false*” News 12 persecution being taken down from the Internet) resulting in this coward ghosting me without a proper response. I then wrote Hearst legal department to which Stephen Yuhan (who also knew of this previous “*outright false*” News 12 persecution being taken down from the Internet) responded by threatening me that if I attempted to sue them saying they would seek to get legal fees from me.

All in all, I deserve a jury trial to put these people on the stand to get at what could also be at play with this hell-bent desire to take my life devoid of any past criminal behavior and

try and convict me via the media against the facts of the past and before Due Process of Law.

PROVE WHAT YOU WROTE ABOUT.

PROVE THERE WAS EVER HARASSMENT.

PROVE THAT POLICE ARE SAYING THAT I HARASSED WOMEN.

PROVE POLICE WROTE HARASSMENT IN THE ARREST WARRANT.

The facts are Hearst can never prove any harassment especially when police investigations have been involved resulting in no arrests, no course of conduct repeated persistent more than one contact with anyone, no witnesses, no sworn written statements, no proven intent, and no probable cause for arrest.

THIS UNPROVEN AND UN-PROVABLE OVER 2 YEARS LIBEL DESERVES TO BE IMMEDIATELY TAKEN DOWN FROM THE INTERNET AND MY ONGOING DAMAGES TO BE PROPERLY ANALYZED AND DISCUSSED WITHOUT FURTHER NEGLIGENT AND COWARDLY SPINNING RETREATS TO IRREVELANT CASES OF THE PAST THAT CAN NEVER JUSTIFY AND PROVE ANYTHING HEARST MALICIOUSLY (REPEATED KNOWN MISTAKES) INFECTS THE WORLD AT LARGE WITHIN THE NEW AGE OF INTERNET SEARCH! HEARST CAN NEVER PROVE POLICE SAID I HARASSED WOMEN FOR YEARS.

I also want to emphasize something I have said before – this is a very important case for the current zeitgeist that demands no judicial activism when interpreting common sense laws, dictionary definitions, and cultural definitions. Allowing for such gross conflation of laws and language will only diminish the importance/stigmas of actual harassment or stalking behaviors – people who are proven harassers and stalkers. A bend toward any special interest group to provide even more ways men can be persecuted free of evidence will lead to more people being accused of harassing and stalking and real PROVEN harassers and stalkers will blend into the increased fray and not receive the stigmas they should be given when they leave prison because the stalking or harassment parameters have been grossly widened to dangerous ways not in tune with the original intentions of harassment and stalking laws. What will inevitably result is more journalists deploying this conflation of laws and language in unrelated arrests, which will even result in police deploying this conflation of laws and language in their police reports in reckless ways that will inevitably lead to more lawsuits and more permanently damaged men free of any evidence or conviction let alone arrest. Yes – avoiding the legal definitions of the issues at hand will result in an increase in people (women) weaponizing these loose law and language definitions against people for personal, political, and career advancement gains.

I will not be forced any more to constantly carry my FBI conviction record around like a dog tag to share with people and organizations who profile me at breakneck speed because of Hearst's undeniable numerous forms of libel.