

SPRINGFIELD DISTRICT COURT

2223AC00803

RIAN WATERS,)
Complainant)
)
AIDAN KEARNEY)
Defendant)

VERIFIED PROPOSED COMPLAINT

I. INTRODUCTION

1. On November 19th, 2021, Kearney created a fake copy of my Facebook profile and conspired to frame me for sending psychotic rape and death threats to his own children. An accomplice and a confidant gave me evidence proving that Kearney orchestrated the conspiracy, and Kearney threatened and extorted them. After the courts approved of his crimes, his threats got more explicit.
2. Kearney’s crimes are violating my 14th Amendment right to equal protection and due process in civil and criminal proceedings, and my concomitant 9th Amendment right to receive basic protection in the courts of justice.
3. I further argue that Kearney is violating my Article 12 right to be able to fairly collect evidence of a crime that I am being accused of, and to produce all proofs of my innocence.

4. I withheld evidence in 1879CV0344 for three and a half years because of witness intimidation.

II. PARTIES

Complainant

5. Rian Waters it is too dangerous for me to tell Kearney where I am living, I did not renew my license because Kearney frequently accesses DMV computers.

Defendant

6. Aidan Kearney lives in Jefferson Massachusetts, and he is the sole owner and operator of a blog that he has proudly weaponized for public shaming.
7. Aidan Kearney is known to go by the name Clarence Woods Emerson on Facebook where he has over 22,000 followers, in most of the exhibits his messages appear as Clarence coming from the left in grey.

Witnesses

8. Cris Gagne is the conspirator who sent the messages in grey from “Diane” on the left in Exhibits A and F.
9. Cristina Yakimowsky is the coconspirator that sent the messages in blue on the right in Exhibits A,B,F,G.

10. Shannon Labarre was one of Kearney's confidants who sent the messages in blue on the right in Exhibit D.
11. I request that the court not file any charges against cooperative witnesses, particularly Cristina Yakimowsky.

III. JURISDICTION AND VENUE

12. **Jurisdiction is proper** under Mass. Gen. Laws ch. 218 § 26, notably the statute has been amended since, Commonwealth v. Muckle, 478 Mass. 1001, (Mass. 2017)
13. **Venue is proper under** G. L. c. 268, § 13B, because the motion hearings and the witnesses were for proceedings in Hampden County Superior Court and Springfield District court

IV. FACTS (additional facts are in the claims)

14. Exhibit A, B, F, and G are all screenshots from videos of Kearney's Facebook group chat "#BlogDat" from Cristina Yakimowsky's prospective.
15. On November 19th, 2021, Kearney got served by sheriff with my motion and a short order notice to appear for a hearing for (1879CV0344) on December 2nd, 2021, for a motion to attach his bank account. Exhibit B (RA 13-14)
16. The motion included a note from my old therapist that detailed the devastating damage that Aidan Kearney's harassment causes me, and she

noted that Kearney's harassment is the identified cause and stressor of my adjustment disorder. Exhibit B pg 3 RA 15

17. Kearney uploaded my motion signed by the sheriff into his conspirator group chat "#BlogDat" about 30 minutes after the sheriff left his house. (Exhibit B) (RA 13)
18. On November 19th 2021, Aidan Kearney created a fake Facebook account in my name (Exhibit E) (RA. 33) and tried to frame me for threatening his children. (RA. 34)
19. Exhibit A 1-7 shows screenshots of the #BlogDat group chat from 11/19/2021 during the conspiracy. Exhibit A 9-13 are screenshots of the #BlogDat group chat from on or around January 3rd 2022.
20. Exhibit C is a Holden police report identifying the members of the #BlogDat group chat with their real names next their screen names. (RA 19 at 2, RA 20)
21. On or around January 3rd, 2022, Kearney told the Holden Police that he must have been hacked because messages that he claimed he had only sent to himself were being read by his ex girlfriend, and ex-employee. Kearney told the officer that he was the only person with access to his Facebook account Clarence Woods Emerson. (Exhibit C pg. 5 RA. 21)
22. The officers found out that Kearney lied to them and that he had also sent the messages to his #BlogDat group chat, because Christina Yakimowsky

admitted she had shared messages from the group chat because she did not like Kearney hurting people. (RA 19 at 2)

23. The officer decided it was reasonable for Kearney to lie to him about the group chat because Kearney trusted his “inner circle.” (RA 19 at 1 and 3)

24. Exhibit D, is screenshots from a Facebook messenger conversation between Shannon Labarre and Kearney using his Clarence Woods Emerson account. After Shannon noted that Exhibit A1 implicated that Kearney sent the threats, Kearney alleged he was just a coconspirator and he sent Shannon a screenshot of the #BlogDat group chat during the conspiracy from his (Clarence’s) perspective. (Exhibit D 02)(RA. 24) compare to the same messages from Crissy’s perspective. (Exhibit A 7) (RA. 8)

25. Exhibit E proves that the fake copy of my profile that sent the threats was created around 10pm on November 19th 2021, and page 2 is the threats from my prospective. (RA 33-34)

26. Exhibit F is screenshots from a video of Kearney’s Facebook group #BlogDat from Cristina Yakimowsky’s prospective, which was provided by Shannon Labarre. Exhibit F 03 proves that Kearney’s goal behind the November 19th conspiracy was to obstruct my ability to file and lawsuits. (RA. 37)

27. Exhibit G shows that Kearney uploaded an e-mail that I sent to his lawyer with a PDF document labeled “emergency files.” The document contained

screenshots of the fake profiles and fake threats, as well as evidence that Kearney is an unhinged psychopath. Coconspirator Laura Hakes did not understand how I had gotten screenshots, because she thought the profile was down before anyone had a chance to report it. **Kearney said that the fake profile was up for about 15 minutes before Facebook took it down**, which proves that Kearney knew when the fake Facebook profile was created, and when it was removed by Facebook. (RA. 40)

28. Exhibit H shows that Aidan Kearney posted on Facebook that he was aware that Cristina Yakimowsky was a witness, and that he was punishing her for it.

29. Exhibit I is a screenshot from Aidan Kearney's June 18th 2022 YouTube video, where Kearney showed his followers screenshots from the #BlogDat group chat that he claims he presented to a judge, and/or gave to the district attorney's office to get Cristina Yakimowsky in trouble for using his blog to intimidate a witness in a different case. (1966CR1686)

30. On June 17th, 2022, in Milford District Court (1966CR1686) Kearney testified against Cristina Yakimowsky saying, "the court order ordered Cristina Yakimowsky not to have anything to do with my blog, or anything like that. I was not aware of this, but for the last two years Chrissy has basically been trying to you know, she befriended me, and **attempted to use the blog to weaponize and attack Hadassah (the victim in the case) more**

and torment her more, behind the scenes that way she was not the one publicly doing it she was essentially, you know feeding me stories, feeding me information about Hadassah. Helping me run the turtle boy Facebook page, she was an administrator on it. **She worked for me.** I mean she was an active participant in this for the last two years in spite of the court order specifically telling her to have nothing to do with me.”

31. The judge asked “she used your business, or your day-to-day activity as an instrument against the alleged victim in the case, is that about the summary of it? Kearney responded, “that's correct.”

32. On November 7th, 2021, Kearney said, “People don't like victims, they like winners. They like people who punch the cancel mob in the face instead of playing defensive. What your fans want is for you to sink to your enemy’s level. That's the Turtleboy philosophy at least. Principles get you nowhere against these people they want to make you destitute and harm your families and for that they must be destroyed, nothing is off limits. Find out everything about them. Learn what their vulnerabilities are. Attack that. Don't even go after them go after their employers, friends, and people they love. Those unrelated parties won't want to deal with it and will begin to pressure them to stop ruin their lives as best as you can and make them regret the day, they ever thought it was a good idea to poke you.” <https://tbdailynews.com/dave->

[portnoy-finally-fires-back-atbusiness-insider-for-hit-piece-smearing-him-as-sex-predator-momfiles-police-report-after-daughter-coerces-sister-into-sleeping-withhim/](#)

V. CLAIMS

COUNT I : Cause injury/intimidate and harassed a person attending a motion hearing. GL CH 268 13B (i)(D)(1) or (iii)(D)(1)

33. On November 19th 2021, Kearney (i) attempted to, and caused an emotional injury and (iii) intimidated and harassed (D) me (person who was attending a motion hearing) by creating a fake Facebook account in my name, (Exhibit E pg1) and he threatened to rape and murder his children using the fake profile with my name. Exhibit E pg 2 (RA. 33-34)
34. Kearney conspired with Cristina Yakimowsky, Laura Hakes, and Cris Gagne in the Facebook group chat #Blogdat, to try and make it look like I sent the threats. (Exhibit A) RA. 5-8
35. Kearney was worried his plan failed after I reported the account and Facebook shut it down. (“Too late I got reported.”) But a member of Kearney’s inner circle, Cris Gagne, had already got screenshots of the threats, (Why too late I got them.” (Exhibit A 2) (RA 5)

36. At Kearney's direction, Cristina Yakimowsky, (admits that she) sent screenshots of the threats to Kearney from multiple Facebook profiles, so that Kearney could use them in court. (Exhibit A 07) (RA 8)
37. Kearney is the identified cause and stressor of my adjustment disorder, and these threats prevented me from reasonably eating or sleeping for several months. This crime has caused both emotional and physical injury. (RA 15)
38. I was a "person who is or was attending" "a motion hearing" or "other civil proceeding of any type," as we had a hearing to attach Kearney's bank account December 2nd, 2021 in Hampden County Superior Court 1879 CV 0344.
39. Aidan Kearney's actions were made with (1) intent or reckless disregard for the fact that they may impede, obstruct, delay, prevent or otherwise interfere with multiple court cases, including 1879CV0344.

COUNT II : Cause injury/intimidated and harassed, person attending a motion hearing. GL CH 268 13B (i)(D)(1) or (iii)(D)(1)

40. Kearney filed for a malicious harassment order in Leominster District Court. (2161RO358) Kearney and I had a hearing for the matter on December 1st, 2022. Exhibit K (RA. 51-52)
41. On December 1st 2021, Aidan Kearney willfully, and directly (i) attempted to, and caused an emotional injury and (iii) intimidated and harassed me, (D) a person who is or was attending a motion hearing, by telling a judge under

the pains and penalties of perjury, that he was certain that the threats that he sent on November 19th 2021 had come from me, because he alleged that when he clicked on the profile that had posted the threats, it linked to my profile with our past messages.

42. I was a “person who is or was attending” “a motion hearing” or “other civil proceeding of any type,” as we had a hearing to attach Kearney’s bank account December 2nd, 2021 in Hampden County Superior Court 1879CV0344.

43. Kearney implied to his co-conspirators that the hearing was somewhat of a success because the judge yelled at me.

44. Kearney's malicious harassment order hearing prevented me from fairly responding to the opposition to my motion and affidavit that Kearney (through his attorney) served on me December 2nd, 2021, a few hours before the motion hearing.

45. Aidan Kearney’s actions were made with (1) intent or reckless disregard for the fact that they may impede, obstruct, or otherwise interfere with 1879CV0344.

COUNT III : Misleading a judge GL CH 268 13B (iii)(C)(1)

46. I restate all allegations stated in Count II as if stated here within.

47. On December 1st 2021 Aidan Kearney directly (iii) misled a (C) judge, with the (1) intent to or with reckless disregard for the fact that it may obstruct the

due course of justice by presenting screenshots of threats to the court that he knew that I did not send, and falsely alleging that he clicked on the profile that sent the threats, and he falsely alleged it linked to my actual Facebook profile.

COUNT IV: Threatening and attempting to cause emotional or economic injury to a witness. GL CH 268 13B (i)(A)(1) or (iii)(A)(1)

48. On January 15th, 2022, Aidan Kearney willfully and directly (i) threatened and attempted to cause an emotional or economic injury and/or property damage (A) to witness/ potential witness Cristina Yakimowsky.
49. Alternatively, on January 15th, 2022, Aidan Kearney, (iii) intimidated and/or harassed (A) Cristina Yakimowsky.
50. Aidan Kearney's actions were made with (1) intent or reckless disregard for the fact that they may impede, obstruct, delay, prevent or otherwise interfere with multiple court cases, including 1879CV0344, and First Circuit 21-1582.
51. Cristina Yakimowsky provided evidence that Kearney conspired to frame me for the fake threats, (Exhibit A) and she told the police that she shared the evidence because she did not like Kearney hurting people. (Exhibit C pg. 3 at 2)
52. On January 15th, 2022, Kearney told his followers that he found out someone was leaking messages from his group chat, and he threatened and extorted

Cristina Yakimowsky on Facebook. The video has been deleted, but I have it recorded. In the video Kearney stated;

- a. “I hope she is scared because she should be, cause did you forget who the f*** I am, and what the f*** I could do? Did you Hun? Did you? Are you s***** your pants yet? Because you should be. What on earth would make you think, because you knew I was going to find out, when the screenshots came out and they’re from your perspective...”
Kearney said the blog with the screenshots was published on January 9th, he was talking about Katherine Peter’s blog that has screenshots from the same conversation as Exhibit A but redacted. [_https://www.massholereport.com/2022/01/09/turtleboy-lies-about-hacking-to-cover-up-his-own-misdeeds/](https://www.massholereport.com/2022/01/09/turtleboy-lies-about-hacking-to-cover-up-his-own-misdeeds/)
- b. “The other people I that I have gone to war with they have nothing to lose, you have a lot to lose, you own a business... you live in a \$600,000 house in Oxbridge, you have a fiancé who does not know that we talk. He is not going to like to see the messages...”
- c. “I am going to still give you a chance to get out of this, you can call me whenever you want, if you don’t, February 17th I will be there at your court date.”

53. Cristina Yakimowsky told the Holden police she is scared of Aidan Kearney because she shared messages from the #BlogDat group. (Exhibit C pg. 3 at 2)

COUNT V: Intimidating a witness. GL CH 268 13B (i)(A)(1) or (iii)(A)(1)

54. On February 17th 2022 Aidan Kearney willfully and directly (i) threatened and attempted to cause an emotional or economic injury and/or property damage (A) to witness/ potential witness Cristina Yakimowsky with the intent to or with reckless disregard for the fact that it may; (1) impede, obstruct, delay, prevent or otherwise interfere with (1879CV0344)

55. On February 17th, 2022, Kearney aggressively confronted Christina Yakimowsky as she walked out of court, and then shortly after he had a live show on YouTube and he said, “if you're listening Chrissy right now, and I'm sure you are, I'm sure you got your puppies in here and they're listening. What were you thinking? Why didn't you just wait? If you wanted to burn me like this, why didn't you just wait like three months two months? You couldn't wait until after the God damn trial? I mean, and then whatever then I wouldn't be able to turn you in and rat on you and stuff like that. You did it right before the court. **Is this the stupidest ***** decision a human being has ever made in their life?** What were you thinking? Like I'm a, I've told, **everybody knows that I am a vindictive c*nt**, everybody knows that.”

56. In the same video, Kearney discussed putting Cristina Yakimowsky's boyfriend's phone number on his public shaming blog, after several followers talked Kearney out of it, Kearney said "I wasn't really going to put his number up there, I just wanted her to think I would."

57. The video is titled on YouTube, "Ep #457 - Interview with a National Socialist, What Happened in Court" and it can be found here https://www.youtube.com/watch?v=eTJzfh_2-7U&t=4153s

COUNT VI: Threatening and intimidating a witness. GL CH 268 13B

(i)(A)(1) or (iii)(A)(1)

58. On June 18th, 2022, Aidan Kearney willfully and directly (i) threatened and attempted to cause an emotional or economic injury and/or property damage (A) to witness/ potential witness Cristina Yakimowsky with the intent to or with reckless disregard for the fact that it may; (1) impede, obstruct, delay, prevent or otherwise interfere with (1879CV0344)

59. On June 17th 2022, Kearney was served with a witness subpoena to appear on June 28th 2022 for a hearing on a motion for sanctions and or default (1879CV0344). Exhibit J (RA 48-49)

60. Cristina Yakimowsky was a potential witness for this case, and she was listed as a primary/potential witness for my motion for sanctions and or default. Exhibit H (RA. 42)

61. On June 18th 2022 Aidan Kearney hosted a video on YouTube titled “Ep #493 - Worcester Softball Mom | Easton Trump Store Attack | Drag Queen | Is Chrissy Going to Jail?” which can be found here https://www.youtube.com/watch?v=85Ch9_jAGG8&t=7559s In the video Kearney said

- a. “I don't know why you thought this was a smart idea, Chrissy, because you know me, and you know what I do, and you know I'm not gonna rest, you know that right, like you own a business, I am speaking to Chrissy right now cause I know she's listening. So, you a business, you have couple kids or whatever, and a family and it's called Royal Thermal View, did you think I wasn't gonna make it like my mission to take all that away from you? Did you think that?”
- b. “Yeah Chrissy, you are going to - - **I am never going to stop until you are destitute, until you are in jail.** I'm not going to break any laws to do it. I'm not going to threaten you, I'm just going to do what I always do, I am going to remind you every ***** day, when you're alone, and sad, and crying, that you were the dumbest ***** person, who made the biggest mistake of your life when you decided to f*** with me, me of all people, me the most vindictive ***** on the planet, and

you're like I'm gonna go f*** with that guy. That's a mistake girl, cause where is crusty panties? She's not protecting you anymore...

- c. **Your business is going to severely suffer from this**, when I contact every single one of your customers and let them know that -- any conversation that they have with you on the phone was likely recorded. Because that's what you are, you're a convicted wiretapper and your lawyer has, you're gonna lose your lawyer now too, **you are losing everyone, cause that's what I do to people**, Chrissy, who **** with me, and maliciously, I don't take it on the chin, I'm not one of those people that just moves on, I'm a vindictive ****. **And I'm not gonna stop, we're just beginning here. I'm not gonna stop destroying your life**, just destroying it, like I am gonna take everything away from you that you love, I want you to feel as low as I did in early January when I found out that you betrayed me. I want you to feel that pain, and you're gonna feel it.”
- d. **“I will not stop until you beg for mercy, and then I'm going to do it twice as much**, you're gonna feel the way I felt when I was in my garage when I wanted to kill myself.”
- e. “I just wanna ask Crissy how's life going? how's life? Do you regret, do you think, I just wanna remind her that six months ago, you were friends

with me, you had a business, and you had kids, life was going OK for you, you had a nice house in Oxbridge. You owned a business, life was going pretty well for you. Then you decided I'm going to throw this all away and I'm going to burn this bridge and I am going to go to crusty panties, and Leah, like they're going to protect me when Aidan retaliates against me, and exposes me, they will protect me, right? Nope. On your court date on February 17th when I confronted you, where were they? Nowhere, but I was there. And I'm going to be at every court date...

COUNT VII: Mislead a Clerk GL CH 268 13B (iii)(C)(1)

62. On April 7th 2022 Aidan Kearney directly and indirectly (iii) mislead (C) a clerk, or court officer, by making false statements, and intentionally omitted information from a statement and thereby caused a portion of such statement to mislead the clerk or court officer of this court with intent to (1) delay his criminal show cause hearing 2223AC803.
63. Aidan Kearney filed an ex parte motion in the District Court by e-mail, and in it he stated, "I have not received the affidavit for the Rian waters complaint so I have no idea what the allegations are." RA 3

64. Aidan Kearney was well aware of what the criminal allegations were, as he was served with these exact same allegations, with the exact same exhibits, in the US. Supreme Court 21A626, Hampden County Superior Court 1879CV0344, First Circuit 21-1582, and Fed. Mass. District Court 3:20-cv-30168. Aidan Kearney has never denied the November 19th allegations in any court.
65. Kearney's April 7th motion further stated "I am requesting that the Rian waters hearing be delayed to another date..." showing intent to delay.
66. Kearney's April 7th ex parte motion further stated, this particular plaintiff has filed multiple **frivolous** lawsuits, criminal complaints, and protective orders against me in this court all of which have failed..."
67. I have never filed a lawsuit that has been labeled frivolous, and the first lawsuit I filed 1879CV344, was dismissed because Aidan Kearney used death threats to suppress my evidence, but it was **reversed on appeal**. The second lawsuit, is active in the Supreme Court, 22-5133 Rian G. Waters, Petitioner v. Facebook, Inc., et al.
68. Kearney's lie that he had no idea of what the allegations were, and lie that my past cases were dismissed as frivolous, not only misled the court into granting the continuance without telling me, (RA. 03) it also misled (or could have misled,) the court into thinking that Kearney was denying the allegations.

COUNT VIII: Threatening and intimidating a witness. GL CH 268 13B

(i)(A)(1) or (iii)(A)(1)

69. On May 3rd, 2022, Aidan Kearney willfully and directly (i) threatened and attempted to cause an emotional or economic injury, (iii) intimidated and/or harassed (A) witness/ potential witness Shannon O’Loughlin Labarre with the intent to or with reckless disregard for the fact that it may; (1) impede, obstruct, delay or otherwise interfere with 1879CV0344
70. Shannon is a witness because Kearney admitted to her that he had a role in the November 19th conspiracy (Exhibit D04-07) (RA. 25-27) on Facebook Messenger and sent her a screenshot of the #BlogDat group chat during the conspiracy from his perspective. (Exhibit D 2) see also A07 R08
71. On February 24th 2022 Aidan Kearney had a conversation with Shannon Labarre on Facebook Messenger, and he acknowledged that all of the group chat screenshots were real. Kearny initially alleged to Shannon Labarre that the November 19th fake account and pedophile threats was Chrissy’s idea, and that he was just a Coconspirator because he presented the threats knowing I did not send them. (RA 24-26)
- a. “Does it matter though? Rian waters beats women and kills dogs.”
 - b. “Chrissy made the account. I knew it wasn't him.”

72. Further in the February 24th 2022 conversation, Shannon pointed out that Kearney admitted to the crime in the group chat messages that were shared when he said “I'm the one who did it”, Kearney said “I'm the one that submitted them in court. Does it matter? that was never for the public to see anyways”

73. Further in the conversation Aidan Kearney said, “I'm sorry. I shouldn't have. you have no idea what this ***hole and all the pressure has done to me. I f***** up.” Exhibit D07 (RA. 27)

74. On February 25th 2022 Aidan Kearney apologized to Shannon for lying about the fake account in my name that had sent the threats on November 19th. Kearney tried to be nice to try and convince her to stay on his team. D09

75. On May 3rd 2022, Kearney told Shannon on Facebook Messenger “I know everything. I've known for a bit. I know you don't want your father and brother dragged into this...”

a. Shannon responded, what the f*** are you talking about, and she sent Kearney screenshots of their earlier conversation with him admitting to sending the fake threats. D10 RA 28

b. Kearney responded “all right we'll do it your way Shannon. You don't think I know your last name?”

c. Shannon responded “Don't care.”

- d. Kearney responded **“you want your father and brother dragged into this?”**
- e. Shannon asked, “why would you attack my family after you admitted your crimes to me?”
- f. Kearney responded, “I'm giving you an out right now. take it or leave it. But I will drag your family into this like you did to my 3-year-old son.”
- g. After some immaterial conversation, Kearney said, **“I'm giving you an out here to spare your family the shame and humiliation. If you're interested in hearing my proposal let me know if not, we'll do it the fun way. We can talk about your fake dead kid. Just know what you're getting yourself into if you don't stop.”**
- h. Shannon responded “my fake dead son that all my friends and family were at the birth and funeral of. Nice Aidan.” Exhibit D 12 RA 29
- i. Kearney responded “Try me.”
- j. Further in the conversation Kearney said “easy way and a hard way”, Kearney sent Shannon a picture of her mom, and said **“there's your mom too. I'm sure she'll appreciate you dragging her into this. Do you want to avoid all this Shannon?”**

- k. Further in the conversation Kearney said, “you helped Rian waters and big black Jeffrey...”
 - l. Further in the conversation Kearney wrote, “a cops daughter helped a domestic abuser. who beat a woman and killed a dog.”
 - m. Shannon responded, “a cops daughter submitted evidence of broken laws? Oh no!”
 - n. Kearney responded, “Shannon no one cares what you have to say you're relevant you have no platform. I thought you were smarter than this. I do. And you know that.” Exhibit D 16 (RA 31)
76. Aidan Kearney published a blog on May 8th 2022, titled, “Exposing Shannon O’Loughlin Labarre Part 1: Boston Cop’s Daughter Uses Social Media To Help Monica Cannon-Grant, Domestic Abusers, Child Rapists, Dog Killers” which can be found <https://tbdailynews.com/exposing-shannon-oloughlin-labarre-part-1-boston-cops-daughter-uses-social-media-to-help-monica-cannon-grant-domestic-abusers-child-rapists-dog-killers/>
77. In the May 8th blog Kearney showed his intent to intimidate/punish and or knowledge of Shannon as a potential witness by stating, “Shannon used the account to assist a man named Rian Waters, who has been trying and failing to sue me, and file criminal complaints against me for the last 4-5 years. Rian horrifically beat up the mother of his disabled child in late 2016, killed her

dog in front of the daughter he abandoned, intimidated her from testifying against him in court, and then sued her for defamation when she was too scared testify. **Shannon sent him private messages between me and a woman named Crissy Yakimowsky** (who is currently facing 2 felony charges in Milford) **that she believes will help Rian ‘end Turtleboy,’ and justified helping this domestic abuser out by claiming that he was a ‘victim’ of wiretapping.”**

COUNT IX: Harassing a witness. GL CH 268 13B (iii)(A)(1)

78. On June 28th, 2022, Aidan Kearney willfully and directly (iii) intimidated and/or harassed (A) witness/ potential witness Shannon O’Loughlin Labarre with the intent to or with reckless disregard for the fact that it may; (1) impede, obstruct, delay, prevent or otherwise interfere with 1879CV0344
79. Kearney put Shannon Labarre’s phone number on his YouTube video and encouraged his followers to call and harass her.
80. Kearney is proud that he weaponized social media, and he is aware that his followers routinely threaten people mentioned on his platform.
81. Kearney shared messages from Shannon's brother and admitted that he was trying to embarrass her.
82. I believe and allege Kearney’s conduct annoyed or alarmed Shannon, and would cause a reasonable person to suffer emotional distress.

Respectfully submitted under the pains and penalties of perjury

/S/ Rian Waters
(530)739-8951 Watersrian@gmail.com Dated: 8/25/2022

Certificate of Service

Kearney will be served with the proposed criminal complaint and Motion to redetermine today by email at Turtleboysports@gmail.com, and tomorrow by mail at 111 mason rd Jefferson MA 01522 (if he doesn't accept email service or tell me another address)

Rian Waters

/s/ Rian Waters dated 8/25/2022

(530) 739-8951 Watersrian@gmail.com