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APR 27 2005

LUTHER D. THOMAS, Clerk  
By:   
Deputy Clerk

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
NEWNAN DIVISION

STEPHEN LEE JOHNSON,

Plaintiff,

vs.

SUSAN BOGGS,  
TAMMY GRIENER,  
PRISCILLA KILLINGSWORTH,  
CHARLES O'NEILL, and  
TAREY B. SCHELL,  
in their individual and official  
capacities, and  
TERRELL MOODY, and  
JAMES THOMAS,  
in their official capacities,

Defendants.

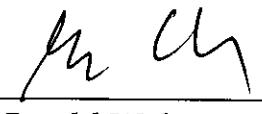
CIVIL ACTION  
FILE NO. \_\_\_\_\_

**3:05-CV-036-JTC**

PLAINTIFFS' EXHIBITS IN SUPPORT OF PRELIMINARY INJUNCTION

The attached Exhibits A-D are incorporated into the Verified Complaint and filed in support of Plaintiff's Motion for Preliminary Injunction.

DATED: This the <sup>27<sup>th</sup></sup> day of April, 2005.

  
Gerald Weber, Legal Director  
Georgia Bar No. 744878

ACLU of Georgia Foundation

70 Fairlie Street, S.W., Suite 340  
Atlanta, Georgia 30303  
(404) 523-6201

**IN THE MAGISTRATE COURT OF PIKE COUNTY  
STATE OF GEORGIA**

STATE OF GEORGIA,

VS

Johnson, Stephen Lee  
325 Concord St.  
Zebulon, GA 30295

Defendant.

) CASE # : 04-37GB  
)  
)  
)

) Good Behavior  
)  
)

**PLAINTIFF'S  
EXHIBIT**

A

**AFFIDAVIT**

Personally came the undersigned affiant, who on oath says that the conduct of Johnson, Stephen Lee is such as to justify the belief that the safety of one or more persons in the county or peace or property of the same is in danger of being injured or disturbed thereby, as shown by the following facts:

**Johnson, Stephen Lee did posted on a web site made false and malicious statements against my family**

Sworn to and subscribed before me this  
21st day of September, 2004.

  
Magistrate

**ORDER OF ARREST**

To any Sheriff, Deputy Sheriff, Coroner, Constable or Marshall of said County:

For sufficient cause made known to me in the above affidavit you are hereby **COMMANDED** to arrest the body of Johnson, Stephen Lee whose conduct is alleged to be such as to justify the belief that the safety of one or more persons in this county or the peace or property of the same is in danger of being injured or disturbed thereby, and bring said accused before a **JUDGE OF THIS COURT** to be dealt with as the law directs. Herein fail not.

So ordered this 21st day of September, 2004.

  
Magistrate

**JACK L. PARK, JR.**  
ATTORNEY AT LAW

P. O. Box 909  
9840 U. S. HIGHWAY 19  
ZEBULON, GEORGIA 30295

PHONE: (770) 567-5225  
FAX: (770) 567-1850

September 14, 2004

**VISA FIRST CLASS MAIL & CERTIFIED MAIL NO. 7003 3110 0005 0577 4867**

Mr. Stephen L. Johnson  
P.O. Box 592  
Zebulon, Georgia 30295-0592



**RE: <http://www.angelfire.com>**

Dear Mr. Johnson:

This letter will serve to put you on notice that my office represents the legal rights and interests of Mr. Charles B. O'Neill, Jr. My office is investigating the dissemination of false and malicious information to third party(s) visa via the above-named web site, regarding Mr. O'Neill's family and his professional status as an attorney.

Be advised that slander is the "uttering of a misleading or untruthful statement about a third person with the intention of damaging that person or their reputation". Please be further advised that libel is "a false and malicious defamation of another, expressed in print, writing, pictures, or signs, ending to injure the reputation of the person and exposing him to public hatred, contempt or ridicule".

If you do not cease and desist posting false and malicious information at the above-named website regarding Mr. O'Neill's family and his professional integrity as an attorney I will initiate proceedings and seek actual as well as punitive damages including attorney's fees in an amount to punish you, and to deter you, from like conduct in the future.

Govern yourself accordingly.

Sincerely,

Jack L. Park, Jr.

JLP/tat

cc: Mr. & Mrs. Charles B. O'Neill, Jr.

October 4, 2004

Visa First Class Mail & Certified Mail No. 7000 0600 0021 6942 1132

Mr. Stephen L. Johnson  
P.O. Box 592  
Zebulon, Georgia 30295-0592



RE: <http://www.anglefire.com>

Dear Mr. Johnson:

This letter will serve to put you on notice that I will seek legal action against you for the dissemination of false and malicious information to third party(s) visa via the above-named web site, regard Susan Boggs and my professional status with the Department of Family and Children Services.

Be advised that slander is the "uttering of a misleading or untruthful statement about a third person with the intention of damaging that person or their reputation". Please be further advised that libel is "a false and malicious defamation of another, expressed in print, writing, pictures, or signs, ending to injure the reputation of the person and exposing her to public hatred, contempt or ridicule".

If you do not cease and desist posting false and malicious information at the above-named website regarding Susan Boggs and my professional integrity as a Supervisor with the Department of Family and Children Services I will initiate proceedings through my attorney and seek actual as well as punitive damages including attorney's fees in an amount to punish you, and to deter you, from like conduct in the future.

Sincerely,

  
Susan R. Boggs

Cc: Mr. Tim Shepherd, Attorney  
Department of Family and Children Services ✓

**JACK L. PARK, JR.**  
ATTORNEY AT LAW

P. O. Box 909  
9840 U. S. HIGHWAY 19  
ZEBULON, GEORGIA 30295

PHONE: (770) 567-5225  
FAX: (770) 567-1850

December 2, 2004

**VISA FIRST CLASS MAIL & CERTIFIED MAIL NO. 7003 3110 0005 0577 4898**

Mr. Stephen L. Johnson  
P.O. Box 592  
Zebulon, Georgia 30295-0592



**RE: <http://www.angelfire.com/ga4/justice>**

Dear Mr. Johnson:

Despite my letter to you dated September 14, 2004, as received by you on September 15, 2004, insisting that you cease and desist in the continuing dissemination of false and malicious information to third party(s) visa via the above-named web site, regarding Mr. O'Neill's family and his professional status, you have willfully refused to comply with my request.

If you do not cease and desist immediately posting false and malicious information at the above-named website or any other website, or publication and/or communicating that information to third parties, regarding Mr. O'Neill's family and his professional integrity as an attorney, I will immediately initiate proceedings and seek actual as well as punitive damages including attorney's fees in an amount to punish you, and to deter you, from like conduct in the future.

Govern yourself accordingly.

Sincerely,

Jack L. Park, Jr.

JLP/tat

cc: Mr. & Mrs. Charles B. O'Neill, Jr.