

**STATE OF MICHIGAN
IN THE CIRCUIT COURT FOR THE COUNTY OF OAKLAND**

G. MICHAEL VORIS; CHRISTINE NILES, and
ST. MICHAEL'S MEDIA, INC., a Michigan
nonprofit corporation,

Plaintiffs,

v.

Case No. 2021-191205-NO
Honorable Jeffery S. Matis

MICHAEL PARROTT and RESTORING THE
FAITH MEDIA, LLC, a Delaware limited liability
company,

Defendants.

MICHAEL PARROTT and RESTORING THE
FAITH MEDIA, LLC,

Counter-plaintiffs,

v.

G. MICHAEL VORIS; CHRISTINE NILES, and
ST. MICHAEL'S MEDIA, INC., a Michigan
nonprofit corporation,

Counter-defendants.

Kathleen H. Klaus (P67207)
MADDIN HAUSER ROTH & HELLER, P.C.
Attorneys for Plaintiffs/Counter-defendants
28400 Northwestern Highway
Second Floor
Southfield, MI 48034
(248) 239-7520
kklaus@maddinhauser.com

Thomas J. Rheume (P74422)
BODMAN, PLC
Attorneys for Defendants/Counter-plaintiffs
6th Floor at Ford Field
1901 St. Antoine Street
Detroit, MI 48226
(313) 259-7777
trheume@bodmanlaw.com

FIRST AMENDED COMPLAINT

G. Michael Voris, Christine Niles and St. Michael's Media, Inc. ("Church Militant") state as follows for their First Amended Complaint against Michael Parrott and Restoring the Faith Media, LLC ("RTFM"):

1. As part of his demonstrated practice of fraudulent fund raising in the traditional Catholic community, Parrott and his media company RTFM used their on-line presence to purport to raise funds from the public to discover the "truth" behind the criminal charges brought against Fr. James Jackson, a Catholic priest arrested for possessing and distributing child pornography. Specifically, the Rhode Island State Police and Department of Homeland Security investigated Fr. Jackson and found files on his computer that "depicted prepubescent females, including infants and toddlers, engaged in sexual acts." Parrott reported on RTFM's social media that he did not believe that Fr. Jackson was guilty, that the evidence against Fr. Jackson was planted and that the "truth" of the allegations needed to be investigated by him, including performing an "independent" analysis of the computer and hard drive from which Fr. Jackson was accused of downloading and distributing the horrific images.

2. Parrott raised significant sums for the "investigation" of the charges against Fr. Jackson in an amount exceeding \$150,000.

3. Mrs. Niles, Mr. Voris and Church Militant are renowned investigative reporters of sex abuse and other abuses in the Roman Catholic Church. Given the strength of the reported evidence incriminating Fr. Jackson and the nonsensical assumptions inherent in Parrott's fundraising efforts, Mrs. Niles contacted Parrott and asked for information on how he intended to spend the money he was raising under the guise of discovering "the truth" about Fr. Jackson. These simple questions unleashed a tirade of false, vulgar and harassing public statements targeting Mrs. Niles, Mr. Voris and Church Militant. Parrott used RTFM to lie about Plaintiffs in order to

continue his fraudulent “fund raising” and to enhance his public profile. His actions violated Michigan law and caused the Plaintiffs significant harm. More importantly, Parrott continues to defraud the public under the guise of representing “traditional” Catholics.

4. Under MCL 600. 2911(2)(b), Plaintiffs demanded a retraction of the defamatory statements Parrott made against them. As of the filing of this First Amended Complaint he refused, choosing instead to accelerate his vicious campaign to discredit those who have shed light on his corruption.

PARTIES, JURISDICTION AND VENUE

5. This court has jurisdiction over this action under MCL 600.605, *et. seq.* Plaintiffs seek damages in excess of \$25,000 and equitable relief.

6. Venue is appropriate in this Court because the original injury for some or all of the claims occurred in Oakland County. Mrs. Niles lives in Oakland County and Church Militant has its principal place of business in Oakland County.

7. Parrott is the owner and operator of RTFM. Through RTFM, he operates a public website, public Twitter and Facebook accounts and a YouTube channel targeted at “traditionalist” Catholics. He sells “swag” on RTFM’s website by, *inter alia*, promoting his and RTFM’s association with Church Militant. Parrott records his podcast from the basement of his \$650,000, three dwelling compound in rural Missouri.

8. Church Militant operates a website dedicated to exposing clergy sex abuse and other corruption in the Catholic Church. It is known as “a vocal critic of the mainstream Catholic Church, including the United States Conference of Catholic Bishops (‘USCCB’).” *St Michael’s Media, Inc. v. The Mayor and City Council of Baltimore*, Case No. ELH-21-2337, 2021 WL 4772927 at * 1 (D. Md. October 14, 2021). Its articles “often criticize[] the current leadership” of

the Catholic Church for ‘corruption in the Church,’ including the Church's protection of priests and others implicated in the sexual abuse of minors.” *Id* at * 3. As part of this mission, Church Militant also reports on fraud and other forms of abuse practiced by those claiming to be “traditionalist” Catholics but who, like Parrott and RTFM, use that label for their own pecuniary gain and to the detriment of the faithful.

9. Mr. Voris operates Church Militant and is its Chief Executive Officer. He has a degree in Communications from The University of Notre Dame a Bachelors of Sacred Theology from the Angelicum in Rome. He worked as an anchor, producer and reporter for various CBS affiliates before starting a Catholic media company in 2006.

10. Mrs. Niles is a senior producer at Church Militant and an on-line reporter. She has a Master’s Degree from Oxford University and a law degree from The University of Notre Dame Law School.

BACKGROUND

11. On October 30, 2021, Fr. Jackson was charged by Rhode Island State authorities with possession or child pornography, transfer of child pornography and “child erotica prohibited”, a crime defined as “the production, possession, display, or distribution of “any visual portrayals of minors who are partially clothed, where the visual portrayals are used for the specific purpose of sexual gratification or sexual arousal from viewing the visual portrayals.”

12. Prior to his arrest, Fr. Jackson portrayed himself as a “traditionalist” Catholic priest. He had been transferred to St. Mary’s Parish in Providence, Rhode Island on August 1, 2021, after spending 15 years at a parish in Littleton, Colorado.

13. The Rhode Island task force charged with investigating crimes involving the sexual exploitation of children was comprised of state a local law enforcement, with participation from

the Department of Homeland Security and the United States Post Office. The task force's investigation revealed that an internet subscriber geolocated to St. Mary's rectory shared child pornography via a peer-to-peer network on four occasions between Sept. 4 and Oct. 17, 2021.

14. Fr. Jackson was present at the rectory when investigators arrived to execute a search warrant. The investigators found "hundreds of image and video files depicting [child sexual abuse material]" during an on-scene forensic preview of a two-terabyte external hard drive located in an office area adjacent to Fr. Jackson's bedroom. The image and video files depicted prepubescent females, including infants and toddlers, engaged in sexual acts.

15. Fr. Jackson has yet to publicly deny the charges, although he entered a "no plea" in the state court criminal case and a "not guilty" plea was entered for him in federal case.

16. On November 4, 2021 Mrs. Niles published an article on Church Militant's website about the charges against Fr. Jackson. Plaintiffs published the article because it was important to them that sexual predators not be allowed to hide behind a veneer of religious orthodoxy and thereby cause further harm to the faithful.

17. In response to concerns that Fr. Jackson could be subject to a frame-up by those hostile to traditionalist Catholics, Mrs. Niles spoke with technology experts who reviewed the public materials related to the arrest, including an affidavit submitted in connection with the search warrant, to determine whether it would be possible to "hack" Fr. Jackson's computer, a rumor that was making the rounds in the traditionalist community.

18. Mrs. Niles relayed what she had learned from experts:

While various online commentators have offered the possibility that Jackson was 'set up' by a hacker who remotely uploaded pornographic material onto his computer, that theory becomes less likely in light of the fact that the content was found on an external hard drive. It also becomes more remote in light of the fact the porn was not simply downloaded but also sent from his computer.

An external hard drive is a storage device separate from the computer that stores data. The material would normally be downloaded from the internet onto the computer first, and then transferred to the external hard drive, although downloading directly to the external hard drive is possible.

Additionally, external hard drives disconnected from the computer cannot be hacked.

Some have even claimed the incident is payback from local satanists, after Jackson held a protest of a black mass. That argument is weakened in light of the fact that the porn downloads took place multiple times in the weeks before the protest took place.

19. Parrott was one of the commentators asserting the bogus “set-up” theory. He created a “GoFundMe” page to raise money to discover “the truth” behind the allegations. Parrott did not know Fr. Jackson and had no relationship with him. He saw the controversy as an opportunity to make money. He intended for the funds he raised to go to the Defendants, not Fr. Jackson or his defense attorneys.

20. Parrott had previously participated in and, on information and belief, benefited from fraudulent fundraising efforts by a grifter posing as an Augustinian Monk. Parrott and the fake-monk raised money to build a monastery and used the money to buy a three-home compound in rural Missouri for Parrott and his family.

21. Concerned about Parrott’s efforts under the circumstances, Church Militant asked Fr. Jackson’s representatives why Fr. Jackson has not denied the charges in light of the fact that Parrott was using Fr. Jackson’s arrest to collect money:

Most of the Catholics donating are convinced of Fr. Jackson's innocence. Is it not incumbent upon Fr. Jackson to say something one way or another, especially to these Catholics?

If Fr. Jackson is indeed guilty and that is proven down the road, his refusal to clarify matters now while accepting thousands of dollars in donations from Catholics convinced of his innocence could very

likely be seen as taking advantage of their naïveté and goodwill for monetary gain.

22. GoFundMe took down Parrott's page after \$50,000 was raised, because the purpose of the campaign violated the website's standards. Parrott then set up a fundraising page on GiveSendGo, shutting it down after his efforts exceeded the stated \$90,000 goal. The fund raising site said:

Big Tech doesn't want the truth, but we do. This fundraiser is to help discover what actually happened with Fr. James Jackson, FSSP. At least 50% of the proceeds will go towards forensic computing and private investigation -- the rest to his legal defense. **WE ONLY CARE ABOUT THE TRUTH. EVEN IF THE TRUTH IS DIFFICULT TO PROCESS.** In an age of political policing, the faithful deserve a 2nd pair of eyes on the evidence.

23. When Mrs. Niles asked Parrott what he intended to do with the vast sums he was raising, Parrott responded that he intended to hire an independent private investigator to examine the computer evidence to determine whether the pornography was planted or the computer hacked.

24. Parrott was not able to explain how or why the state or federal prosecutors would hand this evidence over to him or his private investigators for inspection. The suggestion that Parrott would be able to conduct this examination through his "independent" investigator was ludicrous and any credible investigator would have told him that.

25. Parrott also said his investigators would stake out the home where Fr. Jackson was staying to determine whether any of the activity around the house supported the charges. Again, the charges were based on Fr. Jackson's use of a computer in his private bedroom at a rectory. His crimes are not alleged to have occurred in public, where Parrott's "investigator" could view them.

26. In other words, Parrott's stated plans for the money he was raising, were a sham. He was taking advantage of those hurt and angered that one of "their own" may have engaged in such horrific crimes.

27. Church Militant published accurate information about Parrott's actions on its website, including Parrott's refusal to commit publicly to refunding the money to his donors if Fr. Jackson is convicted or if he cannot use the money to conduct a forensic analysis of the computer evidence, as promised.

28. In response to Plaintiffs putting his fraud in a spotlight, Parrott launched a campaign to discredit Mrs. Niles, Mr. Voris and Church Militant by painting himself – the person committing fraud – as the victim.

29. Parrott's actions including publishing a podcast on RTFM's YouTube channel on November 14, 2021 where he misidentified Church Militant as a wealthy organization and him as a "poor" father who earns less than \$100,000 in a year. This is unlikely, given the value of the compound Parrott owns.

30. Parrott and RTFM also used convicted felon and fellow conman—"traditionalist" Jeff Cassman to solicit funds for his defense of this case:

From: Jeff Cassman <jeff.cassman@catholicmenofamerica.biz>
Date: 01/14/2022 1:03 AM
Subject: help Mike

David and Goliath

I'm writing to ask you to consider helping Mike Parrott. He is a devout Catholic family man who runs a small apostolate ([Restore the Faith](#)), defending the Church and priests who have been falsely accused. He has been blackmailed and now sued for his efforts.

He's already spent \$25k to hire an attorney and expects legal expenses to rise dramatically. Would you consider making a small donation for his defense? You can learn more about the situation here:

<https://link.edgepilot.com/s/f38175c3/uIy3B5JewkmL4xPaG4Bfbg?u=https://www.givesendgo.com/DefeatCMTV>

Finally, if you would consider a prayer for Mike and his family, I would appreciate it.

Have a blessed day,

Jeff Cassman
Co-Founder
CatholicMenOfAmerica.com

Mr. Cassman pled guilty to mail and securities fraud arising from a Ponzi scheme he worked on his friends, family and members of his church. He was captured in Guatemala in 2010, after spending two years on the Tennessee Bureau of Investigation's "Most Wanted" list. He is barred from working in the financial investment industries, but remains one of the people to whom Parrott turns when he needs to raise money quickly from the traditionalist community.

31. The specific defamatory statements made by Parrott through RTFM's November 14, 2021 podcast include:

- a. Mrs. Niles and Mr. Voris threatened Parrott and his family.
- b. Church Militant engaged in potentially criminal activity.
- c. Church Militant is engaged in blackmail and is threatening Parrott's family.
- d. Church Militant is engaged in the crimes of extortion and wire fraud.
- e. Christine Niles sent emails "full of lies" to Parrott's "business associates."
- f. Christine Niles had a "dust up" with Fr. Jackson.

32. None of these statements is true and Parrott and RTFM knew they were not true when they made them.

33. Nonetheless, some people who viewed the podcast believed Parrott and RTFM's lies and cancelled their subscription to Church Militant. Parrott knows this because he tweeted about it on November 16, 2021 through RTFM's twitter account.

34. Parrott then took his campaign of defamatory harassment to Twitter, sending tweets through RTFM's Twitter account on November 15 and 16, 2021, including tweets that made the following defamatory statements:

- a. Identifying to Mrs. Niles as "wine box".
- b. Identifying Church Militant, Mrs. Niles and Mr. Voris as "serial liars."

- c. Identifying Plaintiffs as “funded criminals.”
- d. Referring to Ms. Niles as a “public liar.”

35. “Wine box” is a term imputing a lack of chastity on a woman and is defamatory *per se* under Michigan law. <https://www.urbandictionary.com/define.php?term=wine%20box>.

36. Parrott and RTFM attributed several criminal offenses of all three Plaintiffs, statements that are also defamatory *per se* under Michigan law.

37. Parrott and RTFM also published a tweet in November 2021 stating that Fr. James Altman was funneling money he raised to Church Militant, “via an AZ, LLC, especially from a Canton, OH donor.” This is false and falsely implies Church Militant was doing what Parrott does, *i.e.* personally profiting off of fund raising efforts for traditionalist causes.

38. Parrott and RTFM’s statements were not privileged, because they made the statements knowing they were false and did so for their own personal pecuniary gain.

39. The statements were particularly damaging to Plaintiffs given their roles as reporters of clergy abuse and fraud. Defendants’ efforts to discredit Plaintiffs gives cover to sexual predators and conmen.

40. On November 15 and November 16, 2021 and pursuant to MCL 600.2911, Plaintiffs wrote to Defendants, demanding that they retract their defamatory statements.

41. In response, Parrott offered to stop his campaign of defaming and harassing Plaintiffs, if Plaintiffs would agree to stop asking questions about his fundraising efforts for Fr. Jackson and other “causes.”

42. Plaintiffs would not agree to be silenced. They continued to investigate Parrott’s other fund raising efforts, including the assistance he offered to Martin Navarro – a lay person masquerading as a religious “brother” – to purchase land for a monastery. Church Militant’s

reporting suggested that Mr. Navarro used the funds he raised to assist Mr. Parrott in purchasing a three-home compound in rural Missouri where Mr. Parrott lives with his family.

43. In response to the December 3, 2021 article outlining Parrott’s participation in the fraudulent fund raising scheme, Defendants increased their campaign of harassment, defamation and bullying, including the following:

- a. December 21, 2021 tweet referring to Mrs. Niles as “Nazi Niles” who is a “serial liar.”
- b. December 23, 2021 tweet referring to Church Militant as a “dishonest, discredited organization” and “LIARS.”
- c. December 23, 2021 tweet accusing Mrs. Niles of “slandering priests” and of “operating in bad faith” and “lies daily.”
- d. December 23, 2021 message to Church Militant supporter David Grey accusing Mrs. Miles of attacking Mr. Parrott’s “job, business, home, and family” and calling Mrs. Niles a “vicious, nasty woman.”
- e. December 23, 2021 public tweet comparing Mrs. Niles to a “Marxist goon” and a “vindictive feminist liar.”
- f. December 23, 2021 tweet referring to Mrs. Niles as “Nazi Niles.”
- g. December 23, 2021 public tweet referring to Mrs. Niles (whose immigrated from Viet Nam) as “Saigon Karen” and Church Militant as engaged in “assault” on Catholics.

44. On December 24, 2021, Plaintiffs sent counsel for Defendants an email pursuant to MCL 600.2911, asking that Defendants retract these statements. Defendants did not. Instead, they continued to defame Plaintiffs, including falsely accusing Plaintiffs of “doxxing” [sic] Mr. Parrott in a January 5, 2022 tweet.

45. Parrott also used the RTF platform to induce the public not to donate to Church Militant, including a tweet on December 31, 2021 that stated: “Reminder, [sic] today is the last day of the year NOT to donate to Church Militant.”

46. Parrott also defamed Mrs. Niles, Mr. Voris and Church Militant in oral statements made in a January 19, 2022 radio interview. Parrott again accused Plaintiffs of “blackmail,” of “extortion, a federal crime,” and of threatening to “destroy” him “using our Church Militant

platform.” Parrott again falsely accused Plaintiffs of “doxxing” him show. Parrott also accused Mr. Voris of being a “sodomite” who is “absolutely obsessed with sex” and “sex crazed.”

47. In addition to defaming Plaintiffs directly, Parrott used the RTFM’s social media to defame Plaintiffs by implication, including making the following statements:

- a. November 11, 2021 tweet with a picture of a priest who is a victim of clergy sex abuse blessing an anti-clergy abuse rally sponsored by Church Militant and a tag line saying, “(Not joking here, folks. Literally lives with Voris. No faculties. Lispy. Bunks with Voris.)” Parrott falsely implied that Mr. Voris is on a homosexual relationship with a priest.
- b. December 23, 2021 tweet saying, “\$50 million through that organization and yet Cupich and Dolan and the crew are *still* powerful prelates. Church Militant proposes themselves (sic) as saviors of the Church, but what concretely have they accomplished with all that money (besides (sic) bullying and blackmailing)?” This falsely implies Church Militant has raised \$50 million, when it has not.
- c. December 23, 2021 tweet saying, “If you give a single penny towards Father Jackson’s legal defense, we’ll mobilize our fake news platform to doxx you, smear you, and call you a Nazi and then sue you. Don’t forget to donate!” -Christine Le (AKA Christine Niles).” This implies Plaintiffs dox people, which they do not, smear people, which they do not, and call people who are not Nazis, Nazis, which they do not do.

48. Parrott did all of this intentionally, with malice and to impair Plaintiffs’ credibility as a means of discrediting their accurate reporting on Parrott’s unethical and illegal conduct.

COUNT 1 – DEFAMATION

49. Plaintiffs incorporate their allegations above as their allegations for this paragraph.

50. Parrott, directly and through RTFM, intentionally made false statements about Plaintiffs to the public at large through RTFM’s social media accounts.

51. As set forth above, these false allegations include allegations of lack of chastity on the part of Mrs. Niles and imputations that Plaintiffs were engaged in criminal conduct.

52. Defendants' false statements were not protected by any privilege recognized in law. Rather, they were made for the purpose of generating publicity and to encourage donations to a RTFM.

53. Plaintiffs have suffered greatly because of Defendants' false allegations, in that the statements lowered Defendants' reputation in the community and deterred third-parties from associating with them. They have been subjected to public humiliation and suffered emotional distress and embarrassment.

54. Defendants have demonstrated that they will continue to defame Plaintiffs unless enjoined, causing Plaintiffs further irreparable harm.

WHEREFORE, there being no just cause otherwise, Plaintiffs pray for actual, punitive and exemplary damages; for a permanent injunction barring Defendants from making false statements about them; an injunction requiring Defendants to remove all defamatory statements from their social media accounts; and for Plaintiffs' fees and costs in bringing this action.

COUNT 2 – DEFAMATION BY IMPLICATION

55. Plaintiffs incorporate their allegations above as their allegations for this paragraph.

56. Parrott, directly and through RTFM, intentionally made false statements about Plaintiffs to the public at large through RTFM's social media accounts, through implication.

57. As set forth above, these false implications include allegations of lack of chastity on the part of Church Militant's reporters and imputations that Plaintiffs were engaged in criminal conduct.

58. Defendants' false statements were not protected by any privilege recognized in law. Rather, they were made for the purpose of generating publicity and to encourage donations to a RTFM.

59. Plaintiffs have suffered greatly because of Defendants' false implications, in that the statements lowered Defendants' reputation in the community and deterred third-parties from associating with them. They have been subjected to public humiliation and suffered emotional distress and embarrassment.

60. Defendants have demonstrated that they will continue to defame Plaintiffs unless enjoined, causing Plaintiffs further irreparable harm.

WHEREFORE, there being no just cause otherwise, Plaintiffs pray for actual, punitive and exemplary damages; for a permanent injunction barring Defendants from making false statements about them; an injunction requiring Defendants to remove all defamatory statements from their social media accounts; and for Plaintiffs' fees and costs in bringing this action.

COUNT 3 – FALSE LIGHT

61. Plaintiffs incorporate their allegations to the above paragraphs and their allegations for this paragraph.

62. Defendants painted Plaintiffs in a false light by accusing them of crimes and accusing Mrs. Niles of a lack of chastity.

63. Defendants did this, knowing that the statements about Plaintiffs were false.

64. Being labeled a "wine box" and a criminal is highly offensive to any reasonable person and Defendants knew that it would be highly offensive to Plaintiffs.

65. They made the allegations to generate sympathy and contributions and not pursuant to any privilege.

WHEREFORE, there being no just cause otherwise, Plaintiffs pray for actual, punitive and exemplary damages; for a permanent injunction barring Defendants from making false statements

about them; an injunction requiring Defendants to remove all defamatory statements from their social media accounts; and for their fees and costs in bringing this action.

COUNT 4 – TORTIOUS INTERFERENCE WITH BUSINESS EXPECTANCY

66. Plaintiffs incorporate their allegations above as their allegations for this paragraph.

67. Church Militant sustains its efforts as a media company exposing corruption in the Catholic Church through donors, subscribers and contributors.

68. Parrott was aware of this and defamed Church Militant and its reporters in an effort to induce Church Militant’s donors, subscribers and contributors to leave the company.

69. Parrott’s illegal efforts at interfering with Church Militant’s business relationships were successful in that Church Militant received requests from donors and subscribers to return donations and cancel subscriptions. These people stated that they were withdrawing their financial support from Church Militant based on Mr. Parrott and RTFM’s comments about Church Militant and Mrs. Niles, comments which were false.

WHEREFORE, there being no just cause otherwise, Plaintiffs pray for actual, punitive and exemplary damages and for their fees and costs in bringing this action.

COUNT 5 - EXTORTION

70. Plaintiffs incorporate their allegations above as their allegations for this paragraph.

71. Parrott threatened to continue his campaign to defame and harass Plaintiffs and to interfere with Church Militant’s membership unless Plaintiffs discontinued their investigation into and publication of Parrott’s illegal fund raising activities. Plaintiffs’ defamation and harassment included false accusations that Plaintiffs were engaged in criminal conduct.

72. When Plaintiffs refused to agree to Parrott’s extortionate demands, Parrott, through RTFM, continued his campaign of harassment and defamation.

73. Plaintiffs were injured as a result.

WHEREFORE, there being no just cause otherwise, Plaintiffs pray for actual, punitive and exemplary damages, including their fees and costs incurred in this case.

/s/ Kathleen H. Klaus

Kathleen H. Klaus (P67207)
MADDIN HAUSER ROTH & HELLER, P.C.
Attorneys for Plaintiffs
28400 Northwestern Highway
Second Floor
Southfield, MI 48034
(248) 239-7520
kklaus@maddinhauser.com

Dated: January 21, 2022

STATE OF MICHIGAN MI Oakland County 6th Circuit Court	PROOF OF ELECTRONIC SERVICE	CASE NO. 2021-191205-NO
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Case title
VORIS,G,MICHAEL, vs. PARROTT,MICHAEL,,

1. MiFILE served the following documents on the following persons in accordance with MCR 1.109(G)(6).

Type of document	Title of document
MISCELLANEOUS	First Amended Complaint

Person served	E-mail address of service	Date and time of service
Thomas Rheume	trheume@bodmanlaw.com	01/21/2022 11:29:51 AM

2. I, Sue Beyer, initiated the above MiFILE service transmission.

This proof of electronic service was automatically created, submitted, and signed on my behalf by MiFILE. I declare under the penalties of perjury that this proof of electronic service has been examined by me and that its contents are true to the best of my information, knowledge, and belief.

01/21/2022

Date

/s/Sue Beyer

Signature

MHR&H

Firm (if applicable)