



**NAILAH K. BYRD**  
**CUYAHOGA COUNTY CLERK OF COURTS**  
1200 Ontario Street  
Cleveland, Ohio 44113

**Court of Common Pleas**

**New Case Electronically Filed: COMPLAINT**  
**September 9, 2020 15:58**

By: AARON MINC 0086718

Confirmation Nbr. 2068861

MINC LLC

CV 20 937026

vs.

MELISSA FARMER

**Judge: EMILY HAGAN**

**Pages Filed: 21**



Common Pleas Court of Cuyahoga County, Ohio

DESIGNATION FORM TO BE USED TO INDICATE THE CLASSIFICATION OF THE CAUSE

Aaron M. Minc, Esq.

Plaintiff

Vs.

Melissa A. Farmer

Defendant

Case Number: \_\_\_\_\_

Date: 09/09/2020

Has this case been previously filed and dismissed? Yes  No

Case #: \_\_\_\_\_ Judge: \_\_\_\_\_

Is this case related to any new cases now pending or previously filed? Yes  No

Case #: \_\_\_\_\_ Judge: \_\_\_\_\_

**CIVIL CLASSIFICATIONS: Place an (X) In ONE Classification Only.**

**Professional Torts:**

- 1311 Medical Malpractice
- 1315 Dental Malpractice
- 1316 Optometric Malpractice
- 1317 Chiropractic Malpractice
- 1312 Legal Malpractice
- 1313 Other Malpractice

**Product Liability:**

- 1330 Product Liability

**Other Torts:**

- 1310 Motor Vehicle Accident
- 1314 Consumer Action
- 1350 Misc. Tort

**Workers Compensation:**

- 1550 Workers Compensation
- 1531 Workers Comp. Asbestos

**Foreclosures:**

- Utilize Separate Foreclosure Designation Form

**Commercial Docket:**

- 1386 Commercial Docket
- 1387 Commercial Docket with Foreclosure

**Administrative Appeals:**

- 1540 Employment Services
- 1551 Other

**Other Civil:**

- 1500 Replevin/Attachment
- 1382 Business Contract
- 1384 Real Estate Contract
- 1388 Consumer Debt
- 1390 Cognovit
- 1391 Other Contracts
- 1490 Foreign Judgment
- 1491 Stalking Civil Protection Order
- 1501 Misc. Other
- 1502 Petition to Contest Adam Walsh Act
- 1503 Certificate of Qualification for Employment

**Amount of Controversy:**

- None Stated
- Less than \$25,000
- Prayer Amount \$ 25,000

**Parties have previously attempted one of the following prior to filing:**

- Arbitration
- Early Neutral Evaluation
- Mediation
- None

I certify that to the best of my knowledge the within case is not related to any now pending or previously filed, except as noted above.

Minc LLC

Firm Name (Print or type)

200 Park Ave, Suite 200

Address

Orange Village, Ohio 44122

Address

(216) 373-7706

Phone

Aaron M. Minc

Attorney of Record (Print or Type)

0086718

Supreme Court #

aminc@minclaw.com

Email Address

Signature

**COURT OF COMMON PLEAS**

**CUYAHOGA COUNTY, OHIO**

AARON M. MINC, ESQ.  
200 Park Avenue, Suite 200  
Orange Village, Ohio 44122

*Plaintiff,*

v.

MELISSA A. FARMER  
426 West Belmont Ave, Apt 1206  
Chicago, IL 60657-4705

*Defendant.*

) CASE NO.

) JUDGE:

) **COMPLAINT FOR**  
) **DEFAMATION AND FALSE**  
) **LIGHT**

) **JURY TRIAL REQUESTED**

For his Complaint against Defendant Melissa Farmer (“Defendant”), Plaintiff Aaron M. Minc (“Plaintiff”) alleges as follows:

**PARTIES, JURISDICTION, & VENUE**

1. Plaintiff is an attorney licensed to practice law in Ohio and owns and operates a law firm, Minc LLC. Plaintiff is located at the above captioned address. Plaintiff operates an account on the social media platform Twitter with the username @RepLawyer.

2. Defendant is a sex and pain researcher with a PhD in Clinical Psychology and resides in Chicago, IL. Defendant operates a Twitter account with the username @Farmer\_MindBody.

3. Nicole R. Prause is a California resident. Prause operates an account on Twitter with the username “Liberos” and/or “@NicoleRPrause.” Prause filed for bankruptcy on August 18, 2020 under Chapter 7 of the United States Bankruptcy Code in the United States Bankruptcy Court for the Central District of California, Case No. 2:20-bk-17828-NB. Plaintiff is in the process of obtaining leave from the Bankruptcy Court to include her as a defendant in this lawsuit. When

Plaintiff obtains such permission, Plaintiff intends to request leave to amend his Complaint pursuant to Ohio Civ. R. 15 to add Prause as a co-defendant.

4. This Court has subject matter jurisdiction pursuant to O.R.C. § 2305.01.

5. This Court has personal jurisdiction over Defendant pursuant to O.R.C. § 2307.382(A)(6) and venue is proper under Ohio R. Civ. P. 3(C)(3) and (6).

### **FACTUAL ALLEGATIONS**

6. Plaintiff's law firm currently represents a third party in a lawsuit against Prause. Throughout the course of this lawsuit, Prause has continuously used her Twitter account to attack the reputation of people involved in the lawsuit. Prause has thousands of followers on Twitter. Plaintiff has had little to no personal involvement in the litigation.

7. On or about July 28, 2020, Prause published a series of public tweets on her Twitter account claiming she feared for her safety because Plaintiff had directly sent Prause's home and work addresses, which are presumably private and confidential, to a group of people that have been threatening to kill her for years. Prause's Tweet included an image message from one of the hate group members that said, "[I'll] kill that bitch any time if you'd like me to. Fuck those people." A true and accurate copy of Prause's twitter posts are attached hereto as Exhibit A 1-4 ("Prause's Tweets).

8. Plaintiff replied to Prause's Tweets denying the allegations because they are patently false. Prior to July 28, 2020, Plaintiff barely even knew who Prause was. Plaintiff has no knowledge of Prause's addresses. Plaintiff has never sent Prause's home or work addresses to anyone. Plaintiff has no knowledge about any death threats by anyone against Prause. Plaintiff also has no knowledge of anyone else disseminating Prause's addresses. Plaintiff has no knowledge regarding any of Prause's allegations.

9. Prause additionally claimed that she had contacted the LAPD, who were investigating the matter. When Plaintiff continuously denied her allegations, Prause directed Plaintiff to “Talk to LAPD.”

10. Prause encouraged her twitter followers to repeat her claims, harass Plaintiff by commenting and liking all of the responses she received in support of her claims. One of Prause’s twitter followers with the username “Chanell @nellyy” responded to Plaintiff’s denial by saying, “What a piece of shit!”

11. Two of Prause’s other twitter followers shared the Prause Tweet with the twitter accounts @womenofsextech and @CAGoldberglaw. @CAGoldberglaw is the twitter account of Carrie Goldberg, a sexual assault victims’ advocate and attorney based in New York, from whom Plaintiff receives client referrals. The Prause Tweet has negatively impacted this business relationship.

12. Notwithstanding Plaintiff’s explicit denial, on or about July 30, 2020, Defendant publicly republished Prause’s Tweets and directly messaged and/or shared them with the Ohio State Bar Association, Cleveland Metropolitan Bar Association, and the Ohio Supreme Court’s twitter accounts. The Defendant’s twitter post (“Defendant’s Tweet”) is attached as Exhibit B.

13. Defendant’s Tweet claimed that Plaintiff was “engaging in ethics violations that endanger [a] third party (Ohio Rules of Prof. Conduct Rule 4.4.” Defendant’s Tweet attached a screenshot image of the Ohio Rules of Professional Conduct 4.4 taken from the Ohio Supreme Court website. Defendant’s claims and allegations are false and defamatory per se.

#### **COUNT I: LIBEL AND LIBEL PER SE**

14. Plaintiff incorporates by reference the allegations in the foregoing paragraphs as if rewritten here.

15. The Defendant published tweets containing false statements of fact of and concerning Plaintiff claiming that Plaintiff had violated attorney ethical rules by directly disseminating Prause's confidential home and work address to people that want to kill her.

16. Defendant published the false statements without any privilege to do so.

17. Defendant published her false statements with malice, reckless disregard, and/or at least a negligent level of intent.

18. The false statements in Defendant's Tweets are defamatory per se.

19. Plaintiff has suffered special harm, actual damage, loss to reputation, emotional distress, mental anguish, suffering, and other harm because of Defendant's Tweets, the full amount of which will be proven at trial.

20. Plaintiff additionally requests a permanent injunction against Defendant declaring that these allegations are false, defamatory, and that Defendant is prohibited from creating or publishing the same or similar defamatory statements about Plaintiff or his business in the future.

### **COUNT 2: FALSE LIGHT**

21. Plaintiff incorporates by reference the allegations in the foregoing paragraphs as if rewritten here.

22. Defendant's Tweets publicly cast Plaintiff in a false light to the Ohio State Bar Association, Cleveland Metropolitan Bar Association, the Ohio Supreme Court, as well as a vast audience of Twitter users.

23. The false light Defendant placed Plaintiff in is highly offensive to a reasonable person.

24. Defendant published her Tweet with at least reckless disregard as to the falsity of the facts contained in the Tweet and the false light in which Plaintiff would be placed.

25. Plaintiff has suffered special harm, actual damage, loss to reputation, emotional distress, mental anguish, suffering, and other harm because of Defendant's Tweets, the full amount of which will be proven at trial.

26. Plaintiff additionally requests a permanent injunction against Defendant declaring that these allegations are false, defamatory, and that Defendant is prohibited from creating or publishing the same or similar defamatory statements about Plaintiff or his business in the future.

WHEREFORE Plaintiff prays for judgment against Defendant in conformity with the allegations set forth above and asks this Court to award compensatory, special, actual, and punitive damages amounting to at least \$25,000 with the exact amount to be proven at trial, attorneys fee's and court costs, a permanent injunction against Defendant declaring that these allegations are false, defamatory, and that Defendant is prohibited from creating or publishing the same or similar defamatory statements about Plaintiff or his business in the future, and for any and all other relief at law or in equity as the Court deems equitable, just, and proper.

Respectfully submitted,

/s/ Aaron M. Minc  
Aaron M. Minc (0086718)  
Minc LLC  
200 Park Ave., Suite 200  
Orange Village, Ohio 44122  
Phone: (216) 373-7706  
Fax: (440) 792-5327  
Email: [aminc@minclaw.com](mailto:aminc@minclaw.com)

**JURY DEMAND**

Plaintiff hereby demands a trial by jury pursuant to Ohio Civ. R. 38.

/s/ Aaron M. Minc  
Aaron M. Minc (0086718)

Document title: (2) Libereros on Twitter: "You can ask @RepLawyer why he just sent my physical location to this group that offered to kill me multiple times. <https://t.co/2W2EBUdiP7>" / Twitter

Capture URL: <https://twitter.com/NicoleRPrause/status/1288149561383333888>

Captured site IP: 104.244.42.129

Page loaded at (UTC): Tue, 28 Jul 2020 18:26:33 GMT

Capture timestamp (UTC): Tue, 28 Jul 2020 18:26:53 GMT

Capture tool: v7.0.9

Collection server IP: 52.7.109.102

Browser engine: Chrome/77.0.3865.120

Operating system: Microsoft Windows NT 10.0.14393.0 (10.0.14393.0)

PDF length: 3

Capture ID: aec3765c-b525-4698-9a6f-8f96faac22f0

User: drl-dbuxton



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**Thread**

**Liberos @NicoleRPrause** · 2h  
 My physical home and work address were just sent directly to the group that has been posting death threats to me for 7 years. I am closing everything again and moving yet again. Anti-porn extremist stalking must stop. I cannot keep myself, family, colleagues, or participants safe.

11 replies · 12 retweets · 26 likes

**Liberos @NicoleRPrause**

You can ask @RepLawyer why he just sent my physical location to this group that offered to kill me multiple times.

---

**AntiPorn** · 1 point · 12 months ago

kill that bitch any time if you'd like me to. Fuck those people

4:29 PM · Jul 28, 2020 · Twitter Web App

3 Retweets and comments · 3 Likes

**Aaron Minc @RepLawyer** · 6m  
 Replying to @NicoleRPrause  
 B) I have no information my client has done this either

1 reply · 1 retweet · 1 like

**Liberos @NicoleRPrause** · 5m  
 Tell that to LAPD

1 reply · 1 retweet · 1 like

**Aaron Minc @RepLawyer** · 7m  
 Replying to @NicoleRPrause  
 A) I haven't done anything.

1 reply · 1 retweet · 1 like

**Liberos @NicoleRPrause** · 5m  
 Talk to LAPD.

1 reply · 1 retweet · 1 like

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 Liberos™ biotech innovation & advocates for empirically-supported treatments. Neuroscience & physiology lab studying primary rewards. [liberoscenter.com](http://liberoscenter.com)

**Aaron Minc @RepLawyer** Follow  
[minclaw.com/about-aaron-mi...](http://minclaw.com/about-aaron-mi...)

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**Succession, Cate Blanchett, Issa Rae and Schitt's Creek nab Emmy nominations**  
 Trending with Succession

**#TruistCares**  
 Truist and United Way share a vision for a better America.  
 Promoted by Truist News

Trending in United States  
**#TrumpKillsTexas**  
 105K Tweets

US news · **LIVE**  
**Attorney General William Barr testifies before the House Judiciary Committee**  
 Trending with Hakeem Jeffries

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**Demon Sperm**  
 51.5K Tweets

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


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sarahlaurensmith @sarahlaurensmi





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**Thread**


 **Liberos** @NicoleRPrause · 5m  
Talk to LAPD.


   

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  -  **Aaron Minc**  
@RepLawyer Follow  
minclaw.com/about-aaron-mi...

**What's happening**

Awards Show · 2 hours ago  
**Succession, Cate Blanchett, Issa Rae and Schitt's Creek nab Emmy nominations**  
Trending with: Succession 

**#TruistCares**  
Truist and United Way share a vision for a better America.  
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 sarahlaurensmith  
@sarahlaurensmi

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Document title: (4) Liberos on Twitter: "My physical home and work address were just sent directly to the group that has been posting death threats to me for 7 years. I am closing everything again and moving yet again. Anti-porn extremist stalking must stop. I cannot keep myself, family,colleagues,or participants safe." / Twitter

Capture URL: <https://twitter.com/NicoleRPrause/status/128814069770333888>

Captured site IP: 104.244.42.193

Page loaded at (UTC): Thu, 30 Jul 2020 15:33:43 GMT

Capture timestamp (UTC): Thu, 30 Jul 2020 15:36:02 GMT

Capture tool: v7.0.9

Collection server IP: 54.174.78.137

Browser engine: Chrome/77.0.3865.120

Operating system: Microsoft Windows NT 10.0.14393.0 (10.0.14393.0)

PDF length: 4

Capture ID: 97dd77a2-bc16-4410-a50a-35de7efcd419

User: drl-dbuxton

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**Thread**

**Liberos** @NicoleRPrause

My physical home and work address were just sent directly to the group that has been posting death threats to me for 7 years. I am closing everything again and moving yet again. Anti-porn extremist stalking must stop. I cannot keep myself, family, colleagues, or participants safe.

3:54 PM · Jul 28, 2020 · Twitter Web App

- 19 Retweets 53 Likes
- Liberos** @NicoleRPrause · Jul 28  
Replying to @NicoleRPrause  
You can ask @RePlaywer why he just sent my physical location to this group that offered to kill me multiple times.
- AntiPorn** 1 point · 12 months ago  
kill that bitch any time if you'd like me to. Fuck those people
- Art Keller** @ArtKeller · Jul 28  
Replying to @NicoleRPrause  
Sorry to hear that. How can folks help?
- Liberos** @NicoleRPrause · Jul 28  
Replying to @NicoleRPrause  
Thank you. Working on it. @LAPD is hopeful they can act on this one. It is egregious. Lab is once again closed and equipment is being moved. Once settled, I need better protections for my work address. These stalkers will never stop telling people exactly where to kill me.
- Tim Woodman ProVillain** @ProVillain · Jul 28  
Replying to @NicoleRPrause  
I'm sorry to hear that. I'm so proud of you for the tireless heroic way you keep doing your work, and so ashamed of the cowards and bullies who try to intimate you into giving up
- Stephen Benning** @stephenbenning · Jul 29  
Replying to @NicoleRPrause  
What the actual... I'm so sorry you've had so many vicious travails. This is ludicrous, and I hope that this will be the last time you have to take such measures or endure such abuse.
- Scott Leimroth** @LeimrothScott · Jul 28  
Replying to @NicoleRPrause  
Crazy stuff. Stay safe. Doing science these days is like doing it in the dark ages and avoiding the Spanish inquisition. Primitive beliefs driving violent mob behaviour.
- Gonzalo Quintana Zunino Ph.D.** @DrGonzaloQZ · Jul 29  
Replying to @NicoleRPrause  
I am SO sorry to read this :( I hope things get better, sooner than later!
- Liberos** @NicoleRPrause · Jul 29  
Thanks. I am working on it legally...not their approach thus far.
- Mickey Rowe** @MickeyRowe1 · Jul 28  
Replying to @NicoleRPrause  
I know this can't countermand the threats, but I am sending wishes for your survival and thriving through this awful situation.
- Nash Ashur** @nashashur · Jul 28  
Replying to @NicoleRPrause  
Not to be insensitive at a tough time like this, but @lifetimetv should make a movie about your story someday
- Shane Mauss** @shanecomedy · Jul 28  
Replying to @NicoleRPrause  
I'm so sorry!!!
- Mayte Parada** @MParadaPhD · Jul 28  
Replying to @NicoleRPrause  
Jesus, can you sue this guy for this?
- Liberos** @NicoleRPrause · Jul 28  
I am.
- Christine Milrod** @ChristineMilrod · Jul 28  
Replying to @NicoleRPrause  
I am so sorry this is happening to you. Let me know if I can help in ANY way!

sarahlaurensmith @sarahlaurensmi

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**Christine Milrod** @ChristineMilrod · Jul 28  
 Replying to @NicoleRPrause  
 I am so sorry this is happening to you. Let me know if I can help in ANY way!  
 ❤️❤️❤️
  - 
**Matthias Wieser** @TheWeezer75 · Jul 28  
 Replying to @NicoleRPrause  
 so sorry! Sending solidarity, support, and best wishes! #scientificfreedom
  - 
**Talking Terror Podcast** @TheGhoulofGeek · Jul 29  
 Replying to @NicoleRPrause  
 Wow! I am so sorry you guys are dealing with this. What a POS!
  - 
**Sexual Assault Awareness** @SexAssaultAware · Jul 29  
 Replying to @NicoleRPrause  
 Oh god Nicole! This is horrific. I don't have words for this level of terrorism. I'm glad your taking the best steps you can to be safe.
  - 
**Aug 1-Black SW Liberation march & vigil** @sxnair · Jul 29  
 Replying to @NicoleRPrause and @womenofsextech  
 @cagoldberglaw!!!! WTF
  - 
**Per Börjeson** @Per\_Borjeson · Jul 28  
 Replying to @NicoleRPrause  
 At a loss for words. This is not okay.
  - 
**Christine Larson** @CLarsonsBrain · Jul 29  
 Replying to @NicoleRPrause  
 Oh no. I am sorry. Stay safe!
  - 
**Ase Kvist Innes-Ker** @asehelene · Jul 28  
 Replying to @NicoleRPrause  
 I'm so sorry.
  - 
**brian m. watson** @brimwats · Jul 28  
 Replying to @NicoleRPrause  
 so sorry Nicole 🙏

- More replies**
- 
**Tim Norton** @TimNortonLCSW · Jul 28  
 Replying to @NicoleRPrause  
 Those fucking assholes. Nicole I'm so sorry. Would it help to post their name and address, or just make things worse for you?
  - 
**Liberos** @NicoleRPrause · Jul 28  
 No, because we don't stalk. Basically, I have to sit here and take it. Death threats, expense, lies, until it gets this bad and LAPD can act. Detective thinks this may do it.

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**President Pelosi**  
 23.8K Tweets









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


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 **Liberos** @NicoleRPrause · Jul 28  
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**Liberos**  
@NicoleRPrause

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NBA · Yesterday  
**How the NBA bubble will work as the league plans to resume play in Orlando**  
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 sarahlaurensmith @sarahlaurensmi

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Document title: (2) Aaron Minc on Twitter: "@NicoleRPrause Stop Tweeting at me and go talk to your lawyer about it. You are a Defendant in a lawsuit my firm is handling. It's completely inappropriate to lob ridiculous accusations publicly at the other sides legal counsel over twitter in the middle of a lawsuit." / Twitter

Capture URL: <https://twitter.com/RepLawyer/status/1288183603126579200>

Captured site IP: 104.244.42.193

Page loaded at (UTC): Tue, 28 Jul 2020 18:51:19 GMT

Capture timestamp (UTC): Tue, 28 Jul 2020 18:51:46 GMT

Capture tool: v7.0.9

Collection server IP: 54.175.14.236

Browser engine: Chrome/77.0.3865.120

Operating system: Microsoft Windows NT 10.0.14393.0 (10.0.14393.0)

PDF length: 3

Capture ID: 0683ab2b-6d91-47da-945d-d280d6dadfd5

User: drl-dbuxton

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**Tweet**

**Liberos @NicoleRPrause · 2h**  
 My physical home and work address were just sent directly to the group that has been posting death threats to me for 7 years. I am closing everything again and moving yet again. Anti-porn extremist stalking must stop. I cannot keep myself, family, colleagues, or participants safe.  
 11 replies · 12 retweets · 28 likes

**Liberos @NicoleRPrause · 2h**  
 You can ask @RepLawyer why he just sent my physical location to this group that offered to kill me multiple times.  
 Antiporn 1 point · 12 months ago  
 kill that bitch any time if you'd like me to. Fuck those people  
 2 replies · 3 retweets · 3 likes

**Aaron Minc @RepLawyer · 52m**  
 A) I haven't done anything.  
 2 replies · 1 like

**Liberos @NicoleRPrause · 30m**  
 Talk to LAPD.  
 1 reply · 1 like

**Aaron Minc @RepLawyer**

Replying to @NicoleRPrause

Stop Tweeting at me and go talk to your lawyer about it. You are a Defendant in a lawsuit my firm is handling. It's completely inappropriate to lob ridiculous accusations publicly at the other sides legal counsel over twitter in the middle of a lawsuit.

6:44 PM · Jul 28, 2020 · Twitter Web App

**Liberos @NicoleRPrause · 3m**  
 Replying to @RepLawyer  
 And yet...here his counsel is doing exactly that.  
 1 reply · 1 like

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**Liberos @NicoleRPrause**  
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


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
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**Liberos** @NicoleRPrause · 3m


Replying to @RepLawyer

And yet...here his counsel is doing exactly that.

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**Aaron Minc**  
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Document title: (4) Liberos on Twitter: "You can ask @RepLawyer why he just sent my physical location to this group that offered to kill me multiple times. <https://t.co/2W2EBUdiP7>" / Twitter

Capture URL: <https://twitter.com/NicoleRPrause/status/1288149561383333888>

Captured site IP: 104.244.42.193

Page loaded at (UTC): Thu, 30 Jul 2020 14:15:58 GMT

Capture timestamp (UTC): Thu, 30 Jul 2020 14:17:35 GMT

Capture tool: v7.0.9

Collection server IP: 54.174.78.137

Browser engine: Chrome/77.0.3865.120

Operating system: Microsoft Windows NT 10.0.14393.0 (10.0.14393.0)

PDF length: 3

Capture ID: 95b5463d-1904-4235-bb36-c2c39341d171

User: drl-dbuxton

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**Liberos** @NicoleRPrause · Jul 28  
 My physical home and work address were just sent directly to the group that has been posting death threats to me for 7 years. I am closing everything again and moving yet again. Anti-porn extremist stalking must stop. I cannot keep myself, family, colleagues, or participants safe.

You can ask @RepLawyer why he just sent my physical location to this group that offered to kill me multiple times.

AntiPorn 1 point · 12 months ago  
 kill that bitch any time if you'd like me to. Fuck those people

4:29 PM · Jul 28, 2020 · Twitter Web App

5 Retweets and comments · 8 Likes

- Aaron Minc** @RepLawyer · Jul 28  
 Replying to @NicoleRPrause  
 A) I haven't done anything.
- Liberos** @NicoleRPrause · Jul 28  
 Like last time?  

- Aaron Minc** @RepLawyer · Jul 28  
 Replying to @NicoleRPrause  
 B) I have no information my client has done this either
- Liberos** @NicoleRPrause · Jul 28  
 Tell that to LAPD
- Chanell** @nellyy · Jul 28  
 Replying to @NicoleRPrause and @RepLawyer  
 What a piece of shit!

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


- Liberos** @NicoleRPrause  
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**Chanell @nellyy** · Jul 28

Replying to @NicoleRPrause and @RepLawyer

What a piece of shit!


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Document title: (4) Dr. Melissa A. Farmer on Twitter: "Attention @OSBA @CleMetroBar @OHSupremeCourt - Ohio lawyer @RepLawyer engaging in ethics violations that endanger third party (Ohio Rules of Prof Conduct Rule 4.4). <https://t.co/WDPkG2ETcH>" / Twitter

Capture URL: [https://twitter.com/Farmer\\_MindBody/status/1288464606160138241](https://twitter.com/Farmer_MindBody/status/1288464606160138241)

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Browser engine: Chrome/77.0.3865.120

Operating system: Microsoft Windows NT 10.0.14393.0 (10.0.14393.0)

PDF length: 2

Capture ID: 144f1668-039d-47c0-8e29-3bce626c1e5e

User: drl-dbuxton

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Dr. Melissa A. Farmer  
@Farmer\_MindBody

Attention @OSBA @CleMetroBar @OHSupremeCourt  
- Ohio lawyer @RepLawyer engaging in ethics  
violations that endanger third party (Ohio Rules of Prof  
Conduct Rule 4.4).

8:18  
Not Secure — supremeccourt.ohio.gov

**RULE 4.4: RESPECT FOR RIGHTS OF THIRD PERSONS**

(a) In representing a client, a lawyer shall not use means that have no substantial purpose other than to embarrass, harass, delay, or burden a third person, or use methods of obtaining evidence that violate the legal rights of such a person.

(b) A lawyer who receives a document or electronically stored information relating to the representation of the lawyer's client and knows or reasonably should know that the document or electronically stored information was inadvertently sent shall promptly notify the sender.

**Comment**

(1) Responsibility to a client requires a lawyer to subordinate the interests of others to those of the client; but that responsibility does not imply that a lawyer may disregard the rights of third persons. It is impractical to catalogue all such rights, but they include legal restrictions on methods of obtaining evidence from third persons and unwarranted intrusions into privileged relationships, such as the client-lawyer relationship.

(2) Division (b) recognizes that lawyers sometimes receive a document or electronically stored information that was inadvertently sent or produced by opposing parties or their lawyers. A document or electronically stored information is inadvertently sent when it is accidentally transmitted, such as when an email or letter is misaddressed or a document or electronically stored information is accidentally included with information that was intentionally transmitted. If a lawyer knows or reasonably should know that such a document or electronically stored information was sent inadvertently, then this rule requires the lawyer to promptly notify the sender. For purposes of this rule, "document or electronically stored information" includes paper and electronic documents, electronic communications, and other forms of electronically stored information, including embedded data (commonly referred to as "metadata"), that is subject to being read or put into readable form. Metadata in electronic documents creates an obligation under this rule only if the receiving lawyer knows or reasonably should know that the metadata was sent inadvertently to the receiving lawyer.

(3) Some lawyers may choose to return a document or delete electronically stored information unread. For example, when the lawyer learns before receiving it that it was sent inadvertently. Where a lawyer is not required by applicable law to do so, the decision to voluntarily return such a document or delete electronically stored information is a matter of professional judgment and is fairly assessed to the lawyer, subject to applicable law that may govern discovery. See Rules 1.2 and 1.4.

**Comparison to former Ohio Code of Professional Responsibility**

Rule 4.4(a) incorporates elements addressed by several provisions of the Ohio Code of Professional Responsibility. Specifically, it contains elements of: (1) DR 7-102(A)(1), which, in part, prohibits a lawyer from taking action on behalf of a client that serves merely to harass, annoy, or humiliate a third person; (2) DR 7-105(F)(2), which, in part, prohibits a lawyer from asking any questions that the lawyer

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has no reasonable basis to believe is relevant and that is intended to degrade a third person; and (3) DR 7-108(D) and (E), which, in part, prohibit a lawyer from taking action that merely embarrasses or burdens a third person.

Rule 4.4(b) addresses the situation of when a lawyer receives a document that was inadvertently sent to the lawyer. There is no Disciplinary Rule comparable to Rule 4.4(b).

**Comparison to ABA Model Rules of Professional Conduct**

Rule 4.4(a) is identical to Model Rule 4.4(a), with the additional prohibition of actions that have no substantial purpose other than to "harass" a third person.

Rule 4.4(b) is identical to Model Rule 4.4(b).

Liberos @NicoleRPrause · Jul 28  
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**AmAntiPorn**  
**n kill that b**

1:21 PM · Jul 29, 2020 · Twitter for iPhone



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We are a local, nonprofit professional organization dedicated to serving the needs of legal professionals here in Greater Cleveland.

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