

The defendant did call and text to check on the plaintiff after the abortion procedure. However, less than

24 hours post-procedure, there was an argument where the defendant was screaming and crying, leading the defendant to stop receiving phone calls from the plaintiff.

The plaintiff perceived the defendant's actions as calculated, especially since they had been arguing for months, and this was the first time the defendant had refused to communicate with the plaintiff.

The defendant and Sheriff Bobby Kimbrough apologized to the plaintiff for the humiliating and intimidating experience.

The defendant promised the plaintiff that such an incident would never happen again. He assured her that he would communicate about their issues and strive to be a better person towards her.

The plaintiff felt that she needed the defendant because, regarding the abortion, outside of the handful of people who knew about it, only he understood and only he would say things that didn't exacerbate her pain.

Plaintiff was prescribed a daily dose of 5 MG norethindrone. Following a pill abortion, the plaintiff experienced prolonged bleeding for two months. At the recommendation of her gynecologist, the plaintiff discontinued the birth control to assess if it would help in stopping the bleeding, as birth control may not function the same way after abortions. Despite several attempts to resume the birth control, each time resulted in heavy bleeding. The plaintiff is on a low dosage of birth control due to a previous history of pulmonary embolism during their last pregnancy.

Plaintiff was troubled by dreams of hearing babies, leading to a decrease in her sleep duration. These dreams caused heightened anxiety, particularly triggered by encountering pregnant women or newborn babies.

Even though the plaintiff did not raise his voice often or use curse words, he tended to belittle the plaintiff. The defendant's actions were perplexing, as one day he appeared compassionate and caring, while on other days he seemed cold and lacked compassion for the plaintiff, who was struggling with the aftermath of the abortion.

The defendant informed the plaintiff that he was not going to stop contacting her until she understood that he cared about her. He expressed that he had demonstrated his care for her in various ways, despite appearing indifferent at times, and wanted the plaintiff to believe in his genuine concern for her.

The defendant wanted the plaintiff to understand that after demonstrating his care for her, he intended for them to part ways amicably. However, he made it clear that the conditions of their separation would be dictated by him.

After receiving the letter from attorney Michael Grace and experiencing the stress of dealing with the aftermath of the medical effects on the plaintiff's body, the mental strain, and how the plaintiff was treated by the defendant as a result, the plaintiff ended up losing almost 20 pounds. The plaintiff, an entrepreneur, wasn't working at all to gain new clients and experienced a significant loss of clients during the last seven months.

It was a difficult place for the plaintiff to be in, transitioning from the defendant agreeing to pay for therapy to just a few weeks later accusing the plaintiff of a felonious crime.

It became painfully obvious that after the letter instructed the plaintiff not to call, email, or contact the defendant again, the plaintiff did so anyway and informed the attorney about it, but there were no consequences. It became very clear that the letter was a baseless threat.

The plaintiff has experienced adverse consequences on their well-being as a result of defamation, including a notable decrease in business patronage, the loss of personal and business relationships, severe emotional distress, as well as physical symptoms like weight loss, sleep deprivation and hair loss stemming from anxiety.

The plaintiff believes that the false legal accusations are a form of intimidation and a tactic intended to cause distress.

FACTUAL ALLEGATIONS

(1) June 22, 2023, the plaintiff and the defendant engaged in unprotected sex. A few

days later, the plaintiff noticed spotting and realized she may have missed a few days of her birth control pills. Plaintiff alerted the defendant that they may not have been fully covered, even though the defendant never inquired about contraceptives or condoms.

(2) July 10, 2023, the plaintiff showed a faint positive result on several home pregnancy tests.

(3) July 24, 2023, the defendant picked up the plaintiff to go to the first appointment. The plaintiff was scheduled to return on July 28.

(4) Plaintiff received cash app payment(s) from the defendant July 26, 2023, for \$650.00 July 29, 2023, for \$2000.00 and \$625.00.

(5) August 6, 2023, the plaintiff was contacted by Sheriff Bobby Kimbrough Jr. at the request of the defendant. This communication was not unexpected, considering the plaintiff's relationship with Sheriff Kimbrough. The plaintiff had actively supported Sheriff Kimbrough's campaign endeavors by volunteering time and resources without seeking personal gain.

(6) Believing that Sheriff Bobby Kimbrough was calling to extend personal birthday wishes, the plaintiff was surprised to discover that the defendant had requested the call, and that any conversation would require the sheriff's presence for mediation. To exacerbate the situation, the sheriff was privy to personal information, including details about the plaintiff's abortion. Naturally, this disclosure left the plaintiff feeling enraged.

(7) August 11, 2023, plaintiff received \$3,000.00 cash payment from the defendant.

(8) August 23, 2023, after the plaintiff had requested the defendant the previous night to stop contacting her, the defendant sent a message stating that he had a gift card for her at the Hand and Stone massage spa on Stratford Road.

(9) August 25, 2023, the defendant texted the plaintiff, offering her the opportunity to speak with a therapist and provided a list of therapists to choose from. August 26, 2023, the plaintiff followed the instructions by selecting a therapist, paying the registration fee of \$65.00, and scheduling an appointment to see a local therapist. August 27, 2023, the defendant assured the plaintiff that he would cover all the fees related to the therapist since they only accepted cash payments and did not take insurance.

(10) September 4, 2023, Chief Penn entered the plaintiff's residence with a firearm without the plaintiff's knowledge until later that evening. This conduct deviated from the ordinary. Subsequently, the plaintiff chose to inform Chief Penn that such actions were unwarranted, leading Chief Penn to voluntarily remove the firearm to his vehicle without any further prompting. (RING)

September 4, 2023, the defendant expressed to the plaintiff that he had not forgiven her for making derogatory comments about his penis size and performance. This disclosure came after both parties had previously agreed to forgive each other for particular incidents. (RING)

September 4, 2023, footage captured by the plaintiff's ring camera showed two adults engaged in a discussion about the emotional aspects of their relationship, including issues related to broken promises of improved treatment, lack of forgiveness, and the plaintiff expressing love for the defendant. This conversation effectively disproves any allegations of the felonious crime. (RING)

(11) September 21, 2023, the plaintiff received a letter from Attorney Michael Grace, indicating that if the plaintiff were to contact the defendant again, she would be charged with a *felonious crime*.

(12) September 23, 2023, Dr. Tony Burton III reached out to the defendant and requested a letter of retraction and apology. The defendant instructed the plaintiff to delete all social media content and mentioned that Attorney Michael Grace would be in touch with the plaintiff.

(13) September 25, 2023, the plaintiff informed Attorney Grace that the defendant had been communicating through a third party and agreed to provide the requested letter.

(14) October 2nd, the plaintiff received a phone call from Attorney Jane Doe. Attorney Doe was requested by Attorney Michael Grace to make contact without the plaintiff's awareness or approval. Attorney Doe expressed intentions to facilitate a resolution and inquired about the plaintiff's desired outcome. During the conversation, Attorney Doe asked if the plaintiff would accept the retraction and apology in person. Following the

discussion, the **plaintiff** granted permission for Attorney Doe to communicate with Attorney Grace, as a similar request had been made via email earlier for a written retraction and apology. However, the **plaintiff** experienced unease post-call, being conflicted about being accused of felonious crime while simultaneously being encouraged to convey resolution preferences through legal representation. Subsequently, the **plaintiff** sent a text message to Attorney Doe, requesting a cessation of further actions in this matter.

(15) **October 11, 2023**, the **plaintiff** filed a complaint with the Professional Standards Division with Captain Crystal Pritchard.

(16) **November 18, 2023**, the **plaintiff** and Sheriff Bobby Kimbrough Jr. deliberated on approaching the **defendant** regarding the letter of retraction and an apology. Subsequently, on **November 20, 2023**, Sheriff Bobby Kimbrough Jr. instructed the **plaintiff** to send an email to the **defendant's** attorney, Michael Grace, requesting the letter, with an assurance that it would be provided.

(17) A letter from the City of Winston-Salem dated **March 26, 2024**, found the **defendant** in violation of the Winston-Salem Police Department directives.

(18) **April 23, 2024**, Pastor Tembila Covington reached out to the **plaintiff**, expressing her desire to help and acknowledging that she could see the **plaintiff** was hurting. Pastor Covington mentioned that she had spoken to the **defendant** but did not disclose the details of their conversation. She then asked if the **plaintiff** would agree to a meeting in person with witnesses.

(19) **May 14, 2024**, in a final attempt to resolve the matter before initiating legal action, the **plaintiff** sent an email to the **defendant** seeking to correct the false allegation.

(20) Subsequently, on **May 16, 2024**, Attorney Michael Grace responded, advising the **plaintiff** to obtain legal representation for discussions regarding a potential settlement. (Email)

(21) Against her better judgment, the **plaintiff** decided to hire an attorney, Attorney Jane Doe (2), believing that this was just another tactic in the ongoing legal dispute. Despite retaining Attorney Jane Doe (2), no resolution was reached in the matter.

Attorney Michael Grace and Chief Penn resorted to falsehoods, intimidation, and humiliation in an attempt to address a personal issue. The **plaintiff** pleaded with the **defendant** for a retraction and an apology, despite the fact that the harm caused by these tactics has been extensive.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays judgment be entered in her favor against Defendants, and each of them, as follows:

1. The **plaintiff** is formally requesting \$50,000 in punitive damages.
2. For such other and further relief as the court may deem just and proper.

Dated: June 24, 2024
Winston-Salem, North Carolina

Respectfully submitted,

Quamekia Shavers

