

COMMONWEALTH OF MASSACHUSETTS

BARNSTABLE, ss.

SUPERIOR COURT DEPARTMENT
CIVIL ACTION NO.: _____

JENNIFER McCABE; BRIAN ALBERT;
COLIN ALBERT; and BRIAN HIGGINS,

Plaintiffs,

v.

KAREN READ and AIDAN KEARNEY,

Defendants.

COMPLAINT

I. INTRODUCTION

1. This case arises from a multi-year conspiracy orchestrated by Karen Read (“Read”) and Aidan Kearney (“Kearney”) to subvert and prejudice the criminal justice process in Norfolk County, Massachusetts. Through a coordinated scheme, Read and Kearney sought to protect and enrich themselves by defaming, harassing, and tormenting the Plaintiffs, who served as witnesses in connection with the Commonwealth of Massachusetts’ investigation into the death of John O’Keefe (“O’Keefe”) and its prosecution of Read for his murder. More specifically, Read and Kearney conspired to defame and did defame the Plaintiffs by falsely asserting, among other things, that they were responsible for O’Keefe’s death, conspired to conceal their roles in his death, and framed Read for murder. The Plaintiffs are now and have always been entirely innocent of any involvement in O’Keefe’s tragic death.

2. Read’s and Kearney’s calculated operation to assassinate the character and reputations of the Plaintiffs has caused incalculable harm, subjecting them to a daily tidal wave of hatred, harassment, and intimidation. While the damage to these Plaintiffs has been catastrophic,

Read's and Kearney's lies have also caused a rupture within the Canton, Massachusetts community, poisoning the community's cohesion and discourse. Read's and Kearney's lies, which were amplified by a vigorous public relations campaign, tainted the criminal prosecution of Read and deprived the O'Keefe family and the Commonwealth of the justice they deserve.

3. The Plaintiffs bring this civil action to finally hold Read and Kearney accountable for the wreckage that their conduct has caused and to prove in a public forum governed by the rules of evidence that Read and Kearney, individually and collectively, pursued a deliberate scheme to spread lies about the Plaintiffs, used social media and other amplification means to achieve maximum penetration of those lies, and enriched themselves through their ill-gotten celebrity.

II. JURISDICTION & VENUE

4. This court has subject matter jurisdiction over this action pursuant to M.G.L. c. 212, § 3.

5. Venue is appropriate in this Court pursuant to M.G.L. c. 223, § 1 because at least one party to this case, Brian Higgins, resides in Barnstable County.

III. THE PARTIES

6. Defendant Karen Read is a resident of North Dighton, Massachusetts. On January 29, 2022, an intoxicated Read struck O'Keefe with the back of her Lexus SUV, incapacitating him, and ultimately causing his death. On June 9, 2022, Read was arrested after being indicted by a grand jury for second-degree murder, manslaughter while operating a vehicle while under the influence of alcohol, and leaving the scene of an accident resulting in death in connection with her causing the death of O'Keefe. On July 1, 2024, a jury failed to reach a unanimous verdict on the charged offenses, and the Court declared a mistrial. In 2025, the Commonwealth re-tried Read, and, on June 18, 2025, the jury convicted Read of driving under the influence of alcohol but

concluded that the Commonwealth failed to prove Read's guilt beyond a reasonable doubt on the remaining charges.

7. Defendant Aidan Kearney, a.k.a. "Turtleboy," is a resident of Holden, Massachusetts. Kearney owns and operates the website tbdailynews.com and is responsible for the content that appears on that website. Kearney also owns and controls the YouTube channel Turtleboy Live, the Rumble channel TurtleboyDailyNews, the Facebook page tbdailynews, the X account under the handle DoctorTurtleboy, the Instagram page under the handle turtleboy_news, and the TikTok account under the handle turtleboy_daily_news. Kearney monetizes the content he publishes on these various platforms and outlets by selling merchandise and advertising, and by asking for donations to his CashApp account at \$uncleturtleboy. In 2023, a grand jury indicted Kearney on witness intimidation charges related to his conduct towards the Plaintiffs. The grand jury accused Kearney of harassing the Plaintiffs, charging him with eight counts of witness intimidation, five counts of picketing a witness, and three counts of conspiracy to intimidate a witness.

8. Plaintiff Jennifer McCabe ("McCabe") is a resident of Canton, Massachusetts. McCabe testified publicly and under oath at the trial and re-trial of Read. She also voluntarily testified as a witness before state and federal grand juries.

9. Plaintiff Brian Albert ("Brian Albert") is a resident of Norwood, Massachusetts, and a retired sergeant of the Boston Police Department. Brian Albert testified publicly and under oath at the trial of Read. He also testified voluntarily as a witness before state and federal grand juries.

10. Plaintiff Colin Albert (“Colin Albert”) is a resident of Canton, Massachusetts. Colin Albert testified publicly and under oath at the trial of Read. He also testified voluntarily as a witness before a federal grand jury.

11. Plaintiff Brian Higgins (“Higgins”) is a resident of Sandwich, Massachusetts, and a special agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives. Higgins testified publicly and under oath at the trial of Read. He also testified voluntarily as a witness before state and federal grand juries.

12. Non-party John O’Keefe (“O’Keefe”) was a resident of Canton, Massachusetts and a Boston police officer.

13. Non-party Alan Jackson (“Jackson”) was Read’s attorney.

14. Non-party David Yannetti (“Yannetti”) was Read’s attorney.

IV. FACTUAL BACKGROUND

15. On January 29, 2022, in the middle of a snowstorm, Read struck O’Keefe with the back of her Lexus SUV while she was driving drunk, leaving him to die in freezing temperatures on the front lawn of 34 Fairview Road in Canton, Massachusetts (“34 Fairview”). Read repeatedly told first responders on the scene, “I hit him. I hit him. I hit him,” and made other incriminating statements, including telling the police that she did not see O’Keefe enter 34 Fairview on January 29, 2022. An investigation into O’Keefe’s death resulted in the arrest, indictment, and prosecution of Read for his murder. Jackson and Yannetti represented Read in connection with the Commonwealth’s prosecution.

16. Shortly after her arrest, and consistent with her several admissions of liability, Read’s counsel, Yannetti, told the Court that O’Keefe’s death was an accident by calling the charges “a tremendous reach,” and explaining that Read had no criminal intent.

17. In January 2022, Kearney’s occupation was that of an aspiring internet personality with limited reach in the Greater Boston area. He primarily commented on sports and other media reports. Kearney’s objective was to attract attention to himself in order to build a brand and monetize his audience. To do so, Kearney routinely engaged in provocation and courted controversy. While he described himself at times as a “journalist,” in fact, Kearney has no journalistic training, editorial standards, or oversight.

A. The Launch of the Defamation Campaign¹

18. Despite her several admissions of liability, by the time she was indicted and arrested on murder and related charges in June 2022, Read had set in motion a defamation campaign to falsely blame others for O’Keefe’s death to escape responsibility for her own culpability. Prior to her arraignment, Read falsely denied responsibility for O’Keefe’s death and, contrary to her prior admissions, falsely stated to law enforcement officers that she was not responsible for O’Keefe’s death. Instead, she falsely claimed that O’Keefe had been “beaten up by Brian and Colin Albert.”²

19. Read knew this statement was false and that Brian Albert and Colin Albert had nothing to do with O’Keefe’s death because she knew that she had hit O’Keefe with her car causing his death.

20. Read’s false accusation against Brian Albert and Colin Albert was recorded on police body cameras and released to the public during a pretrial hearing in April 2024.

21. To facilitate the spread and publication of her lies, Read found and enlisted Kearney.

¹ This Complaint does not include each and every example of Read’s and Kearney’s defamatory statements and conduct. Upon the conclusion of discovery, the Plaintiffs will identify all defamatory statements to be presented at trial.

² *Karen Read During Arrest: ‘We’re All In On The Same Joke Right?’*, COURTTV (Apr. 12, 2024), <https://www.courttv.com/title/karen-read-during-arrest-were-all-in-on-the-same-joke-right/>.

22. As of April 2023, Kearney and Read, through an intermediary and Read's counsel, began communicating with one another to further Read's defamatory scheme against the Plaintiffs. Kearney described the intermediary as "a copy and paste vessel that just sent messages between" Read and him.³

23. Read used an intermediary and her counsel to correspond with Kearney to conceal the Defendants' relationship and to create a basis upon which she could plausibly deny her role in Kearney's false claims.

24. Pursuant to this scheme, Kearney would publicize and widely disseminate Read's false claims about the Plaintiffs and others in an effort to destroy the reputations of these individuals so that Read could evade responsibility for causing the death of O'Keefe.

25. As part of this scheme, Read sought to launder defamatory material by gratuitously including it in pleadings filed with the Court. For example, on April 12, 2023, Read, through her counsel, filed a discovery motion for a second time to obtain Brian Albert's phone in which she falsely stated that Brian Albert and Colin Albert were responsible for O'Keefe's death and that McCabe was the "mastermind" who covered it up. Read knew these statements were false.

26. Read, through her counsel, also attached several non-public documents to the filing that had zero relevance to the narrow issue before the Court. The purpose, in part, of those extraneous non-public documents was to convey them surreptitiously to Kearney, who then would amplify the public dissemination of the defamatory material, all in furtherance of the Defendants' defamation scheme. For example, Read attached an unredacted copy of the Canton Police Department's Incident Report that listed the private addresses, cellphone numbers, and social

³ Andrea Burkhart, *Karen Read trial – Journalism and Revolution – A conversation with Dr. Turtleboy Aidan Kearney*, YOUTUBE (Jan. 29, 2025), https://youtu.be/SgS-P3a_jgY.

security numbers of, *inter alia*, the Plaintiffs. Read made this filing in direct violation of Massachusetts Supreme Judicial Court Rule 1:24,⁴ and did so for the purpose of giving this information to Kearney so that he would further disseminate Read's false claims.

27. After this filing, Read, through her intermediary, forwarded her April 12 filing to Kearney for the purpose of Kearney publishing and widely disseminating her false statements.

28. With encouragement and direction from Read, Kearney published his first blog post days after receiving these false statements from Read. Indeed, prior to Kearney's April 18, 2023 publication, Kearney shared his draft blog with Read, through her intermediary, who provided Kearney with dozens of "corrections," which Kearney understood to be from Read. After Kearney received and adopted these "corrections," Read, through her intermediary, texted Kearney, "Amaze ball sauce!!!!" and "Thank you soooo much."

29. Then, on April 18, 2023, the Defendants' defamation campaign went public when Kearney published the first two parts of his "Canton Coverup" series.⁵ In Part I, Kearney stated that "Jennifer McCabe did not kill John O'Keefe, since she's not physically capable of that. Brian Albert, Colin Albert, and the dog were more than capable of that, and Colin Albert had the motive. McCabe was just the quarterback of the coverup." He also explained that "Jennifer McCabe would never have been able to cover up this murder without the assistance of law enforcement." Kearney admitted that he made these statements based on beliefs relayed to him by his "sources."⁶ Although not identified at the time, these "sources" were Read and her legal team. In Part II, Kearney posted

⁴ Massachusetts Supreme Judicial Court Rule 1:24 prohibits the filing of personal identifying information in court documents without appropriate redactions "to reduce the possibility of using such documents for identify theft, the unwarranted invasion of privacy, or other improper purposes."

⁵ As of the date of filing, this series is now up to 545 parts.

⁶ Aidan Kearney, *Canton Cover-Up Part I: Corrupt State Trooper Helps Boston Cop Coverup Murder Of Fellow Officer, Frame Innocent Girlfriend*, TB DAILY NEWS (Apr. 18, 2023), <https://tbdailynews.com/2023/04/18/corrupt-state-trooper-helps-boston-cop-coverup-murder-of-fellow-officer-frame-innocent-girlfriend/>.

screenshots of people’s messages to him that were critical of his defamatory statements.⁷ He made no effort to redact the names and proceeded to publicly mock them. Kearney claimed that “[m]ost people are shocked and outraged about the mountain of evidence indicating that O’Keefe was killed by fellow BPD Sergeant Brian Albert, his nephew Colin Albert, and possibly others.”

30. In reality, this blog post by Kearney, like numerous other defamatory statements that he made, was funneled by Read to her accomplice, Kearney, with knowledge that he would publish it.

31. To Fox News, Kearney later explained that after he published the beginning of his “Canton Coverup” series, his blog “exploded.” He had a “record-setting audience” with over “half a million views.”⁸ Elsewhere, Kearney explained that when he would first go live on his YouTube channel, he would usually have about 300 live viewers, but he had over 2,000 on the first night during his first live stream about the “Canton Coverup.”⁹

32. With this newly found audience, Kearney was now able to disseminate Read’s false narrative to an even larger audience as Read intended. Indeed, given the success of the first show at publishing and disseminating Read’s false narrative to a wider audience, Read’s intermediary told Kearney that Read’s counsel, Jackson and Yannetti, wanted to speak directly with Kearney. The conversation between Kearney and Read’s counsel occurred on April 20, 2023, in which they spoke about Read’s campaign. Kearney secretly recorded that conversation.

⁷ Aidan Kearney, *Canton Cover-Up Part 2: Family And Friends Demand That We Stop Reporting Factual Things About Framing Karen Read For John O’Keefe’s Murder And Covering Up For Killers*, TB DAILY NEWS (Apr. 18, 2023), <https://tbdailynews.com/2023/04/18/family-and-friends-demand-that-we-stop-reporting-factual-things-about-framing-karen-read-for-john-okeefes-murder-and-covering-up-for-killers/>.

⁸ Turtleboy Live, *Fox News – Karen Read Verdict Day*, YOUTUBE (Nov. 21, 2025), <https://youtu.be/NMNgwzBgzNo>.

⁹ *See supra*, n.3.

33. Two days after speaking directly to Read’s counsel, on April 22, 2023, Kearney made additional false statements at the direction of Read. In Episode 575 of his “Weekend Live” show, Kearney repeated Read’s false claim that O’Keefe was killed inside 34 Fairview during a fight with Colin Albert and/or Brian Albert. During that show, Kearney also used the phone numbers that Read and her counsel intentionally made public in their April 12, 2023 Rule 17 motion. Kearney used those numbers to call McCabe and Brian Albert and directly accuse them both of a cover up. Kearney’s voicemail left on Brian Albert’s phone asked, “[D]id you kill John O’Keefe or was it your nephew Colin, and are you covering for him? How did your dog get downstairs and begin biting Mr. O’Keefe?”

34. Later in the April 22, 2023 show, Kearney shared images of the Canton Police Department’s Incident Report, distributing to his thousands of followers the private addresses, phone numbers, and social security numbers of the Plaintiffs. As a direct result of Kearney publicizing their personal identifying information, which he received from Read, the Plaintiffs—who were not generally recognized or responsible for O’Keefe’s death—began to experience disturbing levels of defamation, harassment, and abuse by members of Kearney’s audience.

35. This is exactly what Read intended when she began to use Kearney to disseminate and publish her false story.

36. Indeed, *minutes after* Kearney’s April 22, 2023 broadcast ended, Yannetti, who was watching the live broadcast, messaged Kearney congratulating him: “*That was priceless, dude. GREAT f*cking show, really enjoying the turtle reporting.*”

37. Yet, Read and her counsel repeatedly deceived the public about Read’s coordination and relationship with Kearney, in part, because they knew that using Kearney as a

defamation mouthpiece could subject Read to civil liability for defamation and related civil misconduct.

38. For example, during a September 2023 Boston Magazine interview, Read and her counsel stated that they had never been in contact with Kearney.¹⁰ This statement was false and intended to hide the fact that Kearney was carrying out Read's defamatory scheme.

39. Moreover, 20 months after telling Kearney that his April 22, 2023 show accusing McCabe, Brian Albert and Colin Albert of being involved in the death of O'Keefe was a "GREAT f*cking show," Yannetti disavowed Read's relationship with Kearney. In an address he gave at Boston College Law School on November 11, 2024 regarding Read's first trial, Yannetti said he had concerns about Kearney and that he was someone "you want to keep at arm's length." Yannetti also said, notwithstanding his undisclosed direct and indirect communications and coordination with Kearney, that Kearney's tactics "are not the tactics of a refined defense attorney."¹¹

40. Similarly, Jackson publicly denied communicating and coordinating with Kearney. In an October 18, 2024 interview, Jackson denied involving Kearney in Read's public strategy. Yet, during that same interview, Read acknowledged she had communicated with Kearney frequently, but she limited that disclosure, claiming that the two only spoke in the "months" leading up to her March 2024 criminal trial.¹²

¹⁰ Gretchen Voss, *The Karen Read Case in Canton: The Killing That Tore a Town Apart*, BOSTON MAGAZINE (Sept. 27, 2023), <https://www.bostonmagazine.com/news/2023/09/27/canton-karen-read/>.

¹¹ Alyssa Hatfield, *Defending Karen Read*, BOSTON COLLEGE LAW (Nov. 11, 2024), <https://lawmagazine.bc.edu/2024/11/defending-karen-read/#:~:text=The%20jury%20deadlocked%20on%20the%20verdict%2C%20resulting,keep%20bail%20charges%20at%20a%20reasonable%20amount>.

¹² Abby Patkin, *Highlights from Karen Read's 'Dateline' special, from a 'coy' tipster to calls with Turtleboy*, BOSTON.COM (Oct. 21, 2024), <https://www.boston.com/news/crime/2024/10/21/karen-read-dateline-special-highlights-tipster-turtleboy/>.

41. On April 24, 2023, Kearney published Part 10 of his “Canton-Cover-Up” series, wherein he again accused McCabe of “covering up a murder and pretending to be a compassionate person while a completely innocent woman faces decades in prison.”¹³ In response, Read—through her intermediary—messed Kearney stating, “Please tell [Kearney] – that article might be his best so far.” Kearney responded, “Really? That from her [Read]?” The intermediary replied “Yup.”

42. Since April 2023, Kearney has published 545 parts to his “Canton Coverup” series, along with countless other pieces of content, including posts on X and YouTube, falsely claiming that the Plaintiffs were responsible for O’Keefe’s death. Kearney’s content has spanned thousands of tweets, hundreds of blog posts, hundreds of YouTube videos, and countless other public statements across a variety of platforms. Kearney has also continued to spread his harmful, defamatory statements in interviews with multiple sources.¹⁴

B. The Conspiracy Continues

43. Read and Kearney continued communicating before, during, and after her trials to coordinate their defamation of the Plaintiffs. Read and Kearney agreed to act in concert and used their defamation of the Plaintiffs to subvert the Commonwealth’s prosecution, to attract an audience, and to monetize that audience and their celebrity.

44. In furtherance of this scheme, Read regularly funneled non-public information to Kearney using tradecraft, such as intermediaries, so that Kearney could selectively publish—at

¹³ Aidan Kearney, *Canton Cover-Up Part 10: Jennifer McCabe Hired Boomer Mobster Attorney Kevin Reddington Who Claims She Passed A Polygraph Test*, TB DAILY NEWS (Apr. 24, 2023), <https://tbdailynews.com/2023/04/24/jennifer-mccabe-hired-boomer-mobster-attorney-kevin-reddington-who-claims-she-passed-a-polygraph-test/>.

¹⁴ Aidan Kearney, *Canton Coverup Part 542: A Complete Listing Of Every Turtleboy Interview Before And After Karen Read Not Guilty Verdict*, TB DAILY NEWS (Nov. 21, 2025), <https://tbdailynews.com/2025/11/21/canton-coverup-part-542-a-complete-listing-of-every-turtleboy-interview-before-and-after-karen-read-not-guilty-verdict/>.

Read's behest—certain non-public material for the purpose of casting false suspicion on the Plaintiffs and away from Read. Read instructed Kearney to falsely claim that he had not received information from Read when, in fact, he had done exactly that.

45. For example, on April 23, 2023, despite having already publicly accused Colin Albert of O'Keefe's murder at Read's direction and encouragement, Kearney inquired of Read's intermediary regarding how Read knew that Colin Albert was ever at 34 Fairview on January 29, 2022, after O'Keefe allegedly arrived. In response, Read (through the intermediary) responded, "Brian and Nicole & Chris and Julie all testified he was there. But I can't send [grand jury] testimony because it's sealed." That statement was not true as no witness ever testified that Colin Albert was at 34 Fairview on January 29 after Read's vehicle arrived at that location.

46. That same day, Read also informed Kearney through the intermediary about the details of an alleged non-public, ongoing, separate investigation apparently related to law enforcement's investigation of O'Keefe's death. In a message to Kearney, Read (through the intermediary) stated, "Not public: the feds have been involved longer than anyone is likely guessing."

47. Moreover, on December 1, 2023, Kearney posted a YouTube video in which he included audio that had been recovered from O'Keefe's phone by investigators.¹⁵ Wearing a "Jackson Yannetti 2024" t-shirt that is for sale on his website, Kearney played audio from a voicemail that Read was leaving for O'Keefe at the time she found O'Keefe's body, incidentally capturing McCabe calling 911. At the time of Kearney's YouTube video, only the Commonwealth, Read, and Read's legal team possessed the audio file.

¹⁵ Turtleboy Live, *Karen Read Case: Jen McCabe 911 Tape Breakdown*, YOUTUBE (Dec. 1, 2023), <https://www.youtube.com/watch?v=rp2KMDRPyEQ>.

48. Eventually, Read and Kearney started communicating directly for the purpose of sharing information, coordinating the timing of defamatory publications, and aligning Read's litigation strategy with their shared public defamation campaign. To do so, Read utilized Signal, an encrypted messaging system that avoids detection and aids deletion of communications. Read and Kearney ultimately exchanged over 189 phone calls, totaling more than 40 hours in 2023 alone, not including the countless messages exchanged through Signal. In conspiring with Kearney to defame the Plaintiffs, Read knew that Kearney's and her statements blaming Plaintiffs for the murder of O'Keefe were false because, in reality, she was responsible for O'Keefe's death.

49. In furtherance of the scheme, on May 3, 2023, Kearney met with Read, Jackson, and Yannetti for the purpose of coordinating Kearney's extrajudicial defamatory publications with Read's litigation and media strategy.

50. The same day, and after the meeting with Read and her counsel, Kearney posted a YouTube video reacting to Jackson's press conference after a court appearance.¹⁶ During this video, Kearney stated, "John O'Keefe was murdered by Brian Albert and by Colin Albert and that frickin dog and every other single person in that house who remains quiet to this day and participated in the lie . . . they're all guilty of murder as far as I'm concerned. They're participating in it." By accusing "every other single person in that house," Kearney intended to include McCabe and Higgins in his defamatory statement, a fact that his followers would have understood in light of prior publications.

51. On May 24, 2023, in conjunction with publishing Part 39 of his "Canton Coverup" series, Kearney published a YouTube video reacting to Jackson's press conference following

¹⁶ Turtleboy Live, *Karen Read Post-Court Press Conference at Norfolk County Superior Court 5.3.2023*, YOUTUBE (May 3, 2023), <https://www.youtube.com/watch?v=rOGm4devM0U&list=PLuKu6r4EYPRXKvtQHPemwnQSGHU4W7K2K&index=11>.

another court appearance.¹⁷ In the video, Kearney stated, “Jennifer McCabe and Brian Albert were involved. They are covering it up.” In a subsequent blog post, he continued, “The McCabes have the look of evil in them when you see them in person. These are people with no shame, and aren’t the least bit deterred by the fact that millions of people know that they participated in the murder and subsequent cover up of a murder of a Boston Police Officer.”¹⁸

52. Days later, on May 30, 2023, Kearney published Part 43 of his “Canton Coverup” series, wherein he discussed McCabe yet again, referring to her as “horse face” and reposting a video that Kearney previously took confronting McCabe and calling her a “cop killer.”¹⁹ Notably, the blog post covered the denial of an *ex parte* harassment prevention order (“HPO”) that McCabe sought against Kearney in Stoughton District Court based on his repeated public harassment of her. However, McCabe’s HPO request was not public information. Instead, Kearney received this information directly from Read’s counsel, Yannetti, who sent a text message to Kearney that McCabe’s request for an HPO had been made and denied. In particular, Yannetti wrote to Kearney, “HPO Denied.”

53. Then, on June 6, 2023, McCabe traveled with her husband to attend their children’s sporting event in Billerica, Massachusetts. Kearney traveled to the same event, at Read’s behest, with the purpose of accosting the McCabes, which he did in a video that he posted online. Kearney

¹⁷ Turtleboy Live, *Karen Read Rule 17 Hearing – Defense Team Press Conference and Post Court Thoughts*, YOUTUBE (May 24, 2023), <https://www.youtube.com/watch?v=2NwB4BUZrLI&list=PLuKu6r4EYPRXKvtQHPemwnQSGHU4W7K2K&index=22>.

¹⁸ Aidan Kearney, *Canton Cover-Up Part 39: Judge Cannone Cancels Evidentiary Hearing, Refuses To Allow Defense to Question Jen McCabe And Brian Albert, Karen Read Speaks For First Time*, TB DAILY NEWS (May 24, 2023), <https://tbdailynews.com/2023/05/24/canton-coverup-part-39-judge-cannone-cancels-evidentiary-hearing-refuses-to-allow-defense-to-question-jen-mccabe-and-brian-albert-karen-read-speaks-for-first-time/>.

¹⁹ Aidan Kearney, *Canton Cover-Up Part 43: Jen McCabe Denied Harassment Prevention Order Against Turtleboy In Stoughton District Court*, TB DAILY NEWS (May 30, 2023), <https://tbdailynews.com/2023/05/30/canton-coverup-part-43-jen-mccabe-denied-harassment-prevention-order-against-turtleboy-in-stoughton-district-court/>.

then wrote a blog post about the interaction stating, “Jen and Matt McCabe do not deserve to live a normal life and pretend that they weren’t involved in murdering a Boston Police Officer.” In a subsequent video, Kearney again discussed his harassment of the McCabe family stating, “I went to her kid’s lacrosse game and made a scene there and got kicked out . . . because I kept calling her a cop killer.”²⁰

54. On July 23, 2023, Kearney met with Read and Jackson again in person. The purpose of this meeting was for Read, Jackson, and Kearney to meet with a national CBS News correspondent over dinner at a steakhouse in downtown Boston to discuss Read’s criminal case. This meeting occurred the day after a “rolling rally” organized by Kearney took place, where nearly 50 cars drove in tandem through the streets of Canton expressing their support for Read. During the rally, Kearney stopped at the homes of Brian Albert and McCabe (who was home at the time), shouting into a bullhorn that Brian Albert and McCabe were covering up O’Keefe’s murder. Kearney’s behavior at the rally enjoyed the support of Read and her legal team. Indeed, the day of the rally, Yannetti messaged Kearney, “Thank you for your continued support.”

55. The next day, Kearney hosted his Weekend Live Show on YouTube.²¹ During his show, Kearney stated that “Jen McCabe killed or helped to kill, let’s keep it a buck, that’s what she did, she killed John O’Keefe.” He proceeded to question why O’Keefe’s family was associating with McCabe by stating, “[Jen McCabe] killed her uncle and then you’re escorting her to the f*cking orientation” and “[Jen McCabe] killed your son. She f*cking killed him.”

²⁰ RissFlex, *ELITE MA CORRUPTION ft. TURTLEBOY!*, RUMBLE, https://rumble.com/v3a5bri-elite-ma-corruption-ft-turtleboy.html?e9s=src_v1_s%2Csrc_v1_s_o&sci=062228d5-b064-4d13-832e-c98f2d113fbd (last visited Apr. 15, 2026).

²¹ Turtleboy Live, *Ep #593 – Boston House of Horrors Cover-Up, Photographer Beef, Canton Updates*, YOUTUBE (June 24, 2023), <https://www.youtube.com/watch?v=U-eoYStQnQk&list=PLuKu6r4EYPRXKvtQHPemwnQSGHU4W7K2K&index=35>.

56. On August 9, 2023, Kearney published Part 96 of his “Canton Coverup” series.²² He began the blog post by explaining, “The movement for justice for John O’Keefe and Karen Read continues to grow by the day. Although Turtleboy was the first media outlet to really dig deep into this story, it has taken on a life of its own independent of our award winning journalism. The Facebook group dedicated to discussion of this topic has nearly 20K members and is one of the more active groups you will see on the platform.”

57. In his post, Kearney bragged about the fact that he was able to amass his followers with “well over 100 cars, and at least 200-300 people scattered everywhere” in front of the McCabe home. He included pictures of himself wearing a “FREE KAREN READ” t-shirt next to someone wearing the t-shirt sold by Kearney.

58. Kearney lambasted the Canton Police Chief by stating, “It’s disgusting and pathetic that this public official is treating a cop killer like the victim of a crime. This is the problem – the McCabes and Alberts are treated as royalty in this town, and they know that the police will go out of their way to protect them. This is why they felt so emboldened to kill a man, frame a woman, and think they could get away with it.” Kearney stated, “It’s painfully obvious to anyone with a brain that the McCabes and Alberts murdered John O’Keefe.”

59. On September 5, 2023, Kearney directed remarks in a YouTube video towards Chris Albert, the father of Colin Albert.²³ He bragged, “I go down to your pizza shop and I stand out there for an hour and I yell sh*t about your son. I just sh*t all over your child, Chris. . . . I go

²² Aidan Kearney, *Canton Cover-Up Part 96: Canton Citizens Revolt At Selectboard Meeting After Chief Rafferty Blames Peaceful Protestors For Making Jen McCabe Feel Unsafe, Says Turtleboy Broke The Law*, TB DAILY NEWS (Aug. 9, 2023), <https://tbdailynews.com/2023/08/09/canton-coverup-part-96-canton-citizens-revolt-at-selectboard-meeting-after-chief-rafferty-blames-peaceful-protesters-for-making-jen-mccabe-feel-unsafe-says-turtleboy-broke-the-law/>.

²³ Turtleboy Live, *Ep #611 – Karen Read Case: Is Chris Albert Suing Turtleboy, Federal Grand Jury*, YOUTUBE (Sept. 5, 2023), https://www.youtube.com/watch?v=kWMDVR_8Iao.

down there and I sh*t all over him and I accuse him of some of the most heinous things possible and I affect business. People don't want to go into your business because of the things that I'm saying. I'm telling cars going by what your family did and what you're being accused of and what you've done to cover this thing up and what a scumbag you are and how you don't pay your bills.”

60. By early September 2023, Read's team was concerned that the police were potentially going to charge Kearney with witness harassment. If that were to happen, Read's counsel, Yannetti, expressed “concern” to Kearney that, if that happens, “then a judge prohibits you from having contact with witnesses.” This prospect concerned Read, Yannetti, and Jackson, since they feared silencing Kearney would impact the Defendants' campaign against the Plaintiffs. Indeed, on September 9, 2023, Yannetti messaged Kearney, regarding the Plaintiffs, stating, “These b*stards deserve all the scorn we are giving them.” With Kearney silenced, the “scorn” Read intended to incite might diminish.

61. In addition to using Kearney as a tool to seed the public discourse with defamatory material, Read, through her counsel, also hired a private investigator, Sara Ness (“Ness”). Ness had previously worked with Jackson in connection with his representation of disgraced sex offender, Harvey Weinstein, and was deployed in that case to discredit victims of Weinstein's crimes.²⁴

62. On September 17, 2023, at the direction of Read and Jackson, Ness visited the home of Higgins. Read and Jackson directed Ness to question Higgins and other witnesses using tactics similar to those used against victims and witnesses in the Weinstein criminal trial. While Ness confronted Higgins, who Read and her counsel knew was represented by counsel at the time, Read

²⁴ See Ronan Farrow, *Harvey Weinstein's Army of Spies*, THE NEW YORKER (Nov. 6, 2017), <https://www.newyorker.com/news/news-desk/harvey-weinsteins-army-of-spies> (identifying Ness as one of Weinstein's “spies.”).

and her counsel watched from a blacked-out SUV, with Read texting Kearney in real time about Ness's efforts: "Sorry/ in the car with the lawyers. Stirring sh*t up again."

63. When Higgins refused to speak with Ness, Read texted Kearney again, this time seeking the address of Sarah Levinson, another witness who would ultimately testify against Read.

64. Following Higgins's refusal to cooperate with Ness, the Defendants directed additional defamation and defamatory conduct at him. As a federal law enforcement special agent with covert "under cover" responsibilities, Higgins suffered profound damage to his career as a result of the Defendants' false and widely publicized statements that Higgins was involved in O'Keefe's murder. In addition, due to Read's and Kearney's defamation, individuals have traveled to Higgins's residence for the purpose of taking photographs and videos. Higgins has been surveilled, and individuals inspired by Read's and Kearney's defamation campaign have trespassed and vandalized his property. Kearney himself has personally harassed Higgins by visiting Higgins's residence on multiple occasions for the purpose of confronting him and generating content to be published on platforms Kearney controls.

65. On September 19, 2023, Kearney hosted his Weekday Live Show.²⁵ In his show, Kearney stated, "What I'm saying right now is not, I'm not saying this as a matter of opinion. I'm saying this as a matter of fact that Jen McCabe participated in killing and planning to kill and cover up the murder of John O'Keefe. I am saying that, that is not my opinion that is a fact." He went on to taunt McCabe by exclaiming, "Jen McCabe participated in killing John O'Keefe. So sue me. Why don't you just sue me? Because you did it. Because she did it. That's why because she did it."

²⁵ Turtleboy Live, *Ep615 – Karen Read Case: Attorney Bob Motta Discusses Friday's Hearing | Confrontation in Canton*, YOUTUBE (Sept. 19, 2023), <https://www.youtube.com/watch?v=WeJNDzyqjHc&list=PLuKu6r4EYPRXKvtQHPemwnQSGHU4W7K2K&index=73>

66. During the same live show, Kearney also called McCabe's brother-in-law, Bob Galvin, after someone sent Kearney \$10 to his CashApp with Mr. Galvin's number. Kearney left a voicemail for Mr. Galvin in which he claimed, among other things, "your sister-in-law Jen she done killed that motherf*cker."

67. Thrilled by the level of exposure and overall impact that Kearney's publications were having on Read's defamation campaign, Read messaged Kearney through Signal on September 29, 2023, stating, "***Look at what you've done to their reputations!! And to MY jury pool!*** Chris [Albert]'s business is the next casualty. Just a matter of time." Read was referring to the public degradation of the reputations of, among others, the Plaintiffs.

68. Around this same time, Read and Kearney became "Administrators" of the Facebook group "Justice for Officer John O'Keefe & Karen Read-Turtleboy Official." As Administrators, Kearney and Read maintained complete control over the Facebook group, including the ability to approve or deny posts, delete posts or comments, and approve or deny new members. The group became a feeding ground for defamatory and harassing posts made regarding the Plaintiffs. Read personally posted in the group on several occasions, including instances where she shared confidential information regarding her criminal case that had not been previously made known to the public.

69. On March 12, 2024, Kearney posted a two-hour recap following one of the last court appearances before Read's first trial.²⁶ In the video, Kearney stated, "We called them murderers because they are. They are. They murdered John O'Keefe and I will not shut up about

²⁶ Turtleboy Live, *Ep645 - FBI Bombshells at Karen Read Hearing*, YOUTUBE (Mar. 12, 2024), <https://www.youtube.com/watch?v=LDVSQXXL4R4&list=PLuKu6r4EYPRXKvtQHPemwnQSGHU4W7K2K&index=126>

that. You can call them witnesses all you f*cking want. They murdered John O’Keefe. That is a fact. It is undeniable. We don’t know who delivered the fatal blow but they all f*cking did it.”

70. Kearney attempted to justify his harassment and defamation of the Plaintiffs by claiming that they deserved it. For example, Kearney admitted that he harassed McCabe at her daughter’s lacrosse game and attempted to justify that conduct as follows: “Well guess what? Jennifer McCabe murdered a Boston police officer. She doesn’t have a right to not be asked questions in public about that. You murdered someone. You don’t get to just walk around like none of this happened.”

71. Before launching the defamation campaign with Read against the Plaintiffs, Kearney’s YouTube channel only had 25,000 subscribers. Before the first trial, Kearney’s followers had ballooned to 70,000 YouTube subscribers.

C. The Profit Model

72. Kearney’s willingness to work with Read and his conduct is based on twin motives: greed and fame. Kearney’s business model relies on his ability to attract an audience by spreading outrage and mistrust, including most centrally, through his defamatory statements about the Plaintiffs. It is a very lucrative business model. Kearney and Read have built an audience and personal celebrity by spreading these false narratives.²⁷

73. Kearney holds himself out as a trusted reporter, regularly referring to himself as an award-winning journalist and a truth teller when, in fact, he is nothing more than a willing purveyor of and vessel for defamatory material that Read fed him to publish for her own selfish purposes. Once Kearney captures his audience’s attention with outrageous claims, he exploits their anger and mistrust by urging them to pay him money in exchange for products that echo the false

²⁷ See generally Richard J. Hofstadler, *The Paranoid Style in American Politics, and Other Essays* (1964).

worldview he promotes. In his internet-based shows and content, Kearney hawks merchandise exploiting the “Canton Coverup,” his dishonest characterization of events (“a Boston cop possibly being involved in murdering another cop, followed by an elaborate coverup designed to frame the murdered cop’s girlfriend”), a design featuring a Massachusetts license plate with the word “FRAMED” as the number, and a t-shirt featuring the text of a google search that Kearney has repeatedly lied about, to name just a few.²⁸

74. Kearney consistently hustles his followers to donate directly to him on his homepage and in his posts. His YouTube features a “Defense Fund” where followers continue to send him money in his pursuit of “defend[ing] free speech.”²⁹ And during his live streams, he shares the names and messages of people who donate to him directly while watching his content. For example, during one live stream, he listed that “Stephanie sends 10 bucks and says, Brian Higgins car front of mailbox. How does that work? Help. . . .Thank you very much. Stephanie. Jim Ferris Bueller sends five bucks and says, Hey Liberace, that shirt’s going to irritate your nips. . . . Jason EMT sends five bucks. No comment. Thank you, Jason EMT. . . . Carrie sends five bucks and says, what News Station is covering the trial? All of them. All of them. Brooke sends \$2.50, says Free Karen Read. And can you say, hi, Jennifer. Hi Jennifer. Greg sends \$50 and says Class of 94. We love you, John. Great to see that. Great to see that. Thank you very much, Greg. Okay. And Laura sends 10 bucks and says, please wear that shirt to court Tuesday.”³⁰ After personally

²⁸ *Shop*, TB DAILY NEWS, <https://tbdailynews.com/shop/> (last visited Apr. 11, 2026).

²⁹ *Help Turtleboy defend free speech*, GIVESENDGO, <https://www.givesendgo.com/GB83T?fbclid=IwAR3OEFux3cnn-Hgudot8Ont5PT5AzXeeXsEcDTsVYIS5HivoqGPTcT8ExYQ> (last visited Apr. 15, 2026).

³⁰ Turtleboy Live, *Ep656 – Karen Read: TB Interviews Dismissed Juror, Jill Daniels Self-Doxxing & Julie Grant*, YOUTUBE (Apr. 20, 2024), <https://www.youtube.com/watch?v=nrYA1fwaUck>.

recognizing his followers, Kearney goes on to direct his other followers to donate to him at the link on his website or directly through CashApp.

75. Kearney's followers buy subscriptions, donate to him, purchase his merchandise, and continue to visit his website and YouTube page, all of which boost his attractiveness to advertisers.

76. Kearney has estimated his monthly income to be \$45,000-\$50,000, which he attributes to his defamatory discussions of the Read case.³¹

77. Kearney publicly defends this corrupt business model by explaining, "Well, it's capitalism. If . . . [he creates] a service that people think is worth giving their hard-earned money to, that's capitalism. That's their choice." He claims that "people want to give [him] money. People wanna buy Turtle Club subscriptions. People wanna buy stuff from the store."³²

78. In coordination with Read, and at her behest, Kearney spread elaborate and false narratives about the Plaintiffs because doing so attracted attention, personal notoriety, and a buying audience. He deliberately stokes social anxiety and political discord in his listeners, because distrust in government and cultural tribalism motivates those listeners to buy his products.

79. Kearney also sought production and movie deals to further monetize his highly public defamation and harassment campaign against Plaintiffs. On July 1, 2023, just three months after Kearney began working with Read to disseminate her false claims and harass witnesses, Kearney reported to Jackson that he had received an offer for a Karen Read documentary from B17 Entertainment, a California production company.

³¹ Catherine Elton, "*Free Karen Read*" Blogger Turtleboy Will Not Go Quietly, BOSTON MAGAZINE (May 19, 2024), <https://www.bostonmagazine.com/news/2024/05/19/who-is-turtleboy-aidan-kearney/>.

³² Aussie Insider, *Aidan Kearney Unplugged*, YOUTUBE (July 18, 2025), <https://youtu.be/27wCMD4SXX4>.

D. The Trial of Karen Read

80. Read's first trial began with jury selection on April 16, 2024. Kearney took to his live stream on April 17 and wondered "if they can find jurors that aren't tainted already" because "Turtleboy is everywhere."³³ He proceeded to claim that they "can't find a jury in the United States of America, anywhere, any county, anywhere," because "Turtleboy's too big."

81. On April 20, 2024, Kearney interviewed an excused juror who had previously engaged with his content and had been a member of his Facebook group.³⁴ She explained that when she arrived for jury duty, she saw Free Karen Read signs all along the street, and people wearing pink in support of Read, and that she could hear the protestors inside the courthouse. She also said that everyone in the room said that they had previously heard about the case.

82. During the same live stream, Kearney played a clip covering the courthouse from CourtTV. He proceeded to verbally attack the host who expressed dissatisfaction with the conduct of Kearney and his followers, claiming it was "disgraceful" for them to harass O'Keefe's family. Kearney said, referring to McCabe, "You know what's disgraceful? Julie Grant . . . I'll tell you what's really disgraceful is when somebody who Googled how long to die in cold at 2:27 AM because they wanted to make sure, or they wanted to see and find out how long it would take for John O'Keefe to die in the snow. When a person like that shows up with the O'Keefe family and rubs their shoulders and starts a support group called Peggy's Angels, that's disgusting."

83. Kearney went on to say that McCabe is "sick and sadistic and twisted" and that he has "nothing but hatred to her as I should because I'm normal. I'm a rational person. Any rational person hates Jennifer McCabe [and] is disgusted by her because Jennifer McCabe is a pig. She's a

³³ Turtleboy Live, *Ep 655 – Karen Read Case: Witness List and Jury Selection*, YOUTUBE (Apr. 17, 2024), <https://www.youtube.com/watch?v=fZsT5Mxm75I>.

³⁴ *See supra*, n.29.

pig. She’s a cop killing pig.” He proceeded to mock the CourtTV host again saying, “she supports a cop killing pig like Jennifer McCabe, who googled how long to die in cold.”

84. On May 17, 2024, following the first day of McCabe’s trial testimony, Kearney posted to X that McCabe was a “psychopath” and that she “knew EXACTLY where [O’Keefe] was – dying in the cold on Brian Albert’s front lawn. She plotted to put him there.”³⁵

85. On May 21, 2024, Kearney published Part 354 of his “Canton Coverup” series in which he summarized the testimony of the Plaintiffs and claimed that the Plaintiffs “lie[d] their way through” their testimony.³⁶ He claimed that “[t]hey all have nearly identical, well-rehearsed stories,” which “isn’t surprising because they’ve had two years to make sure they have them straight and their lives depend on the consistency.” He also explained that “all of the [Plaintiffs] were caught in lies at some point during their testimony[.]”

86. On June 7, 2024, Kearney joined “The Morning Club” YouTube channel to discuss the Read trial.³⁷ After being praised for “literally creat[ing] all of” the fanfare surrounding Read’s trial, Kearney touted that people believed, in response to Kearney’s coverage of the case, that the Plaintiffs engaged in “a legitimate coverup and, and a framing of an innocent woman in order to protect some of the most unlikable people ever. Like, it’s not like they’re trying to cover up and protect likable nice people. Like they are protecting Jennifer McCabe, who nobody likes. She’s . . . like a Disney villain. She’s so bad. And like you’re protecting her of all people?”

³⁵ Aidan Kearney (@DoctorTurtleboy), X (May 17, 2024, 2:16PM), <https://x.com/doctorturtleboy/status/1791533299371798946?s=43>.

³⁶ Aidan Kearney, *Canton Cover-Up Part 354: McAlberts Lie Their Way Through Week 3 Testimony In Karen Read Trial*, TB DAILY NEWS (May 21, 2024), <https://tbdailynews.com/2024/05/21/canton-coverup-part-354-mcalberts-lie-their-way-through-week-3-testimony-in-karen-read-trial/>.

³⁷ The Alternate Corner, *Morning Club & Aidan Kearney, Doctor Turtleboy*, YOUTUBE (June 7, 2024), <https://youtu.be/BznamhFd7k4>.

87. On June 22, 2024, Kearney hosted his Weekend Live Show as Read’s defense team began presenting their case.³⁸ During the show, Kearney directed comments towards a member of the Albert family and said, “Your family murdered a cop. A human being and then they covered it up. Then they blamed an innocent woman. This is not an opinion. It is a fact. It is an undeniable fact. . . . The bigger injustice . . . is that John O’Keefe was murdered by the McAlberts³⁹ and left outside to die.”

88. In March 2025, HBO released a five-part docuseries covering Karen Read’s first trial in depth, which featured interviews with Read, Jackson, and Yannetti filmed during Read’s first trial. Episode Two features the relationship that developed between Read and Kearney before and during trial. Yannetti admitted that they wanted media coverage of her case. Initially, there was no coverage, but, according to Yannetti, “the Karen Read case really started to blow up when Turtleboy started shining a light on Karen’s innocence.” Yannetti did not disclose that it was Read and her team who recruited Kearney to disseminate Read’s false statements.

89. Read admitted that her lawyers said that she could provide information to Kearney, so long as it was public, but advised her not to speak with him directly. Nevertheless, she said she “got nervous about who [she] was using as a third-party” so she ended up developing a direct relationship with Kearney herself. They “started talking about the case probably once a day, five – six days a week.” Read, however, failed to disclose to HBO that her counsel, on her behalf, were directly communicating with Kearney at the outset of the defamation scheme.

³⁸ Turtleboy Live, *Ep673 – Karen Read Trial: Lucky Loughran, Medical Examiner, Dr. Russell, Rick Green*, YOUTUBE (June 22, 2024), <https://www.youtube.com/watch?v=F7q-OmwG2Ew&list=PLuKu6r4EYPRXKvtQHPemwnQSGHU4W7K2K&index=216>.

³⁹ “McAlberts” became shorthand for the McCabe and Albert families to Kearney and his followers.

90. In the same HBO series, one of Kearney's followers admitted that Kearney had spurred them to take public action. Another admitted that "Turtleboy [was] the reason there were people outside the courthouse every single day." The documentary features footage of Kearney conceding that his purpose in canvassing the communities and creating a daily courthouse presence was to affect the jury pool. Kearney's followers were so incendiary that the judge created a 200-foot buffer zone around the courthouse and ordered that no one carry any signs or wear clothing with the intent to influence what was happening inside during the trial. Nevertheless, Kearney's followers, who were steeped in his lies about the Plaintiffs, showed up every day chanting, "FREE KAREN READ," and wearing pink as a symbol of their support.

E. The Runup to Read's Retrial

91. On July 1, 2024, a mistrial was declared in Read's first trial after eight jurors decided that Read was guilty of manslaughter, but four jurors disagreed. Following the deadlock, the Commonwealth announced its intention to retry the case. Kearney and Read persisted in their defamation campaign against the Plaintiffs.

92. For example, on July 22, 2024, Kearney hosted a live show from outside the courtroom during a pre-trial hearing.⁴⁰ The video, which is set outside the courthouse, depicts Kearney confronting a police officer who is directing Kearney away from an individual whom the Court had restrained Kearney from contacting. Kearney proceeded to harass other supporters of the O'Keefe family outside the courthouse by saying, "[T]hey're just supporting cop killers. They're supporting the cop killing McAlberts that's what they're here to do. These are the cop killing McAlberts. . . . These are the people supporting the cop killers who murdered John O'Keefe

⁴⁰ Turtleboy Live, *Karen Read Hearing: Live Outside of Court – Part 1 – 7.22.24*, YOUTUBE (July 22, 2024), <https://www.youtube.com/watch?v=ms9DBMaeq9I&list=PLuKu6r4EYPRXKvtQHPemwnQSGHU4W7K2K&index=230>.

in cold blood. They murdered him. They murdered John O’Keefe in cold blood.” He asked the bystanders, “Are you proud to support cop killers like the McAlberts?” He continued, “I didn’t kill someone like Jen McCabe, Brian Albert and they all did. I didn’t kill anyone but they did. Yes they did. Yes they did. They murdered him. They murdered John O’Keefe in cold blood.”

93. On July 29, 2024, Kearney published Part 382 of his “Canton Coverup” series.⁴¹ In this post, Kearney explained, “I’ve been fighting for justice for John for the last 15 months. I sacrificed my freedom for that. But because [the O’Keefe family] can’t get over their hatred for Karen Read and they have too much pride to admit that they’ve been conned by John’s killers, they want me to rot in prison.” Kearney also explained that the reason he faced witness intimidation charges was “because I am standing up for justice for [John], and because I have questioned the people who the evidence shows murdered John.”

94. On August 17, 2024, Kearney hosted his Weekend Live Show on YouTube.⁴² In his show, Kearney discussed a documentary about Scott Peterson’s involvement in Lacy Peterson’s murder in 2002. Kearney stated, “That’s how I view the McAlberts. The same way those reporters view Scott Peterson I view the McAlberts. I didn’t view the McAlberts as witnesses. I view them as murderers because they are. Like, they’re f*cking murderers. They put this in my charging document so let me say it again in case I wasn’t clear the first 1,000 times

⁴¹ Aidan Kearney, *Canton Coverup Part 382: Paul O’Keefe Threatens To Take Down Award Winning Journalist, Punish Small Children, Donate To TB Legal Defense Fund, Reveals Perjured Testimony In Court*, TB DAILY NEWS (July 29, 2024), <https://tbdailynews.com/2024/07/29/canton-coverup-part-382-paul-okeefe-threatens-to-take-down-award-winning-journalist-punish-small-children-donate-to-tb-legal-defense-fund-reveals-perjured-testimony-in-court/>.

⁴² Turtleboy Live, *Karen Read Case: Grant Smith-Ellis Police Reports | John DePetro Reacts to Karen Read Dinner*, YOUTUBE (Aug. 17, 2024), <https://www.youtube.com/watch?v=w4RT9n4e7qs&list=PLuKu6r4EYPRXKvtQHPemwnQSGHU4W7K2K&index=240>.

[that] I've said this. *[T]he McAlberts murdered John O'Keefe. They did . . . the McAlberts murdered John O'Keefe because it wasn't Karen Read.*"

95. On September 14, 2024, Kearney hosted his Weekend Live Show.⁴³ Kearney stated, "Think of how much that cost the Commonwealth. All to protect Jennifer McCabe. All to protect her. A murderer. Let me be very clear about this in case I haven't a million f*cking times. *Jennifer McCabe is a murderer*. Like full stop. That's it. She's a murderer. She did it. She actively participated in the murder of John O'Keefe. I can't stress that enough. I'm begging them to sue me if it's not true. They haven't done it yet. She actively participated in the murder of John O'Keefe."

96. On October 18, 2024, Read publicly acknowledged for the first time her longstanding relationship with Kearney. In an interview given to Dateline NBC, Read admitted to speaking with Kearney on the phone "almost every day, for like 20 minutes."⁴⁴

97. On January 20, 2025, Kearney published part 466 of his "Canton Coverup" series.⁴⁵ In response to a claim by one of McCabe's friends that she was harassed by a "Turtle Rider" (the name for Kearney's followers) in public, Kearney stated, "[t]he fact that Jennifer McCabe has to cover her face in public like this because everywhere she goes people immediately see her face and recognize her as a cop killer, is a great thing."

⁴³ Turtleboy Live, *Ep694 – MSP: Suspicious Death of Enrique Delgado-Garcia | Key Cycles | More "Witness Intimidation"*, YOUTUBE (Sept. 14, 2024), <https://www.youtube.com/watch?v=nRjUDHm1jvo&list=PLuKu6r4EYPRXKvtQHPemwnQSGHU4W7K2K&index=255>

⁴⁴ Abby Patkin, *Highlights from Karen Read's 'Dateline' special, from a 'coy' tipster to calls with Turtleboy*, BOSTON.COM (Oct. 21, 2024), <https://www.boston.com/news/crime/2024/10/21/karen-read-dateline-special-highlights-tipster-turtleboy/>.

⁴⁵ Aidan Kearney, *Canton Coverup Part 466: Hank Brennan's Friend Kerry Lama Caught Spying On FKR Supporters With Jennifer McCabe At Taunton Standout*, TB DAILY NEWS (Jan. 20, 2025), <https://tbdailynews.com/2025/01/20/canton-coverup-part-466-hank-brennans-friend-kerry-lama-caught-spying-on-fkr-supporters-with-jennifer-mccabe-at-taunton-standout/>.

98. On April 24, 2025, ABC released an episode of IMPACT x Nightline in anticipation of Read’s retrial, which featured interviews with Read and Jackson. In it, Read’s attorney, Jackson, stated, referring to the Plaintiffs, “There are people in that house that are actually responsible for his death, and who murdered him. And there are others in the house who are covering up that murder.”⁴⁶ Jackson also specifically refers to McCabe as being involved in a coverup: “Something was going on with John laying in that snow, in that front yard. That means that this was a coverup. John was murdered inside that house, his body was placed outside, and Jennifer McCabe knows that.”

F. The Retrial & Acquittal of Karen Read

99. On April 1, 2025, the second trial of Karen Read began with jury selection.

100. On April 23, 2025, O’Keefe’s mother testified. Kearney reacted on a Weekday Live Show by stating, “[S]he’s on the side of evil.”⁴⁷ He argued that O’Keefe’s mother is, “proudly friends with the people who quite obviously killed her son. Like, if that were my mother and I was killed, my mother would be looking for answers. . . . And she wouldn’t be like, yeah, I’m just gonna be easily manipulated. I mean, Jen McCabe is a master manipulator . . . She’s real good at fooling stupid people. And she’s very lucky that the guy she helped kill John O’Keefe was surrounded by a lot of stupid people. Like, there’s a lot of stupid people in John’s life.”

101. On April 25, 2025, Kearney took to X in response to a post claiming that the Free Karen Read movement should be ashamed of the way they treated O’Keefe’s mother. Kearney replied, “Your friends murdered this woman’s son. Every pain she’s feeling right now is a direct

⁴⁶ *Secrets in the Snow: The Murder Retrial of Karen Read*, HULU <https://www.hulu.com/series/impact-x-nightline-secrets-in-the-snow-the-murder-retrial-of-karen-read-63df15e8-ab47-49d7-97c5-7bffdf1929> (last visited Apr. 11, 2026).

⁴⁷ Turtleboy Live, *Ep755 - Karen Read Retrial Day 1&2: Timothy Nuttall | Kerry Roberts*, YOUTUBE (Apr. 23, 2025), <https://www.youtube.com/watch?v=0hb4ACAwh7E>.

result of the McAlberts and Brian Higgins murdering John O’Keefe. You proudly call these people friends. Nothing you say or think matters. At all.”⁴⁸ Despite quite literally engaging in divisive language, Kearney later posted on X, “The idea that the Canton community is divided is a lie the media spreads to make it sound like there are two equal competing sides to the Karen Read case. There is no divide. There is the vast majority who knows the McAlberts murdered John Okeefe [sic].”⁴⁹

102. Read herself also published more defamatory statements regarding the Plaintiffs during her retrial. On May 1, 2025, following McCabe’s testimony, Read spoke to reporters outside the courthouse about McCabe claiming, “[A]nother witness, *another instance of perjury, or instances, I’d say.*”⁵⁰ Referring to McCabe, Read then said, “[S]he is lying.”

103. Then, on May 8, 2025, Kearney went live outside of the courthouse wearing a t-shirt with a still of McCabe on the stand.⁵¹ He explained that he was “walking the periphery of the buffer zone” and hoped “to not be in violation with the shirt on.” He went around speaking to protestors outside the courthouse, with people coming from as far as California and Georgia. People stopped to take pictures with him, and people handed him money to which he responded, “People just give me cash. It’s nice.”

104. Read knew that her statements regarding McCabe and others, like the same type of statements that she fed to Kearney, were untrue and were intended to deflect from her own

⁴⁸ Aidan Kearney (@DoctorTurtleboy), X (Apr. 23, 2025, 2:15PM), <https://x.com/DoctorTurtleboy/status/1915107163019866323>.

⁴⁹ Aidan Kearney (@DoctorTurtleboy), X (Apr. 25, 2025, 7:56PM), <https://x.com/DoctorTurtleboy/status/1915917898549190776>.

⁵⁰ Boston 25 News, ‘Another instance of perjury’: Karen Read says Jennifer McCabe is lying on the witness stand, YOUTUBE (May 1, 2025), <https://www.youtube.com/watch?v=wfQNP2RsyT0>.

⁵¹ Turtleboy Live, Karen Read Retrial Day 12 - Live Outside of Court, YOUTUBE (May 8, 2025), https://www.youtube.com/watch?v=a1NsX4fn_dY.

culpability. During the retrial, the prosecution presented footage of an interview with Read and Yannetti. During the interview, Read acknowledged that she previously expressed concern to Yannetti that she was responsible for O’Keefe’s death: “And then when I hired David Yannetti, I asked him those questions. The night of January 29th, like David, what if, I don’t know, *what if I ran his foot over or, or what if I clipped him* in the knee and he passed out and, or went to care for himself and he threw up or passed out and *David said, then yeah you have some element of culpability.*”⁵²

105. Moreover, during the Commonwealth’s closing argument, the Commonwealth showed a clip from an interview with Read in the HBO documentary. With a smirk on her face, Read explains, “[t]he closest I must have said was did I hit him? I know I said I hit him, but did I really say it as many times as law enforcement is claiming I said it?”⁵³

106. On June 4, 2025, Kearney posted a video recapping day 27 of the Read retrial.⁵⁴ In response to the testimony of Brian “Lucky” Loughran, a plow-driver who testified on the Defense’s behalf,⁵⁵ Kearney said, “I run Canton. I’m the mayor of Canton. . . . I’m the most powerful person in Canton. Lucky, you don’t have to worry about them anymore. The big wolf is dead. I slayed them. [The McCabes and Alberts] are nothing.” Referencing the McCabes and the Alberts, he continued, “They’re pissing their pants every single day counting down the days of

⁵² Boston 25 News, *Karen Read: Prosecution rests case in murder retrial after 23 days of testimony. What’s next?*, YOUTUBE (May 29, 2025), <https://www.youtube.com/watch?v=kax1pvYD3ss&list=PL-6130lc1Zno-ZE6mMpVKrgNGy3YvJ0dA&index=108>.

⁵³ *Karen Read Murder Retrial: Commonwealth Closing Argument*, COURT TV (June 13, 2025), <https://www.youtube.com/watch?v=Ie-uDRG92cQ>.

⁵⁴ Turtleboy Live, *Ep774 - Karen Read Retrial Day 27: Turtleboy did not Intimidate Lucky Loughran*, YOUTUBE (June 4, 2025), <https://www.youtube.com/watch?v=z9erIqeBapc>.

⁵⁵ It should also be noted that Kearney claims credit for identifying Brian Loughran as a potential defense witness in the case. To NBC 10 WJAR, he explained that he identified “Lucky Loughran, who [was] a major witness for the defense in this case” and he “interviewed him before the State Police did.” NBC 10 WJAR, *Blogger Turtleboy speaks out after Karen Read trial verdict*, YOUTUBE (June 18, 2025), https://www.youtube.com/watch?v=MkeQ24vP_NY.

their freedom. Like Jennifer McCabe is every day. She's a free woman. She's grateful for her freedom because she knows that she's going to spend a significant amount of time in federal prison and it's going to be glorious when that happens.”

107. On June 18, 2025, immediately following the conclusion of the retrial, Kearney was interviewed by NBC 10 in Boston.⁵⁶ During the interview, he said, “[T]he people who murdered John O’Keefe are out there. They’re the McCabes and the Alberts and John O’Keefe went into their home and never came out of it alive, and they threw him on the lawn like trash.”

108. When asked if he felt responsible for the verdict, Kearney explained that he was responsible for “the social media aspect of it.”⁵⁷ He also explained that he’d “like to think that some of the evidence that was presented to [the jury] in court was a result of [his] journalism and [his] influence and [his] activism online.” He also applauded himself for conducting standouts, “put[ting] up billboards all over Norfolk County for Free Karen Read,” and making it impossible for people not to know about the case. Kearney was also asked, “[W]ho killed John O’Keefe,” to which he responded, “[T]he people inside Brian Albert’s house, dude, I don’t know who exactly delivered the fatal blow, but Brian Albert was in there. Colin Albert was in there. Brian Higgins was in there and the dog was in there. And quite frankly, every single person inside that house who has remained silent is just as guilty as the people who delivered the fatal blows to John. They did it.”

⁵⁶ NBC10 Boston, *Blogger ‘Turtleboy’ reacts to verdict in Karen Read trial: Live interview*, YOUTUBE (June 18, 2025), https://www.youtube.com/watch?v=SXpSC_i0qQg.

⁵⁷ NBC 10 WJAR, *Blogger Turtleboy speaks out after Karen Read trial verdict*, YOUTUBE (June 18, 2025), https://www.youtube.com/watch?v=MkeQ24vP_NY.

109. On June 19, 2025, Kearney posted a live YouTube video discussing the retrial.⁵⁸ Within the first ten seconds of Kearney being on camera, he remarked that there were already over 10,000 people streaming the video. He hustled the listeners to subscribe to his page, and, within the first five minutes, he had surpassed 143,000 subscribers to his YouTube channel. 35 minutes into the program, Kearney explained that over 20,000 people were watching the livestream, and that it was the “biggest show we’ve ever had.” He explained that if they had a message that they wanted him to read aloud to everyone, they could donate to him using the link attached to the chat, and they “could pay whatever amount of money [they] want and [they] could write a message.” For example, an individual by the name of Oksana sent him \$150 to say, “You did it Aidan, you did it. You stared down an entire system, built on lies and corruption and intimidation and you never blinked . . . Karen Read walks free.” An individual named Allison sent him \$10 to say, “I can’t imagine the pride and emotion you felt . . . seeing all your hard work come to fruition.”

110. During the same program, Kearney admitted that when the jurors came in after deliberating but before announcing the verdict, two of the jurors looked to him and smiled at him. Kearney also admitted that he was invited to the celebration dinner with Read and her defense team after the verdict. At the dinner, Kearney and Read posed for the picture below, mocking Colin Albert. Kearney then posted the photograph on X. He acknowledged that he and Read had spoken about recreating the picture with the same caption over two years prior.

⁵⁸ Turtleboy Live, *Ep782 - Karen Read: Not Guilty, Not Guilty, Not Guilty | The Verdict | Jurors Start to Speak Out*, YOUTUBE (June 19, 2025), <https://www.youtube.com/watch?v=7Tk3v38apo4>.



111. On November 2, 2025, Kearney hosted his Weekend Live Show in which he reacted to a podcast that he had previously appeared on speaking about the Read case. In the podcast, Kearney admitted that he “protected Karen Read” and that he lied “to Boston Magazine” about their relationship. He explained that Read’s team did not “want to be publicly associated with him”—“they wanted [him] to [do] the work of getting the story out there . . . about what the McAlberts have done.” He admitted that he understood it would be dangerous if her team were publicly tied to him, but that privately “they praised [him]” and “they fully supported [him].”⁵⁹ In the same video, Kearney also admitted that he approached McCabe in the past to ask her questions *at the direct request* of Read, Jackson, and Yannetti.

112. On January 12, 2026, Read participated in her first podcast interview since her criminal trial ended with Rotten Mango.⁶⁰ When asked, “[W]hat do you think happened to John O’Keefe?,” Read responded that he “entered the house at 34 Fairview and much sooner than later

⁵⁹ Turtleboy Live, *Ep822 – Sean Good on Leave? | Canton Connections | Drama*, YOUTUBE (Nov. 2, 2025), <https://www.youtube.com/watch?v=U11Ap62azAU&rco=1>.

⁶⁰ *Episode 483: Karen Read’s First Exclusive Interview After MURDER ACQUITTAL – What REALLY Happened At 34 Fairview*, ROTTEN MANGO (Jan. 12, 2026), <https://www.rottentangopodcast.com/allepisodes/azzlktkme97rwnr-ljffa-yemel-myw9k-8egyy-fl4cr-dp9er-j8r56-8kz25-argpa-b69p4-2nnhd-lnp54-trlee-bb4ma-ph63k-47828-xk9en-tlktj-tmdw2-g5ckl-datge-bz4hs-j6jhs-2gcsmdxht2-83k7e?rq=karen%20read>.

met his demise.” She bluntly concluded that “someone in that house killed John O’Keefe,” referring to the Plaintiffs.

G. The Impact of Kearney and Read’s Conspiracy

113. Every day since April 18, 2023, when the defamation campaign began, the Plaintiffs and their families have been harassed and tormented as a result of Kearney’s and Read’s unlawful conspiracy to defame them. The Plaintiffs have become prisoners in their own communities, besieged by Kearney and others who have been duped by Kearney and Read to believe that the Plaintiffs are murderers.

114. Defendants have deliberately employed these false narratives about O’Keefe’s murder and the Plaintiffs’ families as part of a marketing scheme that has brought Kearney substantial personal income. Kearney has an audience of hundreds of thousands of followers. He has purposely published statements by other people who falsely assert that the Plaintiffs are responsible.

115. As a result of Defendants’ campaign, the Plaintiffs have been forced to endure malicious and cruel abuse at the hands of ruthless and unscrupulous people. On a regular basis, the Plaintiffs have faced physical confrontation and harassment at their personal residences, their places of business, and their children’s extracurricular activities. The Plaintiffs have also sustained a barrage of harassment and verbal assaults on social media. Throughout Read’s trials, Kearney and his followers harassed the Plaintiffs as they reported to court to serve as witnesses. The harassment was so extreme that the judge ordered a buffer zone around the courthouse to protect those inside. Kearney and his followers chanted, “COP KILLERS,” as the Plaintiffs walked by and shouted, “FREE KAREN READ” all day.

116. The Plaintiffs have had to undertake efforts to protect themselves and their identities. Their families' places of business have been targeted. And Kearney has stalked them at their children's extracurricular activities, causing fear and emotional trauma to the Plaintiffs and their families. Kearney admitted publicly that one of the goals of his false, outrageous, and defamatory statements about the Plaintiffs was not only to portray the Plaintiffs as those responsible for O'Keefe's murder, but also to taint the jury pool for Read's trial and to benefit financially from the publicity.

V. CAUSES OF ACTION

COUNT ONE
(DEFAMATION AND DEFAMATION *PER SE*)
As to Defendant Read

117. The paragraphs above are incorporated and realleged as if fully set forth herein.

118. In repeatedly publishing false statements asserting or reasonably understood to be asserting that the Plaintiffs were responsible for the murder of O'Keefe, and a coverup of their purported role in that murder, Read published numerous defamatory statements both directly and through her accomplice, Kearney.

119. Read's statements were false. The Plaintiffs did not murder John O'Keefe, did not participate in any conspiracy to murder O'Keefe, did not engage in any coverup of O'Keefe's death, and did not frame Read for murder. Read knew her statements were false because she was present when O'Keefe was struck by her vehicle, made multiple admissions to first responders that she hit O'Keefe, and acknowledged to her own attorney that she may have had "some element of culpability" in O'Keefe's death.

120. These publications were not only individually defamatory, but also part of a continuous course of conduct, starting in 2023 and continuing through today, stating, asserting, implying and suggesting that the Plaintiffs were responsible for the murder of O'Keefe and

engaged in a coverup by, in part, framing Read for O'Keefe's death.

121. The statements contained in the Read's campaign of harassment and abuse constitute defamation *per se*. The harmful nature of the defamatory statements is self-evident. The defamatory statements implicate the Plaintiffs in heinous criminal conduct. False implications of criminal conduct constitute classic defamation *per se*.

122. Read's statements were of and concerning each of the Plaintiffs. She repeatedly identified Plaintiffs by name, and her audience understood the defamatory statements to refer specifically to the Plaintiffs. The defamatory statements were published to third parties, including Kearney's hundreds of thousands of followers, across multiple social media platforms, blog readers, podcast listeners, and television viewers.

123. Read's defamatory statements have injured the Plaintiffs' reputations and images, and have exposed the Plaintiffs to public and private hatred, contempt, and ridicule. These false publications have caused the Plaintiffs actual to sustain and substantial damages.

124. Read published her outrageous, cruel, and malicious lies about the Plaintiffs negligently, with knowledge that the statements were false, or with reckless disregard as to whether or not they were true.

125. These acts of Defendant Read resulted in damage to the Plaintiffs.

COUNT TWO
(DEFAMATION AND DEFAMATION *PER SE*)
As to Defendant Kearney

126. Paragraphs 1-116 above are incorporated and realleged as if fully set forth herein.

127. In repeatedly publishing false statements asserting or reasonably understood to be asserting that the Plaintiffs were responsible for the murder of O'Keefe, and a coverup of their purported role in that murder, Kearney published numerous defamatory statements.

128. Kearney's statements were false. The Plaintiffs did not murder John O'Keefe, did

not participate in any conspiracy to murder O’Keefe, did not engage in any coverup of O’Keefe’s death, and did not frame Read for murder. Kearney knew or had reason to know his statements were false because: (a) he received his information exclusively from Read and her legal team, who were motivated to deflect blame from Read; (b) he made no independent journalistic effort to verify the accuracy of the murder accusations before publishing them; (c) he repeatedly ignored or dismissed evidence contradicting his narrative; and (d) he admitted that he “protected Karen Read” and lied about their relationship to conceal the source of his information.

129. These publications were not only individually defamatory, but also part of a continuous course of conduct, starting in 2023 and continuing through today, stating, asserting, implying and suggesting that the Plaintiffs were responsible for the murder of O’Keefe and engaged in a coverup by, in part, framing Read for O’Keefe’s death.

130. The statements contained in Kearney’s campaign of harassment and abuse constitute defamation *per se*. The harmful nature of the defamatory statements is self-evident. The defamatory statements implicate the Plaintiffs in heinous criminal conduct. False implications of criminal conduct constitute classic defamation *per se*.

131. Kearney’s statements were of and concerning each of the Plaintiffs. He repeatedly identified Plaintiffs by name, and his audiences understood the defamatory statements to refer specifically to the Plaintiffs. The defamatory statements were published to third parties, including Kearney’s hundreds of thousands of followers across multiple social media platforms, blog readers, podcast listeners, and television viewers.

132. Kearney made these defamatory statements in an effort to increase his viewership and to profit financially.

133. Kearney’s defamatory publications readily identified the Plaintiffs to hundreds of

thousands of people.

134. Kearney's defamatory publications were broadcast to hundreds of thousands of people.

135. Kearney's defamatory publications have injured the Plaintiffs' reputations and images, and have exposed the Plaintiffs to public and private hatred, contempt, and ridicule. These false publications have caused the Plaintiffs to sustain actual and substantial damages.

136. In light of his prior experience with similar sorts of negligent, reckless and false statements, Kearney knew that his publications would cause the Plaintiffs to suffer harassment and potential violence.

137. Kearney broadcast his outrageous, cruel, and malicious lies about the Plaintiffs negligently, with knowledge that the statements were false, or with reckless disregard as to whether or not they were true.

138. These acts of Defendant Kearney resulted in damage to the Plaintiffs.

COUNT THREE
(AIDING & ABETTING DEFAMATION AND DEFAMATION *PER SE*)
As to Defendant Read

139. Paragraphs 1-116, as well as paragraphs 126-138 above are incorporated and realleged as if fully set forth herein.

140. Defendant Read knowingly, recklessly, negligently, and maliciously aided and abetted the foreseeable, wrongful and tortious conduct of Defendant Kearney against the Plaintiffs described above, thereby substantially assisting and encouraging such conduct.

141. Among other things, Read continuously and intentionally provided Defendant Kearney with non-public and/or confidential information about her criminal case and the Plaintiffs,

whether directly or through an intermediary, to direct, assist, and encourage Defendant Kearney's tortious conduct.

142. As a direct and proximate result of Defendant Read's wrongful conduct, the Plaintiffs have been injured and damaged as described above and are entitled to recover compensatory and punitive damages from Defendant Read.

COUNT FOUR
(AIDING & ABETTING DEFAMATION AND DEFAMATION *PER SE*)
As to Defendant Kearney

143. Paragraphs 1-125 above are incorporated and realleged as if fully set forth herein.

144. Defendant Kearney knowingly, recklessly, negligently, and with legal malice aided and abetted the foreseeable, wrongful and tortious conduct of Defendant Read against the Plaintiffs described above, thereby substantially assisting and encouraging such conduct.

145. Among other things, Kearney continuously and intentionally communicated with Read and her legal team to secretly gather non-public and/or confidential information about Read's criminal case and the Plaintiffs to direct, assist, and encourage Defendant Read's tortious conduct.

146. As a direct and proximate result of Defendant Kearney's wrongful conduct, the Plaintiffs have been injured and damaged as described above and are entitled to recover compensatory and punitive damages from Defendant Kearney.

COUNT FIVE
(INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS)
As to Defendant Read

147. Paragraphs 1-116 above are incorporated and realleged as if fully set forth herein.

148. In engaging in her campaign of outrageous and false statements about the Plaintiffs, Read intended to inflict emotional distress or knew, or should have known, that emotional distress was the likely result of her conduct.

149. Read's conduct was extreme and outrageous.

150. Read's conduct was extreme and outrageous because she orchestrated a coordinated campaign to falsely accuse the Plaintiffs of murder and conspiracy to frame her, knowing these accusations were false. Read deliberately used an intermediary and encrypted communications to funnel false statements to Kearney for maximum public dissemination, hired a private investigator previously associated with Harvey Weinstein to confront Plaintiffs, and celebrated the destruction of Plaintiffs' reputations while monetizing the resulting publicity. Read's conduct exceeded all bounds of decency because she knowingly destroyed the reputations and lives of innocent people to deflect attention away from her own culpability in O'Keefe's death.

151. Read's conduct was the cause of the Plaintiffs' distress.

152. The emotional distress sustained by the Plaintiffs was severe.

153. As a direct and proximate result of Read's conduct, the Plaintiffs suffered severe emotional distress including, but not limited to, anxiety, fear for their personal safety and the safety of their families, damage to personal and professional relationships, and the inability to participate in normal daily activities without fear of harassment or confrontation.

154. The Defendant's conduct was so outrageous in character, and so extreme in degree, as to go beyond all possible bounds of decency, and to be regarded as atrocious, and utterly intolerable in a civilized community.

155. The Plaintiffs have suffered actual and substantial damages as a direct and proximate result of Read's conduct.

COUNT SIX
(INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS)
As to Defendant Kearney

156. Paragraphs 1-116 above are incorporated and realleged as if fully set forth herein.

157. In broadcasting his campaign of outrageous and false statements about the Plaintiffs, Kearney intended to inflict emotional distress or knew, or should have known, that

emotional distress was the likely result of his conduct.

158. Kearney's conduct was extreme and outrageous.

159. Kearney's conduct was extreme and outrageous because he: (a) published over 545 blog posts and countless videos falsely accusing Plaintiffs of murder; (b) stalked and confronted Plaintiffs at their homes, workplaces, and children's extracurricular activities; (c) publicly released Plaintiffs' personal identifying information including social security numbers, home addresses, and phone numbers; (d) organized mobs to gather outside Plaintiffs' homes; (e) called Plaintiffs derogatory names including "cop killer," "pig," and "horse face"; (f) left harassing voicemails for Plaintiffs and their family members; and (g) encouraged his followers to harass and confront Plaintiffs. Kearney's sustained, multi-year harassment campaign designed to torment the Plaintiffs and profit from their misery, constitutes conduct that exceeds all bounds of decency.

160. Kearney's conduct was the cause of the Plaintiffs' distress.

161. The emotional distress sustained by the Plaintiffs was severe.

162. As a direct and proximate result of Kearney's conduct, the Plaintiffs suffered severe emotional distress including, but not limited to, anxiety, fear for their personal safety and the safety of their families, depression, humiliation, damage to personal and professional relationships, and the inability to participate in normal daily activities without fear of harassment or confrontation.

163. Kearney's conduct was so outrageous in character, and so extreme in degree, as to go beyond all possible bounds of decency, and to be regarded as atrocious, and utterly intolerable in a civilized community.

164. In light of his prior experience with similar types of negligent, false and reckless statements, Defendant Kearney knew that his publications would cause the Plaintiffs to suffer harassment and potential violence.

165. The Plaintiffs have suffered actual and substantial damages as a direct and proximate result of Kearney's conduct.

COUNT SEVEN
(AIDING & ABETTING INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS)
As to Defendant Read

166. Paragraphs 1-116, as well as paragraphs 156-165 above are incorporated and realleged as if fully set forth herein.

167. Defendant Read knowingly, recklessly, negligently, and with legal malice aided and abetted the foreseeable, wrongful and tortious conduct of Defendant Kearney against the Plaintiffs described above, thereby substantially assisting and encouraging such conduct.

168. Among other things alleged herein, Read continuously and intentionally provided Defendant Kearney with non-public and/or confidential information about her criminal case and the Plaintiffs, whether directly or through an intermediary, in an effort to assist and encourage Defendant Kearney's tortious conduct.

169. As a direct and proximate result of Defendant Read's wrongful conduct, the Plaintiffs have been injured and damaged as described above and are entitled to recover compensatory and punitive damages from Defendant Read.

COUNT EIGHT
(AIDING & ABETTING INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS)
As to Defendant Kearney

170. Paragraphs 1-116, as well as paragraphs 147-155 above are incorporated and realleged as if fully set forth herein.

171. Defendant Kearney knowingly, recklessly, negligently, and with legal malice aided and abetted the foreseeable, wrongful and tortious conduct of Defendant Read against the Plaintiffs described above, thereby substantially assisting and encouraging such conduct.

172. Among other things alleged herein, Kearney continuously and intentionally communicated with Read and her legal team through encrypted means to secretly gather non-public and/or confidential information about Read's criminal case and the Plaintiffs in an effort to assist and encourage Defendant Read's tortious conduct.

173. As a direct and proximate result of Defendant Kearney's wrongful conduct, the Plaintiffs have been injured and damaged as described above and are entitled to recover compensatory and punitive damages from Defendant Kearney.

COUNT NINE
(NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS)
As to Defendant Read

174. Paragraphs 1-116 above are incorporated and realleged as if fully set forth herein.

175. Read's campaign of outrageous, cruel, and malicious lies created an unreasonable risk of causing the Plaintiffs severe emotional distress.

176. The Plaintiffs' distress was foreseeable.

177. The Plaintiffs' emotional distress was severe enough that it resulted in illness or bodily harm, including, but not limited to, anxiety, depression, sleep disturbances, and other physical manifestations of severe psychological trauma.

178. Read's outrageous, cruel, and malicious conduct was the cause of the Plaintiffs' distress.

179. The Plaintiffs have suffered actual and substantial damages as a direct and proximate result of the Defendant's conduct.

COUNT TEN
(NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS)
As to Defendant Kearney

180. Paragraphs 1-116 above are incorporated and realleged as if fully set forth herein.

181. Kearney's campaign of outrageous, cruel, and malicious lies created an

unreasonable risk of causing the Plaintiffs severe emotional distress.

182. The Plaintiffs' distress was foreseeable.

183. The Plaintiffs' emotional distress was severe enough that it resulted in illness or bodily harm, including but not limited to anxiety, depression, sleep disturbances, and other physical manifestations of severe psychological trauma.

184. Kearney's outrageous, cruel, and malicious conduct was the cause of the Plaintiffs' distress.

185. The Plaintiffs have suffered actual and substantial damages as a direct and proximate result of the Defendant's conduct.

COUNT ELEVEN
(AIDING & ABETTING NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS)
As to Defendant Read

186. Paragraphs 1-116, as well as paragraphs 180-185 above are incorporated and realleged as if fully set forth herein.

187. Defendant Read knowingly, recklessly, negligently, and with legal malice aided and abetted the foreseeable, wrongful and tortious conduct of Defendant Kearney against the Plaintiffs described above, thereby substantially assisting and encouraging such conduct.

188. Among other things alleged herein, Read continuously and intentionally provided Defendant Kearney with non-public and/or confidential information about her criminal case and the Plaintiffs, whether directly or through an intermediary, in an effort to assist and encourage Defendant Kearney's tortious conduct.

189. As a direct and proximate result of Defendant Read's wrongful conduct, the Plaintiffs have been injured and damaged as described above and are entitled to recover compensatory and punitive damages from Defendant Read.

COUNT TWELVE
(AIDING & ABETTING NEGLIGENT INFLECTION OF EMOTIONAL DISTRESS)
As to Defendant Kearney

190. Paragraphs 1-116, as well as paragraphs 174-179 above are incorporated and realleged as if fully set forth herein.

191. Defendant Kearney knowingly, recklessly, negligently, and with legal malice aided and abetted the foreseeable, wrongful and tortious conduct of Defendant Read against the Plaintiffs described above, thereby substantially assisting and encouraging such conduct.

192. Among other things alleged herein, Kearney continuously and intentionally communicated with Read and her legal team through encrypted means to secretly gather non-public and/or confidential information about Read's criminal case and the Plaintiffs in an effort to assist and encourage Defendant Read's tortious conduct.

193. As a direct and proximate result of Defendant Kearney's wrongful conduct, the Plaintiffs have been injured and damaged as described above and are entitled to recover compensatory and punitive damages from Defendant Kearney.

COUNT THIRTEEN
(CIVIL CONSPIRACY)
As to Defendants Kearney & Read

194. Paragraphs 1-193 above are incorporated and realleged as if fully set forth herein.

195. The Defendants, acting in concert with each other, conspired by concerted action to pursue a campaign of defamation, harassment, abuse, and intimidation resulting in severe emotional distress on the Plaintiffs, which included numerous unlawful acts or lawful acts by unlawful means as described above.

196. The Defendants formed an agreement, whether express or implied, to defame the Plaintiffs and, through their intentional, reckless, and negligent conduct, to inflict severe emotional distress on them. This agreement is evidenced by: (a) Read's use of intermediaries and encrypted

communications to funnel information and false statements to Kearney; (b) Kearney's admission that he received information and direction from Read and her legal team; (c) Read's praise and encouragement of Kearney's defamatory publications; (d) their coordinated timing of publications to coincide with court proceedings; (e) their shared financial and strategic interests in the defamation campaign; and (f) Read's and Kearney's joint efforts to conceal their relationship from the public.

197. In furtherance of their scheme to defame, harass, abuse, and intimidate the Plaintiffs, the Defendants committed overt acts and were otherwise willful participants in joint activity.

198. The Defendants' misconduct was undertaken with malice, willfulness, recklessness, and negligent indifference to the rights of others.

199. These acts of the Defendants resulted in damage to the Plaintiffs.

COUNT FOURTEEN
(MASSACHUSETTS UNFAIR TRADE PRACTICES ACT)
As to Defendant Kearney

200. Paragraphs 1-116, as well as paragraphs 126-138 above are incorporated and realleged as if fully set forth herein.

201. Kearney, in the course of trade or commerce, unethically, oppressively, immorally, and unscrupulously developed, propagated, and disseminated outrageous and malicious lies about the Plaintiffs and their family members, and he did so for profit. Kearney operates a commercial enterprise through which he monetizes content by selling subscriptions, merchandise featuring the Plaintiffs' names and likenesses, and advertising, and by soliciting donations. Kearney's defamatory statements about the Plaintiffs were integral to his commercial business model and were designed to attract paying customers and generate revenue.

202. This campaign of lies, abuse, and harassment was a deceptive and unfair practice

and offended public policy. Kearney's conduct constitutes unfair methods of competition and unfair or deceptive acts or practices in the conduct of trade or commerce within the meaning of M.G.L. c. 93A, § 2.

203. Kearney's reprehensible conduct caused substantial injury to the Plaintiffs that is not outweighed by any countervailing benefits to consumers or competition, and that the Plaintiffs themselves could not have reasonably avoided. Kearney's monetization of defamatory content about private individuals constitutes an unfair business practice.

204. Plaintiffs are consumers, and Kearney's actions caused them to suffer significant damages to, *inter alia*, money or property.

205. Kearney's conduct was a foreseeable cause of and a substantial factor causing the Plaintiffs' injury.

206. Kearney broadcast his outrageous, cruel, and malicious lies about the Plaintiffs negligently or with knowledge that the statements were false or with reckless disregard as to whether or not they were true.

207. Kearney's conduct was willful and knowing, entitling the Plaintiffs to an award of double or treble damages pursuant to M.G.L. c. 93A, § 9. Kearney deliberately built a commercial enterprise around defaming the Plaintiffs, knowing his statements were false or acting with reckless disregard for their truth or falsity.

208. These acts of the Defendant resulted in damage to the Plaintiffs.

209. Plaintiffs, through their counsel, served a demand letter on Kearney at least thirty (30) days prior to the filing of this Complaint pursuant to M.G.L. c. 93A, detailing the underlying facts of this cause of action with reasonable specificity.

VI. REQUEST FOR RELIEF

WHEREFORE, for the reasons set forth above, the Plaintiffs respectfully request that the Court grant the following relief:

- A. Enter judgment in favor of the Plaintiffs on all counts;
- B. Award damages in an amount to be determined at trial, but to exceed at least this Court's jurisdictional limit, including double or treble damages, pursuant to Chapter 93A;
- C. Award punitive damages in an amount to be determined at trial;
- D. Award the Plaintiffs reasonable attorneys' fees, costs, expenses of this litigation, and pre-judgment interest;
- E. Award any such other legal, equitable, and declaratory relief as the Court deems just and proper.

VII. JURY DEMAND

PLAINTIFFS DEMAND A TRIAL BY JURY ON ALL ISSUES SO TRIABLE.

Dated in Boston, Massachusetts on this 16th day of April, 2026.

JENNIFER McCABE, BRIAN ALBERT, COLIN
ALBERT, and BRIAN HIGGINS

By their attorneys,



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