

STATE OF ILLINOIS)

Attorney No. [REDACTED]

) SS

COUNTY OF COOK)

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION**

LEONARD COLDWELL,)

Plaintiff,)

v.)

Case No.)

OMRI SHABAT a/k/a)

JASON MICHAEL JONES,)

Defendant.)

COMPLAINT AT LAW FOR DEFAMATION PER SE

NOW COMES the Plaintiff, LEONARD COLDWELL, by and through his attorney, [REDACTED] and in support of the above-captioned complaint against Defendant, OMRI SHABAT a/k/a JASON MICHAEL JONES (hereinafter “JASON MICHAEL JONES”), and states as follows:

1. That at all times relevant, Plaintiff, LEONARD COLDWELL, was a resident of Charleston County, South Carolina.
2. That at all times relevant, Defendant, JASON MICHAEL JONES, was a resident of Cook County, Illinois, with his principal residence located at 1250 S. Michigan Ave., Chicago, IL 60605.
3. That Plaintiff, LEONARD COLDWELL is considered a public figure in the area of health law and is an author, lecturer, clinician, radio and TV personality and founder of the IBMS Instinct-Based Medicine System.

4. That Plaintiff, LEONARD COLDWELL, is board certified in the United States as a Dr. of Naturopathic Medicine (NMD), has been awarded the honorary degree of Doctor of Humanities, and has various other certificates and academic achievements.

5. That Defendant, JASON MICHAEL JONES, writes blogs on two websites: “Salty Droid” (saltydroid.info) and “Glancing Web” (glancingweb.com).

6. That when Defendant, JASON MICHAEL JONES, writes blog posts on Glancing Web he writes under the alias OMRI SHABAT.

7. That the Defendant, JASON MICHAEL JONES, published to the internet population on Glancing Web, articles containing false and/or defamatory statements about the Plaintiff, LEONARD COLDWELL, including words imputing the commission of a criminal offense and words that impute the Plaintiff’s lack of integrity in performing his duties and/or lack of ability in his profession, examples of which are set out by dates below:

- a. That on February 18, 2013, Defendant, JASON MICHAEL JONES, published an article on his blog titled, “The Leonard Coldwell Song” in which he made the following statements (a copy of this document attached hereto as *Exhibit A*):
 - i. That Plaintiff was a “rogue impostor”;
 - i. That Plaintiff was a “molesting fraud”;
 - ii. That Plaintiff was a “psychopath”; and
 - iii. That Plaintiff was a “fake doctor.”
- b. That on February 28, 2013, Defendant, JASON MICHAEL JONES, published an article on his blog titled, “Rachele Brooke Smith Entanglement with Lunatic

Coldwell” in which he made the following statements (a copy of this document attached hereto as *Exhibit B*):

- i. That Plaintiff was a “pseudo-healer”;
- ii. That Plaintiff “fabricated four ‘doctor degrees’”;
- iii. That Plaintiff is the “fakest doctor in the world”;
- iv. That Plaintiff is a “psycho”; and
- v. That Plaintiff’s IBMS system is a “scam.”

c. That on March 27, 2013, Defendant, JASON MICHAEL JONES, published an article on his blog titled, “Gun Control Commentary by a Psychopath” in which he made the following statements (a copy of this document attached hereto as *Exhibit C*):

- i. That Plaintiff is a “molestation-connoisseur”;
- ii. That Plaintiff “pretends to heal” patients; and
- iii. That Plaintiff was a “quack.”

d. That on April 8, 2013, Defendant, JASON MICHAEL JONES, published an article on his blog titled, “The Only Answer to Becoming a Desolation” in which he made the following statements (a copy of this document attached hereto as *Exhibit D*):

- i. That Plaintiff conducted “brainwash teleseminars”;
- ii. That Plaintiff committed “horrid crimes and felonies”;
- iii. That Plaintiff was a “fake doctor”;
- iv. That Plaintiff lead his own “con-cult”;

- v. That Plaintiff was “not a real doctor”; and
- vi. That Plaintiff “portrays himself as a doctor.”

8. As a proximate result of the foregoing defamatory statements by Defendant, JASON MICHAEL JONES, Plaintiff, LEONARD COLDWELL, suffered injuries including injuries to his personal and professional reputation as well as significant economical damages to his business.

9. Furthermore, that while the Plaintiff, LEONARD COLDWELL, suffered actual harm to his reputation, the false and defamatory statements are so obviously and materially harmful that injury to his reputation may be presumed if not proven.

10. The foregoing defamatory statements were made by Defendant, JASON MICHAEL JONES, with the knowledge of their falsity and with actual malice, so as to justify an award of punitive damages in an amount in excess of \$300,000.00.

WHEREFORE, Plaintiff, LEONARD COLDWELL, demands judgment against Defendant, JASON MICHAEL JONES, for compensatory damages in an amount in excess of fifty-thousand dollars (\$50,000.00) and for exemplary damages in an amount that will serve to punish Defendant, JASON MICHAEL JONES, and deterred the Defendant from similar conduct.

Respectfully Submitted,

[REDACTED] Attorney for Plaintiff

[REDACTED]