

**UNITED STATES COURTS OF APPEALS
FOR THE SECOND CIRCUIT**

**James Lawrence
v.
Hearst**

Case #: 21-813

**On Appeal from the United States District Court
for the District of Connecticut**

CORRECTED BRIEF of Appellant James Lawrence Pro Se

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- This arresting “incident” is the only incident reporter had any details to read and she cherry picks what to report so to deploy her subjective *“harass”* terminology.

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- Confirmation **Harassment** was NEVER part of any past investigation prior to the only investigation for **Harassment** - the Feb. 6, 2019 false arrest for **Second Degree Email Harassment**.
- Confirmation **Threatening** NEVER part of anything in my past.
- Confirmation I was arrested for **part #6 of the Second Degree Breach of Peace statute** and **NOT part #1** to which Appeal Court in James Lawrence v. Altice outrageously associated me with part #1 while not quoting the entire statutes parts #1-6 when attempting to conflate different laws.
- Confirmation the Incident Report for the arrest for **One Count of Second Degree Breach of Peace** has a Brief Description for the Incident Report as **“Suspicious Person”** and NOT “**Harassment**”.
- Confirmation ALL past **Incident Reports devoid of arrest** have either a Brief Description of **“Suspicious Person” or “Police General Service”** and NEVER have a “**Harassment**” Brief Description.
- Confirmation that the Brief Description of the Incident Report of the one and only **Harassment charge/arrest** from Officer Mark Grasso is “**Harassment**”.
- Confirmation that the Brief Description of the Incident Report for twice-rejected Warrant for **Second Degree Stalking** by the same officer is “**Harassment**”.
- Hearst lawyer Stephen Yuhan free to ask the Warrant writing Officer Sullivan at Deposition if he thinks I **harassed** anyone from his Warrant and Hearst never asks this big question! NOT ONCE, and thereby knowing there are many grey issues and thus disgustingly hoping a Judge will empower them with some legal spin to continue their (at best) now personal feelings.
- The ONLY part of my past with “police” at issue that Hearst lawyer Stephen Yuhan delved into at the Deposition was the Feb. 6, 2019 first time **Harassment** arrest for **Second Degree Email Harassment** which is after the original March 23, 2018 **Article #2** Big Deuce.

The Issue of NO Alleged Caller to Police about Feelings of “*getting into personal space*” at a Public Market Being Named

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- Without a third party or in this case “Police” deploying this loaded **harass** terminology (a word that is an actual statute), then logic dictates that the article/media demands names of women deploying this language.
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Certificate of Compliance

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STATEMENT OF THE CASE:

On March 5, 2018, I James Lawrence was called by Officer James Sullivan of the Westport Ct. Police Department to turn myself in for an alleged **ONE count of Second Degree Breach of Peace** incident for allegedly *“getting into personal space”* at a Westport supermarket on Nov. 5, 2017. Yes 5 months earlier. The arrest has no named complainant, no Sworn Written Statement, no proper evidence in the forms of video cams, etc... and thus after two years of court runs was settled in a non-criminal way by paying a \$90 infraction fee on the eve of Covid induced court lockdowns/delays. I wanted a trial, but prosecution refused me a trial having no evidence let alone witness as Warrant shows – NO Sworn Written Statement from an accuser. I could not wait any longer. This settlement was essential for perspective for my civil cases because it maintained my clean Connecticut Criminal Record.

Back in March of 2018 things became hyped to extremes because of Altice/News 12 and then Hearst/Westport News seizing the Arrest Warrant and doing special second articles on the arrest based on the Warrant narrative and not the Official Police Press Release. A 58-year-old woman named Wendy Higgins Chambers read about me in the Westport News/Hearst **Article #1** and made a beeline to News 12 Ct./Altice reporter Mark Sudol who seized the Arrest Warrant and proceeded to report that I was *“Arrested for Stalking Several Women”* around Westport supermarkets. A call from my lawyer to News 12 Ct. and they took down their coverage after 1 day admitting they got the arrest wrong let alone any fair and accurate interpretation of the warrant narrative about KNOWN **past “cases” that resulted in no arrest of any kind after investigation.**

Which brings me to Hearst/Westport News – defendant in the case at hand. After Wendy Higgins Chambers saw Altice/News 12 Ct. take down their material after 1 day, Wendy Higgins Chambers approached Hearst reporter Sophie Cecilia Vaughan who herself concocted another special secondary article about the arrest by attempting to interpret the Arrest Warrant deploying the words *“harass” and “haunt”* along with piling on an arrest record without informing the public of my conviction record. In this Westport News **Article #2** entitled *“Police: Man Harassed Women for Years”*, **Wendy Higgins Chambers is the only woman named and quoted and not even this sole woman Wendy Higgins Chambers deploys the very loaded and Course of Conduct language of “harass”.**

An attempted call and resulting Email exchange with first former Westport News editor Jarrod Ferrari (now working in luxury real estate) and then Hearst legal Stephan Yuhan produced no results for fair and balanced interpretations of the seized Warrant. Hearst refused to take down their unproven and unprovable

nameless, quote-less (alleged victim/accuser), and extremely damaging coverage and this **Article #2 (unlike Altice/News 12's 1-day coverage) has existed for 3.5 years and counting**. This essential time difference between News 12/Altice and the Westport News/Hearst coverage is only an introductory presentation as to how the resulting federal cases from the fiasco - James Lawrence v. Altice and then James Lawrence v. Hearst are different in many undeniable ways.

On Feb. 6, 2019, after leaving the country in July of 2018 so to feel safe from the Hearst persecution I was experiencing, I was arrested while home for some business for a (as Official Police Press Release states) **non-threatening Second Degree Email Harassment** for a solitary Sept. 18, 2018 Email that reads *"Anna advice: Do not cause my beloved 77 year old parents any stress whatsoever. Take this advice."* This arrest happened from an Arrest Warrant submitted by a different officer in October of 2018 while I lived far away from the area (See Exhibit K). Hearst's same reporter from **Article #2** parroted her **self-chosen words** of unproven and unprovable nameless, quoteless **"accusers of harassment"** by reporting with the headline ***"Man Accused of Harassing Women (plural) Arrested Again"*** – a first and only arrest for **Harassment**. The reporter also again piled on an arrest record contrary to the Warrant narrative without informing the public of my conviction record despite now having a year to verify my conviction record with ample resources (including my website on the fiasco - www.WestportJamesLawrenceNOTGuilty.com to read my official FBI Criminal Background Check conviction record (See Exhibit E).

In February of 2020, I James Lawrence Pro Se brought a **libel** case against Hearst/Westport News via **Complaint – ECF 1**. After a year of sharing arguments and evidence via Responses and Replies, the case was ready for Connecticut Judge Michael P. Shea to rule on a Summary Judgment in March of 2021. Prior to the Summary Judgment and prior to the Feb. 22, 2021 Deposition of the first Warrant writing Officer James Sullivan, I offered to drop the case against Hearst free of paying any Damages if they took down their unproven and unprovable articles. The Deposition of the arresting and Warrant writing officer verified not only that this officer never charged me with **harassment**, never used the term **"harass"** in the Warrant, but never thought of using the term **harass** in the Warrant.

There can be no better witness – the actual Warrant writing officer verifying there was **NO harassment** - EVER. The officer also confirmed that there were NEVER any **"threats"** for he confirmed not only are there no documents from **any Incident Report from my past that resulted in no arrest case long closed** (See Exhibit B) showing past **threats** but that the 2018 arrest was based on **section #6** of the Connecticut **Second Degree Breach of Peace statute** leaving absolutely no room for conflating this ONE count of **Second Degree Breach of Peace** with any more serious Course of Conduct crime like **Harassment or Stalking or Threatening** – a very significant fact revealed to the Second Circuit Court of Appeal in James Lawrence v Altice around the same time March of 2021 only to have a Petition for Rehearing

denied. I ask this fact now be properly processed within Brief and Exhibits.

After the Deposition of Officer James Sullivan, Hearst was given a Third Offer to do the right thing (to which took Altice/News 12 only 1 day to figure out back in March of 2018) and take down their unproven and unprovable material free of paying any Damages. Hearst for a third time refused to take down their unproven and unprovable material. Why? Even after learning through the Deposition that the actual Warrant writing officer was not agreeing with their interpretation of the Warrant, but also learning of some undeniable police misconduct, let alone knowing all the details presented from 2 cases, etc... Hearst still refused to accept my very generous offer and part ways amicably. Why the **persistence – veritable harassment** by Hearst?

District Judge Michael P. Shea outrageously rested his March 11, 2021 Summary Judgment absolutely on the previous Altice case. I was man put through undeniably “*unfair*” and “*outright false*” treatment as verified from Judge Stefan Underhill in James Lawrence v. Altice, me being a 55-year-old man 3+ years into this fiasco fighting a 24/7 unprovable extreme narrative that is wreaking havoc on my life from many angles. Extreme coverage is a cornerstone of any defamation case. Media coverage that refuses **to name or quote any woman** or even third party whatsoever while deploying the loaded term “**harass**” let alone **contradicting the Warrant writing officer** is undoubtedly extreme and belongs in front of a jury of our peers given all the unresolved issues of labeling me with a behaviour free of proper evidence. I now ask the Second Circuit Court of Appeals to fairly process all the arguments and be prepared to address how this case of James Lawrence v. Hearst is significantly different that James Lawrence v. Altice.

TABLE OF AUTHORITIES:

District Court ECF 42 Summary Judgment by Judge Michael P. Shea from the Connecticut District Court was NOT based on any solid statutes or case precedents. Judge Shea simply conflates the questionable and flawed reasoning from the Second Circuit Court of Appeal's Decision in James Lawrence v. Altice which itself attempts to establish its own Judicial Activist special authority on James Lawrence the individual. Summary Judgment of Judge Michael P. Shea does not entertain any obvious differences between James Lawrence v. Altice and James Lawrence v. Hearst. The March 11, 2021 Summary Judgment of James Lawrence v. Hearst was based on feelings from Second Circuit Court of Appeals Judge Debra Ann Livingston that I had a history or "*totality of*" KNOWN never proven and definitely unprovable "*conduct*" of as Arrest Warrant in question states "*getting into personal space*", and thus this was enough evidence for allowing extreme conflation with **stalking** despite there never being any arrest for **stalking** relative to the Westport Ct. incidents being interpreted nor any arrest of any kind in reference to the Westport Ct. "*totality of Lawrence's conduct*", nor having any evidence in the form of Affidavits, Sworn Written Statements, Video, let alone **names, quotes** describing alleged **stalking** or **harassment**, or evidence of any kind from a past legal investigation or proceeding that had ambiguous conclusions.

**STATEMENT OF SUBJECT MATTER AND APPELATE
JURISDICTION:**

A: Not needed

B: Not needed

C: The relevant filing dates establishing the timeliness of the Appeal was within the 30 days limit after March 11, 2021 Summary Judgment – **ECF 42**.

I filed the Appeal on March 24, 2021.

D: This Appeal is a result of the March 11, 2021 – **ECF 42** Summary Judgment by Judge Michael P. Shea from the Connecticut District Court.

**STATEMENT OF THE ISSUES PRESENTED FOR REVIEW:
AT ISSUE:**

ARGUMENT OF HEARST/WESTPORT NEWS REPORTING

“Police: Man Harassed Women for Years” and
“haunted women” and *“Man Accused of Harassing Women”*
as NOT being “*substantially true*”.

English: Substantially – 1: to a great or significant extent

2: for the most part; essentially

Essence - 1a: the permanent as contrasted with the accidental element of being

b: the individual, real, or ultimate nature of a thing especially as opposed to its existence

c: the properties or attributes by means of which something can be placed in its proper class or identified as being what it is

2: the most significant element, quality, or aspect of a thing or person

3: one that possesses or exhibits a quality in abundance as if in concentrated form

“Truth is stranger than fiction, but it is because Fiction is obliged to stick to possibilities; Truth isn't.” – Mark Twain

Is it right for me NOW TO BE FOREVER PORTRAYED AS A “**HARASSER**” devoid of any arrest or conviction and without any evidence in the form of **harassing terminology** within the **one count of Second Degree Breach of Peace** Arrest Warrant and Deposition from the Warrant writing Officer, let alone any past incident report devoid of any kind of arrest, let alone arrests devoid of convictions?

INTRODUCTORY QUESTION: Can a media organization repeatedly dox past arrests insinuating conviction without clarifying if the arrest ever became a conviction? Meaning at what point is the same reporter obliged to do further research or ascertain an Official Criminal Background Check or report the already KNOWN conviction records?

Section 12 of Exhibit A – Warrant for March 2018 Arrest for One Count of Second Degree Breach of Peace.

12. That on December 12, 2017 a Criminal History was performed for James Lawrence, dob 12/15/1965. It was learned that he does not have a Connecticut History but he did have an Arrest Record in the states of Florida and California. In Florida he had charges of Resisting Arrest and Fleeing/Eluding Police. In California he was charged with Petty Theft, Theft of Personal Property, Stalking, Inflicting Corporal Injury to Spouse and Battery of Spouse.

The March 2018 **Article #2** (See **Exhibit C**) parroted the Warrant (See **Exhibit A**) in ways that insinuated convictions and left the reader to imagine what they wanted.

A proper journalist would have spent time finding out more information like interviewing the officer or doing a Criminal Background Check (See Exhibit E).

The Feb. 2019 Article #3 (See Exhibit L) REPEATED the same Article #2 narrative a year later KNOWING of other articles and/or resources to properly complete the revelation/doxxing of the arrests. Article #3 again insinuated convictions for the article left the reader to imagine what they wanted.

INTRODUCTORY QUESTION continued: In addition, if we are to allow journalists to seize Warrants about an arrest are not journalists obliged to parrot the Warrant of the arrest they are covering?

Article #3 was covering an arrest that not only again had an Official Police Press Release that did not dox these past arrests, but also had a Warrant that toned down the doxing of past arrests unlike the previous Warrant for Article #2. The Warrant for 2019 arrest has NO mentioning of a past stalking arrest that resulted in no conviction.

Section 20 of Exhibit K - Warrant for Feb. 2019 Arrest for One Count of Second Degree Email Harassment.

20. That I conducted a criminal history check for the accused which revealed his arrest by Officer Sullivan on 03/05/2018 for Breach of Peace. In addition, the accused has an arrest record in the state of Florida dating back to 1986 and in California dating back to 1994. Prior to his arrest by Officer Sullivan, the accused was most recently arrested on 10/31/2013 for "BAT: SPOUSE/EX SP/DATE/ETC". no doxxing

Somehow the first Warrant was not properly redacted (by clerk of court) for it violated Westport Police redaction policies (See Exhibit H). The police obviously saw me persecuted by the media/Altice for stalking from the 2018 Arrest and felt they could be held responsible so made extra efforts to make sure this past conviction-free stalking arrest was not doxxed so people like the inexperienced 22-year-old Hearst journalist could not pursue her nasty opportunist agenda and blind persecution.

HEARST LEAGAL has KNOWN this for 3 years from correspondences. The REPORTER SOPHIE C. VAUGHAN KNEW of Altice/News 12 taking down their coverage of me after 1 day back in March of 2018, and certainly KNEW in 2019 when writing Article #3 that I was not ever convicted of the stalking charge. She had resources let alone the Warrant of the 2019 arrest she is covering at her disposal but chose to continue to muddy the waters with incomplete information insinuating the worst and allowing the reader aka "average reader" to imagine what they wanted.

ISSUES/QUESTIONS FOR REVIEW:

QUESTION #1:

Can a media lawfully portray this **ONE TIME Second Degree Breach of Peace** arrest as "**POLICE: Man Harassed Women For Years**" (not even written to be "alleged") given the fact that the **HARASS terminology** (COURSE OF CONDUCT BEHAVIORS AND ACTUAL LAWS) are not part of the **Second Degree Breach Of Peace Statute** nor anything in my past mentioned "cases" and the **HARASS terminology** is NOT DEPLOYED BY THE WARRANT WRITING OFFICER, thereby being forever portrayed by the media as a **HARASSER** in the Age of the Internet, portrayed as a **HARASSER** not only of a woman (related to the one-time arrest for **Second Degree Breach of Peace**) who was never quoted or willing to give a Sworn Written Statement as the Arrest Warrant in question shows, but of ANY PHANTOM WOMEN (NO NAMES OR QUOTES) in the past that **did not use the harass terminology** and who themselves also NEVER gave Sworn Written Statements let alone have any kind of arrest tied to their one-time call of concern to police resulting in INVESTIGATION, NO PROBABLE CAUSE, AND NO POLICE ACTION with Statute of Limitations fully in effect for decades?

SECTION 11 NARRATIVE FROM THE ARREST WARRANT FOR THE MARCH 5, 2018 ARREST IS THE MAIN ISSUE AT HAND.

Section 11 of Arrest Warrant:

11. That in checking this departments case history with Lawrence, I learned that there were 10 case incidents logged from 2002 till present. In all of these complaints Lawrence was seen ^{superlatives} following the complainants around a store or coffee shop and then following them out to their cars where he would either stare at them or get right into their personal space. In most of these cases, Lawrence was told that his actions scared the complainants to the point of them calling the police. He has even stated himself that he needed to rethink his approach with woman. That

QUESTION #2:

Is not the opinion/Deposition of the Warrant writing officer enough to allow for a jury of our peers since Hearst has been given multiple opportunities since the Deposition to remove their unproven and unprovable coverage free of any lawsuit?

QUESTION #3:

If a media company are to choose different words (that are actual laws) than the Warrant should they not be obligated to have **actual names with actual quotes** from a woman to which Hearst claims these women have **accused** deploying the **harassing terminology**?

QUESTION #4:

Is not a case (James Lawrence v. Altice/News 12) where a media organization chose their own words (*stalk*) that deviated from the Warrant's wording and actual

arresting charge, and then this media organization (Altice) made remedial efforts by removing all their unprovable coverage within **one day, radically let alone substantially different** than a case (James Lawrence v. Hearst) where a media organization who themselves chose their own wording (*harass*) deviating from the Arrest Warrant wording and actual charge, and refusing to remove or re-edit any aspects of their unprovable coverage thereby their coverage being alive for nearly 4 years and counting?

QUESTION #5:

Is not 1 day different than 4 years (1460 days)? AND are not the Damages from 1460 days more extreme and worthy of a jury than 1 day?

THE SECOND CIRCUIT COURT OF APPEAL DECISION'S IN JAMES LAWRENCE V. ALTICE SIGNIFICANT QUOTE:

APPEAL SUMMARY ORDER QUOTE - Judge Debra Ann Livingston
Case 20-393, 01/07/2021, Page of 2-3 of 5.

Here, the district court properly granted summary judgment because the evidence showed that News 12 accurately reported on what police said regarding Lawrence's documented history of following women in a harassing manner. The totality of Lawrence's conduct—including on November 5th and numerous past instances—met the common definition of "stalking": "to pursue quarry or prey stealthily," or "to pursue obsessively to the point of harassment." *Stalk*, Merriam-Webster's Online Dictionary (accessed Nov. 9, 2020). As described in the arrest warrant application on which News 12 based its reporting, Lawrence was accused on November 5, 2017 of following a woman inside a grocery store and out to her car in the parking lot, where he stood staring at her. This behavior was similar to his behavior in ten other reported incidents since 2002 in which he followed women in public places causing them to call the police because they felt uncomfortable. Therefore, because the November 5th incident and the other incidents mentioned in the arrest warrant involved Lawrence's repeated, unsolicited, and frightening behavior toward women, they were fairly described as stalking.

QUESTIONS #6:

WHY IS THE SECOND CIRCUIT COURT OF APPEAL NOT WRITING

ALLEGED “*totality of Lawrence’s conduct*” given the fact the reader of the Warrant KNOWS that these past alleged “*get into personal space*” are theories, unproven, and unprovable because there are NO arrests tied to these incidents, NO details, let alone NO evidence, for veritable **HARASSING behavior** would have at least one instance of Probable Cause for an arrest for something?

QUESTIONS #7:

Why is the Second Circuit Court deploying the word **harass** when it is not deployed by the Warrant writing officer and does the Second Circuit have a proper understanding of and accurately define the dictionary definition of **harassing** within a double-spaced paragraph of a Decision?

QUESTIONS #8:

Is not the term **harassing** a broad term that has many possible connotations and thus needs to be more precisely defined like the various forms of typical **harassment**, because the “*mind of the average viewer*” let alone top Internet searches for the term **harassment** shows **sexual harassment with accusers** as the most likely result or “*substantial*” opinion especially involving a man and a woman?

QUESTIONS #9:

Can fully KNOWN long past decades old complaints/calls of concerns and **resulting warnings devoid of any Probable Cause for any type of arrest** (let alone the Course of Conduct arrest of either **harassment or stalking**) and devoid of any evidence in the form of Sworn Written Statements, video coverage, witnesses, etc ... or more appropriately quotes from actual named women (that do not exist as of now), be lumped together as what the Second Circuit Court of Appeals wrote “*the totality of Lawrence’s conduct*”?

IT IS THIS QUOTE FROM THE SECOND CIRCUIT COURT OF APPEAL THAT IF RELATIVE TO THIS CASE (which it is not) DESERVES IMMEDIATE SOCIALLY SCIENTIFIC ANALYSIS AKA JURY OF OUR PEERS, POLLS, SURVEYS, LINGUISTIC EXPERTS, LEGAL EXPERTS, ETC... WHEN DISCUSSING WHAT JUDGE STEFAN UNDERHILL WROTE IN JAMES LAWRENCE V. ALTICE “*the mind of the average viewer*”.

This simple phrase/broad brush generalization from the Second Circuit Court of Appeal is one of a few controversial opinions, for equating any let alone “all” long past **run ins with someone that resulted in NO threats/police action/arrest** as “**harassing**” **devoid of any evidence**, with simple common sense logic dictating that each past call to police that resulted in no police action other than providing a warning - obviously **have their own particular circumstances** that the Warrant never ever delves into, a Warrant once again that NEVER uses the **stalk or harass terminology** let alone show any kind of past arrest for anything related to the subject matter **like stalking or harassing – actual statutes**. Media should never be

empowered to choose their own wording of an Arrest Warrant (let alone own crimes) especially loaded weapon words like **stalk or harass**.

QUESTIONS #10:

And (referring to Altice Decision) does the Second Circuit Court of Appeal have the right to even write “*Lawrence’s documented history of following women in a **harassing** manner*” when the Warrant writing officer himself never used the terms **harassing or stalking** (both Course of Conduct behaviors) and within Warrant writing officer’s Sworn Deposition said he never thought of using these words **stalk or harass** and opted for “*get into personal space*” – an actual dictionary phrase shown in [Exhibit J](#) that NEVER has the words **harass** or **stalk** within its definition?

The screenshot shows the Merriam-Webster website interface. At the top, there are navigation links for GAMES, BROWSE THESAURUS, WORD OF THE DAY, and WORDS AT PLAY. The Merriam-Webster logo and 'SINCE 1828' are on the left. A search bar contains the text 'invade someone's space'. Below the search bar are tabs for 'DICTIONARY' and 'THESAURUS'. The main heading is 'invade someone's space' followed by 'idiom'. There is a 'Save Word' button with a bookmark icon. The definition section is titled 'Definition of invade someone's space' and includes the text: ': to place oneself too close to someone', '// I felt uncomfortable with her so close, *invading my space*.' and 'also : to be in the space where another person is or wants to be', '// I went to study in the library so I wouldn't *invade my roommate's space*.'

Even the definition of “**invade**” and not the more benign Warrant words “*get into*” NEVER uses the wording – **stalk or harass**.

This Webster’s entry that does not use the Course of Conduct acts of **harass and stalk** is still even more severe than what the Warrant states because this definition states “**invade personal space**” while the Warrant is more benign showing lesser INTENT “*get right into personal space*”. In addition, no media article on the issue of “**violation of personal space**” uses the terms **stalking or harassing** to cover this behavior/“*conduct*” (See [Exhibit J](#)).

I argue “**POLICE:**” aka the Warrant writing officer chose this dictionary entry and actively avoided the Course of Conduct terms **stalk and harass**. The Deposition of the Warrant writing officer confirms this fact (See [Exhibit I](#)).

QUESTIONS #11:

- How can a major media news organization report nearly 4 years and counting of someone being **"POLICE: Man Harassed Women For Years"** (not even written to be "alleged") and **"haunting women"** and **"Man Accused of Harassing Women"** when in all fact this person (Pro Se James Lawrence) with no criminal history (in reference to the subject matter) was arrested for a **single count of Second Degree Breach of Peace** involving one woman WHO herself is never quoted with this word **harass** **nor are there any woman of the past documented as using or accusing** with this **harass terminology**?

QUESTIONS #12:

- How can a major media news organization's report of **"POLICE: Man Harassed Women For Years"** and **"haunting women"** and **"Man Accused of Harassing Women"** for nearly 4 years and counting and be deemed by District Judge Underhill in James Lawrence v. Altice **"outright false"** aka not true, but be spun **"substantially true"** without any evidence of **stalking or harassment** (allegedly at local markets wired inside and out with cameras yet not one video submitted as evidence), let alone reported on as **"harassing/haunting women"** without any evidence of police themselves saying/writing that someone was **stalking** or **harassing**, without any evidence in the form of arrests, or arrests with convictions, or actual written words deploying the **harassing language** within the Warrant?

QUESTIONS #13:

- With THE WORD **"substantially"** defined as - for the most part, essentially, to a great or significant extent – How can someone be reported upon nearly 4 years and counting as **"POLICE: Man Harassed Women For Years"** (not even written to be "alleged") and **"haunting women"** and **"Man Accused of Harassing Women"** with overwhelming Damages, when this person did not ever legally **harass** any woman, and the remaining questions being of whether this person might have **harassed** in some lesser way but can never ever be answered (unproven and unprovable material) given there was already **thorough investigations of the alleged police accusations/threats** aka no arrests of any kind and no women deploying a **harassing accusation**, and any attempt to continue any long gone unproved and unprovable "case" (meant to be redacted from public consumption as evident from Police FOIA Officer) would be against the law of the statute of limitations, let alone the fact that no complainant ever came forward to have a long gone "case" re-investigated or coming forward with new evidence with willingness to give a sworn written statement on this new evidence?

QUESTIONS #14:

Is it right for me James Lawrence to NOW TO BE FOREVER PORTRAYED AS A **"HARASSER"** without any evidence in the form of **harassing terminology** within the **one count of Second Degree Breach of Peace** Warrant let alone **any past investigated Incident Report devoid of threats/arrest** (See Exhibit B), let alone arrests devoid of

convictions, let alone a woman being quoted of such a loaded accusation or charge? This loose conflation of terms by the Second Circuit Court of Appeals dangerously belittles actual proven **stalking or harassing** and can not only cause more people to be unjustly accused of **stalking or harassing**, but would decrease the necessary severity of actual proven **stalking or harassing** like **criminal stalking or harassing** thereby giving these **convicted stalkers or harasser** freedoms and empowerment to rationalize or minimize their **proven stalking or harassing behavior** that is contrary to what the **stalking or harassing laws** since the 1990s intended. This is very dangerous to say the least.

QUESTIONS #15:

- Given the evidence presented to the Second Circuit Court of Appeals should not this case be granted a potential jury trial so to have a middle course in between resolution that discourages any other media organization in the future to parrot the unproven and unprovable *"harassment"* narrative to which Hearst caused and **persistently stands by (veritable harassing behavior)** for 4 years and counting?

QUESTIONS #16:

- In today's highly politicized culture and gender warring zeitgeist is not a trial of a diverse body of everyday people necessary to help define the term **stalk and harass** and how these terms resonate in what Judge Stefan Underhill phrased in James Lawrence v. Altice *"the minds of the average viewer"*?

QUESTIONS #17:

- Can a court conflate let alone equate the behavior of a **One Count charge of the statute Second Degree Breach of Peace** with the **statute of Third Degree Stalking** let alone apply it to **past investigations and closed cases devoid of any kind of arrest**?

QUESTIONS #18:

- Can a court conflate let alone equate the behavior of a **One Count charge of the statute Second Degree Breach of Peace** with the any **Harassment statute** let alone apply it to **past investigations and closed cases devoid of any kind of arrest**?

QUESTIONS #19:

- Can a court conflate let alone equate the behavior of a **One Count charge of the statute Second Degree Breach of Peace** with any KNOWN **past incident report that involved a full investigation resulting in no Probable Cause for any kind of arrest cases long closed** and never reopened?

QUESTIONS #20:

- Can the Second Circuit Court of Appeals allow and empower the extreme **nearly 4 years and counting** characterization of *"POLICE: Man Harassed Women For Years"* (not even written to be "alleged") and *"haunting women"* and *"Man Accused of Harassing Women"* to someone (James Lawrence) based on a **One Count of Second Degree Breach of Peace** arrest and Warrant narrative **that never deploys** the words

“harass” toward James Lawrence?

QUESTIONS #21:

- Can the Second Circuit Court of Appeals allow and empower the extreme nearly 4 years and counting characterization of *“POLICE: Man Harassed Women For Years”* (not even written to be “alleged”) and *“haunting women”* and *“Man Accused of Harassing Women”* to someone (James Lawrence) based on a **One Count of Second Degree Breach of Peace** Warrant narrative *“follow and get into personal space”* that mentions prior KNOWN unproven and unprovable **past investigated long closed cases resulting in no threats/no arrest of any kind** (or as the Second Circuit CIVIL Court of Appeals writes past *“totality of Lawrence’s conduct”*) with statute of limitations in effect?

QUESTIONS #22:

- What is this (as Second Circuit Court of Appeals wrote) *“totality of Lawrence’s conduct”* (alleged) and because there are no details of past “cases” is not ONLY sticking to the **actual wording** of the Warrant in order?

QUESTIONS #23:

Since there has been no reading of past Incident Reports, no Sworn Written Statements, and never any prior arrests for anything written about in the Warrant aka Westport Ct. list of incidents narrative, can anyone ever know in any way let alone a *“substantial”* way what was the *“totality of Lawrence’s conduct”*?

QUESTIONS #24:

- Can the Second Circuit Court of Appeals allow and empower the extreme nearly 4 year characterization of *“POLICE: Man Harassed Women For Years”* (not even written to be “alleged”) and *“haunting women”* and *“Man Accused of Harassing Women”* to someone (James Lawrence) based on a **One Count of Second Degree Breach of Peace** Warrant narrative *“follow and get into personal space”* that mentions prior KNOWN **(for 3 years by Hearst)** unproven and unprovable **past investigated long closed cases resulting in no arrest of any kind** (or as the court writes past *“totality of Lawrence’s conduct”*) with statute of limitations in effect all the while this very Warrant never deploying the words **“stalk” or “harass”**?

QUESTIONS #25:

- Can the Second Circuit Court of Appeals allow and empower the extreme nearly 4 years and counting characterization of *“POLICE: Man Harassed Women For Years”* (not even written to be “alleged”) and *“haunting women”* and *“Man Accused of Harassing Women”* to someone (James Lawrence) based on a **One Count of Second Degree Breach of Peace** Warrant narrative *“follow and get into personal space”* that mentions prior KNOWN unproven and unprovable **past investigated long closed cases resulting in no threat/no arrest of any kind** (or as the court writes past *“totality of Lawrence’s conduct”*) with statute of limitations in effect all the while the **author of the Warrant states in a sworn Deposition that he not only never**

deployed the words “stalk” or “harass” but never thought of using this words of “stalk” or “harass”?

QUESTIONS #26:

- Since Hearst refused to take down their unproven and unprovable coverage after the Deposition of the Warrant writing officer free of any legal action by me James Lawrence should not a jury of our peers sort out this issue of very questionable motivations and **persistence** with Hearst?

QUESTIONS #27:

- Can the Second Circuit Court of Appeals allow and empower the extreme nearly 4 years and counting characterization of *“POLICE: Man Harassed Women For Years”* (not even written to be “alleged”) and *“haunting women”* and *“Man Accused of Harassing Women”* to someone (James Lawrence) based on a **One Count of Second Degree Breach of Peace** Warrant narrative *“follow and get into personal space”* that mentions prior KNOWN unproven and unprovable **past investigated long closed cases resulting in no threat/no arrest of any kind** (or as the court writes past *“totality of Lawrence’s conduct”*) with statute of limitations in effect all the while there never had been any prior arrest for **stalking or harassing** nor any other charge like **Second Degree Breach of Peace** hence having a KNOWN clean record in regard to the material at issue?

QUESTIONS #28:

- Can the Second Circuit Court of Appeals allow and empower the extreme nearly 4 years and counting characterization of *“POLICE: Man Harassed Women For Years”* (not even written to be “alleged”) and *“haunting women”* and *“Man Accused of Harassing Women”* to someone (James Lawrence) based on a **One Count of Second Degree Breach of Peace** Warrant narrative *“follow and get into personal space”* that mentions prior KNOWN unproven and unprovable **past investigated long closed cases resulting in no threats/no arrest of any kind** (or as the court writes past *“totality of Lawrence’s conduct”*) with statute of limitations in effect” all the while there NEVER being any **actual woman quoted accusing someone of “stalking” or “harassing”**?

QUESTIONS #29:

- Can the Second Circuit Court of Appeals allow and empower the extreme nearly 4 years and counting characterization of *“POLICE: Man Harassed Women For Years”* (not even written to be “alleged”) and *“haunting women”* and *“Man Accused of Harassing Women”* to someone (James Lawrence) based on a **One Count of Second Degree Breach of Peace** Warrant narrative *“follow and get into personal space”* that mentions prior KNOWN unproven and unprovable **past investigated long closed cases resulting in no threats/no arrest of any kind** (or as the court writes past *“totality of Lawrence’s conduct”*) with statute of limitations in effect all the while there NEVER being any evidence of **“stalking” or “harassing”**.

QUESTIONS #30:

- Can the Second Circuit Court of Appeals be allowed to conflate the **Course of Conduct terms of stalk and harass** and **Course of Conduct laws of stalking or harassing** with a one-time alleged **One Count of Second Degree Breach of Peace** for *“following and getting into personal space”* let alone with any **threatless/past Incident Report** devoid of any kind of arrest.

QUESTIONS #31:

- Can the Second Circuit Court of Appeals be allowed to falsely refer to the Connecticut **Second Degree Breach of Peace Statute** in a way that conflates this Connecticut **Second Degree Breach of Peace Statute** with Connecticut **Third Degree Stalking** all the while ignoring the sworn Deposition of the arresting officer that affirmed the one-time arrest for **One Count of Second Degree Breach of Peace** was in reference to the **#6 part** of the statute *“creates a (single) public and hazardous or physically offensive condition”* and not any other part of the **Second Degree Breach of Peace statute (#1)** *“engage in a threatening manner”* to which the court attempted to associate the arrest with by grossly conflating the statutes of **Second Degree Breach of Peace** with **Third Degree Stalking**?

QUESTIONS #32:

- WHY WAS I NOT ARRESTED FOR **THIRD DEGREE STALKING**? AND are not different laws different for particular reasons?

QUESTIONS #33:

- Why does the Second Circuit Court of Appeal when delivering their very questionable and controversial James Lawrence v. Altice Decision, reference a lone past actual **stalking arrest** from 1996 in California involving my known ex-girlfriend who provided warning (hence the Restraining Order and violation of), a only **stalking arrest** that itself resulted in **no conviction** as **Exhibit E** proves by showing my FBI Criminal Background Check known by Hearst for years now.

QUESTIONS #34:

- What is the *“average reader’s”* understanding of the terms **“stalk” or “harass”** let alone *“Arrested for Stalking or Harassing Women for Years”, “POLICE: Man Harassed Women For Years”* (not even written to be “alleged”) and *“haunting women”* and *“Man Accused of Harassing Women”*?

QUESTIONS #35:

- If a news organization is to report and reference a **past closed case or call of concern to police that resulted in a full investigation and NO arrest** as **stalking or harassing** should there not be a quote from the police that there was **stalking or harassing**?

QUESTIONS #36:

- If a news organization is to report and reference a **past closed case or call of**

concern to police that resulted in a full investigation and NO arrest as stalking or harassing should there not be a quote from the news organization from some named or quoted woman deploying these terms of stalking or harassing?

QUESTIONS #37:

- How is the accusation of, let alone arrest of, or let alone crime of stalking or harassment different from other crimes reported upon?

QUESTIONS #38:

- Is the news headline “Man Arrested for one count of Second Degree Breach of Peace” “substantially” different than “Man Arrested for Stalking or Harassing Several Women”?

QUESTIONS #39:

- Are what Judge Stefan Underhill termed “IMPACTS” AKA DAMAGES of the news headline “Man Arrested for one count of Second Degree Breach of Peace” different than “Man Arrested for Stalking Several Women”?

QUESTIONS #40:

- Who are the “average reader/viewer”? Is the average reader/viewer a single judge or more than one person in the form of 3 judges within an Appeals Court, or more scientifically - juries, witnesses, studies, linguistic experts, surveys, and polls – EVERYDAY PEOPLE – when defining the term harass?

QUESTIONS #41:

- Is a thorough and detailed analysis of the Damages from the “IMPACT” of Westport News/Hearst’s nearly 4 years and counting news reports **necessary** to measure if Westport News/Hearst “dulled the impact” (as Judge Underhill wrote in James Lawrence v. Altice)?

QUESTIONS #42:

- Can you report on someone having “harassing behavior” from merely referencing the long ago fully investigated Incident Reports that resulted in no arrests/no charges/no threats aka no criminal behavior?

QUESTIONS #43:

- Westport News reporter Sophie C. Vaughan controversially read the Warrant that mentioned that I James Lawrence allegedly “had been involved in 10 other cases with women at local supermarkets” while at the same time reading in that same Warrant the fact that I James Lawrence does not have a criminal history in Connecticut (local) –meaning SHE KNEW these “incidents” were case closed hence unproven and unprovable, but Sophie C. Vaughan goes on to report on these alleged “incidents” **devoid of names and quotes** not even related to the arrest and never can be related to the arrest (since they were investigated long ago resulting in **no arrest/no charge with statute of limitations in effect**) in a way that jumps beyond

what anything can be proved – *“POLICE: Man Harassed Women For Years”* (not even written to be “alleged”) and *“haunting women”* and *“Man Accused of Harassing Women”* let alone jumps beyond the actual arresting incident – **single count of Second Degree Breach of Peace**. Since she KNEW these cases were closed what right does Hearst have let alone any right of any Civil Court to spin that these past closed cases are “substantial” “harassing behavior” devoid of any proper presentation of **harassing evidence**?

QUESTIONS #44:

- What is (as the Warrant states) *“follow”* and *“get into personal space”* (a now newly coined popular phrase) and how can we define **“violation of personal space”**? Is not the police using this *“follow”* language intentionally avoiding to use the more extreme Course of Conduct behavior/language of **“stalking or harassing”**?

QUESTIONS #45:

- Are not violations of verbal well documented warnings typical when talking about **“harassing”** in a non-violent way?

QUESTIONS #46:

- Are we living in a very freakishly aggressive and increasingly unjust Guilt by Accusation culture/zeitgeist that is not affording people proper Due Process of Law let alone Due Process after Law (respect for already completed legal processes - i.e in the form of **past investigations of alleged Incident Reports**) and are we prepared to begin to do something about this ever-growing problem?

QUESTIONS #47:

- Are not alleged past “incidents” that became complaints/calls of concern to police and then are **investigated resulting in no arrest** more conclusive than the current zeitgeist of women being allowed to come forward and point the finger in the media devoid of any kind of police investigation? There are open questions with such accusations not investigated by police. My alleged past “incidents” have closure while the permissive zeitgeist of allowing women (NAMED AND QUOTED WOMEN – unlike the case at hand) to come to the media devoid of investigation and make complaints do not have closure. FOR EXAMPLE – Governor Andrew Cuomo is **accused** by named and quoted women (**See Exhibit X**) and now the Attorney General is investigating these **harassment accusations**. YES, in the narrative against me there were COMPLETED INVESTIGATIONS. In these ever growing happenings now with women deploying the media to share their **HARASSING STORIES** there are **names of accusers of such harassment!**

QUESTIONS #48:

- Since there is no name that came forward in relation to the **one count of Second Degree Breach of Peace arrest**, and no names at all from any alleged **past Incident Report** that ever came forward **let alone pressed charges** aka the Incident Reports that were deemed not criminal NOT **“HARASSING”** aka **no arrest cases**

investigated and long closed, how can any reference to these Incident Reports be taken into account at all other than past complaints/calls of concern of a single act of UNINTENDED “getting into personal space”?

QUESTIONS #49:

- Can a news organization while reading the Warrant narrative of past unproven and unprovable past “follow and get into personal space” report on someone’s one time arrest for One Count of Second Degree Breach of Peace as “POLICE: Man Harassed Women For Years” (not even written to be “alleged”) and “haunting women” and “Man Accused of Harassing Women” all the while having no women (named or not) quoted from the past and also having the only woman who is quoted in their reports (Wendy Higgins Chambers) never having an Individual Police Report and this lone woman quoted – Wendy Higgins Chambers never deploying the words stalk or harass?

QUESTIONS #50:

Are we as a nation going to continue to allow a woman/women (named) to use the media to push her/their unproven often under-informed, emotional, mysterious agenda-driven accusations (i.e. dirty politics) devoid of proper police/legal investigations? Are we going to continue to allow these obvious persecutions of accusing men of non-criminal behavior in ways that not only insinuate some kind of criminality but slanderously results in reports of criminal BEHAVIOR that jumps levels beyond either any guiltless police investigatory conclusions of anything at issue or even beyond an actual arrest (like my arrest of one count of Second Degree Breach of Peace)?

QUESTIONS #51:

- Does Judge Stefan R. Underhill’s Decision and Second Circuit Court of Appeals Judge Debra Ann Livingston’s Decision make the obvious growing problems with the current hypocritical persecutory zeitgeist of women feeling the freedom to deploy the media against a man better or worse, freedoms to deploy media devoid of police/legal investigations/processes let alone contradicting past police investigations and contradicting Sworn Deposition of Warrant writing officer?

QUESTIONS #52:

- Does the Second Circuit Court of Appeals accurately define the dictionary terms stalking, stealth, and harassing and can it be done in a less than a page double-spaced quote from a Decision?

QUESTIONS #53:

- If a media company are to choose different words (let alone words that are actual laws) than the Warrant should they not be obligated to have actual quotes from a police interview deploying these self-chosen words “harassing”?

QUESTIONS #54:

- Is a past police Incident Report devoid of any Probable Cause for any type of arrest that describes/labels/codifies the Incident Report as a "suspicious person" any kind of proper evidence of past harassment?

QUESTIONS #55:

- Can the necessary definition of persistence within the term and statute stalk and certainly term harass – be applied to lump sum of KNOWN completed guiltless “cases” of formerly alleged yet never proven hence unprovable acts given statute of limitations with no Sworn Written Statements, or as Second Circuit Court opines “totality of Lawrence’s conduct”?

QUESTIONS #56:

- Can a sum of past concerns of a "suspicious person" devoid of any police action after investigation be evidence of let alone described as any kind of persistent behavior in tune with provable harassment definitions? Are we allowed to report on the KNOWN unprovable in an accusatory way?

QUESTIONS #57:

- IF someone can be arrested for One Count of Second Degree Breach of Peace without a Sworn Written Statement as I was (See Exhibit A) then how can any past “case” also without a Sworn Written Statement be viewed NOW as having had potential Probable Cause for an arrest?

QUESTIONS #58:

- Can we not apply the very loose opinion of the Second Circuit Court of Appeal Decision in James Lawrence v. Altice - “Lawrence’s totality of conduct” to anyone who has had previous adverse feelings directed at them about alleged conduct that resulted in no harms, no damages, no pressing of charges, and no Probable Cause for any type of arrest? Is there a difference to calling police and getting a warning or calling a boss and getting an inhouse investigation/corporate warning or calling friends or family and getting a warning? How significant is a call to a third party authority devoid of any arrest?

QUESTIONS #59:

HOW ABOUT THIS QUESTION:

Fact: Internet search/Google “James Lawrence” and/or “James Lawrence Westport” and my documentary/website on recording every aspect of the fiasco is a top result along with Heart’s/Westport News nearly 4 years and counting libel who picked up on Altice/News 12 coverage before they took their coverage down after 1 day. SO ...since I record all happenings around the false arrests and resulting civil lawsuits at top search result for the fiasco
www.Westport JamesLawrenceNOTGuilty.com
what happens if someone decides to do a similar “stalking or harassment” story NOW after reading the Officer’s Sworn Deposition of Feb. 2021 at top search result
www.Westport JamesLawrenceNOTGuilty.com

where the Warrant writing/arresting officer says under oath he never thought of using the term “stalk or harass”

WHAT SHOULD HAPPEN TO ANYONE NOW WHO CHOOSES TO PORTRAY ME AS A “STALKER OR HARASSER”?

WHO IS THEIR AUTHORITY?

Hearst/Westport News????

THAT WOULD BE INSANELY UNJUST.

Anyone portraying me as a *stalker or harasser* would be sued by me especially given the facts established in 2021.

And if this very real scenario happens

what does that say about the right to “*substantially*” portray me as a “*stalker or harasser of women*” devoid of proper evidence – names, quotes, accusations, police wording in Warrant, police Deposition, prior arrests, etc...

HEARST/WESTPORT NEWS is responsible for portraying me as a “*Harasser of Women*” (WHO what where when why HOW and how long, etc..) and at the very least we need a trial to allow them to prove it or simply compensate me in a temperate way for Damages from the *persistence or totality of their conduct- 4 years* so no one even thinks of parroting this unprovable madness!

QUESTIONS #60:

If a reporter is to choose their own personal wording when interpreting a Warrant should not this reporter be obligated to further investigate the ascertainable fabric of the Warrant (via FOIA) – the previous Incident Reports – so to prove his/her own subjective wording? AND should not the media company employing the reporter attempt to do remedial efforts after learning of the reporter’s negligence especially knowing of the negligence “for years”?

QUESTIONS #61:

How can anyone effectively defend against 24/7 articles that makes “*Police*” their source of *harassment accusations*? Is this not far more damaging coverage than a subjective named woman making an accusation via the media with an awaited investigation to reveal more details?

STATEMENT OF FACTS

Fact: I was arrested twice:

March 5, 2018 for one count of **Second Degree Breach of Peace (found Not Guilty).**

Feb. 6, 2019 for one count of **Second Degree Harassment as of June 2021 still pending because of Covid-19 with a type of Nolle Prosequi Offer yet I am determined to hold police accountable and await total Dismissal.**

Hearst reported on me 3 times.

Article #1 – Article on my first arrest with a deceiving headline.

Article #2 – The Big Deuce special hit job article before and after Due Processes of Law filled with errors and **libel**.

Article #3 – Article on second arrest that once again goes beyond the Official Police Press Release and Warrant (**See Exhibit K**) regurgitating similar errors and **libel** from **Article #2** aka first Arrest Warrant and **repeated libel and with new forms of libel**. The regurgitating of the first Arrest Warrant narrative while ignoring the police’s correcting of this narrative within the second Arrest Warrant of the this second false arrest is at issue. Yes Hearst responded during the process by submitting the Incident Report for this arrest but conveniently did not submit the Arrest Warrant for this arrest because it shows police’s redaction polices not wanting any “Arrest Record” devoid of Conviction Record to be doxxed from their reports like how my lone past 1996 **stalking arrest** was paraded around as if I was found guilty of **stalking**.

Proceedings before Summary Judgment **ECF 42** included discussions of the issues at hand and presentation of evidence via relative ECF Documents.

Relative ECF Documents of Past District Court Arguments:

ECF 1 - Complaint

ECF 17-18 - Response 1

ECF 20/23 – Response 2

ECF 26 – Response 3

ECF 41 – Objection to Motion to Dismiss

ECF 42 – Summary Judgment (without Judge asking for any Reply from Defense?)

The 21 Points of Complaint ECF 1 – Condensed: **SEE Exhibits C, L**

Article #2 – The Big Deuce

1: Deploying the headline/claim **“POLICE, Man Harassed Women for Years”** and **harass terminology** despite the fact that the Arrest Warrant never deploys the **harassing terminology** for the police carefully choose distinct words **“getting into personal space”**, chosen wording so to **not** use and **ACCUSE** of **harassing**.

2: Deploying the language **“haunting for years”** despite the fact I lived in San Francisco 2007-2017.

3: Depicting **known** closed “cases”/Incident Reports after police investigations as

“harassing women”, investigations that never saw any probable cause for harassment let alone anything else.

4: Depicting these **known** closed “cases” at odds with Westport Police redaction policies and contrary to the Official Police Press Release and Police Facebook Postings, to which this former Hearst reporter Sophie Cecilia Vaughan has a history of fighting with the Westport Police’s right to redact what they choose to redact.

5: Depicting alleged past incidents as *“harassing”* AFTER Due Processes of Law aka investigations related to **Point 3** but also going beyond the Official Police Press Release and reporter doing her own special story that deviates from all her other past reporting on people with criminal pasts. This woman reporter is the only person who chooses to cover me this way.

6: Depicting the known closed “cases” as *“harassing”* (devoid of names and quotes) all the while **knowing the cases are closed and I have no criminal history in Ct.** – Westport being the only place of alleged past incidents.

7: Deploying a libelous language of *“harassing women”* after **knowing** I was already harmed from Altice/News 12 (via the same woman used in Hearst **Article #2**) who after 1 day took down aka made efforts to *“compensate”* or *“dull the impact”* of their *“outright false”* coverage *“stalking several women”* thereby showing more agenda-driven malice. **Knowing** her cohort Wendy Higgins Chambers’ quote *“preying on women”* was scrubbed from Altice/News 12 reporting and there were issues with depicting me in these unprovable Course of Conduct ways.

8: Doxxing a past arrest record against police redaction policies and not distinguishing between arrests and convictions nor making any efforts to distinguish arrest record with conviction record with proper research – interview police, interview me, or do a background check. It is obvious this biased reporter had an agenda to paint a picture of her own opportunistic, sensationalist, and unscientific ways.

9: Email Evidence I tried to help the Westport News editor of the time Jerrod Ferrari now gone from Hearst with necessary perspective to do what News 12 did – take down their *“outright false”* report only to be ghosted by this irresponsible incompetent coward.

10: Email Evidence I tried to help Hearst legal Stephen Yuhan with necessary perspective to do what News 12 did – take down their *“outright false”* report only to be threatened with legal fees.

11: The right for Hearst/Westport News to deploy their cohort Wendy Higgins Chambers after **knowing** her actions with News 12 and language used *“preying on women”* was removed from News 12 in an effort to clean up their *“outright false”* mess aka effort at *“dulling the impact”*. The right of Westport News to deploy this woman after she went to police who investigated her complaint and she does not even have an individual police report nor was I ever called by police about this crazy old woman. This is a serious issue to be taken up by the court – **a woman known to have visited police** yet deployed as **the only name and quoted woman** in a libelous story of *“harassing women”* despite police never seeing this woman’s story

as **harassment** let alone anything criminal and Chambers not saying "harass".

Article #3

12: Deploying the headline: "*Man Accused of Harassing Women*" – plural. This is the only reportable **harassment** around "Police" or **having an actual "accuser"** – this arrest for **email harassment** where police allege probable cause of **repeated or persistent course of conduct and harassing intent** thus the only **harassing** incident/arrest worthy of news being the only name and quotes and investigation for **harassment**.

13: Fact that Westport News **Article #2** contributed to the second false arrest via evidence of Email complainant's false statements/perjury where scorned complainant/tenant mentions the Westport News **Article #2** narrative - **nine times** in her sworn written statement, to be presented as evidence in Damages.

14: Deploying the following:

"A local man alleged to have harrassed (sloppy very telling misspelling) women for years at area stores has once again been arrested."

Notice how the reporter now in this **Article #3** uses the word "allege" unlike the first libelous report - **Article #2**, when she wrote "Police: Man Harassed Women for Years" one year earlier thereby bringing merit to my Complaints. Once again, ANOTHER unprovable article despite police never deploying the **harassing terminology** referencing past Incident Reports (let alone actual language in Incident Reports) for there was no proof of any past **harassment** hence no prior arrests after investigations.

Fact: There was an ability to arrest me for something even without a sworn written statement for the March 5, 2018 arresting incident was without a sworn written statement aka complainant.

15: Repeating the same mistakes as **Point 3** from **Article #2** but again in **Article #3** (See **Point 3**).

16: Repeating the same mistakes (and more) as **Point 8** from **Article #2** but again in **Article #3** and **against the actual wording in the Arrest Warrant** for **Article #3**.

Yes - Police did not mention these past arrests devoid of conviction like the 1996 stalking arrest in this second Warrant and Incident Report (which Hearst only shares). Reporter is parroting her narrative from **Article #2** – Big Deuce all **the while having a full year to ascertain my conviction record (See Point 8)**.

Police were obviously sensitive to what happened to me before and did not want to be accused of depicting me as a **stalker**. THIS in itself demands Hearst at least remove or re-edit both of their hit jobs.

17: Repeating again by doxxing me of material that is according to Westport Police redacted from release. This is once again out of the ordinary reporting against the Official Police Press Releases and Police Facebook posts. This is also contrary to the history of Hearst's reporters treatment toward actual criminals with records to dox.

18: Introductory issues and evidence of reporter's obvious malice with coming detailed evidence of how she never does this to anyone in her past – doxxing people arrested of arrest records without actual criminal records.

19: Repeating I **harassed women**- plural yet with no past evidence – **names, quotes, witnesses,** or third party willing to depict the past as “*harassing*” like “*Police*”.

20: The very important issue for the court to take up with the right of reporters to accuse of **harassing** despite not having **actual names of accusers** (typical in the MeToo type persecutions via the media devoid of police investigations) yet the issue that I had actually had past investigations of “*getting into personal space*” incidents that resulted in no proven crimes aka **harassment** thereby making my past even more hands off for there were actual police investigations.

21: An appeal to empathy –a still maintained clean criminal record - NOT GUILTY of the **Second Degree Breach of Peace** charge that started this mess (a charge that had nothing to do **harassment**) yet unlike News 12 whose “*outright false*” reporting being alive for only 1 day the Westport News wreaking havoc on my life to this day – 3.5 + years and counting...

SUMMARY OF ARGUMENT:

District Court ECF 42 Summary Judgment is not good for the country and certainly unfair let alone dangerous to any man who was **never** accused of harassment prior to Hearst's March 23, 2018 **Article #2 persecution and libel**. A media organization has no right to put their own words (let alone own statute laws) into the mouth of an investigating and arresting officer's Warrant. A media organization has no right to put their own words into any prior police report about any prior investigation devoid of any kind of arrest. A media organization has no right to claim someone **"harassed a woman"** let alone **"harassed women"** without any woman being quoted accusing this someone of **"harassing"**. A media organization has no right to claim someone **"harassed a woman"** let alone **"harassed women"** without any third party quoted accusing this someone of **"harassing"**.

* NOTE:

FOR THE PURPOSES OF THIS APPEAL BRIEF

∞ - *Judges, Hearst, and Police will always be portrayed in Italics writing.*

∞ - Plaintiff James Lawrence will always be portrayed in Regular writing.

*** NOTE: I sometimes use coloured writing to make locating, discerning, and reading easier. I do this in tune with linguistic references like a thesaurus so to further prove my arguments.**

Red – refers to defamation of **"Harassed Women for Years"/"Haunted women"** and related terms to **stalking or harassment**.

Orange – refers to language within **Arrest Warrant/Official Police Press Release**.

Yellow – will symbolize **Infraction**.

Blue - will symbolize **any past police incident report that was fully investigated resulting in no probable cause for any arrest and "cases" that are known by reporter to be closed statute of limitations in effect.**

Green – refers to relative **Exhibits and previous ECF documents**.

BRIEF'S ARGUMENT – 12,000 Words

INTRODUCTION: MIDDLE COURSE IN BETWEEN OFFERS TO HEARST

Exhibit F has a Feb. 1, 2021 E-mailed letter and call/conversation with Hearst legal. In this letter I propose a peaceful resolution to not proceed with my lawsuit if they now after 3 years of ascertaining more details remove the contested **Article #2** and **Article #3** or at least re-edit **Article #3**. I was motivated by looking at potential extreme outcomes and trying to get what Altice/News 12 themselves did 3 years ago – removal of established “*unfair*” and “*outright false*” unprovable material devoid of proper evidence or witnesses. I offered this to Hearst knowing I will not get any monetary compensation and presented all the now known numerous shady and grey areas of this fiasco. It seems in this very black and white legal world with a few pages of double-spaced Decisions that I am either fair to be depicted as some kind of **stalker** or **harasser of women for years** or I am entitled to some gross monetary settlement for the pushing of unproven and unprovable material. The system invites a proper middle course in between prior to a much-deserved trial. Judges can be in difficult positions, and it is up to the parties to allow for middle courses in between. It is up to the media editorial desk to be fair. Hearst now since the launch of my Feb. 2020 lawsuit has pages and pages of documents to make better decisions. My offer is generous. **Hearst rejected this Offer. Hearst not acting on this Feb. 1, 2021 Offer shows they have an agenda and thus to fulfil this agenda a trial is in order.**

Regarding the public, the average person does not understand this “*substantial truth*” legal speak. The fact is 99% of the public aka “*average reader*” thinks a “*substantially true*” legal decision has a “*similar*” meaning as if it was true. Sad but true, to which is why the issue of motivations of editorial boards with proper appearances and testimonies is crucial. With this generous offer by me absorbing the already 3+ years of Damages and for certain ongoing future Damages of generalized unprovable **harassment accusations by Hearst and ONLY Hearst**, I chose not to risk getting even more inevitable hype and persecution if a page long doubled spaced Decision was to paint me as a “*substantial*” **harasser** despite no proper evidence – NO names and quotes from complainants, NO police wording, NO witnesses, NO third parties, NO cams, etc... NO proper evidence, and I offered Hearst an out – generous despite them not worthy of this offer.

My initial plea to Hearst for fair treatment in April of 2018 fell on deaf ears. My Feb. 1, 2021 Middle Course In Between Offer 3 years later fell on deaf ears. **AND again, after the Feb. 22, 2021 Deposition (See Exhibit I)** of Warrant writing Officer James Sullivan which has him saying under oath that he not only NEVER used the term “**harass**” or “**stalk**” but NEVER even thought of using these extreme terms, I extended the offer to Hearst to withdraw the lawsuit free of costs. **Hearst again rejected the offer** despite Hearst now knowing significant information.

The following is what Hearst has known for the past year.

- 1:** - A Final Disposition showing I was never criminally convicted of anything from the March 5, 2018 first arrest for **one count of Second Degree Breach of Peace** as evidence in recent Criminal Background Check shows (See Exhibit E).
- 2:** - They have had a proper detailed FBI printout of my record and lack of record and not just a simplistic and scandalous “arrest record” devoid of “*substance*” at odds with the Redaction Policies of the Westport Police (See Exhibits E, H).
- 3:** - They know that any **past Incident Report devoid of arrest** that NEVER uses the term **harassment** is not proper evidence of **harassment** and not to be entertained as evidence especially in a trial. Meaning they have had 3 years to do proper research.
- 4:** - They have pages and pages of numerous documents in 3 lawsuits of mine to see other significant details and issues – all the grey areas that their less than a page of 3 broken paragraph articles from the self-admitted “novice” reporter never address.
- 5:** - They even have evidence of police themselves having their own type of misconduct. They have this not only from conversations from me, but by reading the Altice case and seeing Altice submitted only 4 past **Incident Reports (resulting in no arrest)** thereby showing the number “*9 cases*” of prior calls of concern from women written about in Warrant is not true.
- 6:** From the Feb. 22, 2021 Deposition Hearst learns that the Warrant writing officer does not agree with the Course of Conduct terms “*harass*” or “*stalk*” deployed at me and verifies he not only NEVER used these extreme terms but NEVER thought of using these extreme terms.
- 7:** From the same Deposition Hearst learns about a primary detail of a future lawsuit against police where I explain that the Warrant writing officer lied when writing in Section 13 of the Warrant about “*women being afraid to give statements out of fear of retaliation*”, for NOT ONE Incident Report or any police document relative to his investigation documents this lie. At Deposition, the Officer CONFIRMS that Section 13 of the Warrant is not documented in any past Incident Reports – the only place such an accusation could come from. **Exhibit B** confirms this information as would any proper research from Hearst the past year let alone 3 years. Hearst having their own compilation of Incident Reports via FOI, has had ample time to review issues I have with police and act in a fair manner but continues the extreme unprovable treatment.
- 8:** In this same Deposition Hearst learned of more misconduct of how this Officer Sullivan CONFIRMS that Dispatch Tapes (See Exhibit G) were never submitted to the Prosecutor let alone any Discovery. The fact is this Officer knew this case was going nowhere to such an extreme end from the beginning but was seemingly unaware that his Warrant would be seized and extremely paraded around.
- 9:** In the same Deposition Hearst learned of more shady misconduct - that there were no Booking Tapes submitted to the Prosecutor or available through FOIA despite this too being a routinely recorded and submitted aspect of any arrest to the Prosecutor.
- 10:** And of course, there are the numerous ONGOING DAMAGES from their

extreme reporting that had people turning on me in extreme ways. [See Complaint.](#)
ETC: ...

WHAT KIND OF NEWS ORGANIZATION WOULD WANT TO **PERSIST** AGAIN AND AGAIN AND AGAIN 24/7 WITH ALL THE OBVIOUS MISCONDUCT FROM NOT ONLY THEIR “*novice*” REPORTER BUT NOW EVEN THE POLICE?

FACT: ALTICE/NEWS 12 CHOSE THIS MIDDLE COURSE IN BETWEEN WITHOUT ANY OF THIS INFORMATION and Altice’s saner editorial desks chose to take down their coverage after 1 day back on March 15, 2018 – A undeniably huge difference in the cases. There is obviously something going on against me within Hearst.

Hearst now after 3+ years continues to double down and given there was a middle course in between offer to resolve this case and it was rejected shows **Hearst has an agenda and this agenda demands a trial.** I chose this middle course in between because what will inevitably result is more litigation in the form of an Appeals to the U.S. Supreme Court, another future lawsuit against Hearst, and yes a lawsuit against the police themselves because I would have federal judges telling me that the police Warrant depicts me as a “*substantial*” **harasser or stalker** despite no such arrests all the **while Hearst’s headlines and articles are not re-edited to say I am a “substantial” harasser.**

Hearst by not accepting this offer is not being fair to the police themselves. Without Hearst’s articles I have no need to pursue the very Herculean effort to sue the police and all involved can be spared the hassles. Should the act of one or two officers effect an entire police department? My potentially next move of suing the police saying potentially 8 Federal Judges opine you are responsible for depicting me as a **stalker or harasser**, will result in the police arguing “but we never wrote these words and never arrested you for these crimes” (prior to the one officer’s later irrelevant 2019 **Email harassment**). I agree in many ways with the police’s inevitable defense in relation to the **stalking and harassing narrative** and any “*reasonable person*” would agree also. We have ambiguity here and ambiguity demands a trial to be judged by everyday people. Ambiguity also deserves proper editorial judgment.

Altice/News 12 Ct. by agreeing with a middle course in between back on March 15, 2018 would never republish or re-broadcast their established “*unfair*” and “*outright false*” material and have chosen not to since the Jan. 2020 Summary Judgment and Jan. 2021 Appeal Decision let alone dare to ask for attorney fees, for if they did present the material in the same way, I could sue them for knowingly reporting in an “*unfair*” and “*outright false*” way. To republish there would have to be a re-editing of the material in tune with more types of investigative journalism and truth. Altice also never chooses to report on the results of the lawsuit and allows for the middle course in between to tone down aka mitigate aka “*dull impact*” free of

further hype. Altice never asked for attorney fees after Appeal Court Decision thereby showing even Altice knows (as their removed material shows) I was wronged in some extreme ways. Why does Hearst persist year after year after year devoid of proper evidence?

Hearst cares for no middle course in between and continues to be reckless and still persists. This persistence devoid of a trial without proper evidence – Who What Where When Why How - is malice. Why the agenda? There are far too many strange happenings going on for the Court to sweep this dirt under the table without a well-deserved trial. After a year of preparing details for the Case Management Plan, if Hearst does not have any named women from anything in the Warrant ready for a trial to verify their personally persistent veritably haunting of *“harassment accusations”* against me, then that is a big red flag. They also best have *“Police”* saying I *“harassed women”*, but Hearst cowardly avoided asking Warrant writing Officer Sullivan if he thought I *“harassed women”* at the Feb. 22, 2021 Deposition (See Exhibit I).

INTRO TO DISSECTING **ARTICLE #2** – SEE EXHIBIT C

Westport News March 23, 2018: **BIG DEUCE** – **Article #2**

“Police: Westport Man Harassed Women for Years”.

This is obvious **libel**. “Police”/Officer Sullivan did not say I **“harassed”**.

Why? – There is no **“persistently”, “tormenting”, or “continually”, “pester”** let alone **“persecution”** nor **“repeated attacks”**, more than one alleged act, etc... toward any particular person EVER!!!.

English: Harass – 1: to disturb **persistently**; torment, as with troubles or cares; bother continually; pester; **persecute**
2: to trouble **by repeated** attacks, incursions, etc... as in war or hostilities, harry, raid

English: Repeatedly -

English: Repeat- [from Latin repeterere **to seek again**, from re- + petere to seek]
1: to say or write (something) again **either once or several times** restate or reiterate
2: to do or experience (something) **again once or several times**
3: (**intr**) to occur **more than once** the last figure repeats **repeat oneself to say or do the same thing more than once**, esp so as to be **tedious**

English: Persistently – 1: **persisting, especially in spite of opposition, obstacles, discouragement, etc. persevering**
2: **lasting or enduring tenaciously**
3: **constantly repeated; continued**

There was NO PERSISTENCE – NO opposition, NO discouragement, NO obstacles. There were NO warnings, NO hostile words, only a single filing of a complaint of ONE ALLEGED INCIDENT of an surprised or worst unwanted advance. There were NO tenacious enduring approaches and NEVER words of opposition from the complainants. **The incidents NEVER involved any repeated or continued approaches.** I was warned by police and stayed away. THERE WAS NO **THREATS!** And there was NO tenacity in any approach.

English: Torment – 1: to afflict with great bodily or mental suffering; pain
2: to worry or annoy excessively

There was NO bodily or mental suffering.

There was NO excessive worry or annoy.

NEVER ARRESTED FOR ANY PAST INCIDENT MENTIONED BY OFFICER SULLIVAN.

English: Pester – to bother persistently with petty annoyances

Once again,

there was NO **persistent behavior** with a particular complainant,

there was NO annoyancesu – plural at an individual.

INTRO TO DISSECTING **ARTICLE #3** - **SEE EXHIBIT L**

Westport News Feb. 11, 2019 **Article #3**

“Westport Man *Accused* of Harassing Women Arrested Again”.

Again obvious **libel**. Officer Sullivan did not write that I **“harassed”**. There are no names and or quotes or even a third party like **“Police”** deploying this extreme language (let alone actual statute) at me – EVER!

Westport News **Article #3** Quote:

*“A local man **alleged** (now using allege after not using allege in Article #2 The Big Deuce) to have **harrassed** (misspelled) women for years at area stores has once again been arrested.”*

Why is it now **“alleged”** to have **“harrassed”** (very telling misspelling) but when reported on a year earlier was **“Police: Westport Man Harassed Women for Years”**? This is undoubtedly false because police NEVER used the word **“harass”** in the Warrant. Just the fact that I am now at the time of this second arrest **“alleged”** to have **“harrassed”** (misspelled) and a year before written about as **“Police: Man Harassed Women for Years”**, shows that **Article #2 The Big Deuce was and is and always will be libel.**

Westport News Quote: *“Since 2002, Lawrence was logged by Westport police in 10 incidents were women **felt harassed** by him, but in each case, they **felt** afraid to pursue charges against him for fear of retaliation, according to court documents.” ...*

FACT: This is not the language of the Warrant nor the language in any past Incident Report (**See Exhibit B**) and the reporter is putting words in mouths of phantoms – no names and no interviews and no quotes and no sworn written statements let alone putting words in the Warrant writing officer’s pen. The Warrant states alleged one-time acts of **“following and getting into personal space”** (**See Exhibit J**). Police did not characterize this as **“harassed”** for if I did **“harass”** then I would have been arrested and charged with veritable harassment for Harassment, Third Degree Stalking, and Violation of Restraining Order (**See Exhibit P**) are crimes where the **harassing** language is written in the Connecticut statutes.

FACT: After an actual investigation (unlike many media **“harassment” persecutions** which are devoid of police investigations) I was not arrested for anything. Does not this fact make the court wake up to the numerous ambiguities and allow for a trial? Women are deploying the media for personal agendas unrelated to **veritable harassment** as evident in my **Email Harassment** arrest.

Westport News Article #3 Quote: *“Lawrence was also arrested in March 2018 after he allegedly followed a woman around Westport’s Fresh Market grocery store and then to her car in November 2017. After Lawrence’s arrest report was released in March, several woman (very telling misspelling - several woman or several women? – sloppy) came forward claiming they*

had experienced similar harassment from Lawrence at local shops.

Who are these women? Where are the names? Where are their **“HARASSING” stories and accusations**? These types of hit jobs on men always have actual women/names coming forward to the press or at least a third party to verify the accusations! (See Exhibit X).

FACT: Wendy Higgins Chambers – the woman interviewed in **Article #2** is the **ONLY** woman named and even she did not deploy the very loaded generalized term **“harass”**, not even in her Affidavit from my slander case against her (See Exhibit D).

English: Persecutory – 1: to pursue with harassing or oppressive treatment, especially because of religious, political beliefs, ethnic or racial origin, gender identity, or sexual orientations
2: to annoy or trouble persistently

WHO ENDED UP VERITABLY HARASSING WHO?

Hearst is VERITABLY **harassing** me 24/7 with their **Big Deuce Article #2** special article before and after Due Processes of Law unlike any other article their reporter has written about (See Exhibit T). Hearst reporter **PERSISTED** by knowing Altice/News 12 removed their March 14, 2018 *“outright false”* reporting after 1 day and then she **PERSISTED** again doxing things she can never prove in ways she never does to any other arrested person (even known criminals) - **PERSISTENTLY** affecting the world at large for the past 3+ YEARS. **Hearst unable to field proper who what when where why how evidence would surely lose in a trial and that in itself demands the Appeal Court do its job and grant me a trial.**

FACT: My case had NOTHING to do with **veritable persistence in tune with harassment definitions**, never being warned, never any hostile words or documented evidence of such, single act/s of questionable *“getting into personal space”* from a **“suspicious person”** that were not **repeated** let alone causing any harm that were **non-sexual supermarket encounters**. I was obviously conflated by Hearst with the MeToo Movement and Nasty Woman Movement zeitgeist by this opportunistic 22 year old reporter Sophie Cecilia Vaughan.

Unlike typical MeToo or Times Up stories, Sophie Cecilia Vaughan **cannot name one name in her report** outside of cohort mentioned in the Big Deuce **Article #2** - Wendy Higgins Chambers, who herself has no individual police Incident Report aka “case” and never complained to police when we met 9 months earlier devoid of damages (to which I have all the facts about to which reporter never had the decency to ask me) and Wendy Higgins Chambers never complained to market manager or even complained to me for she had my business card. **Is this not**

enough ambiguity for a trial?

FACT: This one named woman – Wendy Higgins Chambers – approached police only after her Altice/News 12 persecution (which was scrubbed from existence) and before visiting Hearst’s Sophie Cecilia Vaughan. Wendy Higgins Chamber’s visit to police resulted in no police action – **not even an individual Incident Report** or even a call to me thereby showing police saw Sophie Cecilia Vaughan’s big scoop name devoid of *“harassing” accusations* to be a woman without any serious issue.

Read the idiotic **Article #2** and ask yourselves is this typical let alone newsworthy **harassment stories** being reported on in today’s world? – *“giving someone a business card at a market”* – really? Public markets are known hotspots for meeting or flirting and any *“harassment”* best have proper evidence (See Exhibits Y, Z). Wendy Higgins Chambers is the **ONLY** named or quoted women/*“woman”*. **Where are the names and proper descriptions to justify accusations of veritable harassment as opposed to what police wrote “getting into personal space” at a public market?**

All the while Hearst 22 year-old dyed in the wool feminist reporter is doing special stories on me by dubiously ascertaining an Warrant police themselves say they do not intend to be consumed in the way she writes aka police redaction policies, dubiously ascertaining an Warrant for someone with no Ct. criminal history **KNOWN** by reading the Warrant and doing a special agenda-driven hit job by doxxing pasts like a couple of guiltless arrests that Hearst reporter never does for other people (including people with criminal backgrounds!). Reporter **NEVER** even made attempts to ascertain a conviction record. Reporter **NEVER** made attempts to interview the Warrant writing officer. Reporter **NEVER** made attempts to read old Incident Reports and interview past named women. Reporter **NEVER** made one FOIA Request for possible camera footage from markets that do not exist. Review everyday arrests and see how often this special doxxing of a person’s arrest record are shared devoid of conviction record. 99% of the time this does not happen with proper reporters.

ONCE AGAIN;

Who is veritably HARASSING/STALKING/PERSECUTING who?

The March 2018 **Article #2** (See Exhibit C) parroted the Warrant (See Exhibit A) in ways that insinuated convictions and left the reader to imagine what they wanted. A proper journalist would have spent time finding out more information like interviewing the officer or doing a Criminal Background Check (See Exhibit E). The Feb. 2019 **Article #3** (See Exhibit L) **REPEATED** the same **Article #2** narrative a year later **KNOWING** of other articles and/or resources let alone correspondences with me to properly complete the revelation/doxxing of the arrests. **Article #3** again insinuated convictions for the article left the reader to imagine what they wanted.

Article #3 was covering an arrest that not only again had an Official Police Press Release that did not dox these past arrests, but also had a Warrant that toned down the doxing of arrests unlike the previous 2018 Warrant for **Article #2**. The Warrant for 2019 arrest has NO mentioning of a past **stalking arrest** that resulted in no conviction.

Section 20 of Exhibit K - Warrant for Feb. 2019 Arrest for One Count of Second Degree Email Harassment.

20. That I conducted a criminal history check for the accused which revealed his arrest by Officer Sullivan on 03/05/2018 for Breach of Peace. In addition, the accused has an arrest record in the state of Florida dating back to 1986 and in California dating back to 1994. Prior to his arrest by Officer Sullivan, the accused was most recently arrested on 10/31/2013 for "BAT: SPOUSE/EX SP/DATÉ/ETC".

no doxing

Somehow the first Warrant was not properly redacted (by clerk of court) for it violated Westport Police redaction policies (See Exhibit H). The police obviously saw me persecuted by the media/Altice for **stalking** from the 2018 Arrest and felt they could be held responsible so made extra efforts to make sure this past **conviction-free stalking arrest** was not doxxed so people like the reckless 22-year-old Hearst journalist could not pursue her opportunist agenda and blind persecution.

HEARST LEAGAL has KNOWN this for 3 years from correspondences. The REPORTER SOPHIE C. VAUGHAN KNEW of Altice/News 12 taking down their coverage of me after 1 day back in March of 2018, and certainly KNEW in 2019 **Article #3** that I was not convicted of the **stalking charge**. She had resources let alone the Warrant of the 2019 arrest at her disposal but chose to continue to muddy the waters with incomplete information insinuating the worst and allowing the reader aka "*average reader*" to imagine what they wanted. A veritable Nasty Woman.

HOW JAMES LAWRENCE V. HEARST IS DIFFERENT FROM JAMES LAWRENCE V. ALTICE

First: Hearst reported KNOWING of previous “*unfair*” and “*outright false*” coverage because their star witness and only witness – Wendy Higgins Chambers - was responsible for both cases having first approached Altice/News 12 and then seeing the coverage taken down took it upon herself with Hearst reporter to do their own subjective interpretation of the Warrant in question deploying unproven and unprovable “*harassing and haunting accusations*” at me devoid of any kind of proper particular who what when where why how evidence.

Second: Hearst has had 3+ years of knowledge of my conviction record and have been able to make proper edits to tone down the hype of **Article #2** and **Article #3**.

Third: As for the Second Circuit Court of Appeal, Judge Debra Ann Livingston undoubtedly made mistakes in James Lawrence v. Altice (CONFIRMED from Officer Deposition) that would take pages to address. Among these mistakes is associating anything in my past to **threatening** (See Exhibit M) to which is cleared up within Officer Sullivan’s Deposition (See Exhibit I). I refer you to James Lawrence v. Altice at the Second Circuit Court of Appeals and the **Petition for Rehearing** where word limits have me addressing 4 of 11 areas of the Appeal Decision.

Fourth: Is the issue of INTENT aka malice. In the Altice Appeal Decision, I truly believe given various evasions of arguments and obvious holes in reasoning that Altice is being given a pass for doing the right thing for their remedial efforts – removal of **unintended** “*unfair and outright false*” material after 1 day back on March 15, 2018 thereby showing no malice. **Obviously - Hearst cannot claim this.** I also believe that had I not been falsely arrested a year later in Feb. 2019 for alleged “**Email Harassment**”, that evidence in my favor would have allowed for a trial for Judges are human and seeing a later arrest prejudices Decisions as evident in Hearst lawyer Stephen Yuhan only addressing this Feb. 6, 2019 **Email Harassment** arrest at the Feb. 22, 2021 Deposition and NEVER journeying into any other material completely avoiding asking the officer about the **first arrest** and any **past alleged incidents devoid of arrest** (See Exhibit I).

VERY SIGNIFICANT ISSUE/QUESTION:

Can a Judge write a Decision saying yes there was slander BUT the slanderer removed the slander in a day and thus it is not slander?

NO, I believe not. Once a Judge invites that there is defamation Damages must be reviewed, and in today’s Internet age as Mark Twain wrote “a lie travels around the world 6 times before the truth puts its pants on”, showing Damages is easy. All these buzz words coming from the Altice Decision like “*dulled impact*” or “*mitigated*”

the problem” or as the Appeals court avoided addressing these District Judge Underhill buzz terms and instead wrote “*compensated*” all the while showing no proper examples of compensation leads me to presenting this issue.

Fifth: This case against Hearst is truly different because 3+ years of INTENTIONALLY publishing KNOWN unproven and unprovable material versus 1 day of UNINTENTIONALLY publishing unprovable material is an undeniable HUGE difference. **Does Hearst have something like the following** by their special hit job articles to which News 12 posted after their “*not fair*” and “*outright false*” coverage?



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ADVERTISING



NO HEARST DOES NOT!!!

FACT: If Altice’s “outright false” material was alive for 3+ years there would have been at least some edits to the coverage for it was “outright false”. Hearst on the other hand has never entertained doing any proper edits for 3+ years.

Sixth: This Hearst case has its own unique 21 Point Complaint with own Exhibits.

Seventh: The following submitted Exhibits were also NOT part of the Altice Decision. Being Pro Se I made the mistake during the Appeals thinking I could include the following Exhibits within my Reply Brief. I filed a Motion to include the following Exhibits within Reply Brief but the Motion was denied. **The following are relative Exhibits to both cases that the court needs to address in detail: See Exhibits B, P, Q, R.**

Eighth: Altice/News 12 NEVER had the PERSISTENT headlines “*POLICE: Man Harassed Women For Years*” / “*Man Accused of Harassing Women*” and Altice NEVER had such a headline **veritably harassing me (devoid of police or women using these words) alive for years** – 3+ years and counting for the public now. In all reality Hearst has been **harassing me** with no proper evidence of such accusations – **named and quoted women coming forward with harassment stories** or as **Article #3** states “**accusations**” while reporter conflates the Warrant narrative of anything in my past KNOWN to be **devoid of Probable Cause for an arrest of any kind**. Reporter does this never making the effort to read any past Incident Report (See Exhibit B) and conflates my past as some kind of “*similar*”

harassment” devoid of essential details - **who what when where why how** - contrary to **Harassment or Stalking laws** and contrary to socially scientific language definitions let alone any past police action and police words. And Hearst certainly NEVER *“dulled any impact”* or attempted to *“mitigate a problem”* or *“compensate”* me from such unproven and unprovable words for referring to *“for years”* demands the Who What When Where Why How and How long?

Ninth: Altice had the *“outright false”* headline *“Man Arrested for Stalking Women”* and according to court attempted to *“dull impact”* and *“mitigate the problem”* or as Appeals Court said *“compensate”*, for here they misrepresented the arrest. Altice is doing a first-time botched story (March 14, 2018) 9 days after the arrest **while Hearst KNOWING of this botched “outright false” news report** (Wendy Higgins Chambers again the same instigator and only witness/name/quotes) does a special second article (March 23, 2018) 10 days after Altice’s *“outright false”* report does their hit job. **Hearst refuses to remove let alone re-edit their unproven and unprovable hit job alive now for 3+ years while having years to do research.**

Tenth: I did not depose the Warrant writing officer for the Altice case mainly because I was inexperienced being Pro Se and thought there was more than enough evidence to proceed to trial having the Motion to Dismiss Denied and in my favor. Hearst has had the opportunity to question and review the officer responsible for the Warrant narrative. Altice did not. Yet once again, Altice did the right thing without this information 3 years before.

Eleventh: Hearst has had more time and chances to get proper information with proper references than Altice in March of 2018 and now with rejecting my Feb. 1 and Feb. 22, 2021 Middle Course In Between Offers shows even more agenda that demands a trial with long overdue proper evidence – any woman (women), police, market managers, witness, camera footage, let alone the journalist and her legal and editorial decision makers all properly questioned, linguistic experts, polls, surveys and focus groups in a trial done by the people who know the zeitgeist.

Twelfth: Hearst has known how various establishments have banned me because of the media’s March 2018 *“unfair”* and *“outright false”* reports. **Hearst has seen the effects upon the public from the “unfair” and “outright false” reports (See Exhibit K)**, a public veritably in the dark attempting to imagine WHAT and HOW happened in any past “incident” (let lone WHO or WHEN or WHY) or in fact “incident” **“without incident”** (See Exhibit B). From the Warrant one can ONLY know a vague WHERE but NO DETAILS. To truly *“dull an impact”* would have any woman from the past quoted in her own words as to what was **“uneasy”** or worse **harassing**. Altice got the arrest wrong (*Police:*) and made remedial efforts. Hearst attempts to delve into the issue of past “cases” fully KNOWN to be **without arrest/threats/faults case long closed** (*Police:*) while not having any proper reference to past incidents with actual names and quotes and interview from any police

officer.

Thirteenth: Harassment is related to but arguably a more loaded word than stalking. The language of both these terms deserves a courtroom with everyday proper witnesses, linguistic experts, and opinions to shed light on short comings within the law and **often loopy use of these terms**. I think as the police believe let alone the history of law clearly shows, both terms/acts are serious **accusations** not to take lightly. Both are Course of Conduct behaviors **and crimes**. But unlike the general term **stalk** there are **types of harassment like sex harassment, verbal harassment, electronic harassment, workplace harassment, street harassment, etc...** . Ever hear of **supermarket harassment or night club harassment**? NO – there needs to be a proper description relative to the complaint **in tune with what people believe to be harassment.**

Fourteenth: The Warrant writes of an unproven and unprovable *“follow and get into personal space”* which in all actuality fits neither term - **stalk** or **harass**, hence why the officer admitted in Deposition that the words **stalk or harass** **“never came up”** for a choice of words. But if we were to identify which term certainly **cannot be viewed as a potentially “substantially true”** term then **harassment** would be that term because where lesser forms of dictionary **stalking** can be a quiet, secretive **stealthy “following”** act, and as Judge Underhill questionably opined that a dictionary definition of **stalk** can be a one-time act, **harassment** as a dictionary term clearly shows more kinds of **detailed behavior**. What is needed are descriptions from accusers of the alleged **harassing behavior** – What was said? Were there any warnings? What behavior persisted and how long? Let alone what kind of **harassment**.

FACT: YOU CAN STALK SOMEONE WITHOUT THEM KNOWING BUT YOU CANNOT HARASS SOMEONE WITHOUT THEM KNOWING THEY ARE BEING HARASSED. MEANING WE NEED SOME KIND OF QUOTES.

This truth I show above throws a wrench into the Altice Appeal Decision because the Second Circuit Court of Appeals simply wrote that:

Here, the district court properly granted summary judgment because the evidence showed that News 12 accurately reported on what police said regarding Lawrence's documented history of following women in a harassing manner. The totality of Lawrence's conduct—including on November 5th and numerous past instances—met the common definition of "stalking": "to pursue quarry or prey stealthily," or "to pursue obsessively to the point of harassment." *Stalk,*

The police NEVER wrote “following in a harassing manner”. In addition, if there was any **harassing** then there would have been at least one arrest in the past

but there was not so how in the hell can anything be hyped to **harassment**?

Websters Dictionary: **Stalk** – to pursue obsessively to the point of harassment

The dictionary is saying that **stalking and harassment** are both Course of Conduct behavior as the law recognizes. **The reporter is reporting on “Police” not any named woman coming forward with accusations and quotes of harassment thus adherence to legal definitions is in order.**

FACT: A stalking law/crime/offense has more severe connotations than a harassment law/crime/offense because of the connotations of a prolonged period of time with more premeditation. Yet interestingly, the dictionary term of harass is more loaded and severe than the dictionary term of stalk.

Dictionary presentations (See Exhibit N) themselves show **harassment** is this **repeated behavior** toward someone known to be **harassed** and Investigating Officer Sullivan CONFIRMS this in Deposition (See Exhibit I). In fact, Hearst’s own **Article #3** depicts **harassment** as **“repeated” toward an individual** AND NOT a personal feeling from Civil Court Judge that a **“totality”** of unnamed **harassment-free incidents** constitutes **“substantial” harassment**.

Fact: There is no evidence of **“obsession”** in the **first arrest** then how in the hell and where is there evidence of any **obsession** toward anyone in the past **devoid of arrest**. **Once again, the mental anguish having to explain common sense demands a jury with proper evidence.**

Fifteenth: **The Damages from Hearst’s 3+ years of allowing unproven and unprovable material to exist are far more than Altice.**

Courts cannot spin away from legal and cultural reality. Appeals Court had the opportunity to give Altice/News 12 a pass for proper/better editorial judgment while Hearst is a reckless editorial judgment nightmare with **more intent and agenda**. The truth is self-admitted “novice” reporter Sophie C. Vaughan and Hearst themselves KNEW I was already harmed by the use of **stalk** and **persisted** devoid of any veritable **harassing descriptions** with more false information like the more dangerous and **loaded term of “harass”** especially in this MeToo and Cancel Culture zeitgeist. **The 15 clear and undeniable differences presented here demand detailed analysis.**

NOW WITH WHAT HEARST KNOWS YET STILL DOUBLING DOWN - THE NEEDED FAIRNESS TO REPORT ON THE OTHER 2/3 OF THE WARRANT

Hearst cherry picked aspects of the Warrant to hype. Hearst now KNOWS I was NOT criminally convicted, has KNOWN that there were NO Witnesses, NO Sworn Written Statements, NO Market Cams, NO Complaint from Store Managers, and NO proper Discovery Submitted for the ONE Count of **Second Degree Breach Of Peace Peace** (let alone irrelevance of **past Incident Reports devoid of any arrest** as proof of **harassing**), AND Hearst now KNOWS my Actual Conviction Record, Etc ... Let us now read the other 2/3 of the Warrant neglected by their reporter.

Section 6 of the **One Count of Second Degree Breach of Peace** Warrant:

6. That upon returning with Lt. Gouveia and Sgt. Russo we met with James Lawrence and Castagnazzi inside the store. When asked, Lawrence stated that he had returned to the store to turn over a \$100.00 dollar bill he had found on the floor as he was walking out of the store. He stated that he walked over to the complainants car to see if the money belonged to her but when he approached her vehicle she drove away before he could say a word.

Where is the **harassment**? There were absolutely **NO words** ever between me and this mystery woman and **NO warnings and NO verbal harassment**. NONE!!! CONFIRMED in Officer's Deposition. What could have possibly happened within the public store that could be described as "**harassment**"? This is a public place – a supermarket – with other people and **plenty of potential witnesses**. The market manager himself said he noticed, heard, sensed NOTHING.

FACT: This "incident" is the only incident reporter has any details on and she cherry picks what to report.

Section 3 of the **One Count of Second Degree Breach of Peace** Warrant:

3. That upon police arrival at the store, there was no one fitting that description found in the area. In speaking with the store manager, Anthony Castagnazzi, he stated that he did not see anyone fitting that description in the store and was unaware that anything had happened.

Would not someone veritably being "**harassed**" or as Hearst also attempts to say "**threatened**" and in relative fear proceed to a safe zone like market personnel and ask for help? This did not happen! **Harassment is a very sensed occurrence with words, warnings, angers, spectacles, etc....** So we are left with the approach at the mystery woman's car parked next to mine as Dispatch Tapes say in front row of store which was not a far distance hence could not be termed "**stalking**".

FACT: I checked out before this woman and our meeting at her car parked next to mine was a **brief instant of time** (See Exhibit G). When I approached the car window this woman drove away and made a call to her boyfriend when she left the

market, and HE made the call (with initial false descriptions) to the police as Dispatch Tapes reveal. **NOT only did “Police” not use the terminology “harass” but neither did the woman.** How about answering Who? What? Where? When? Why? How? How long?

This is Hearst’s big story to report on. Any past Incident Report also shows no **harassment** for if I were **veritably harassing** someone, I would have been arrested **for this false arrest is proof one can be arrested without a Sworn Written Statement.** Once again, since Hearst and only Hearst believes ***POLICE: Man Harassed women for years*** in the past then they **best bring forward accusers/names with their own stories, let alone police willing to verify these stories and characterize them as some kind of harassment which NEVER HAPPENS IN OFFICER’S DEPOSITION** and to which police did not prior to the later 2019 false arrest for **Email Harassment** after Hearst’s **blind persecution** became the big James Lawrence story readily available via Google.

FACT: It is very hard to fight an article that attempts to use “POLICE” as their source. THIS IS VERY DAMAGING! In all reality “Police” should file a lawsuit against Hearst especially if I file a lawsuit against the police for this unproven and unprovable characterization. Altice respected police aka law.

Who would report that some guy is ***“POLICE: Man Harassed Women for Years”*** at a shared public place like a supermarket **(See Exhibit Y) devoid of police or actual named women coming forward themselves deploying this loaded harass term/accusation** wanting to make a public story with particulars about any encounter? Without Sworn Written Statements what is alleged? Where are any actual women feeling the need to make a supermarket encounter some kind of **harassment story**, let alone need for an arrest. This grossly inexperienced and agenda-driven young girl reporter pumped up with the MeToo zeitgeist was obviously biased to say the least looking for more **(See Exhibit U – Reporter’s State of Mind 2018-2019).**

WHY POLICE aka LAW OFFICERS NEVER DEPLOYED THE TERM **HARASS** WITHIN THE FIRST ARREST WARRANT

Common sense: When reporting on an arrest (let alone when referencing **no arrest at all**), media cannot be allowed to deploy words at someone that are the names of other statutes. Media might be able to choose an outlandish and controversial word occasionally like “pester” or “torment” (not names of actual laws) but choosing a word with its own distinct legal name and definition when claiming **“Police”** as their source is clearly **libel**.

FACT: The ONLY time the term harassment is used in the Warrant in question is when describing my opinions of police treatment of me. And notice it is in reference to more than one encounter with police – comparing the arresting incident to another incident in the past – 2 or more Incidents directed at me – Course of Conduct.

Section 10 of Warrant:

10. That during our conversation with Lawrence we would have to keep reminding him to lower his voice and stop swearing. He stated that he felt the police were harassing him. That he was arrested in a previous incident in this town (file #2017-022558) and he was able to get the charges cleared because he did not do anything wrong. In checking this file later, I learned that there is still a protective order in effect against Lawrence.

[Note in reference to Section 10: : I never said I was arrested in the past – another mistake from Officer (outside of not able to convict me). Fact: I was never arrested in Connecticut before this fiasco.]

Why would the Warrant writing officer mention the word “harass” when referring to my feelings with the police yet then NEVER counter with the same harass language when referring to the arresting incident let alone any past complaint/call of concern from another person in the past referenced in Warrant? The word harass is obviously in his vocabulary.

Once again, the Warrant writing officer knew when writing the Warrant to leave out the **very loaded unproven and unprovable harassment language**. He chose lesser types of behavior – *“follow and getting into personal space”*. This officer of the law knew the dangers of painting someone with an irrelevant and unprovable **behavior and crime** to which his **Deposition has him saying about the issue of using the terms stalk or harass - “they just did not come up”**.

The Deposition of the Officer (See Exhibit I) CONFIRMS that he reviewed the statutes and felt **Section #6 of the Second Degree Breach of Peace Statute** fit **“what I had done”**. If there was **veritable harassment** in tune with Connecticut laws, he would have proceeded to arrest me for a **Third Degree Stalking Charge** for Connecticut does not have a Third Degree Harassment Statute and the **Second Degree Harassment Statute** has to do with Electronic media. Hence why a trial with experts (let alone making legislators further clarify some statutes) because

Webster’s Dictionary definition of **stalking** - “to pursue obsessively to the point of **harassment**” contradicts Appeal Court flawed reasoning. Where is the **obsession**? Where is the **harassment**? How can a 55-year-old man be painted by the Second Circuit Court of Appeal with a “*totality of behavior*” – of alleged yet in all reality given the evidence unproven and unprovable **obsessive conduct**, meeting women over the course of decades. This could be applied to anyone and that is not right.

The Deposition of investigating officer also CONFIRMS that **there is not one Incident Report from my past devoid of arrest that has a Brief Description of “Harassment”** and these “cases” resulting in no arrest also do not have the words **harassment** deployed by the actual officers when writing about my behavior.

Deposition of Arresting Officer James Sullivan: (See Exhibit I)

25 Q. Okay. Now, from your research, are you aware

Page 15

1 that any past incident report of mine fully
2 investigated, resulting in no arrest, no probable cause
3 for arrest, with the cases all closed, all have brief
4 the description of either suspicious person or police
5 general service, and not one incident report has the
6 brief description of harassment. Did you read this
7 fact?

22 A. And you are correct in that assumption.

There was NEVER police descriptions of harassment in the past. Is this not enough for a trial given Hearst choosing their own wording from the Warrant and refusing my peaceful offer to go our ways free of costs?

Conflation of the terms of alleged one-time arrest of a “Suspicious Person” “follow and getting into personal space” (not convicted) let alone past unproven and unprovable “Suspicious Person” “follow and get into personal space” (See Exhibit B) devoid of Probable Cause with Course of Conduct behavior of **Harassment** that does not exist within the actual Warrant wording is not justice. **Are we to describe any allegedly suspicious, awkward, or uncomfortable courting behavior at common night clubs or any public space as “harassment” and if so what kind?** FEELINGS FROM A JOURNALIST OR COURT DEVOID OF WITNESSES SHOULD NOT REIGN WITH SUCH DAMAGING WORDS.

There was also absolutely NO “to pursue obsessively to the point of harassment” for there is no prior warnings or words or hostile communications. No **verbal harassment** let alone conversations with warnings is mentioned in Warrant. The alluded to past incidents or calls of concerns that **never resulted in any arrest** go back to 2001, 2002, 2004, 2006 – decades (See Exhibit B). Nothing can be known of these alleged one-time incidents at a public place devoid of ever having a witness/evidence or Probable Cause. This is nothing but hearsay. **This civil case is not for a Judge to interject their own personal feelings of a past resolved incident never deemed criminal let alone devoid of names and quotes.**

FACT: The law/lawyers correctly inform me that ONLY if there were prior sex assault Incident Reports could the court see prior Incident Reports devoid of an arrest as Prior Bad Acts admissible in a court of law.

FACT: THE MARCH 5, 2018 ONE COUNT CHARGE – Connecticut General Statutes 53a-181 – Breach of the peace in the second degree: Class B misdemeanor

Current as of: 2018 | [Check for updates](#) | [Other versions](#)

(a) A person is guilty of breach of the peace in the second degree when, with intent to cause inconvenience, annoyance or alarm, or recklessly creating a risk thereof, such person: (1) Engages in fighting or in violent, tumultuous or threatening behavior in a public place; or (2) assaults or strikes another; or (3) threatens to commit any crime against another person or such other person’s property; or (4) publicly exhibits, distributes, posts up or advertises any offensive, indecent or abusive matter concerning any person; or (5) in a public place, uses abusive or obscene language or makes an obscene gesture; or (6) **creates a public and hazardous or physically offensive condition by any act which such person is not licensed or privileged to do.** For purposes of this section, “public place” means any area that is used or held out for use by the public whether owned or operated by public or private interests.

NOTICE NO USE OF THE WORD HARASS LIKE HOW THE ARREST WARRANT DOES NOT USE THE WORD HARASS.

Connecticut General Statutes 53a-181a – Creating a public disturbance: Infraction - \$90 Fine

Current as of: 2018 | [Check for updates](#) | [Other versions](#)

(a) A person is guilty of creating a public disturbance when, with intent to cause inconvenience, annoyance or alarm, or recklessly creating a risk thereof, he (1) engages in fighting or in violent, tumultuous or threatening behavior; or (2) annoys or interferes with another person by offensive conduct; or (3) makes unreasonable noise.



Infractions are usually color coded in yellow **\$\$YELLOW\$\$**

AGAIN - NOTICE NO USE OF THE WORD HARASS LIKE HOW THE ARREST WARRANT DOES NOT USE THE WORD HARASS.

NOW HOW ABOUT ANY INCIDENT REPORT DEVOID OF AN ARREST WITH AT WORST A DESCRIPTION "SUSPICIOUS PERSON"?

INCIDENT REPORT	REPORT NUMBER: :
Westport Police Department	ORI# :
50 Jesup Road	REPORT DATE: :
Westport CT 06880-4385	DATE INCIDENT: :
203-341-6000	DATE END: :

ANY MENTIONED "CASE"/INCIDENT REPORT FULLY INVESTIGATED RESULTING IN NO ARREST CASE KNOWN TO BE CLOSED. INCIDENT REPORT FULLY INVESTIGATED RESULTING IN NO ARREST AKA NO STATUTE – 000 – NO PROBABLE CAUSE, NO CRIME.

DEFINITELY NO USE OF THE WORD HARASS OR STALK.

Veritable Harassment is repeated, persistent, over time (short or long), systematic, involving courses of conduct – 2 or more acts that involve VIOALTED warnings toward an individual (WITH KNOWN ACCUSERS) NOT an unnamed list of people or alleged "totality" of people devoid of proper quotes of **harassment stories.**

Police would never set themselves up to be sued jumping over to more serious and extreme **harassment accusations**. If there was any past **harassment** I would have been arrested for **Third Degree Stalking**.

First Arrest Warrant – Section 11

11. That in checking this departments case history with Lawrence, I learned that there were 10 ^{superlatives} case incidents logged from 2002 till present. In all of these complaints Lawrence was seen following the complainants around a store or coffee shop and then following them out to their cars where he would either stare at them or get right into their personal space. In most of these cases, Lawrence was told that his actions scared the complainants to the point of them calling the police. He has even stated himself that he needed to rethink his approach with woman. That ^{Lies P.S.}

Internet search aka Google the phrase “*get into personal space*” and see the “*popular acception*” and “*mind of the average viewer/reader*” of the phrase “*get into personal space*” (See Exhibit J). This carefully chosen wording used by the officer in the Warrant clearly has different connotations to veritable let alone past proven **stalking** or in relation to this case - **harassment**.


The American Psychological Association is the largest scientific and professional organization of psychologists in the United States, with over 121,000 members, including scientists, educators, clinicians, consultants, and students.



ABOUT APA TOPICS PUBLICATIONS & DATABASES PSYCHOLOGY HELP CENTER NEWS & EVENTS SCIEN

APA Dictionary of Psychology

Search and select a Dictionary term 

personal space invasion 

the intrusion by one person into the personal space of another. The intruder inappropriately and uncomfortably crowds the other person. See [proxemics](#).

DEFINITION THAT NEVER USES THE WORDING– *stalk, stealth, prey, harass*. Why? Because *stalk and harass* involve Course of Conduct – INTENDED **repeated, more than one, persistent, systematic, chronic, and continual advances against someone while having been warned. And keep in mind Warrant only said “*get into*” *personal space* and not “*violate*” or “*invade*” **personal space** as shown here which has more intrusive connotations regarding intent.**

Websters Dictionary – the most popular English dictionary in America.

Merriam-Webster SINCE 1828

GAMES | BROWSE THESAURUS | WORD OF THE DAY | WORDS AT PLAY

invade someone's space

DICTIONARY | THESAURUS

invade someone's space idiom



Definition of *invade someone's space*

: to place oneself too close to someone

// I felt uncomfortable with her so close, *invading my space*.

also : to be in the space where another person is or wants to be

// I went to study in the library so I wouldn't *invade my roommate's space*.

DEFINITION NEVER USES THE WORDING – STALK, STEALTH, PREY, HAUNT, OR HARASS.

Collins Dictionary one of the world's largest publishing companies and is one of the Big Five English-language publishing companies.

Definition of 'to invade sb's personal space'

to invade sb's personal space

in British English

to come too close to somebody, so that they feel uncomfortable

I felt my body involuntarily stiffen against her invasion of my personal space.

See full dictionary entry for personal space

ONCE AGAIN, DEFINITION NEVER USES THE WORDING – STALK, STEALTH, PREY, HAUNT, OR HARASS.
SEE VERY TELLING EXHIBIT J.

FACT: This word “*follow*” and carefully chosen phrase “*and get into personal space*” and **certainly** in describing any alleged past incident devoid of arrest aka no criminal intent, no probable cause of anything criminal or threatening, was used by Officer Sullivan for a reason and respecting his words are in order.

WHERE DOES THE WORD HARASS OR STALK EXIST IN THE

DICTIONARY DEFINITION OF “follow”, the actual language used by police in the Warrant?

English: Follow –

verb (used with object)

- 1: to come after in sequence, order of time, etc.: *The speech follows the dinner.*
- 2: to go or come after; move behind in the same direction: *Drive ahead, and I'll follow you.*
- 3: to accept as a guide or leader; accept the authority of or give allegiance to: *Many Germans followed Hitler.*
- 4: to conform to, comply with, or act in accordance with; obey: *to follow orders; to follow advice.*
- 5: to imitate or copy; use as an exemplar: *They follow the latest fads.*
- 6: to move forward along (a road, path, etc.): *Follow this road for a mile.*
- 7: to come after as a result or consequence; result from:
- 8: to go after or along with (a person) as companion.
- 9: to go in pursuit of: *to follow an enemy.*
- 10: to try for or attain to: *to follow an ideal.*
- 11: to engage in or be concerned with as a pursuit: *He followed the sea as his true calling.*
- 12: to watch the movements, progress, or course of: *to follow a bird in flight.*
- 13: to watch the development of or keep up with: *to follow the news.*
- 14: to keep up with and understand (an argument, story, etc.): *Do you follow me?*

verb (used without object)

- 15: to come next after something else in sequence, order of time, etc.
- 16: to happen or occur after something else; come next as an event: *After the defeat great disorder followed.*
- 17: to attend or serve.
- 18: to go or come after a person or thing in motion.
- 19: to result as an effect; occur as a consequence: *It follows then that he must be innocent*

FACT: A person can follow without intent “to trouble” yet a person who veritably stalks or harasses is following with intent.

The screenshot shows the Thesaurus.com interface for the word "follow". The search bar contains "follow" and the site logo is visible. Below the search bar, the word "follow" is displayed with its phonetic transcription [fol-oh] and a speaker icon. To the right, there is a link to "SEE DEFINITION OF follow". Below this, there are four tabs representing different meanings: "verb take the place of", "verb trail, pursue physically", "verb act in accordance with", and "verb understand". The "verb act in accordance with" tab is currently selected. Underneath the tabs, the text "Synonyms for follow" is followed by a grid of 20 synonym boxes arranged in four rows and five columns. The synonyms listed are: pursue, postdate, supersede, come after, go next; chase, replace, supervene, come from, proceed from; displace, result, supplant, come next, spring from; and ensue, succeed, be subsequent to, go after.

MORE FACTS: There is NO wording **stalk or harass** here in the thesaurus aka “substantial” language of the word “follow” used in the Warrant much like there is NO wording **stalk or harass** within the definitions of “get into personal space”!

The largest Social Media network worldwide is Facebook with 2.8 billion accounts. When using Facebook, one builds a Friends List and a Follow List. With Facebook, one can hide their Friends list and/or their Follow list. A Friends List can be controlled. One would have to request a friend first to which would result in getting either accepted or denied. Accumulating a Follow List is free and allow people to follow their curiosity without the one being followed knowing of the following because they opt for a public display of their posts. One can follow on Facebook without being the one approved to be followed. This Follow List aids curiosity for what is made public. If someone **harasses** someone with unwanted attention/messages, then this person is warned and if it **persists** then this **harasser** can be de-platformed or even arrested for **online harassment or cyber stalking**. MEANING: Facebook's Follow List is NOT called **Stalk List** for a reason.

Public spaces demand temperate language when attempting to define interactions. The Warrant writing officer chose words in tune with a momentary one-time feeling and did not escalate any past unprovable *“follow and stare or getting into personal space”* as something that was **harassing** devoid of proper detailed descriptions. The media and court most certainly should do the same. Define what you can and do not venture into extreme and subjective interpretations devoid of proper evidence.

FEB. 22, 2021 DEPOSITION OF INVESTIGATING AND ARRESTING OFFICER JAMES SULLIVAN RESPONSIBLE FOR THE WARRANT NARRATIVE IN QUESTION - SEE EXHIBIT I.

- **Confirmation Harassment** was NEVER part of any past investigation prior to the only investigation for **Harassment** - the Feb. 6, 2019 false arrest for **Second Degree Email Harassment**.
- **Confirmation Threatening** NEVER part of anything in my past.
- **Confirmation** I was arrested for part **#6 of the Second Degree Breach of Peace statute** and NOT part #1 to which Appeal Court in James Lawrence v. Altice outrageously associated me with part #1 while not quoting the entire statutes parts #1-6 when attempting to conflate different laws.
- **Confirmation** the Incident Report for the arrest for **One Count of Second Degree Breach of Peace** has a Brief Description for the Incident Report as **"Suspicious Person"** and NOT **"Harassment"**.
- **Confirmation** ALL past **Incident Reports devoid of arrest** have either a Brief Description of **"Suspicious Person" or "Police General Service"** and NEVER have a **"Harassment"** Brief Description.
- **Confirmation** that the Brief Description of the Incident Report of the one and only **Harassment charge/arrest** from Officer Mark Grasso is **"Harassment"**.
- **Confirmation** that the Brief Description of the Incident Report for twice-rejected Warrant for **Second Degree Stalking** by the same officer Mark Grasso is **"Harassment"**.
- **Hearst lawyer Stephen Yuhan free to ask the Warrant writing Officer Sullivan at Deposition if he thinks I harassed anyone from his Warrant and Hearst never asks this big question! NOT ONCE, and thereby knowing there are many grey issues and thus disgustingly hoping a Judge will empower them with some legal spin to continue their (at best) now personal feelings.**
- **The ONLY part of my past with "Police" at issue that Hearst lawyer Stephen Yuhan delved into at the Deposition was the Feb. 6, 2019 first time **Harassment** arrest for **Second Degree Email Harassment** which is after the original March 23, 2018 **Article #2** Big Deuce.**

THE ISSUE OF NO ALLEGED CALL OF CONCERN TO POLICE ABOUT FEELINGS OF ME “*getting into personal space*” AT A PUBLIC MARKET BEING NAMED AND/OR QUOTED USING THE TERM “HARASS”.

See Exhibit X

From Judge Shea Summary Judgement:

Mr. Lawrence's related claim that Hearst defamed him by stating that he had harassed "women for years" also fails. Without citing any legal authority, he contends that articles about harassment demand actual names and actual descriptions of the type of harassment from actual women." ECF No. 41-1 at 3 . As the Court of Appeals observed, in addition to the N

1 51
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YES. Without a third party or in this case “*Police*” deploying this loaded **harass** terminology (a word that is an actual statute), then logic dictates that the article/media demands names of women and quotes deploying this **accusation/language**. Without their being any legal precedents of this issue it is up to the **Appeal Court to show courage and be bold to properly address this issue** in tune with what is fair for future cases. Judicial Activism was attempted in the Altice case by Judge Livingston associating an unnamed never quoted list or “*totality of conduct*” of KNOWN unproven and unprovable “*getting into personal space*” as **stalking-like conduct**. I believe the court should be deciding this case based not only on Hearst’s 4 year Course of Conduct toward me, but the issue presented here, and acting in a way they think is good for society because empowering more ways to accuse someone devoid of any proper evidence only invites more conflicts.

IF the Court does not address this issue I see myself suing again and again and again over this issue for the rest of my life because the unproven and unprovable Hearst **harassing narrative devoid of names or quotes will be used by other shady journalists/media.**

WHAT IS HARASSMENT?

Harassment is a loaded term. Unlike the general term **stalk** there are types of **harassment** like **sex harassment**, **verbal harassment**, **electronic harassment**, **workplace harassment**, **street harassment**, etc... . **Ever hear of supermarket harassment or night club harassment? NO hence officer's choice of statute.** There needs to be a proper description relative to the complaint. Google **"harassment"** and see what a loaded term it is. The first 10 pages of search results show **sex harassment!** Conflating a generalized reference to past KNOWN harmless Incident Reports to a loaded term like **harassment** is not justice.

What is Harassment? There is **verbal harassment** but that too had nothing to do with my arrest or past for there was NO words spoken in the brief crossing of paths of the arrest and there are NO **stories of harassment** in the Warrant. In fact, Hearst's own **Article #3** depicts **harassment** as **"repeated" toward an individual** AND NOT a personal feeling from a Civil Court Judge that a vague **"totality"** of **harassment-free incidents** constitutes **harassment**.

Hearst's Article #3 itself refers to the lone **Harassment arrest**/investigation with the Course of Conduct terms **"repeatedly" and "several requests" and "continued"**. **Article #3:**

Resident James Lawrence, 53, was arrested on charges of second-degree harassment after a victim told the Westport police on Sept. 18 that she was **repeatedly** harassed by Lawrence. The victim said she made **multiple requests** to Lawrence that he stop contacting her, but he **continued** to contact her through email, police said.

PLEASE TAKE THE FOLLOWING VERY SERIOUS:

WIKIPEDIA – (the largest encyclopedia in the world).

This type of **harassment** is the closest type of **dictionary/cultural harassment** that anyone could attempt to associate me with yet this itself is also far from anything described in Warrant.

Street harassment

From Wikipedia, the free encyclopedia

"Catcall" redirects here. For the novel, see *Catcall (novel)*. For the musician, see *Catcall (musician)*.



The examples and perspective in this article may not represent a worldwide view of the subject. You may improve this article, discuss the issue on the talk page, or create a new article, as appropriate. (March 2018) (Learn how and when to remove this template message)

Street harassment is a form of harassment, primarily **sexual harassment** that consists of unwanted comments, gestures, honking, **wolf-whistlings**, **catcalling**, exposure, following, persistent sexual advances, and touching by strangers in public areas such as streets, shopping malls, and public transportation.^[1]

NOTICE “at shopping malls”. The Warrant in question was talking about public shopping areas (supermarket) but did not describe anything under this **Street Harassment** description. At a quick look of this description shows a “unwanted following” might partially fit the Warrant but there would need to be an **intended**

persistence of this following someone aka KNOWN unwanted following **after a kind of communication/warning on the spot** to which is not described in the Warrant at all – **no words** - hence the one-time **One Count Second Degree Breach of Peace** charge, which is why the next description is **“persistent sexual advances”**.

This Wikipedia **Street Harassment** description is all about language – words and body language – **“comments, gestures, honking, wolf-whistling, cat calling, and touching”** – all **verbal** and/or **sexual types of harassment** which is NOT within the Warrant hence the officer’s careful choice of wording. You cannot simply take the word “follow” as **harassment** without knowing what kind of following? Advances are part of everyday life between the sexes and being called a **“harasser of women”** devoid of proper evidence for at worst being an occasional player putting oneself out there for 55 years is not a crime. There will always be awkward and unwanted situations for men making advances, especially in the suburbs with married people. The question is are there any **intended advances contrary to someone’s communicated wishes** let alone any kind of damages from the advance.

FACT: YOU CAN STALK SOMEONE WITHOUT THEM KNOWING BUT YOU CANNOT HARASS SOMEONE WITHOUT THEM KNOWING THEY ARE BEING HARASSED. Meaning – particular descriptions are essential in any **“totality”**.

If there was any **“harassment”** then there would be proper particular **harassment stories** – **who what where when why how and how long** - and not some generalized SUBJECTIVE AND CONFLATED VERSION of a police narrative devoid of **particular harassment stories** with actual **names** tied to these **harassing stories** and with **quotes** from a woman telling these **harassment stories**. No experienced let alone sane person could think any alleged past calls to the police resulting in no arrest were absolutely similar (See Exhibit B).

Since it is firmly established CONFIRMED IN DEPOSITION that there was no **threats** or **obsession** like **hostile words** or documented **violated warnings** aka **verbal harassment** and my conduct was certainly not **sex harassment** and no evidence of any **persistence** - Course of Conduct behavior, **then what kind of harassment are we talking about here?** The woman from the one arrest let alone Hearst’s lone big witness -Wendy Higgins Chambers, nor any woman from the past ALL NEVER use the term **harass** when describing the encounter. What are we talking about here? **Snowflake harassment?** People call the police every day based on feelings of uneasiness. We are talking about **Hearst accusing me of harassment.**

Harassment is 99% of the time a MeToo story (See Exhibit R). Internet Search Results for **Harassment** show the undeniable evidence of the **“mind of the average reader”** and **“popular acceptance”** regarding the term **harass** and this search result is **sex harassment**. A MeToo story let alone any **harassment story** has actual

women/names coming forward and making a case with proper accusations/descriptions that fit **harassment** norms legal or not.

Harassment

From Wikipedia, the free encyclopedia

Harass or **harassment** is a when a person annoys or upsets someone else, usually repetitively. It is done on purpose and makes the target feel scared, worried or sick from fear. These are behaviors that appear to be disturbing, upsetting or threatening.

There are a lot of types of harassment: **bullying** at school or by **neighbors**, **sexual harassment** at work or when someone borrowed money, or racial and religious **discrimination**. There are laws against harassment in many countries, and employers now have a duty to protect employees from harassment.^[1]

Proper experienced journalists obey the credo – **Who? What? Where? When? Why? How?** The Warrant’s chosen language should have been the headline and NOT a loaded term inviting all kinds of imagery that never “*dulls impact*” but **leaves the reader to imagine** WHAT and HOW happened in any long past “incident” (let lone WHO or WHEN) or even so-called incident “**without incident**” (See **Exhibit B**). We ONLY know a WHERE but NO PROPER DETAILS. To truly “*dull an impact*” would have any woman from the past quoted in her own words as to what was “**suspicious or uneasy**” (See **Exhibit B**) or worse **harassing** with proper details.

GOOGLE (largest search engine in the world) **DEFINES HARASSMENT AS:**

What does it mean when someone is harassing you? ^

harassment. If **someone** is abusing, insulting, or otherwise harming **you** on a regular basis, it's called **harassment**. Cruel and usually really annoying, **harassment** is also illegal in some cases. **Harassment** is a word that describes any kind of ongoing torment. At school, **harassment** is often known as bullying.

Once again – **persistent, ongoing verbal** like insulting, **persistent** invading space like abusing, on a **regular basis**. You cannot take a handful of unproven and unprovable acts in 55 years of history as a “*totality of conduct*” devoid of anyone using such language - complainant, police, or any witness.

GOOGLE (largest search engine in the world) **DEFINES HARASSMENT AS:**

How many texts are considered harassment? ^

It can be the same type of behaviour or different types of behaviour on each occasion. For example, one **text** message intended to distress you is not **harassment**. Two **text** messages may be **harassment**. One **text** message and one phone call may also be **harassment**.

rightsofwomen.org.uk › wp-content › uploads › 2016/03

Harassment and the law - Rights of Women

NONE OF THE FOLLOWING IS PART OF THE WARRANT:

GOOGLE (largest search engine in the world) DEFINES **HARASSMENT** AS:

What happens when you file a police report for harassment? 

What happens when you file a police report for harassment? ... They will look at **the** evidence **you** have provided, ask witnesses to verify your claims and interview **the** person who has been **harassing you**. If this does not stop **the harassment**, **you** may be able to **file** a court complaint. Dec 14, 2018

legalbeagle.com › 7595518-file-police-harassment-report

[How to File a Police Harassment Report - Legal Beagle](#)

GOOGLE (largest search engine in the world) DEFINES **HARASSMENT** AS:

What is psychological harassment? 

Psychological harassment is vexatious behaviour that manifests itself in the form of conduct, verbal comments, actions or gestures characterized by the following four criteria: They are repetitive*; They are hostile or unwanted; They affect the person's dignity or **psychological** integrity, and.

www.psychologicalharassment.com › psychological-haras...

[Psychological Harassment at Work](#)

GOOGLE (largest search engine in the world) DEFINES **HARASSMENT** AS:

What are the two most common types of harassment? 

The two most common forms are described as quid pro quo sexual harassment and hostile work environment sexual harassment:

- Quid pro quo harassment. ...
- Hostile work environment harassment.

Quid pro quo harassment occurs when someone offers or merely hints that he or she will give the someone something in return for satisfaction of a sexual demand.

Once again, these are NOT the case with my past. HARASSMENT is a loaded term. Judgement in favor of Hearst allows them to skirt by without providing some necessary evidence while **persisting** with their own subjective term/accusation, a term/accusation that is not related to the March, 5, 2018 arrest,

my past, and a term that is also other types of crimes/statutes. YES – there is **First Degree and Second Degree Harassment**, but also **Sex Assault statutes** like the following that all deploy **the term harassment**.

§ 53a-70	Sexual assault in the first degree: Class B or A felony
§ 53a-70a	Aggravated sexual assault in the first degree: Class B or A felony
§ 53a-70b	Sexual assault in spousal or cohabiting relationship: Class B felony
§ 53a-70c	Aggravated sexual assault of a minor: Class A felony
§ 53a-71	Sexual assault in the second degree: Class C or B felony
§ 53a-72	Rape in the first degree: Class B felony
§ 53a-72a	Sexual assault in the third degree: Class D or C felony
§ 53a-72b	Sexual assault in the third degree with a firearm: Class C or B felony
§ 53a-73	Rape in the second degree: Class C felony
§ 53a-73a	Sexual assault in the fourth degree: Class A misdemeanor or class D felony

Because of the Hearst’s choice of words, Internet search results of their special **Article #2** had **sex assault stories** associated with the search result for James Lawrence (See **Exhibit S**), for **sex harassment** and **sex assault** are the top search result for **harassment**. AND **the term harassment** is within Course of Conduct crimes **First Degree, Second Degree and Third Degree Stalking**, and **Violation of a Protection Order** (See **Exhibit P**).

What are “average readers” to believe *“Police: Man Harassed Women for Years”*. What kind of **harassment**? Was there attempted touching? Were there hostile words? Who? What? When? How? How long? Why? Where? Really - What happened in this list of *“getting into personal space”*? **Harassment** invites all kinds of imagery and demands NAMES AND QUOTES FROM ALLEGED VICTIMS!

ONCE AGAIN something to think about:

FACT: A stalking law/crime/offense has more severe connotations than a **harassment law/crime/offense** in the “*mind of the average viewer*” because of the connotations of a more prolonged period of time with more premeditation. Yet interestingly, the **dictionary term of harass** is more loaded and severe than the **dictionary term of stalk**. **Stalking** is also a less common behavior and carries a heavier stigma than **harassment** because there are various **types of harassment accusations** happening every day.

**COMPLETE BLACK'S LAW, BOUVIER LAW, AND MULTIPLE
DICTIONARY DEFINITIONS OF HARASSMENT**
SEE EXHIBIT N.

ARTICLE #2 DOUBLE COURSE OF CONDUCT
CONNOTATIONS OF THE WORDING HAUNT + HARASS THAT
EXTREMELY GOES BEYOND THE WARRANT AND NEVER
“dulls impact” or “mitigates problems” or “compensates”.
 All Dictionaries on the word **Haunt** (See Exhibit O).

First, how could I have *“haunted women for years”* while living in San Francisco from 2006-2017?

Westport News Article #2 Quote:

*“Local women **haunted** for years by a man they say would aggressively approach them at local stores and cafes are speaking out after his arrest this month. Westporter Wendy Chambers (ONLY WOMAN SPEAKING OUT) said after reading reports of the arrest of James Lawrence in the media last week, she wanted to come forward with her story.”*

English: Haunt – 1: to visit habitually or appear to frequently as a spirit or ghost
2: to recur persistently to the consciousness of; remain with
3: to visit frequently; go to often:
4: to frequent the company of, be often with

Once again bad **libelous** words, there was NO habitually recurring frequent persistent behavior with a particular person.

Connecticut Judge Michael P. Shea simply defines **haunt as also meaning “to trouble”. REALLY?**

From ECF 41 Summary Judgment:

N.Y. Times Co., 842 F.2d 612, 624–25 (2d Cir. 1988)). As to Hearst's use of the term "haunt," it was not defamatory because it fairly characterized the impact of Mr. Lawrence's conduct on Ms. Chambers, at least, that is "to have a disquieting or harmful effect on: TROUBLE." *Haunt*, Merriam-Webster Online Dictionary (accessed March 11, 2021). In any event, "[f]acts do not cease to be facts because they are mixed with the fair and expectant comment of the story teller, who adds to the recital a little touch by his piquant pen." *Strada v. Connecticut Newspapers, Inc.*,

FACT: People can rightfully trouble others for like help or for evasions of duties, but people are not rightfully **harassed.**
 The following idiom proves this:

trouble (one) to do (something) (redirected from *trouble you to*)

trouble (one) to do (something)

To burden or inconvenience one to do something. Typically used in the form of a question beginning with "could" as a polite request.

Sorry to bother you, Mr. Manning, but could I trouble you to look over my report?

Could we trouble you to complete our short survey about your current Internet service and provider?

Ever hear of an idiom or expression – **Can I harass you to do?**

AND if I was *“haunting”* in a *“harassing”* way is not the following dictionary and thesaurus definitions relative?

The screenshot shows the Merriam-Webster website interface. At the top, there are navigation links for 'GAMES & QUIZZES', 'THESAURUS', and 'WORD OF THE DAY'. The Merriam-Webster logo is on the left, with the text 'SINCE 1828'. A search bar contains the word 'trouble'. Below the search bar, there are two tabs: 'Dictionary' (which is selected) and 'Thesaurus'.

trouble verb

troubled; troubling \ 'trə-b(ə-)liŋ  \

Definition of *trouble* (Entry 2 of 2)

transitive verb

- 1 **a** : to agitate mentally or spiritually : WORRY, DISTURB
 - b** : to put to exertion or inconvenience
*// I'm sorry to *trouble* you*
 - c** (1) : to produce physical disorder in : AFFLICT
*// *troubled* by a cold*
 - (2) *archaic* : MISTREAT, OPPRESS
- 2 : to put into confused motion
*// the wind *troubled* the sea*

WHERE IS THE WORD **HAUNT** OR **HARASS**?

Notice when reading the definition of **trouble** that the closest word to **harass** or **haunt** is “mistreat” or “oppress” which is ARCHAIC for a reason. Do we allow for old laws to supplant new laws? NO. Then why would we allow for old archaic words to reign over the evolution of language. **Veritable haunting** or **haunting in a harassing way** has multiple 2 or more intended happenings at one individual person or area

all the while the warned person **persisting** in the face of “troubling” feelings.

Merriam-Webster SINCE 1828

GAMES & QUIZZES | THESAURUS | WORD OF THE DAY | FEATURES

trouble

Dictionary | Thesaurus

Synonyms & Antonyms for *trouble*

Synonyms: Noun

affection, ail, ailment, bug, complaint, complication, condition, disease, disorder, distemper, distemperature, fever, ill, illness, infirmity, malady, sickness

Synonyms: Verb

bother, fear, fret, fuss, stew, stress, sweat, worry

WHERE IS THE WORD **HAUNT** OR **HARASS?**

COM | THESAURUS.COM | MEANINGS | GAMES | LEARN | WRITING | WORD OF THE DAY

SYNONYMS | trouble

trouble See definition of trouble on Dictionary.com

noun annoyance, worry | noun something requiring great effort | noun bad health | verb bother, worry | verb make ▶

OTHER WORDS FOR *trouble*

anxiety	predicament	bind	heartache	sorrow
concern	problem	bother	hindrance	spot
danger	strain	commotion	irritation	task
difficulty	stress	discontent	misfortune	torment
dilemma	strife	discord	nuisance	tribulation
disorder	struggle	disquiet	pest	tumult
disturbance	suffering	dissatisfaction	pickle	vexation
inconvenience	unrest	distress	puzzle	bad news
mess	woe	grief	row	dire straits
pain	agitation	hang-up	scrape	hot water

Compare Synonyms

WHERE IS THE WORD **HAUNTING** OR **HARASSMENT?**

Yes once again a **veritable haunting** or **harassment** has multiple 2 or more intended unwanted happenings at one individual person all the while the warned person **persisting**. **Exhibit X** shows how some media opt for more benign terms like “unwanted advance” instead of deploying the word **harass**.

The use of this word **Haunt** takes any needle in the haystack non-Course of Conduct definition of **Harassment** into the definite realm of **Course of Conduct accusations**. The writing of **Haunt + Harass** = accusations of clearly **persistent** approaches toward someone, not a mysterious unnamed unquoted “similar” list devoid of deploying such extreme and damaging terms.

FACT: One can haunt a bookstore as Websters Dictionary shows, or have a “haunt” aka a hangout, but these frequented places are for what the place offers – books – habitually reading. I can haunt supermarkets because I am buying food every week. I cannot haunt a woman or women at supermarkets because I am obviously doing other business (shopping) in **this shared public space**. An alleged frightening ghost is not expected to be habitually present at the place of concern. Haunting a woman or women would entail showing up at unexpected private places or at the very least a public place this ghost has no right to be like someone’s work, etc... hence Restraining Orders and Violations of such orders. All this I am now describing is not simply “troubling” - it is **veritable harassment**. Once again, conflation from learned Judges is what is really troubling in a lasting way for the effects of these troubling Decisions causes **harassment/persecution**.

We cannot conflate behaviors in such gross ways. **Linguists use this color coding that I use for a reason. Comparing a yellowish orange synonym with a red synonym is saying there are differences – WHY THE COLOR CODES? AND once again, NONE of these synonyms presented here have actual laws named after them.**

It is fair to say the only veritable haunting happening is Hearst’s 3+ year unproven and unprovable articles spooking the public. I give Hearst an actual warning once again – **PROVE YOUR AND ONLY YOUR ACCUSATIONS WITH PROPER EVIDENCE OR LEAVE ME ALONE** - yet **they persist**.

WITH ALL DUE RESPECT - I have written that this case belongs in front of a jury with actual witnesses, **linguistic experts**, socially scientific presentations, polls, surveys, focus groups, etc... for it is obvious that a double-spaced quote from a legal Decision is not enough to bring order. **Words and definitions exist for a reason much like different laws exist for a reason.** I am not just an inexperienced yet competent Pro Se Plaintiff attempting to make my way through legal speak, I am schooled in and speak various languages so there is no disrespect intended with my aggressive and direct approach with what I know for certain.

WHAT IS “*totality of conduct*” AND HOW IS “*totality of conduct*” TO BE REPORTED UPON with HEADLINE “*Police: Man _____*”

Potentially and partially at issue are the personal feelings from Judge Debra Anne Livingston that a vague unproven and unprovable list or “*totality*” of **harassment-free incidents** constitutes **harassment**. This “*totality*” with not one description from a Complainant or Officer using the terms **harassment** is a gross conflation that treats women as a group, as some inanimate object and not individual cases for if journalist or Judge had the desire to analyze any past **Incident Report devoid of Probable Cause for any arrest** they would read numerous quotes that show no **harassment** (See Exhibit B). Subjective interpretations of a Warrant demand further investigations by all involved especially media.

FACTS: It is possible to have “10 crime-free cases” of taking too many free samples of food when asked to leave some samples for others yet not be a petty thief or worse kind of thief like an armed robber – other actual statutes. It is possible to have “10 crime-free cases” of allegedly staring at a woman – men do this every day, yet this staring is not described as **harassment**! It is possible to have “10 crime-free cases” of “*getting into personal space*” on a subway trying to read someone’s newspaper or jockeying for a space or preaching one’s own religious views or persisting in an argument, etc... yet not be charged with **harassment**. It is possible for a fat person to “*get into personal space*” toward an INDIVIDUAL (not list or vague “*totality*”) multiple times over his/her life on an airplane and occasionally be asked to de-board based on his/her weight no intended harm no foul much like how I was called by police and warned – no harm no foul.

FACT/COMMON SENSE: It is possible for someone to “*get into personal space*” flirting or attempting to communicate yet not be **harassing**!

More Questions for the Court to answer:

What actually happened on Nov. 5, 2017 (March 5, 2018 arrest), the distant past, and what will happen in 2022, 2023, etc...?

Is a Criminal Background Check a real proven and provable “*totality of conduct*” when deploying a word that is an actual statute?

Unproven and unprovable cases KNOWN to be devoid of any kind of arrest are a “*totality*” of what?

Are they “*similar*”?

Unproven and unprovable cases KNOWN to be devoid of anyone using the term **harass** are a “*totality*” of what?

WITH ALL DUE RESPECT:

Civil Judges are not supposed to be painting anyone with undue criminal accusations. **Harassment and Stalking** are actual names of actual crimes/statutes. Civil Judges are not supposed to be painting anyone with any alleged Course of Conduct behavior criminal or not without proper who what when where why how

evidence.

Civil Judges are not supposed to be hyping any police Warrant beyond what the Warrant writing officer wrote.

Civil Judges are not supposed to be coming to their own conclusions without proper evidence of any past police investigation.

Civil Judges are not supposed to assume the worst of someone without fair and balanced details.

AND MOST importantly and relevant to this case, Civil Judges are not supposed to be aiding any media to **extremely** hype an unproven and unprovable “*totality of conduct*” **in a persistent way (Hearst unlike Altice)** without a trial with long overdue witnesses – complainants, police, other third party witnesses, etc...

This Hearst case has major DIFFERENCES than the Altice case and deserves to **not** be addressed in an absolutely similar way.

WESTFAIR COMMUNICATIONS : AN EXAMPLE OF A PROPER EDITORIAL DECISION - **SEE EXHIBIT W.**

- Westfair Communications re-edits their article they parroted word for word from Westport News/Hearst after ascertaining necessary facts thereby removing the word “**harass**”, and also removing the doxxing of past arrest record devoid of a conviction record.

Once again, the public are on my side. Not only are other journalists empathizing with my Damages, but the people involved in the fiasco as well. I sued spinster Wendy Higgins Chambers (only named and quoted woman) and she refrained from asking for any of her \$17,000 in legal fees after learning and processing what has EXTREMELY happened to me (See Exhibit D). She could have asked for less money, but she asked for nothing – nada. Is not this “victim” (devoid of individual police report) of the alleged big bad supermarket “**harasser**” – an “alleged victim” (working as a travel agent in the time of a pandemic) in need of legal fees? Also, as we all know I sued Altice/News 12 and when the controversial Second Circuit Court of Appeal Decision gave them the opportunity to ask for legal fees they NEVER asked for any legal fees as well - a class organization. I even have police themselves opining I have been EXTREMELY mistreated. SO Why is it that nearly every walk of life knows I have been extremely treated and unquestionable damaged for life, yet supposedly educated and urbane Judges struggle to process the details and empathize with the Damages? These Hearst articles are not going anywhere in the age of the Internet.

Δ - CONCLUSIONS – AT REPLY BRIEF

I have asked Hearst lawyer Stephen Yuhan as to who the ultimate decider is regarding the issue of rejecting my fair and balanced offers. Mr. Yuhan ghosted this question. What are they hiding? I gave Mr. Yuhan a 1-page letter to give Hearst CEO Steven Swartz. Until I am told differently, I will hold Steven Swartz responsible for the unprovable **persistence**. If the ultimate decider is someone else in the organization or outside the organization, I would appreciate being informed in Hearst's Response. Hearst by not informing me of **who** is the ultimate decider of being the only people to date **accusing me of harassment** (prior to Feb.6, 2019 arrest) shows they inevitably would have no respectability or credibility in a trial.

IT IS TIME TO PROCEED TO THE DAMAGES.

Is Gossip a harassment? ^

In addition to detracting from productivity and creating an unprofessional work environment, **gossip** and personal attacks can evolve into something that, if left unaddressed by you, can be actionable as **harassment**. Jan 1, 2014

<https://www.mcafeetaft.com> › when-gossip-becomes-haras...

When gossip becomes harassment – McAfee & Taft

Yes a momentary crossing of paths with someone (5 minutes) devoid of any crime or Damages whatsoever versus 4+ years (1460 days or 2,102,400 minutes) of **constant 24/7 harassment and damages** via a unprovable media campaign is clearly **libel**.

YES - IT IS TIME TO PROCEED TO THE ONGOING DAMAGES.
THE STORIES OF SUCH DAMAGES IN REPLY BRIEF ARE VERY SERIOUS.

Pro Se Certificate of Compliance with

Word or Page Limits Adapted from Federal Rules of Appellate Procedure Form 6

A document filed with the Court must not be longer than the Federal Rules of Appellate Procedure or the Court's Local Rules permit. Check the box for the document you are filing and state the number of words or pages.

- Brief** contains 14,000 words. [14,000 word limit - LR 32.1(a)(4)(A)], or
Brief contains _____ pages. [30 page limit - FRAP 32(a)(7)(A)]
- Reply Brief** contains _____ words. [7,000 word limit - LR 32.1(a)(4)(B)], or
Reply Brief contains _____ pages. [30 page limit - FRAP 32(a)(7)(A)]
- Writ of Mandamus/Prohibition** contains _____ words. [7,800 word limit - FRAP 21(d)(1)], or
Writ of Mandamus/prohibition contains _____ pages. [30 page limit - FRAP 21(d)(2)]
- Motion or Response to the Motion** contains _____ words. [5,200 word limit - FRAP 27(d)(2)(A)], or
Motion or Response to the Motion contains _____ pages. [20 page limit - FRAP 27(d)(2)(B)]
- Reply to the Motion** contains _____ words. [2,600 word limit - FRAP 27(d)(2)(C)], or
Reply to the Motion contains _____ pages. [10 page limit - FRAP 27(d)(2)(D)]
- Petition for Panel or En Banc Hearing** contains _____ words. [3,900 word limit - FRAP 35(b)(2)(A)], or
Petition for Panel or En Banc Hearing contains _____ pages. [15 page limit - FRAP 35(b)(2)(B)]
- Petition for Panel Rehearing** contains _____ words. [3,900 word limit - FRAP 40 (b)(1)], or
Petition for Panel Rehearing contains _____ pages. [15 page limit - FRAP 40 (b)(2)]

February 2017

James Lawrence

July 4, 2020