

**UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF MARYLAND
(Baltimore Division)**

EBENEZER QUAINOO, MD *
5238 Harvey Lane *
Ellicott City, Maryland 21043 *

Plaintiff *

vs. *

JAMES MCGIBNEY *
5608 E. Quiet Cloud Court *
Las Vegas, NV 89141 *

and *

CHEATERVILLE.COM *
10620 Southern Highlands Parkway *
Suite 110-234 *
Las Vegas, NV 89141 *

Civil Action No.:

Resident Agent: Serve On *
James McGibney *
5608 E. Quiet Cloud Court *
Las Vegas, NV 89141 *

and *

JOHN DOE *

and *

JANE DOE *

Defendants *

* * * * *

COMPLAINT AND DEMAND FOR JURY TRIAL

NOW COMES the Plaintiff, Ebenezer Quainoo, by and through his attorney, Reuben E.

Lawson, pursuant to 28 U.S.C. § 1332 brings this action against the Defendants, James McGibney, Cheaterville.com, John Doe and Jane Doe and for reasons states:

STATEMENT OF JURISDICTION

1. At all times hereinafter mentioned, Plaintiff was and still is a resident of Maryland.
2. The Defendant, Cheaterville.com, is a corporation incorporated under the laws of Delaware with its principal place of business in Nevada.
3. The amount in controversy, without interest and costs exceeds \$75,000.00.
4. The true names and addresses of Defendants John Doe and Jane Doe are unknown to Plaintiff at this time. Plaintiff sues those defendants by such fictitious names pursuant to Maryland Rule 2-201 of the Maryland Rules of Court. Plaintiff is informed and believes, and based on that information and belief alleges, that each of the defendants designated as a DOE is legally responsible for the events and happenings referred to in this Complaint, and unlawfully caused the injuries and damages to Plaintiff alleged in this Complaint.

DEFAMATION OF CHARACTER - LIBEL

5. The Plaintiff is married and has worked as a physician for Baltimore Health Care, PC for ten years and has during all this time enjoyed a good reputation, both generally and in his profession.
6. On or about March 30, 2011, Defendants posted a statement with Plaintiff's picture on Cheaterville.com website that "Ebenezer Quainoo is a doctor who works where I work, at ***** Park Rehab. I pity his poor wife and children because he is carrying on an affair with a married nurse for over a year now. They flirt at work shamelessly and meet during work hours and after work. I am not sure if her husband knows, but this is not the first time this man has done this at work. I believe that he is carrying on an affair at St.***** Hospital with another nurse, but I don't

know whether they know about each other. This home wrecker should be put out there, because he is probably lying to those women, telling them that his marriage is over or that he is separated. Let's hope his wife will find out the truth". (See Exh. 1)

7. The statement referred to Plaintiff by name throughout, was made of and concerning Plaintiff, and was so understood by those who read the statement.

8. The entire statement on the Cheaterville.com website is false as it pertains to Plaintiff.

9. The statement is libelous on its face. It clearly exposes Plaintiff to hatred, contempt, ridicule and obloquy because it charges Plaintiff, a married man, with having committed adultery.

10. The statement is constantly seen and read by anyone who visits the Cheaterville.com website. As of the date of filing this complaint more than 5,437,972 persons have visited the website, including his daughter who told his wife, and more than 138,943 votes have been cast on the website's Cheater Meter as it pertains to Plaintiff. (See Exh. 1)

11. As a proximate result of the above-described publication, Plaintiff has suffered a loss of his reputation, shame, mortification, injury to his feelings and alienation of affections.

12. The above-described publication was not privileged because it was published by Defendants with malice, hatred and ill will toward Plaintiff and the desire to injure his professional reputation.

13. Defendants are clearly at fault for the publication.

THEREFORE, the Plaintiff demands:

A. Judgment against one or all Defendants for \$350,000.00 compensatory and \$1,000,000.00 punitive damages plus interest and costs;

B. This honorable court order all references to and images of Ebenezer Quainoo on

Cheaterville.com website be deleted and/or removed.

C. For such other and further relief as this Honorable Court deems just and proper.

Date 3/7/14

/s/ Reuben E. Lawson
Reuben E. Lawson, Esq.
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Second Floor
Baltimore, Maryland 21218
lawsonlaw2@yahoo.com
(410) 685-6060

Attorney for Plaintiff

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 7th day of March, 2014, a copy of the foregoing Complaint was mailed first class, postage prepaid, Cheaterville.com and to James McGibney, 5608 E. Quiet Cloud Court, Las Vegas, Nevada 89141, Defendants.

/s/ Reuben E. Lawson
Reuben E. Lawson, Esq.