

VIRGINIA:

IN THE CIRCUIT COURT FOR THE COUNTY OF ROANOKE

ADRIAN MAVER, STAN SEYMOUR and
JANE SEYMOUR

Plaintiffs/Counterclaim Defendants,

v.

SOUTHWEST VIRGINIA WILDLIFE CENTER
OF ROANOKE, INC.

Defendant/Counterclaim Plaintiff,

v.

BLAINE CREASY,
Third-Party Claim Defendant.

Case No.: CL19000874-00

**SOUTHWEST VIRGINIA WILDLIFE CENTER OF ROANOKE, INC.’S FIRST
AMENDED RESPONSIVE PLEADING TO THE COMPLAINT**

Defendant Southwest Virginia Wildlife Center of Roanoke, Inc., (the “Center”) by
counsel, submits this First Amended Responsive Pleading to the Complaint, stating as follows:

Answer

For its Answer to the allegations in the Complaint, the Center hereby responds to each
of the numbered allegations as follows:

1. The Complaint speaks for itself, and thus, no response is necessary, though the Center denies that the Complaint states a viable cause of action or that the Center is liable as alleged.
2. The Center admits that Adrian Maver is a resident of Roanoke County, Virginia, but denies that he is a private citizen for purposes of his defamation claim.
3. The Center admits that Stan Seymour is a resident of Roanoke County, Virginia, but denies that he is a private citizen for purposes of his defamation claim.

4. Denied as moot, inasmuch as the Court's Order of February 20, 2020, allowed the non-suit of Plaintiff Jane Seymour's claims in this action.

5. Admitted.

6. Inasmuch as there is no Virginia Code § 8.01-328.18, the Center denies the asserted basis for personal jurisdiction.

7. Inasmuch as Virginia Code § 8.01-257 is merely a general statement on venue and not a code section establishing a proper venue for the cause of action asserted herein, the Center denies the asserted basis for venue.

8. The Center admits that Exhibit A appears to be an incomplete screenshot of text acquired from a mobile device which speaks for itself; denies that it is a true, accurate and/or complete copy of any posting on social media; denies any allegation inconsistent therewith or which misconstrues or alleges more than is shown from the limited context of Exhibit A; and denies that it has falsely stated anything as alleged.

9. The Center admits that Exhibit A appears to be an incomplete screenshot of text acquired from a mobile device which speaks for itself; denies that it is a true, accurate and/or complete copy of any posting on social media; denies any allegation inconsistent therewith or which misconstrues or alleges more than is shown from the limited context of Exhibit A; and denies that it has falsely stated anything as alleged.

10. The Center admits that Exhibit A appears to be an incomplete screenshot of text acquired from a mobile device which speaks for itself; denies that it is a true, accurate and/or complete copy of any posting on social media; denies any allegation inconsistent therewith or which misconstrues or alleges more than is shown from the limited context of Exhibit A; and denies that it has falsely stated anything as alleged.

11. The Center admits that the statements contain references to Adrian Maver and Stan Seymour.

12. Denied.

13. Denied.

14. Denied.

15. Denied.

16. The Center's responses to Paragraphs 1-15 above are incorporated herein by reference.

17. Denied.

18. Denied.

19. Denied.

20. Denied.

21. Denied.

22. Denied.

23. Denied.

24. Denied.

25. Denied.

26. Denied.

27. The Center denies that Plaintiffs are entitled to any judgment or recovery whatsoever, including as requested in Paragraph 27 and their *Ad Damnum*.

Affirmative and Other Defenses

1. Plaintiffs cannot recover for defamation as alleged because the statements complained of are not provably false assertions of facts about Plaintiffs.

2. Plaintiffs cannot recover for defamation as alleged because Plaintiffs are public figures or, at a minimum, limited purpose public figures, and the statements about which they complain related directly to the matters for which they are public figures.

3. Plaintiffs cannot recover for defamation as alleged because the Center enjoyed a fair report privilege for substantially accurate reporting of matters of public concern from court or other proceedings done in good faith.

4. Plaintiffs cannot recover for any alleged defamatory statements made in excess of one year prior to the filing of their Complaint in this matter.

5. Plaintiffs cannot recover for defamation as alleged inasmuch as they have suffered no damage or injury and the alleged defamatory statements do not constitute defamation *per se*, from which harm may be assumed.

WHEREFORE, the Center respectfully requests that the Complaint against it be dismissed with prejudice and that the Center be awarded recovery of its attorney's fees and costs incurred in having to respond hereto, and such other and further relief as the nature of this cause may merit.

A TRIAL BY JURY ON ALL ISSUES IS REQUESTED.

Respectfully submitted,

SOUTHWEST VIRGINIA WILDLIFE CENTER OF
ROANOKE, INC.

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**SOUTHWEST VIRGINIA WILDLIFE CENTER OF ROANOKE, INC.’S
COUNTERCLAIMS AGAINST PLAINTIFFS ADRIAN MAVER, STAN SEYMOUR,
AND THIRD PARTY CLAIMS AGAINST JANE SEYMOUR AND BLAINE CREASY**

Southwest Virginia Wildlife Center of Roanoke, Inc., (the “Center”), by counsel, hereby states for its Counterclaim against Stan Seymour and Adrian Maver, and for its Third Party Complaint¹ against Jane Seymour and Blaine Creasy, as follows:

Parties

1. Counterclaim Plaintiff, Southwest Virginia Wildlife Center of Roanoke, Inc. (the “Center”), is a 501(c)(3) not-for-profit, nonstock corporation having its principal place of business at 5985 Coleman Road, in Roanoke County, Virginia. The Center is a state and federally licensed wildlife rehabilitation facility and veterinary hospital that offers quality care and veterinary treatment to the animals of the greater Roanoke Valley and surrounding areas. The Center is operated by Sabrina and Lucky Garvin, members of the National Wildlife Rehabilitators Association and the International Wildlife Rehabilitation Council.

2. Counterclaim Defendant Stan Seymour and Third Party Defendant Jane Seymour are citizens and residents of Roanoke County, Virginia, residing and owning real estate at 5942 and 5960 Coleman Road.

3. Counterclaim Defendant Adrian Maver and Third Party Defendant Blaine Creasy are citizens and residents of Roanoke County, Virginia, residing and owning real estate at 5946 Coleman Road.

Jurisdiction and Venue

4. This Court has subject matter jurisdiction over this dispute pursuant to Va. Code §17.1-513.

¹ By agreement of counsel and as per the Consent Order entered herein on February 20, 2020, the addition of these Third Party Claims and Defendants was contemplated without further objection.

5. This Court has personal jurisdiction over each of the parties hereto pursuant to Va. Code §§ 8.01-328.1(A)(1), (A)(3) and (A)(6).

6. Venue is proper in this Court pursuant to Va. Code §8.01-262(1), (3) and (4).

Facts

7. The Seymours purchased their residence at 5942 Coleman Road in 2008.

8. The Center moved its principal place of business to 5985 Coleman Road in 2013 and has operated there continuously since that time.

9. Maver and Creasy purchased their residence at 5946 Coleman Road in July 2017.

10. The Seymours purchased a second property at 5960 Coleman Road in December 2017.

11. As described more particularly below, since the beginning of 2018, and continuing to the present day, the Seymours, Maver and Creasy have acted in concert with each other to interfere with and disrupt the ongoing business of the Center and for the express purpose of injuring the Center financially, with the intention of driving the Center out of business, or at least out of its present location at Coleman Road by, through, and utilizing a combination of wrongful and unlawful measures, tactics and practices, including but not limited to:

- a. threats and acts of intimidation designed to make staff, volunteers and members of the public fearful of their personal safety and/or apprehensive of working with or engaging with the Center;
- b. establishing dangerous obstacles in the road to the Center for the purpose of rendering it impassable or difficult to navigate, or even damaging vehicles trying to do so, in order to impair and impede access to the Center by staff, volunteers and members of the public generally;

- c. frivolously threatening to shut off access to the road the Center has used to access its property for the entirety of its time on Coleman Road, and which has been used openly, obviously and continuously since long before the Seymours, Maver and Creasy came to Coleman Road, thereby establishing the Center's continued right to use the road, and causing the Center to spend valuable resources and time defending a known, obvious and established right to the road;
- d. publishing false statements of fact about the Center and its Directors in order to discourage staff, volunteers and members of the public from working with, engaging with or giving their financial support to the Center;
- e. trespassing on the Center's property;
- f. pursuing and continuing knowingly baseless and vexatious litigation for the sole purpose of consuming the Center's time and financial resources on legal fees defending itself in court; and
- g. causing the nuisance of excessive noise through the repeated discharge of numerous firearms adjacent to the Center's property for the sole purpose of disturbing the Center's quiet enjoyment of its property, disturbing and interfering with the Center's ongoing business operations, and disturbing and causing permanent damage and injury to the wildlife the Center is rehabilitating through the stress knowingly created by the loud gunfire in such close proximity to the wildlife.

12. On or about January 28, 2018, Stan Seymour wrote a letter to the Roanoke County Zoning Administrator to complain about the Center's ongoing operations and plans for further expansion of its facilities.

13. On March 9, 2018, the Center filed an application for a special use permit with Roanoke County for the purpose of building a new structure on its property for the rehabilitation of raptors – medium- to large-sized birds of prey, such as hawks, eagles, owls and the like. That application resulted in concerted opposition by the Seymours, Maver and Creasy, including baseless opposition at public hearings in Roanoke County, a failed appeal to the Roanoke County Board of Zoning Appeals, and multiple unsuccessful lawsuits and appeals therefrom, which appeals are continuing to the present day.

14. At one public hearing in Roanoke County, Maver spoke in opposition to the Center's application with a personal attack on the Center's director, Sabrina Garvin, stating "many of you don't know this but Sabrina is nothing but a bully." By so stating, Maver implied personal knowledge to support the knowingly false statement of fact about Sabrina Garvin.

15. Both Stan Seymour and Maver have entered the private property around the Center's principal place of business at 5985 Coleman Road without permission or business with the Center and for the purpose of interfering with and injuring the Center's business.

16. In March, 2018, Adrian Maver stormed into the Center unannounced and without any business to transact with the Center, and having no proper or lawful purpose for being on the Center's property, and in an overtly threatening manner designed to intimidate, provoke, harass and make fearful the Center's staff, volunteers and guests who were in the Center at the time, shouted obscenities and threatening words to the effect of "this is bull**it," "you'd better be careful," "you'd better be packing," and/or "pack up and get out." The Center's staff,

volunteers and visitors who witnessed Maver's tirade were fearful and felt threatened and concerned for their safety.

17. Soon thereafter, in March 2018, the Center caused Maver and Stan Seymour to receive notices ordering them to cease and desist from trespassing on the Center's property.

18. In response, on or about March 18, 2018, Stan Seymour posted on his Facebook timeline or page pictures of "silvertip" and hollow-point bullet boxes depicting wildlife, for the purpose of posing an open, obvious and hostile threat to the safety and well-being of the Center, its business partners, its staff, volunteers and community supporters and for the hopeful purpose of causing all who saw it or became aware of it to terminate their further relations or business with the Center upon pain or penalty or fear of violent reprisal.

19. As a further physical demonstration of the threat of actual violence and as an act of purposeful intimidation, harassment and creation of a nuisance designed to interrupt and interfere with the Center's business of rehabilitating injured wildlife, Stan and Jane Seymour, and upon information and belief Maver and Creasy, participated in several hours of repeated and exceedingly loud discharge of firearms on the Seymours' property in close proximity to the Center.

20. On or about March 18, 2018, Stan Seymour himself confirmed this act of hostility, aggression and intimidation against the Center, its staff, volunteers and supporters by posting on Facebook that at least 1,000 rounds of ammunition were shot for three hours at his residence.

21. The Seymours, Maver and Creasy engaged in this shooting episode with full knowledge and awareness that the Center was hosting a group for a special program and designed the shooting episode purposefully to interfere with and disrupt the Center's program and business

operations. In fact, on March 18, 2018, the Center was hosting a lecture by the region's bat rehabilitation expert for a group of the Center's volunteers, staff, and unaffiliated local permitted rehabbers. One of the Center's woodpeckers who was in the last stage of recovery in one of the Center's enclosures, as well as at least two other birds in other cages, were responding very negatively to the noise from the shooting episode, hurling themselves into the cage walls while exhibiting signs of severe distress, which could have been exceedingly dangerous to the animals' potential for a successful recovery.

22. Without knowing the Seymours, Maver or Creasy, the guest lecturer's perspective on the shooting episode was that it was carried out with the intention of making visitors to the Center feel very uncomfortable, at best, or very afraid, at worst.

23. An attendee of the presentation who also did not know the Seymours, Maver or Creasy, was fearful for her personal safety because the gunshots were rapid, excessive and in close proximity, although she did not know from where they were coming.

24. Similar shooting episodes have continued from time to time, from 2018 to the present, when volunteers, staff and/or visitors are gathered at the Center, solely for the purpose of disrupting those business activities and relationships of the Center.

25. In the summer of 2018, a volunteer for the Center was feeding animals outside the Center when she heard a gunshot so close that the sound of the gunshot resonated in her chest. Upon information and belief, one of the Seymours, Maver or Creasy was responsible for discharging the firearm either knowingly or recklessly in the direction of the Center's property.

26. Since Maver and Creasy have moved to the property they currently occupy, there have been a couple dozen incidents where individuals bringing wildlife to the Center for the first

time have commented to Center staff or volunteers about the strange and uncomfortable stares, vibes and hostile feelings felt from Maver or Creasy as they approached the Center.

27. In July 2018, an intern with the Center was headed to the Center for her shift when she drove into a gravel berm that had been placed across the width of the road, scraping the entire length of the bottom of her car. There was no way to go around it as it took up almost the entire width of the road. The intern observed Maver sitting outside in a driveway to the left of the road in a lawn chair, drinking and just watching the cars try to navigate the road with the obstacle on their way to the wildlife center. Also in July 2018, a volunteer was prevented from reaching the Center due to a large mound of gravel placed across the width of the roadbed outside the Center's property that was so tall her car could not pass over it, preventing her from volunteering for the Center.

28. At other times, Adrian Maver has left wood and stones on the roadway to impede access to and from the Center.

29. Upon information and belief, Maver erected these barriers and obstacles in and across the roadbed for the sole, intentional purpose of thwarting vehicular access to the Center by the Center's employees, volunteers and visitors, and for the sole purpose of frustrating and disrupting the Center's ongoing business operations.

30. Also in July 2018, another Center intern was traveling to the Center with her mother as Maver came hurriedly from his property to their car, waving his hands frantically and yelling. The intern and her mother became very unnerved and uncomfortable with Maver's erratic and impulsive manner as he continued to yell at them. Ever since the event, the intern is fearful of encountering Maver again.

31. Stan Seymour has engaged in petty conduct designed to harass and intimidate the Center, its staff, volunteers and supporters and to generally frustrate, vex and interfere with the Center's daily ongoing business operations. For example, Seymour frivolously and without lawful basis has contested and challenged and caused the Center to remove road signage that the Center previously had placed on Coleman Road directing incoming traffic to the Center. Seymour similarly and equally frivolously has contested and caused the Center to remove No Trespassing signs that previously had been placed along the boundary of the Center's property for purposes of ensuring the safety of the animals residing on the Center's property. Seymour also has contested the Center's use of the roadway for weekly placement and retrieval of the County-issued garbage bin for regular public trash removal, as has been the normal course of business for many years prior, leaving the Center to haul its refuse off-site to a County-owned dumpster.

32. On August 16, 2018, Stan Seymour falsely advised a Fox News reporter that the Center and/or its directors Sabrina and Lucky Garvin had in fact violated criminal statutes by asserting that they have been "illegally dumping carcasses" and accusing the Center of not being "properly licensed." These statements were knowingly and provably false statements of fact about the Center and/or its directors for the purpose of injuring and tarnishing the Center and its directors' reputation, integrity and standing in the community in order to hurt and diminish the financial support the Center might achieve otherwise.

33. By letter dated August 17, 2018, the Center caused a notice to be sent to the Seymours, Maver and Creasy ordering them to cease and desist from continued false statements of fact and blatant and knowing misrepresentations about the Center.

34. On September 25, 2018, the Board of Supervisors of Roanoke County approved the Center's request for a special use permit to construct its proposed raptor building.

35. In November 2018, firearms were discharged continuously on or from the Seymours' property for at least three hours, creating an unnecessary and excessive disturbance and nuisance to the Center's ongoing operations and threatening damage and injury to the Center's wildlife being treated and rehabilitated on the Center's property.

36. Jane Seymour posted on a Facebook timeline or page that she has a "militia" at the ready, and that anyone who drives on Coleman Road to the Center near her house is taking a "chance," further stating that supporters of the Center are "[poop] [crazy] loonatics" and a "cracker head." Jane Seymour's statements were made for the express, sole, knowing and intentional purpose of threatening and intimidating the Center's employees, volunteers, visitors and supporters with the goal and purpose of diminishing and injuring the Center's ongoing business and financial support.

37. On or about December 7, 2018, Creasy registered a false and baseless complaint about the Center to the Virginia Department of Game and Inland Fisheries to the effect that:

- a. she identified or located a "bird carcass," feces, bedding, "other animal waste," "molded animal food," and "medical gloves and waste" in or around the Center's garbage container;
- b. that it was cruel for the Center to participate in a local parade with one of the Center's wildlife ambassador animals, a squirrel;
- c. that it was somehow improper for the Center to "borrow" an ambassador animal from another rehabilitation center;

- d. that the Center rehabilitated animals to “turn them into ambassador animals on an as needed basis strictly for fund raising purposes;”
- e. that the Center was deceiving the public about the number of animals it treats;
- f. that the Center violated the law by not having a veterinarian available twenty-four hours a day, seven days a week;
- g. that the Center misused funds by purchasing a vehicle for animal transport; and
- h. that the animal cages at the Center attracted bear and a mountain cougar.

38. Creasy made these frivolous and baseless complaints knowing they were false, knowing that she was abusing the process available for reporting legitimate complaints by registering false complaints solely for the purpose of procuring investigation into, distraction and expense for the Center’s ongoing operations, and for the purpose of creating a seemingly proper complaint to use as a basis for further publication of such falsehoods to the public at large, under the seeming veil of qualified immunity from defamation. Creasy did so with the intention of injuring the Center in its business, trade and reputation.

39. The Virginia Department of Game and Inland Fisheries responded on or about December 11, 2018, refuting Creasy’s charges as baseless and dismissing her complaint.

40. On or about February 28, 2019, Creasy registered another false and baseless complaint about the Center to the Virginia Department of Agricultural and Agricultural Services, to the effect that:

- a. the Center had been doing a significant amount of fundraising and started driving a new luxury vehicle after one of its events;
- b. the Center solicits funds from outside the state and country and may not have filed all the proper forms to do so.

c. A website owned by a company unaffiliated with the Center, with the federal government, and with the Virginia government does not show that the Center has filed “any paperwork” since 2016.

41. Creasy made these frivolous and baseless complaints knowing they were false, knowing that she was abusing the process available for reporting legitimate complaints by registering false complaints solely for the purpose of procuring investigation into, distraction and expense for the Center’s ongoing operations, and for the purpose of creating a seemingly proper complaint to use as a basis for further publication of such falsehoods to the public at large, under the seeming veil of qualified immunity from defamation. Creasy did so with the intention of injuring the Center in its business, trade and reputation.

42. The Virginia Department of Agriculture and Consumer Services responded on or about March 8, 2019, refuting Creasy’s charges as baseless and dismissing her complaint.

43. In mid-April 2019, Stan Seymour or Maver, directly or indirectly through another, contacted a Master Falconer in Floyd County and tried to convince the Master Falconer to receive money to build an aviary to displace the need for the raptor building planned by the Center.

44. Also in May, 2019, a local physician dropped off an injured animal to the Center and on his way out found the Center’s gravel road blocked by Maver’s small pickup truck pulled directly across the road. Maver was accompanied by a uniformed Roanoke County Police Officer. The officer asked the physician if he had seen the 5mph sign on Coleman Road and the physician replied that the sign did not look official. This scenario repeated itself the next day. The speed limit sign in issue was not 5 feet off the ground, two feet back from the road, or 24”x30” in size, or placed by the Virginia Department of Transportation for a road used by the

public, as required by VDOT requirements for such a sign. Upon information and belief, one or more of the Seymours, Maver and/or Creasy caused the non-conforming sign to be placed on Coleman Road for the purpose of obstructing and interfering with the normal and lawful use of the road by the Center's employees, volunteers and other visitors and of disrupting the Center's normal business operations.

45. On May 21, 2019, Stan Seymour, Creasy and/or Maver received a No Trespassing Notice the Center caused to be delivered strictly forbidding them from entering into, coming upon and/or remaining upon the lands, buildings or premises operated, used or occupied by the Center.

46. On May 23, 2019, the local physician volunteer was making his way to the Center when Maver approached him and accused him of being on private property and speeding. Maver became very agitated and started to use obscene and profane language and threatened to sue him and the Center.

47. On or about June 9, 2019, Maver erected a sign outside the Center property listing alternative wildlife centers as distant west to Floyd, as north to Staunton, and as east to Lynchburg and informing the public that the Center "isn[']t the only game in town." Maver's actions in this regard were designed solely to thwart, interrupt and disrupt the ongoing business and financial support for the Center.

48. On or about June 27, 2019, Adrian Maver cursed at and threatened a FedEx driver making a delivery of necessary animal food to the Center, with the intention of intimidating and harassing the delivery driver so as to thwart, impede or interrupt the regular and ongoing delivery of essential supplies to the Center.

49. In June, 2019, Jane Seymour made multiple threats in the comments section of a social media post made by a volunteer and supporter of the Center, directed at that volunteer and supporter of the Center and others, intimidating and threatening them against continuing to drive past the Seymours' property to the Center.

50. In July, 2019, while two female volunteers were driving to deliver food to the Center, Maver walked alongside the car with a pitchfork in his hand and stared directly into vehicle at the ladies. The ladies felt physically threatened by his action.

51. On another occasion while the same female volunteers were traveling to the Center, the road was blocked by tree logs and brush making driving to the Center dangerous and difficult. At that time, Maver was taking down trees on his property and it appeared he was the one placing the debris in the road.

52. The sum total effect of the Seymours, Maver and Creasy's actions and statements, and the constant wear and tear and turmoil created thereby caused one of the veterinarian doctors on whom the Center relied for veterinarian services to stop providing those services.

53. Adrian Maver's, Blaine Creasy's, Stan Seymour's, and Jane Seymour's conduct and statements have caused unnecessary increases in costs to the Center.

54. The ongoing frivolous litigation and court proceedings have intimidated staff, volunteers, prospective board members, and supporters of the Center.

55. The Center recently lost its grant from Wells Fargo that it previously had received to build its raptor cage, due to the ongoing litigation strife and delay and tactics of the Seymours, Maver and Creasy.

56. Most recently, on February 25, 2020, the Seymours, Maver and Creasy caused their attorneys to send to the Center a notice that they must cease and desist using the roadway they

have always used to access the Center, allegedly due to some error in the location of the roadway within the easement allotted for it. Inasmuch as this roadway has been laid and used in the same open, obvious and continuous manner for in excess of fifteen years, by the continuous and successive owners and occupants of the Center's property, the claims by the Seymours, Maver and Creasy in this regard are equally baseless. The letter is just one more attempt to interfere with, interrupt and deter the ongoing business operations of the Center.

COUNT I
VIRGINIA COMMON LAW CIVIL CONSPIRACY

57. The allegations of Paragraphs 1 through 56 are incorporated herein as if fully restated.

58. Each of the Seymours, Maver and Creasy, have knowingly and purposefully engaged in the actions identified at length above, incorporated herein by reference, and have combined, associated, conspired, agreed and undertaken actions mutually and in concert with one another for the purpose of willfully and maliciously injuring the Center in its reputation, trade, and business, all in violation of Virginia common law.

59. Each of the Seymours, Maver and Creasy have engaged in the foregoing acts knowingly, willfully, intentionally and as part of a communicated and preconceived plan for the sole purpose of injuring the Center in its trade, business and reputation.

60. The pervasive and overly public nature of the wrongful and unlawful conduct alleged against each of the Seymours, Maver and Creasy has had the pre-conceived and designed effect of interfering with the Center's ongoing business, sources of revenue and financial support, and relationships with its staff, volunteers and donors.

61. As a result, the Center has been injured in its reputation, trade, business and profession by reason of the malicious and concerted activity of the Seymours, Maver and Creasy just

noted and is entitled to recover its actual damages sustained, together with such punitive damages and all such costs incurred herein as allowed at common law.

WHEREFORE, The Center requests judgment against the Seymours, Maver and Creasy, jointly and severally, in the amount of \$500,000.00 in compensatory damages; punitive damages of \$350,000.00; together with all manner of temporary and permanent injunctive relief to prevent the continuation of such conduct; and such other relief to which the Center may be entitled.

COUNT II
VIRGINIA STATUTORY CIVIL BUSINESS CONSPIRACY

62. The allegations of Paragraphs 1 through 56 are incorporated herein as if fully restated.

63. Each of the Seymours, Maver and Creasy, have knowingly and purposefully engaged in the actions identified at length above, incorporated herein by reference, and have combined, associated, conspired, agreed and undertaken actions mutually and in concert with one another for the purpose of willfully and maliciously injuring the Center in its reputation, trade, and business, all in violation of all in violation of Virginia Code § 18.2-499.

64. Each of the Seymours, Maver and Creasy have engaged in the foregoing acts knowingly, willfully, intentionally and as part of a communicated and preconceived plan for the sole purpose of injuring the Center in its trade, business and reputation.

65. The pervasive and overly public nature of the wrongful and unlawful conduct alleged against each of the Seymours, Maver and Creasy has had the pre-conceived and designed effect of interfering with the Center's ongoing business, sources of revenue and financial support, and relationships with its staff, volunteers and donors.

66. As a result, the Center has been injured in its reputation, trade, business and profession by reason of the malicious and concerted activity of each of the Seymours, Maver and Creasy

just noted, and is entitled to recover its damages sustained, trebled, together with punitive damages as may be allowed by law, as well as its costs incurred herein, including a reasonable attorney fee, all pursuant to Virginia Code § 18.2-500.

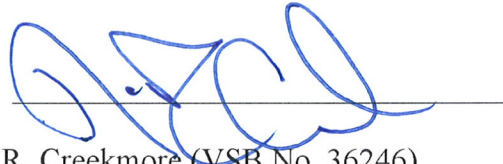
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A TRIAL BY JURY ON ALL ISSUES IS REQUESTED.

Respectfully submitted,

SOUTHWEST VIRGINIA WILDLIFE CENTER OF
ROANOKE, INC.

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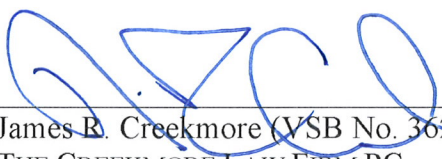
CERTIFICATE OF SERVICE

The undersigned counsel hereby certifies that on March 5, 2020, I served the foregoing by electronic mail, and by subsequent electronic filing, through which notice is given, and by first-class mail on March 6, 2020, to the following counsel of record for Defendants:

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