

JACKELYN YANONG : DOCKET # 609,429 - ~~B~~ ~~A~~ A
 VERSUS : FIRST JUDICIAL DISTRICT COURT
 JENNY DAWSON COLEMAN, etal. : CADDO PARISH, LOUISIANA

SCANNED 01 02 01 00 00 00 01 07

PETITION FOR DAMAGES

The petition of JACKELYN YANONG who is a resident of Shreveport, Caddo Parish, Louisiana, (hereinafter referred to as "petitioner"), respectfully represents:

1.

Made defendants herein are:

- 1) GEORGE ERIC HATFIELD, a resident of Shreveport, Caddo Parish, Louisiana, who may be served at 10305 Ellerbe Road, Shreveport, Louisiana 71106; and
- 2) JENNY DAWSON COLEMAN, a resident of Greer, South Caroline, who may be served pursuant to the Louisiana Long Arm Statute at her last known address of 223 Cornelson Drive, Greer, South Carolina 29651.

2.

Petitioner shows that she is a resident of Louisiana and is legally in the United States of America by virtue of a visa permitting the same.

3.

Petitioner further shows that she is a private person and not a public figure.

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4.

Petitioner further shows that she is engaged to be married to Danny Lawler, who is a resident and domiciliary of Caddo Parish, Louisiana.

5.

Petitioner shows that on numerous occasions GEORGE ERIC HATFIELD and JENNY DAWSON COLEMAN have made false and malicious statements claiming that JACKELYN YANONG is a prostitute.

6.

Petitioner shows that the following false and defamatory statements were made by the defendants:

- a. That JACKELYN YANONG was 16 years of age when she was purchased by Danny Lawler;

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SANDY ROTHELL
DEPUTY CLERK OF COURT
CADDO PARISH

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- b. That the petitioner's family sold her to Danny Lawler;
- c. That petitioner is a little girl;
- d. That petitioner was bought in the Philippines;
- e. That petitioner was 17 or 18 years of age when she entered the country.

7.

Petitioner further shows that her date of birth is November 3, 1997 (20 years of age).

8.

Petitioner further shows that the statements were made with reckless disregard for the truth.

9.

Petitioner further shows that on occasions the defendants have said that her fiancé purchased her from her family in the Philippines.

10.

Petitioner further shows that the allegations regarding her being "purchased" are completely false and untrue.

11.

Petitioner further shows that GEORGE ERIC HATFIELD and JENNY DAWSON COLEMAN have live video podcasts and that they have stated on numerous occasions that they have contacted the Philippine authorities to notify them that Danny Lawler is a sex trafficker and that the petitioner is involved in sex trafficking.

12.

Petitioner further shows that the defendants have stated that the petitioner was a minor when Danny Lawler began dating her, which is untrue.

13.

Petitioner further shows that GEORGE ERIC HATFIELD and JENNY DAWSON COLEMAN have stated that the petitioner "might be 17 years old".

14.

Petitioner further shows that defendant, JENNY DAWSON COLEMAN, contacted an organization that fights human trafficking and stated that petitioner was underage.

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15.

Petitioner further shows that JENNY DAWSON COLEMAN also told the organization that Danny Lawler was a sex trafficker.

16.

Petitioner further shows that JENNY DAWSON COLEMAN contacted the organization representative, and invited them, on the show to attack Danny Lawler and attempted to cause issues with petitioner obtaining a fiancé visa in order for her to travel to the United States of America.

17.

Petitioner further shows that as a requirement to leave the Philippines, she needed a certificate from the Commission on Filipinos Overseas (CFO).

18.

Petitioner further shows that based upon information and belief the CFO began interrogating petitioner about petitioner's relationship with Danny Lawler.

19.

Petitioner further shows that based upon the false statements made by defendants the petitioner was subject to an investigation and was required to fly to Manila for questioning on two (2) occasions.

20.

Petitioner further shows that after the investigation, it was determined by the authorities that the false claims made by defendants had no merit.

21.

Petitioner further shows that upon information and belief the defendants also made baseless claims to the United States Immigration Authorities.

22.

Petitioner further shows that upon arrival in the United States, the authorities detained her for three (3) hours for questioning.

23.

Petitioner further shows that the defendants are bound in solido for the damages sustained by the petitioner.

24.

Petitioner further shows that the actions described hereinabove are designed and intended to cause damage to the petitioner in the following non-exclusive ways:

- a. Defame, libel or slander petitioner;
- b. Invade the privacy of the petitioner;
- c. Intentionally inflict emotional distress and mental anguish on the petitioner.

25.

Petitioner further shows that irreparable injury and loss has resulted from the false and malicious statements, and that a permanent injunction should be issued herein, after proof is elicited in an ordinary process.

26.

Petitioner further shows that the actions of defendants as stated hereinabove are malicious, reckless and entitle petitioner to damages whether general or specific.

27.

Petitioner further desires that this Honorable Court award damages unto petitioner to compensate her for emotional distress, inconvenience, and mental anguish.

28.

Petitioners further show that the amount in dispute in this litigation does not exceed fifty thousand dollars, exclusive of interest and costs.

29.

Petitioner further shows that their damages, both past, present and future, were caused by the malicious and reckless actions of the defendants, GEORGE ERIC HATFIELD and JENNY DAWSON COLEMAN.

30.

Petitioner further reserves her right to supplement and amend her petition herein at any time prior to trial.

WHEREFORE, PETITIONER PRAYS THAT:

- 1) Defendants be served with a copy of this petition and be cited to appear and answer the same;

- 2) After due proceedings had, there be judgment herein in favor of petitioner, **JACKELYN YANONG**, and against the defendants, **GEORGE ERIC HATFIELD** and **JENNY DAWSON COLEMAN** in solido, for such sums as the Court may direct or for any award justified under law for the damages sustained by petitioner;
- 3) After due proceedings had, a permanent injunction be issue herein; and
- 4) For all general and equitable relief.



RONALD J. MICIOTTO
Bar No. 07540
628 Stoner Avenue
Shreveport, Louisiana 71101
Tel: (318) 424-0200
Fax: (318) 424-3730
ATTORNEY FOR PETITIONER

01/09/2014 09:00:00 AM

PLEASE SERVE:

GEORGE ERIC HATFIELD
10305 Ellerbe Road
Shreveport, Louisiana 71106

and

JENNY DAWSON COLEMAN
*Pursuant to Louisiana Long Arm Statute at
her last known address of:*
223 Cornelson Drive
Greer, South Carolina 29651

JACKELYN YANONG : DOCKET #
VERSUS : FIRST JUDICIAL DISTRICT COURT
JENNY DAWSON COLEMAN , etal. : CADDO PARISH, LOUISIANA

ORDER

THE FOREGOING PETITION CONSIDERED:

IT IS HEREBY ORDERED that defendants be served with a copy of this petition and be cited to appear and answer the same.

Shreveport, Caddo Parish, Louisiana, on this 15th day of June 2018.



HONORABLE DISTRICT COURT JUDGE
First Judicial District Court

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JACKELYN YANONG : DOCKET #
VERSUS : FIRST JUDICIAL DISTRICT COURT
JENNY DAWSON COLEMAN, etal. : CADDO PARISH, LOUISIANA


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AFFIDAVIT OF VERIFICATION

STATE OF LOUISIANA

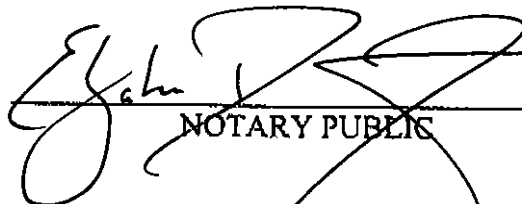
PARISH OF CADDO

BEFORE ME, the undersigned Notary Public, duly commissioned and qualified within and for the State and Parish aforesaid, personally appeared JACKELYN YANONG, who, after being by me duly sworn, said that she has read the foregoing petition, and all of the allegations of fact contained therein and true and correct, to the best of her knowledge, information and belief.

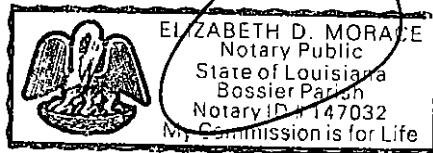


JACKELYN YANONG

SWORN TO AND SUBSCRIBED before me, this 15 day of June, 2018.



NOTARY PUBLIC



Citation

JACKELYN YANONG
VS
JENNY DAWSON COLEMAN, ET AL

NO. 609429- A
STATE OF LOUISIANA
PARISH OF CADDO
FIRST JUDICIAL DISTRICT COURT

THE STATE OF LOUISIANA, TO: GEORGE ERIC HATFIELD
10305 ELLERBE RD
SHREVEPORT, LA 71106

YOU HAVE BEEN SUED.

Attached to this Citation is a certified copy of the Petition.* The petition tells you what you are being sued for.

You must EITHER do what the petition asks, OR, within FIFTEEN (15) days after you have received these documents, you must file an answer or other legal pleadings in the Office of the Clerk of this Court at the Caddo Parish Court House, 501 Texas Street, Room 103, Shreveport, Louisiana.

If you do not do what the petition asks, or if you do not file an answer or legal pleading within FIFTEEN (15) days, a judgment may be entered against you without further notice.

This Citation was issued by the Clerk of Court for Caddo Parish, on this date June 19, 2018.

*Also attached are the following:

MIKE SPENCE, CLERK OF COURT

____ REQUEST FOR ADMISSIONS OF FACTS

____ INTERROGATORIES

____ REQUEST FOR PRODUCTION OF DOCUMENTS

By: _____

XX PETITION FOR DAMAGES

Deputy Clerk

RONALD MICIOTTO

Attorney

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Long-Arm Citation

JACKELYN YANONG
VS
JENNY DAWSON COLEMAN, ET AL

NO. 609429 – A
STATE OF LOUISIANA
PARISH OF CADDO
FIRST JUDICIAL DISTRICT COURT

THE STATE OF LOUISIANA, TO: JENNY DAWSON COLEMAN

YOU HAVE BEEN SUED.

Attached to this Citation is a certified copy of the Petition.* The petition tells you what you are being sued for.

You must EITHER do what the petition asks, OR, within THIRTY (30) days after you have received these documents, you must file an answer or other legal pleadings in the Office of the Clerk of this Court at the Caddo Parish Court House, 501 Texas Street, Room 103, Shreveport, Louisiana.

If you do not do what the petition asks, or if you do not file an answer or legal pleading within THIRTY (30) days, a judgment may be entered against you without further notice.

This Citation was issued by the Clerk of Court for Caddo Parish, on this date June 19, 2018.

*Also attached are the following:

MIKE SPENCE, CLERK OF COURT

- REQUEST FOR ADMISSIONS OF FACTS
- INTERROGATORIES
- REQUEST FOR PRODUCTION OF DOCUMENTS
- PETITION FOR DAMAGES

By: _____
Deputy Clerk

RONALD MICIOTTO
Attorney

SCANNED 6/28/2018 11:00:15

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