

FILED IN OFFICE  
CLERK OF STATE COURT

**IN THE STATE COURT OF COWETA COUNTY, GEORGIA**  
PHYSICAL ADDRESS: 72 GREENVILLE STREET, NEWNAN, GEORGIA 30263  
MAILING ADDRESS: P.O. BOX 884, NEWNAN, GEORGIA 30264  
TELEPHONE (770) 254-2699 \* FACSIMILE (770) 252-6422

2011 FEB 16 09:21:26  
COWETA COUNTY, GA  
SHEILA W. ECHOLS, CLERK

ROBERT ROYCE

Plaintiff

Vs.

245V0105E  
Case Number

JAMES DEICHELBOR / NEWNAN  
COWETA SCANNER TRAFFIC /  
R41D41 INDUSTRIES, LLC.

Defendant

**SUMMONS**

TO THE ABOVE NAMED DEFENDANT(S):  
You are hereby summoned and required to file with the Clerk of said Court and serve upon Plaintiff's Attorney, whose name and address is:

ROBERT ROYCE, PER SE / 36 HILLTOP CIRCLE, GRANTVILLE, GA  
30220

answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, Judgment by default will be taken against you for the relief demanded in the complaint.



SHEILA W. ECHOLS  
CLERK OF COURT  
State Court of Coweta County  
Deputy Clerk

By: \_\_\_\_\_

**Robert Royce, In Pro Se**

Plaintiff,

v.

**R41D41 Industries, LLC.,**

**Newnan Coweta Scanner Traffic,  
James Deichelbor**

Defendants.

Case No.: 245V0105E

### COMPLAINT

1. PLAINTIFF, proceeding *pro se*, brings this complaint against DEFENDANTS and alleges as follows:

#### STATEMENT OF JURISDICTION

2. Jurisdiction and venue in this Court are proper per O.C.G.A 9-10-93. The tortuous act was conducted in Coweta County and the injury occurred in Coweta County and a substantial part of the business of the Defendants are transacted or occur within Coweta County.

#### PARTIES

3. Plaintiff is an individual and a resident of Coweta County
4. Defendant R41D41 Industries, LLC is a registered LLC with the Georgia Secretary of State's office and is registered to have a Coweta County business location.

5. Newnan Coweta Scanner Traffic is a Coweta County based business.
6. James Deichelbor who is a resident of Coweta County and an officer of R41D41 Industries, LLC and is the “Admin” of Newnan Coweta Scanner Traffic Facebook page.
7. The torts originated in Coweta County and were received in Coweta County

### **FACTS ALLEGED**

1. Defendant James Deichelbor asserts himself as the “Admin” of the Facebook page Newnan Coweta Scanner Traffic, and a corporate officer for R41D41 Industries, LLC. The Facebook page Newnan Coweta Scanner Traffic asserts it is owned by R41D41 Industries LLC.
2. Plaintiff alleges the Newnan Coweta Scanner Traffic’s primary purpose is publishing information pertaining to first responders, weather, crime and traffic within Coweta County and surrounding areas.
3. Plaintiff alleges Newnan Coweta Scanner Traffic is highly respected resource of information and is trusted by over 48,000 people in the community as being accurate, factual, and truthful with the published information on the Facebook page Newnan Coweta Scanner Traffic. Plaintiff alleges the 48,000 subscribers to the social media site hold the Coweta Newnan Scanner Traffic and the information published in high regard and would on face value have no reason not to believe statements Defendant James Deichelbor published.
4. Plaintiff alleges Defendant James Deichelbor has tried to make the entirety of his published statements about the Plaintiff as opinions merely by stating “in my opinion,” which are just false factual connotations disguised as opinion.

5. On or about January 6, 2024, Defendant James Deichelbor published a social media post. The post started by stating "*I have had it with ignorant assholes*" Defendant James Deichelbor expressed his state of mind of his efforts to create the content of his statements to scorch the Plaintiff "*If you don't like cuss words...or the ignorant getting scorched...*" Plaintiff alleges these words are a representation of Defendant James Deichelbor's desire to intentionally cause damage to the Plaintiff. Defendant negligently attributed actions of others to the Plaintiff to aid with "scorching" the Plaintiff by defamatory statements.
6. Plaintiff alleges Defendant had knowledge he was publishing false statements and had reckless disregard for the truth. Defendant admitted having viewed, read, and listened to the original statements, comments, and video recordings by the Plaintiff prior to publishing the false statements.
7. Plaintiff alleges Defendant James Deichelbor stated in the published statement he has read and comprehends laws, policies and procedures and he can speak with "factual intelligence" about them. Plaintiff alleges Defendant James Deichelbor has admitted he is well informed on Georgia laws which makes him knowledgeable about the libel laws. Plaintiff alleges defendant is a professional publisher who has a complete understanding about the legal difference between an opinion and a statement published as a fact. Defendant James Deichelbor was sophisticated about the structure of his published statements in his attempt to assert opinion as fact.
8. Plaintiff alleges Defendant James Deichelbor published statements which are false assertions of facts about the Plaintiff on the Facebook page Coweta Newnan Scanner Traffic. Plaintiff read comments posted on the same social media site *demanding Plaintiff be arrested*, a Deputy Sheriff Lieutenant from Butts County Sheriff's Office posted "*Did you know the average price of 9mm ammo is about \$ .20/cents right now...it would still*

*be a waste....”* and a Grantville resident mentioned in another social media site commented *“Red would like to be that hand of Karma this outstanding gentlemen spoke of that they deserve”* and another comment *posted the street and city where Plaintiff resides.*

9. Plaintiff alleges there were over 240 comments and many opinions had referenced Defendant James Deichelbor published falsehoods about the Plaintiff. Plaintiff asserts these statements and others have caused the Plaintiff to suffer from worrying about himself and his family’s safety, loss of sleep and reduced appetite. Defendant James Deichelbor expressed the desire to “scorch” the Plaintiff in the public eye. Plaintiff alleges Defendant James Deichelbor placed the Plaintiff in false light in the community which caused hatred, contempt, and ridicule to the Plaintiff.
10. Plaintiff alleges the Defendant’s published statement begins by stating *“This is an open letter to Robert Royce and the rest of the braindead GA transparency asshats.”* Plaintiff asserts the Defendant’s Facebook page does not have an editorial section. Defendant James Deichelbor wrote an “open letter” on a Facebook post and claimed the statement to be a “PSA”, Public Service Announcement, and made no assertion it was part of an editorial.
11. Plaintiff alleges Defendant James Deichelbor who was acting as a corporate agent (Officer) of R41D41 Industries LLC had engaged as an individual in a tort. Therefore, Defendant James Deichelbor is personally liable. Defendant James Deichelbor published *“The opinions expressed above are mine and mine alone. They are not to be taken as approved by, supported by, or in any other manner looked favorable on by anyone other than myself.”* Furthermore, Plaintiff asserts the second path to Defendant James Deichelbor personal liability is R41D41 Industries, LLC is merely an alter ego of Defendant James Deichelbor.

12. Plaintiff does not own, has no financial interest in GA Transparency, does not control, access to any ability to use or publish on the GA Transparency YouTube channel or makes any business decisions of GA Transparency. Plaintiff alleges that Defendant falsely implies the Plaintiff has a leadership role in the highly controversial YouTube social media site of GA Transparency. Plaintiff alleges the statement *"This is an open letter to Robert Royce and the rest of the braindead GA transparency asshats."* was to intentionally mislead the defendant's readers about the Plaintiff and created a false association. Published comments clearly demonstrates the Defendant's influence on the community which falsely associates Plaintiff as being a first amendment auditor; *"Those auditors need to have the same come to them as they do to others"* another comment *"...I have seen his dumb ass video assaults on people. Places and agencies..."* and another comment *"He's a 1<sup>st</sup> Amendment auditor..."*
13. Plaintiff has never met or spoken with the Defendant James Deichelbor or had any prior conflicts with the defendant.
14. Plaintiff alleges the Defendant James Deichelbor had pre-publishing knowledge and with careless and reckless disregard for the truth published a statement with a false assertion of fact; *"You stand on your digital soapbox and spew your ignorance at everyone regardless of the context, the truth, or any semblance of humanity, compassion, or worth"*. Plaintiff alleges this statement is a false factual connotation disguised as opinion. The statement is a false assertion of fact that Plaintiff is dishonest by the context of what the Plaintiff has written or stated, and the Plaintiff lies to everyone. Defendant had knowledge prior to publishing there was no evidence to support his statement. Plaintiff alleges the published statement creates a false light about the Plaintiff in the community and created an atmosphere in the community of hatred, contempt, and ridicule towards the Plaintiff. Prior to Defendant James Deichelbor above published statement, Defendant knew the

statement was false. The Defendant had previously read one of several Plaintiff posts on social media "*Lets pray for the Gantville Officer involved*" which the Plaintiff asserts is compassion and a display of humanity.

15. Plaintiff is a licensed private investigator. Plaintiff is the proprietor of a business named Classic Investigations. The business has a sole proprietorship business structure which joins a business and proprietor as one and the law views a sole proprietorship and proprietor without legal distinction. Plaintiffs' professional reputation for honesty and integrity and competence has been permanently damaged by the Defendant James Deichelbor published false assertion of fact. The Plaintiff's honesty and integrity and competency plays a major role in obtaining business and how the Plaintiff is viewed when testifying in court. Plaintiff alleges a potential client would not want their case to be clouded by a bad community reputation of dishonesty and incompetence by their investigator. Plaintiff alleges the Plaintiff's potential future business earnings have been damaged by the defendant's published false assertion of facts. Plaintiff alleges this false assertion of fact holds the Plaintiff in a false light in the community. Plaintiff alleges the Defendant's James Deichelbor false assertion of facts has caused hatred, contempt, and ridicule in the community towards the Plaintiff.

16. Plaintiff alleges Defendant James Deichelbor had pre-publishing knowledge and with careless and reckless disregard for the truth published a statement with a false assertion of fact and paints the picture which holds the Plaintiff in a false light; "*I've watched you've made videos besmirching the name of good people as you rally the applause of the braindead that follow you.*" Plaintiff alleges this statement is just a false factual connotation disguised as opinion. Plaintiff does not engage in publishing videos on a YouTube channel referred to as GA Transparency besmirching good people and Plaintiff has no followers on that YouTube channel. Defendant had knowledge prior to publishing

there was no evidence to support his statement and Defendant James Deichelbor had prior knowledge Plaintiff was not producing, narrating, directing, editing, or filming the video the Defendant James Deichelbor had referred to. The false assertion of fact holds the Plaintiff in a false light in the community which has caused hatred, contempt, and ridicule in the community towards the Plaintiff.

17. Plaintiff alleges Defendant James Deichelbor had pre-publishing knowledge and with reckless disregard for the truth published a statement with a false assertion of fact; *"...you can't read nor comprehend the law, administrative policies..."* and *"You don't read. You don't comprehend."* Plaintiff alleges Defendant James Deichelbor published an assertion that the Plaintiff is illiterate and incompetent, this is a false assertion of fact. Plaintiff alleges the statement is a false factual connotation disguised as opinion. Plaintiff alleges Defendant had knowledge prior to publishing there was no evidence to support his statement. Defendant's pre-publishing the false assertion of fact Defendant James Deichelbor had read the social media comments written by the Plaintiff and Defendant James Deichelbor knew the Plaintiff was not illiterate or incompetent (this complaint composed solely by the Plaintiff and will be evidence the Plaintiff is not illiterate). The statement directly attacks the Plaintiff's credibility and competence whose trade is a licensed private investigator and Plaintiff's ability to obtain future work in the community causing a loss of future income. Plaintiff alleges the same reason as stated in this complaint allegation # 15 pertaining to the Plaintiff's business apply in this accusation. Defendant James Deichelbor falsely asserted a falsehood in the statement placing the Plaintiff in a false light in the community and has resulted in community hatred, contempt, and ridicule towards the Plaintiff.

18. Plaintiff alleges Defendant James Deichelbor had pre-publishing knowledge and with reckless disregard for the truth published a statement with a false assertion of fact; *"In*



the midst of multiple tragedies impacting the heart of our community (Plaintiff alleges this is a reference to the death of Deputy Minix), you want to take to the comments in an attempt to impune the character of the officers of the Grantville Police department going so far as to insinuate that the GPD that was in pursuit was the probable cause of the tragedy." Plaintiff alleges the statement is a false factual connotation disguised as opinion. Defendant James Deichelbor had pre-publishing knowledge that Newnan Coweta Traffic Scanner published information about the pursuit prior to any comments the Plaintiff published. Plaintiff used the Newnan Coweta Traffic Scanner published information about the police pursuit to assist with composing social media comments. Defendant asserts the Plaintiff "impune" the character of all Grantville police officers which the Defendant had prior knowledge there is no supporting evidence for his statement. Plaintiff alleges the content of Defendant James Deichelbor's statement was an outrageous false assertion of fact which shocked the conscious of the community that was sadden by the tragic death of a law enforcement officer. Defendant James Deichelbor false assertion of fact implies the Plaintiff is not honest. Plaintiff restates # 15 of this complaint as it applies to the Plaintiff's business. The false assertion of fact in this statement holds the Plaintiff in a false light in the community and has resulted in community hatred, contempt, and ridicule towards the Plaintiff.

19. Plaintiff alleges Defendant James Deichelbor had pre-publishing knowledge and with reckless disregard for truth and absent evidence to support his statement. The statement was a false assertion of fact; "...deprived the community of the Christmas cheer they deserve." Plaintiff alleges the statement is a false factual connotation disguised as opinion. Plaintiff alleges Defendant James Deichelbor understands the community is a faith-based community and Christmas is an important day, pulls at the emotional strings of the community and just another part of the scheme to "scorch" the Plaintiff. Plaintiff

alleges there is absent any evidence the community was deprived of their right to enjoy Christmas cheer. The false asserted fact in this statement holds the Plaintiff in a false light in the community and has resulted in community hatred, contempt, and ridicule towards the Plaintiff.

20. Plaintiff alleges Defendant James Deichelbor had pre-publishing knowledge and with reckless disregard for the truth published a statement with a false assertion of fact; "*You have zero information which to base your blatant bullshit*". Plaintiff alleges this statement is a reference to the public comments the Plaintiff made regarding the pursuit which led to the death of a Coweta County Deputy Sheriff. Defendant James Deichelbor published information about the pursuit within hours of the incident which was later read by the Plaintiff and was the basis for statements made by the Plaintiff. Plaintiff had no informational details about the deadly pursuit until it was read on Newnan Coweta Scanner Traffic Facebook page. Plaintiff alleges the false assertion of fact by Defendant James Deichelbor is an assertion the Plaintiff is not honest and is a liar. Plaintiff alleges the false assertion of fact published statement holds the Plaintiff in false light in the community and Plaintiff has suffered hatred, contempt, and ridicule from community members.
21. Plaintiff alleges Defendant James Deichelbor had pre-publishing knowledge the statement was a false assertion of fact and a reckless disregard for the truth published; "*I can personally say that your making my job and my life harder.*" Plaintiff alleges the statement is a false factual connotation disguised as opinion. Defendant James Deichelbor claims the Plaintiff has interfered with his business operations and the manner in which he lives his life with no supporting evidence. The statement paints the picture to the community that the Plaintiff is interfering with a source of information that community members trust and rely on for important local information. The Plaintiff alleges the false

assertion of fact published statement holds the Plaintiff in false light in the community.

The Plaintiff has suffered hatred, contempt, and ridicule from community members.

22. Plaintiff alleges Defendant James Deichelbor had pre-publishing knowledge and reckless disregard for the truth regard published a statement with a false assertion of fact; *“the fact that you just open your mouth and let whatever your brain shits out hit the keyboard is horrifying without end.”* Plaintiff alleges the statement is a false factual connotation disguised as opinion. Plaintiff alleges the false assertion of fact published is stating the Plaintiff lies about everything the Plaintiff states or publishes. Defendant had knowledge prior to publishing there was no evidence to support his statement. Plaintiff alleges this false assertion of fact damages the Plaintiff future potential business income. The Plaintiff makes the same allegation as listed # 15 of this complaint as it relates to business. The Plaintiff alleges the false assertion of fact published statement holds the Plaintiff in false light in the community. The Plaintiff has suffered hatred, contempt, and ridicule from community members.

23. Plaintiff alleges Defendant James Deichelbor had pre-publishing knowledge and with reckless disregard for the truth published a statement with a false assertion of fact; *“...I wish your combined man hours could actually be used for the good of the community instead of trying to implode it with your baseless bullshit”*. Plaintiff alleges the statement is a false factual connotation disguised as opinion. Plaintiff alleges the false assertion of fact published is stating the Plaintiff lies about everything the Plaintiff states or publishes. Plaintiff alleges Defendant published statement is asserting the Plaintiff is trying to damage the harmony of the community and had knowledge prior to publishing there was no evidence to support his statement. The Plaintiff alleges the false assertion of fact published statement holds the Plaintiff in false light in the community. The Plaintiff has suffered hatred, contempt, and ridicule from community members.

24. Plaintiff asserts the Defendant only placed Plaintiffs full name in the false statement he authored. Plaintiff asserts the Defendants use of the plain and commonly understood words “you” and “your(s)” can only be understood as a reference to the Plaintiff and no others.
25. Plaintiff alleges that the totality of the Defendant James Deichelbor Facebook posted statements clearly demonstrates the defendant’s scheme to “scorch” the Plaintiff and the disdain for the Plaintiff, his efforts to defame the Plaintiff and create a false light of the Plaintiff in the community. Plaintiff asserts Defendant James Deichelbor has successfully created hatred, contempt, and ridicule of the Plaintiff.
26. Plaintiff alleges after the publication of the false assertion of facts; Plaintiff posted on the Coweta Newnan Traffic Scanner Facebook page in the comments that the Plaintiff was willing to meet with Defendant James Deichelbor and share information which would demonstrate Defendant James Deichelbor published statements needed to be corrected because they were false. Defendant James Deichelbor did not respond.
27. The Plaintiff emailed Defendant James Deichelbor a written notice requesting a retraction and apology for the false assertion of facts published. Defendant James Deichelbor did not retract the statements but did publish a statement that Defendant James Deichelbor was at “war” because of the request for retraction and possible legal action.

## **CLAIMS FOR RELIEF**

### **COUNT 1:**

1. Plaintiff re-alleges and incorporates all prior allegations in this Complaint as if fully set forth here.

2. Defendant James Deichelbor actions constitute a tort and violation of Georgia Libel law, and it is alleged special damages libel per se.

3. Defendant James Deichelbor has caused Plaintiff damages in the amount of \$211.00 State Court filing fee, Sheriff's Office service to Defendant at \$50.00 per defendant and future business income.

**COUNT 2:  
Invasion of Privacy – False Light**

4. Defendant James Deichelbor actions constitute a tort and a violation of the Georgia Invasion of Privacy – False Light laws.

**PRAYER FOR RELIEF**

5. WHEREFORE, Plaintiff requests the following relief:

- A money award judgment entered against Defendant James Deichelbor for Plaintiff's damages in the amount of \$261.00 for all court cost and service to defendant(s).
- A money award for punitive damages of \$ 16,000.00 from Defendant James Deichelbor.
- Plaintiff's reasonable costs and disbursements for bringing this action.
- Any and all other relief the Court deems just and reasonable under the circumstances.
- Plaintiff requests a bench trial.

Respectfully submitted on: February 16, 2024

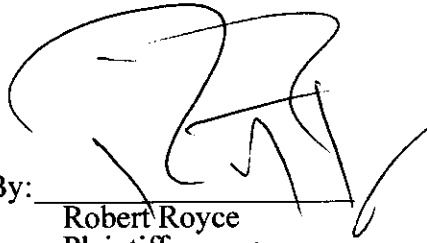
By: 

Robert Royce  
Plaintiff, *pro se*  
36 Hilltop Cr.  
Grantville, GA 30220  
(404) 645-9251  
[robertroyce@protonmail.com](mailto:robertroyce@protonmail.com)

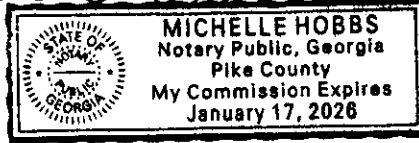
**VERIFICATION**

I, Robert Royce, hereby declare that the above statements are true to the best of my knowledge and belief, and that I understand they are made for use as evidence in court and are subject to penalty for perjury.

Dated: February 16, 2024

By:   
Robert Royce  
Plaintiff, *pro se*





Feb 16, 2024