

IN THE CIRCUIT COURT OF LIVINGSTON COUNTY  
STATE OF MISSOURI

GYPHY ROSE-ALCIDA ANDERSON; )  
KRISTY MATHERNE BLANCHARD; )  
ROD JOSEPH BLANCHARD JR.; and )  
MIA TERESE BLANCHARD )

Cause No.

Plaintiff, )

v. )

Division:

APRIL JOHNS )  
A/K/A FRANCESCA MACELLI )  
A/K/A FANCY MACELLI )  
Defendant. )

**VERIFIED PETITION FOR INJUNCTIVE RELIEF AND DAMAGES**

COMES NOW, Plaintiffs, state and allege as follows for their Petition for  
Injunctive Relief and Damages against Defendant:

**THE PARTIES**

**Plaintiffs:**

**Gypsy Rose-Alcida Anderson**

[Redacted]

**Kristy Matherne Blanchard**

[Redacted]

Court Document Not an Official Court Document Not an Official Court Document Not an Official Court Document

**Rod Joseph Blanchard Jr**

[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]

**Mia Terese Blanchard**

[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]

Defendant:

**April Johns, AKA Franchesca Macelli, AKA Fancy Macelli**

[Redacted]  
[Redacted]  
[Redacted]  
[Redacted]

**JURISDICTION & VENUE**

**Missouri Jurisdiction**

The Court has subject matter jurisdiction over this action pursuant to § 527.010 *et seq.* RSMo and Article V, Section 14 of the Missouri Constitution and has personal jurisdiction over all parties pursuant to § 506.500 RSMo.

**Livingston County Venue**

Livingston County is a proper venue for this action pursuant to § 508.010 RSMo.

## FACTS

- 1) During Plaintiff Gypsy Anderson's (then Blanchard) (Hereinafter "Gypsy") childhood, she lived in the New Orleans area of Louisiana.
- 2) Her parents divorced when she was very young and she lived primarily with her mother Dee Dee Blanchard (Hereinafter Dee Dee).

### The Abuse

- 3) During her childhood years, her mother began reporting that Gypsy suffered from myriad medical conditions. These conditions included, but were not limited to Muscular Dystrophy, Leukemia and paraplegia; requiring Gypsy to be in a wheelchair. Gypsy received services and assistance based on the representations of Dee Dee.
- 4) August 2005, Hurricane Katrina devastated the New Orleans area. Gypsy and Dee Dee sought refuge from their flooded apartment in a special need shelter in the New Orleans area.
- 5) While there she met medical staff from St. John's Hospital (now Mercy) (hereinafter "Mercy") in Springfield, MO. Based on the representations of Dee Dee regarding the severity of Gypsy's medical conditions, Mercy ultimately used one of their medical helicopters to fly Gypsy and Dee Dee from Louisiana to Springfield, MO.
- 6) While living here, Dee Dee sought medical care from several dozen medical providers in Springfield and Kansas City, MO. During these visits, Gypsy's list of medical ailments increased.

- 7) Gypsy's mother Dee Dee regularly sought the assistance of charities under the auspices of helping care for her ailing daughter. These charities provided untold thousands of dollars of assistance in the form of everything from free motorized wheelchairs, travel, vacations, meetings with celebrities and a brand new house provided by Habitat for Humanity.
- 8) During this time period, the abuse was ongoing.
- 9) On June 9, 2015, Dee Dee Blanchard was stabbed to death by Nicholas Godejohn (hereinafter "Godejohn").
- 10) On June 14, 2015, Gypsy was arrested, along with Godejohn, at the house of Godejohn's parents in Wisconsin. They were both charged with Murder in the First Degree in Greene County, MO.
- 11) It was discovered, for the first time publicly, that Gypsy could walk and did not have most of the ailments for which her mother was having her treated.
- 12) During the investigation, it was uncovered that Dee Dee had been subjecting Gypsy to nearly a lifetime of medical abuse and used her as prop to commit fraud upon everyone.
- 13) Experts agree that Gypsy was the victim of a condition called "**Munchausen by Proxy**". These unnecessary procedures included, but were not limited to, the removal of salivary glands, the placement of a feeding port in her stomach and painful diagnostics procedures. Gypsy was also forced, for years, to take medications for seizures and narcotics for illnesses and disorders she didn't have. All of this was forced upon Gypsy by her mother Dee Dee.

14) Due to the extent of the abuse Gypsy suffered, and the circumstances surrounding the murder, Gypsy was offered, and pled guilty to a reduced charge of Murder in the Second Degree and a sentence of 10 years in the Missouri Department of Corrections.

15) In July 2016, Gypsy was assigned, by the Missouri Department of Corrections, to Chillicothe Correctional Center in Livingston County, MO where she remained until her release on December 28, 2023.

#### The Contract

16) Shortly after Gypsy's arrival at Chillicothe Correctional, Plaintiffs Gypsy, her father Rod Blanchard (hereinafter "Rod"), and stepmother Kristy Blanchard (hereinafter "Kristy") were contacted by a woman calling herself "Franchesca Macelli". Franchesca Macelli's real name is April Johns (hereinafter "Johns/Macelli").

17) Defendant Johns/Macelli approached the Plaintiffs Gypsy, Rod, and Kristy about hiring her production company "Mad Ginger Entertainment" to produce media projects on Gypsy's behalf.

18) Defendant Johns/Macelli purported to be an "up and coming producer" with her own production company "Mad Ginger Entertainment". She purported to have experience in the entertainment industry and that she had the resources and expertise to bring media projects to fruition that would be financially beneficial to Plaintiffs Gypsy, Rod and Kristy.

19) She presented them with a document entitled “Life Rights Option Agreement” (hereinafter “Agreement”) [Exhibits A & B] wherein she would obtain a one (1) year option, renewable for an additional year, for the life rights to Gypsy’s story and set out parameters for payment of “Net Profits” upon the production of said media projects.

20) At the time Johns/Macelli approached them, Gypsy was in prison in Chillicothe, MO, possessed little formal education and had not obtained her GED. Also, her father and stepmother lived in [REDACTED] more than 870 miles away from Gypsy. The overwhelming majority of the contact prior to the signing of the contracts by the parties, was via phone calls.

21) Based on the representations of Johns/Macelli, Plaintiffs agreed to sign the Agreements with Defendant. The “Life Rights Option Agreement” was signed by Gypsy on December 1, 2017 at Chillicothe Correctional Center in Livingston County, MO. All communications by Gypsy with Johns/Macelli originated from Chillicothe Correctional Center. [Exhibit A]

22) A separate, but similar “Life Rights Option Agreement” was signed by Rod and Kristy prior to Gypsy’s Agreement on September 17, 2017. [Exhibit B]

23) In furtherance of the signed agreement, Gypsy, Rod and Kristy provided Johns/Macelli and her “team” with access and copies of the evidence and documents surrounding Gypsy’s life and case. This included, but was not limited to, the criminal case discovery (including crime scene photos, police videos, court transcripts, family photos/videos and Gypsy’s private, protected medical records).

24) For the next two (2) plus years, Plaintiffs Gypsy, Rod and Kristy diligently worked with Defendant Johns/Macelli. They had countless conversations and interviews with her regarding their lives and the circumstances of the murder. During this time, Johns/Macelli purported to be skilled and experienced enough to perform her side of the contract.

25) In a May 2019 article in *In Touch Weekly*, Defendant Johns/Macelli lauds how “open and honest” Plaintiffs have been with her. Johns/Macelli even acknowledged Gypsy had been raised by her mother to be deceptive and that she had helped Gypsy “break that habit”. The article states

a) *“Though it took Gypsy a while to open up, she’s become more comfortable with Fancy over time. ‘Based on the first [time] I started talking to her, I feel a difference in [her] honesty and the willingness to be honest. When I first started talking to her, I know she wasn’t being intentionally deceptive, but I think she was still worried about saying something wrong. Or saying something that would upset or hurt another person. ... So she just kind of went along with certain things.’ Fancy had to help her break that habit. ‘We had a conversation [about it] very early on. I said to her, ‘If I’m going to do this, and you want me to trust you, and you want me to tell the truth as you see it, then you can’t lie to me.’ You can tell me, ‘I don’t want to tell you.’ That’s fine. You can say, ‘I don’t want to answer that.’ But do not tell me something that isn’t true.’ After that, Gypsy was an open book. ‘Whatever I asked, she just answered.’” [Exhibit C]*

26) Later in 2019, due to non-performance by Johns/Macelli, in her failure to secure any media projects or produce any marketable content, as well as Johns/Macelli becoming confrontational over Gypsy’s relationship with her fiance Ken; Plaintiffs severed ties with Johns/Macelli.

27) Over the next three and half years, Johns/Macelli continued to create content about Gypsy's case.

28) These came in the form of posts, comments, videos, podcasts, interviews, etc on numerous social media and streaming platforms.

29) The first posts on her Facebook page "Good Wives Guide to True Crime" began on July 5, 2019. Over the next two months there were three (3) posts related to Gypsy. One was entitled "Psych Expert about the effects of long term abuse on Gypsy" (September 24, 2019).

30) November 1, 2019, following the termination of the Plaintiff's and Defendant's relationship, Johns/Macelli wrote a blog post criticizing Gypsy for some "recent choices". This comment was in reference to Gypsy having a relationship with a man named Ken while she was incarcerated. Johns/Macelli also made comments that Rod and Kristy were "horrible parents" for allowing this.

31) December 1, 2019, Johns/Macelli posted a blog in Patreon, a subscription based website, "DD & Gypsy Career Cons w/ a Script". The topic is about Gypsy helping her mother "con" the people of Slidell, LA. [Gypsy would have been pre-teen during this time.]

32) Subsequent to the termination of their contractual relationship, Defendant Johns/Macelli created, and continues to create, through multiple platforms and screen names, "true crime" content. These include, but are not limited to, "The [REDACTED] Defendant utilizes internet and social media platforms including, but not limited to, TikTok, Instagram, Patreon, YouTube, Facebook, Facebook Messenger.

33) From late 2019 to present, Johns/Macelli produced content sporadically about Gypsy. She would also discuss her falling out with Gypsy and the Blanchard family. The subject of this content became more focused on a theme of Gypsy and the Blanchard family are "hiding things." She began to state that she was the "foremost expert" on Gypsy and only she had the full story. For example, she



posted on the [REDACTED] Facebook page, “*Cancer???? This boils my fucking blood. Tbh!!!! Call it obsession fine I’m obsessed with the fact a murderer and her lying, con artist step mother are conning the world one paycheck at a time!!! I am disappointed in our society and feel humanity is failing!!!! Credit to CJ for the video!*” [Exhibit D-1 & D-2]

34) October 10, 2023, the content began to be more pointed and caustic. On that date, Johns/Macelli posted a video on the [REDACTED] Facebook page, regarding the announcement that day of Gypsy’s release date instead of announcing it sooner, that it was just a “publicity stunt” (Gypsy’s release date was set in December 2021). Johns/Macelli went on to state that she turned down media projects over the years because they involved working with the Blanchards saying “*I know anytime the Blanchards are involved, no truth will be told*”.

35) That same day she released a second video “responding” to a post by Plaintiff Mia Blanchard (hereinafter Mia), Gypsy’s younger sister. In this video, Johns/Macelli acknowledges she has previously stated that her goal was “*to bury Gypsy*”. (This statement was reaffirming a text message sent by Johns/Macelli previously [Exhibit E]). Johns/Macelli stated that Mia’s parents were “exploiting” Mia. She also stated she was “*concerned for Mia’s life*”, implying that Mia was in danger from Gypsy.

36) A month later, on November 6, 2023, Johns/Macelli posted an article in which Gypsy says her “big goal was to meet Taylor Swift and Travis Kelce”. The title of this post was “*And the scam just continues...*” [Exhibit F]

37) After the November 6, 2023 post on Facebook, nearly every post or created content on every platform by Johns/Macelli, and her associates, related to Gypsy or the Blanchard family. Some days there were multiple per day.

38) Many of these platforms are “monetized” for the account holder. Patreon, a platform where Johns/Macelli has posted full copies of the criminal case discovery, including gruesome crime scene photos, is a subscription based site requiring a purchased subscription to view the content. Johns/Macelli’s page, in

particular, includes subscription options ranging from \$5 - \$50 per month [**Exhibit G-1 & G-2**]

39) As evidenced by Defendant Johns/Macelli's conduct, and the conduct of her agents/associates, Johns/Macelli is intentionally and freely utilizing the materials she received from Plaintiffs pursuant to the Agreements signed by Plaintiff Gypsy and Plaintiffs Rod and Kristy, respectively, without their consent and for her own pecuniary gain.

40) As part of her conduct, Johns/Macelli posted, online in both public and subscription based platforms, documents, photos and videos she received from the Plaintiffs as part of the contractual relationship. These included:

a) Johns/Macelli has posted online for public viewing, Gypsy's private, protected medical records. She has had Colleen McShane, a professor of Nursing at University of Wisconsin-Milwaukee and co-owner of the Good Wives Network, read and opine as to what is in Gypsy's private, protected medical records. In posts in early 2024, Johns/Macelli stated she was uploading Gypsy's medical records, in her possession, to the Patreon account. This is a website that allows people to subscribe monthly, for a fee, to obtain access to the content. [**Exhibit H**]

b) Johns/Macelli also posted police reports, police videos and police photographs; including the crime scene photos of Dee Dee's body. [**Exhibit I**]

c) Johns/Macelli has posted Plaintiffs personal cell phone numbers online on one of her paid forums.

41) Prior and subsequent to Gypsy's release from the Department of Corrections on December 28, 2023, Johns/Macelli has posted dozens of videos, again sometimes multiple per day, saying things such as:

a) *"I'm so sick of Gypsy" ... "Like I honestly want to bury her so far down a rabbit hole and I think if I dig enough I could make her look so fucking bad."*

- b) In a January 27, 2024 video, in reference to Johns/Macelli's assertion the Blanchards prevented her from giving an interview on "Banfield":
- i) *"You should have let me do my interview, and write my book, and make my documentary"*.
  - c) In an undated clip from Tik Tok<sup>1</sup>, Defendant is screaming and cursing about the prosecutor "sweeping this under the rug." She then screams "...and *Kristy Blanchard sold you fucking munchausen by proxy and Mark Feldman the expert on the case in munchausen by proxy...never looked it up...and I have it in email. I'm calling it. It ain't fucking medical child abuse. We've been had. Fuck it Bitch. Sue me.*"
- 42) In these videos she makes repeated accusations that the Plaintiffs are stalking her and encouraging people to stalk and harass her. She has stated that she is in fear that someone "will take her out". She presents no evidence to back up the assertions that she is either being stalked or that the Plaintiffs are encouraging such behavior.
- 43) February 3, 2024, a letter was sent to the home of Johns/Macelli by Stanfield Law LLC addressing these issues and requesting Johns/Macelli immediately stop creating content and saying false, defamatory and harassing things regarding Plaintiffs, take down the offending material and contact undersigned counsel. The person at Johns/Macelli's residence, at the time of delivery, was not able to sign for the letter and the US Postal Service left information for package pickup. Johns/Macelli acknowledged, on subsequent videos, that she was aware the package was likely a "cease and desist" letter from undersigned counsel on behalf of Plaintiffs and she was not going to pick it up. She never attempted contact with undersigned counsel and continued to produce offending content. In fact, Defendant's knowledge of this letter from Plaintiffs' Counsel appears to have only increased Defendant's conduct in quantity and acrimony towards Plaintiffs.

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<sup>1</sup> The clip is from Tik Tok account [REDACTED]. Counsel was unable to locate the full clip due to Tik Tok having suspended this account.

44) Johns/Macelli has made comments that she has contacted Gypsy's parole officers demanding changes to her parole conditions.

45) A live video posted to YouTube on February 6, 2024 entitled "Gypsy Rose Expose- The Truth Behind the Lies- Fancy's Final Thoughts", Johns/Macelli made the following statements:

a) *"I absolutely am the leading expert on the Gypsy Rose Blanchard case"*

b) [referring to Gypsy] *"...she is a dangerous frickin person and shouldn't be in anyone's home ever", "She's a deviant."*

c) [talking about that Godejohn would be able to] *"...burn her [Gypsy's] ass down. "I'm gonna try to bury her just a little bit for him tonight. ... [Johns/Macelli said if she looked hard enough at the evidence] "...I would bury that bitch. I'm gonna do that tonight."*

d) *"Fuck you bitch [Gypsy], I'm going to bring you down tonight."*

46) Counsel has spoken with, and is prepared to present testimony from, witnesses who have worked closely with Defendant Johns/Macelli and recently stopped working with her. They state they have repeatedly warned Defendant that her conduct is unprofessional, illegal and defamatory. She has failed to heed this advice and engaged in similar abusive conduct towards them.

47) Defendant Johns/Macelli has shown no indication she intends to either curb or cease this behavior. In a February 28, 2024 video posted online, she stated that she has a "source" close to the Blanchard family that Kristy's son [REDACTED] no longer speaks with her because "he found out Kristy tried to steal pills from the house [the murder scene] before she called Mike Stanfield over". She said she doesn't know if this is true, but the source is reliable and she "believes it" because *"she knows Kristy is a pill popper"*. Neither of these allegations are true.

48) Defendant has continued to thwart any attempt by the various platforms to take down her offending content. As an example, Tik Tok has suspended her [REDACTED] account on more than one occasion. [At the time of this writing, that account remains suspended.] Defendant has created new accounts to post

videos such as [REDACTED]. She has made social media posts stating she will continue to create new accounts when they are suspended. **[Exhibit J].**

49) Defendant Johns/Macelli was convicted of the misdemeanor offense of Welfare Fraud in the Superior Court of California, County Riverside on March 22, 2000 under California Code 10980(C)(1). **[Exhibit K]**

### Causes of Action

50) Plaintiff restates, realleges and incorporates herein by reference each and every allegation contained in the preceding paragraphs as though fully set forth herein in *haec verba*.

51) Plaintiff alleges that Defendant, by and through the above referenced conduct, has engaged in the following causes of action:

- a) Fraud
- b) Breach of Contract
- c) Unjust Enrichment
- d) Defamation
- e) False Light

Using any other Court process, other than injunctive relief, would require Plaintiffs to engage in a multiplicity of litigation.

52) Defendant retained documents, videos, photos, audio, related to Plaintiffs that she received in connection with her contractual relationship with Gypsy as a

“producer”, including, but not limited to police reports, crime scene photos, police videos, surveillance videos, court transcripts, and medical records related to Gypsy Rose Blanchard. After failing to fulfill any of the objectives of the contractual agreement and being dismissed by Plaintiffs, Defendant has used these materials, especially Gypsy’s private, protected medical documents to produce public content

making false and defamatory statements about each of the plaintiffs, accusing the Plaintiffs of criminal behavior for which she has no reasonable basis in fact to assert and for Defendant's own personal financial gain.

53) Defendant has threatened Plaintiff Gypsy's freedom by alleging she has/will be contacting her parole officer to make changes to her parole conditions. Defendant has openly stated she believes Gypsy should still be in prison.

54) Defendant, herself and by and through her agents, used her previous contractual relationship with Plaintiffs to posit herself as the "foremost expert" on Gypsy's case. She then uses the fact that she had "inside access" to create the illusion that she possesses information that no one else possesses; which is untrue. Since November of 2019 and to the greatest extent, since October 2023, Defendant and her agents have used their platforms to harass, abuse and defame Plaintiffs, including, but not limited to, posting Plaintiffs cell phone numbers and protected medical information online. Defendant has resisted all attempts by Plaintiffs to resolve this issue.

### **Count I - Temporary Restraining Order**

55) Plaintiffs restates, realleges and incorporates herein by reference each and every allegation contained in the preceding paragraphs as though fully set forth herein in *haec verba*.

56) Defendant Johns/Macelli caused, and continues to cause, immediate irreparable harm to Plaintiffs.

57) Pursuant to the Agreements between Plaintiffs and Defendant, Defendant

Johns/Macelli was provided with sensitive and private, protected records, photos, documents, videos, etc from Plaintiffs.

58) As evidenced by Defendant Johns/Macelli's conduct, and the conduct of her agents/associates, Johns/Macelli misrepresented her abilities and expertise related to her ownership of Mad Ginger Entertainment. Unbeknownst to Plaintiffs, who

have no experience in the entertainment industry, Defendant Johns/Macelli never possessed the requisite skills or expertise to perform the terms of the Agreement.

59) After providing Defendant with years of exclusive access to Gypsy, the Blanchard family and the rights to all media projects surrounding Plaintiffs, Plaintiffs terminated their relationship with Defendant. At the time of termination of the business relationship, Defendant Johns/Macelli had failed to secure or produce a single marketable media project as promised.

60) Following termination of their contractual relationship, Johns/Macelli proceeded to create the public perception that, because she had inside access to the people and personal access to these private documents, that she alone possessed the only full understanding of Gypsy's case.

61) In creating this perception, she made false statements regarding people and situations to create a public perception that Plaintiffs are attempting to "silence her" because she alone knows what they are doing.

62) Defendant, knowing these statements are false, is uttering the defamatory statements to "punish" the Plaintiffs for termination their contractual relationship with her and to create "buzz" for her content and drive viewers and subscribers; thereby increasing her monetization.

63) Defendant has been repeatedly warned by agents/associates who have worked closely with her, that her conduct is defamatory and illegal. Several former agents/associates have severed all ties with Johns/Macelli to avoid potential future liability for her continued behavior. In the video posted on February 28, 2024, the co-host attempts to temper an allegation put forth by Johns/Macelli by saying "I wouldn't go that far...". Johns/Macelli immediately doubles down and reaffirms what she said was from a "reliable source" and she believes it because she "knows Kristy is a pill popper".

64) Plaintiffs are requesting this Court enter a Temporary Restraining Order, enjoining Defendant Johns/Macelli and her officers, agents, servants, employees and attorneys from:

- a) further producing or uttering public content, and remove currently public content (digital, written, video, audio, ...) referring to herself as an “expert” (or any term similar in context or meaning) or having any type of special knowledge or insight into Gypsy or her family (Plaintiffs), her past, her criminal case or her future due to her access to Plaintiffs and/or the materials she received in connection to her contractual relationship with Plaintiffs.
- b) Immediately remove and refrain from making or producing public content, including, but not limited to, digital, written, video, audio accusing the Plaintiffs of harassing, stalking or threatening Defendant.
- c) Immediately remove and refrain from making or producing future public content, including, but not limited to, digital, written, video, audio accusing the Plaintiffs of encouraging others to harass, stalk or threaten Defendant.
- d) Posting any further documents, videos, photos, audio, related to Plaintiffs that she received in connection with her contractual relationship with Gypsy as a “producer”, including, but not limited to police reports, crime scene photos, police videos, surveillance videos, court transcripts, medical records related to Gypsy Anderson (then Gypsy Blanchard).
- e) Immediately remove from public view any documents, videos, photos, audio and any other content related to Plaintiffs that she received in connection with her relationship with Gypsy as a “producer” including, but not limited to police reports, crime scene photos, police videos, surveillance videos, court transcripts or medical records related to Gypsy Anderson (then Gypsy Blanchard).
- f) Immediately remove from public view any public content, including, but not limited to, digital, written, video, audio containing excerpts, screenshots or any reference to the material(s) referenced in (b) or (c) above.
- g) Further public or private dissemination of the documents, videos, photos, audio and any other content related to Plaintiffs that she received in



connection with her relationship with Gypsy as a “producer” including, but not limited to police reports, crime scene photos, police videos, surveillance videos, court transcripts, medical records related to Gypsy Anderson (then Gypsy Blanchard).

65) No party would be prejudiced by the issuance of a temporary restraining order in this matter; as such, Plaintiffs request that no bond be required, but if bond is required that said bond not exceed one thousand dollars (\$1,000). In fact, Plaintiffs are prejudiced each day the offending content and behavior continues to be accessible or occur.

WHEREFORE, Plaintiffs pray this Court enter a Temporary Restraining Order, enjoining Defendant as stated in Paragraph 63(a) - (g) above, and for such other relief as this Court may deem just and appropriate.

### **Count II - Request for Preliminary and Permanent Injunction**

66) Plaintiffs restates, realleges and incorporates herein by reference each and every allegation contained in the preceding paragraphs as though fully set forth herein in *haec verba*.

67) Defendant Johns/Macelli caused, and continues to cause, immediate irreparable harm to Plaintiffs.

68) Plaintiffs are requesting this Court enter a Preliminary and Permanent Injunction, enjoining Defendant April Johns and her officers, agents, servants, employees and attorneys from:

a) further producing or uttering public content, and remove currently public content including, but not limited to, digital, written, video, audio referring to herself as an “expert” (or any term similar in context or meaning) or having any type of special knowledge or insight into Gypsy or her family (Plaintiffs), her past, her criminal case or her future due to her access to

Plaintiffs and/or the materials she received in connection to her contractual relationship with Plaintiffs.

- b) Immediately remove and refrain from making or producing public content, including, but not limited to, digital, written, video, audio accusing the Plaintiffs of harassing, stalking or threatening Defendant.
- c) Immediately remove and refrain from making or producing future public content, including, but not limited to, digital, written, video, audio accusing the Plaintiffs of encouraging others to harass, stalk or threaten Defendant.
- d) Posting any further documents, videos, photos, audio, related to Plaintiffs that she received in connection with her contractual relationship with Gypsy as a “producer”, including, but not limited to police reports, crime scene photos, police videos, surveillance videos, court transcripts, medical records related to Gypsy Anderson (then Gypsy Blanchard).
- e) Immediately remove from public view any documents, videos, photos, audio and any other content related to Plaintiffs that she received in connection with her relationship with Gypsy as a “producer” including, but not limited to police reports, crime scene photos, police videos, surveillance videos, court transcripts or medical records related to Gypsy Anderson (then Gypsy Blanchard).
- f) Immediately remove from public view any public content, including, but not limited to, digital, written, video, audio containing excerpts, screenshots or any reference to the material(s) referenced in (b) or (c) above.
- g) Further public or private dissemination of the documents, videos, photos, audio and any other content related to Plaintiffs that she received in connection with her relationship with Gypsy as a “producer” including, but not limited to police reports, crime scene photos, police videos, surveillance videos, court transcripts, medical records related to Gypsy Anderson (then Gypsy Blanchard).

h) Return to Plaintiffs or destroy documents, videos, photos, audio and any other content related to Plaintiffs that she received in connection with her relationship with Gypsy as a “producer” including, but not limited to police reports, crime scene photos, police videos, surveillance videos, court transcripts, medical records related to Gypsy Rose Blanchard. If destruction of the content is chosen by Defendant, that Defendant submit a sworn affidavit confirming the complete destruction of all above referenced materials.

### **Count III - Fraud**

COMES NOW Plaintiffs Gypsy, Kristy and Rod, by and through its attorney of record, Stanfield Law, LLC for Count III of its cause of action against Defendant Johns/Macelli, respectfully states, alleges and avers to the Court as follows:

69) Plaintiffs restates, realleges and incorporates herein by reference each and every allegation contained in the preceding paragraphs as though fully set forth herein in *haec verba*.

70) As described above, Defendant Johns/Macelli made multiple representations regarding its business, knowledge and expertise that were false at the time made and material to the decisions made by Plaintiffs, with knowledge of the falsity of the statements made and with the intention that the statements should be acted upon by Plaintiffs in the manner contemplated.

71) At or around the time of signing the Agreement and engaging in business with Defendant, Plaintiffs were ignorant of the falsity of such representations, relied on the perceived truthfulness of the representations, and had the right to rely upon the statement.

72) As a direct and proximate result of Johns/Macelli’s false representations and omissions, Plaintiffs have been damaged through the actions of Johns/Macelli in

the form of missed opportunities for projects due to the exclusive irrevocable option granted Johns/Macelli during the contract period and providing access to private and confidential case materials, as well as private, protected health information and medical records of Gypsy.

73) As a further direct and proximate result of Johns/Macelli's false representations and omissions, Plaintiff is damaged through the actions of Johns/Macelli in the form of Johns/Macelli using her "inside information", as well as documents and materials provided by Plaintiffs, per the contract, to make false and defamatory representations regarding Plaintiffs to the public, for the purpose of enriching Johns/Macelli.

74) That as a direct and proximate result of the acts and omissions of the defendant, by and through its associates, plaintiff have suffered the following:

- a) Lost income;
- b) Lost career opportunities; and
- c) Mental and emotional anguish.
- d) That the acts and omissions of defendant, by and through its associates, was:
  - i) Made with malice or reckless indifference to plaintiff's federally protected rights; and/or
  - ii) Outrageous because of its evil motive or reckless indifference to plaintiff's rights.

WHEREFORE Plaintiffs, prays this Court enter its Judgment against Defendant, in amount fair and reasonable, and for punitive damages, and for such further and additional relief as this Court may deem just and proper.

**Count IV - Breach of Contract (Express and/or Implied)**

COMES NOW Plaintiffs Gypsy, Kristy and Rod, by and through its attorney of record, Stanfield Law, LLC for Count IV of its cause of action against Defendant Johns/Macelli, respectfully states, alleges and avers to the Court as follows:

- 75) Plaintiffs restates, realleges and incorporates herein by reference each and every allegation contained in the preceding paragraphs as though fully set forth herein in *haec verba*.
- 76) The Agreement, entered into by Plaintiffs Gypsy and Plaintiffs Rod and Kristy respectively, granted an irrevocable “Life Rights” Option to Johns/Macelli for the purpose of Johns/Macelli representing above referenced Plaintiffs in media projects regarding Plaintiff’s life stories involving Munchausen by Proxy and the resulting criminal case.
- 77) In documents that memorialize the obligations of the parties, Defendant promised Plaintiffs to “commit her talents and energies to the utmost”, to fulfill the stated purpose of the contract which was to produce a “series” or other projects, to fairly and accurately portray the events and circumstances of Plaintiffs’ life stories.
- 78) In documents that memorialize the obligations of the parties, Plaintiffs promised Defendant to fully cooperate with interviews and the gathering of documents necessary to produce the series or other projects.
- 79) In furtherance of these ends, Defendant paid Plaintiffs Gypsy, Rod and Kristy a nominal advanced payment of \$10, with further payment spelled out in the Agreement upon successful completion and production of a series or other project.
- 80) In furtherance of these ends, Plaintiffs fully and completely cooperated with Defendant for over two years. Plaintiffs provided copies of all relevant case materials, as well obtaining and providing all of Gypsy’s medical records, as were obtainable. They likewise participated in countless recorded and unrecorded interviews with Defendant to provide the necessary information. At the time of

termination of their contractual relationship, Defendant had produced no marketable results.

81) Defendant Johns/Macelli retained, and has refused to return, all provided materials.

82) Defendant Johns/Macelli has embarked upon a course of action in which she has used these materials to portray Plaintiffs in a negative light. Defendant has placed these materials in public view, and on paid subscription websites, for the purpose of enriching Defendant in contravention of the terms and intended purpose of the Agreement.

83) Defendant has provided no financial remuneration to Plaintiffs, as spelled out in the Agreement pursuant to the enrichment of Defendant from the use of these materials.

84) Defendant's actions have breached the requirement under Missouri law of the "Duty of Good Faith and Fair Dealing" in the performance and enforcement of the Agreement. *Slone v. Purina Mills, Inc.*, 927 S.W.2d 358 (Mo. App. W.D. 1996).

WHEREFORE Plaintiffs, prays this Court enter its Judgment against Defendant, in amount fair and reasonable; and for punitive damages, and for such further and additional relief as this Court may deem just and proper.

### **Count V - Unjust Enrichment**

COMES NOW Plaintiffs Gypsy, Kristy and Rod, by and through its attorney of record, Stanfield Law, LLC for Count V of its cause of action against Defendant

Johns/Macelli, respectfully states, alleges and avers to the Court as follows:

85) Plaintiffs restates, realleges and incorporates herein by reference each and every allegation contained in the preceding paragraphs as though fully set forth herein in *haec verba*.

86) The Agreement, entered into by Plaintiffs Gypsy and Plaintiffs Rod and Kristy, respectively, granted an irrevocable “Life Rights” Option to Johns/Macelli for the purpose of Johns/Macelli representing above referenced Plaintiffs in media projects regarding Plaintiff’s life stories involving Munchausen by Proxy and the resulting criminal case.

87) In documents that memorialize the obligations of the parties, Defendant promised Plaintiffs to “commit her talents and energies to the utmost, to fulfill the stated purpose of the contract which was to produce a “series” or other projects, to fairly and accurately portray the events and circumstances of Plaintiffs’ life stories.

88) In documents that memorialize the obligations of the parties, Plaintiffs promised Defendant to fully cooperate with interviews and the gathering of documents necessary to produce the series or other projects.

89) In furtherance of these ends, Defendant paid Plaintiffs Gypsy, Rod and Kristy a nominal advanced payment of \$10, with further payment spelled out in the Agreement, upon successful completion and production of a series or other project.

90) In furtherance of these ends, Plaintiffs fully and completely cooperated with Defendant for over two years. Plaintiffs provided copies of all relevant case materials, as well obtaining and providing all of Gypsy’s medical records, as were obtainable. They likewise participated in countless recorded and unrecorded interviews with Defendant to provide the necessary information. At the time of termination of their contractual relationship, Defendant had produced no marketable results.

91) Defendant Johns/Macelli retained, and has refused to return, all provided materials.

92) Defendant Johns/Macelli has embarked upon a course of action in which she has used these materials to portray Plaintiffs in a negative light. Defendant has placed these materials in public view, and on paid subscription websites for the purpose

of enriching Defendant in contravention of the terms and intended purpose of the Agreement.

93) Defendant has been enriched through the use of the information and materials garnered from the execution of the contract and has provided no financial remuneration to Plaintiffs.

WHEREFORE Plaintiffs, prays this Court enter its Judgment against Defendant, in amount fair and reasonable; and for punitive damages, and for such further and additional relief as this Court may deem just and proper.

**Count VI - False Light**

COMES NOW Plaintiffs, by and through its attorney of record, Stanfield Law, LLC for Count VI of its cause of action against Defendant Johns/Macelli, respectfully states, alleges and avers to the Court as follows:

94) Plaintiffs restates, realleges and incorporates herein by reference each and every allegation contained in the preceding paragraphs as though fully set forth herein in *haec verba*.

95) In the past several years, and more particularly, in the past twelve (12) months, Defendant Johns/Macelli has embarked upon a course of conduct to give publicity to Defendants through the uttering of false statements on public internet based forums. These false utterances are done with actual malice and a reasonable person would find them offensive.

96) Plaintiffs, through multiple witnesses, will show that the false statements have been made to purposely cast Defendants in a false light. Through Defendant's own words, Plaintiffs will show that Defendant's actions are not for a legitimate public purpose, but for the purpose "to bury Gypsy".



97) That as a direct and proximate result of the acts and omissions of the defendant, by and through its associates, plaintiff have suffered the following:

- a) Lost income;
- b) Lost career opportunities; and
- c) Mental and emotional anguish.

d) That the acts and omissions of defendant, by and through its associates, was:

- i) Made with malice or reckless indifference to plaintiff's federally protected rights; and/or
- ii) Outrageous because of its evil motive or reckless indifference to plaintiff's rights.

WHEREFORE Plaintiffs, prays this Court enter its Judgment against Defendant, in amount fair and reasonable; and for punitive damages, and for such further and additional relief as this Court may deem just and proper.

**Count VII - Defamation**

COMES NOW Plaintiffs Gypsy, Kristy and Rod, by and through its attorney of record, Stanfield Law, LLC for Count VI of its cause of action against Defendant Johns/Macelli, respectfully states, alleges and avers to the Court as follows:

98) Plaintiffs restates, realleges and incorporates herein by reference each and every allegation contained in the preceding paragraphs as though fully set forth herein in

*haec verba*.

99) In the past several years, and more particularly, in the past twelve (12) months, Defendant Johns/Macelli has embarked upon a course of conduct to give publicity to Defendants through the uttering of false statements to third parties, in person

and on public forums. These false utterances are done with actual malice and a reasonable person would find them offensive.

100) Plaintiffs, through multiple witnesses, will show that the false statements have been made to purposely defame Defendants. Through Defendant's own words, Plaintiffs will show that Defendant's actions are not for a legitimate public purpose, but for the purpose "to bury Gypsy".

101) Defendant has made false statements to third parties, in person and on public forums, imputing fraudulent and criminal conduct to Plaintiffs. Said statements by Defendant were published and made known to third parties; said statements are false, published with actual and/or express malice, knowledge of its falsity, or with reckless disregard to its truth or falsity at a time when Defendant had knowledge of, or serious doubts as to, the veracity of said statements. Further, said statements are defamatory, made to and read/heard by third parties and Plaintiffs were damaged thereby.

102) That as a direct and proximate result of the acts and omissions of the defendant, by and through its associates, plaintiff have suffered the following:

- a) Lost income;
- b) Lost career opportunities; and
- c) Mental and emotional anguish.
- d) That the acts and omissions of defendant, by and through its associates, was:
  - i) Made with malice or reckless indifference to plaintiff's federally protected rights; and/or
  - ii) Outrageous because of its evil motive or reckless indifference to plaintiff's rights.

WHEREFORE Plaintiffs, prays this Court enter its Judgment against Defendant, in amount fair and reasonable; and for punitive damages, and for such further and additional relief as this Court may deem just and proper.

Conclusion

WHEREFORE, Plaintiffs pray this Court:

A. Enter a Temporary Restraining Order enjoining Defendant as set out in Paragraph 64(a) - (g) above until such time as a hearing can be held and evidence presented on the preliminary and permanent injunction.

B. Enter, after evidence is adduced, a Preliminary Injunction pursuant to Paragraphs 68(a) - (h) above.

C. Enter, after evidence is adduced, a Permanent Injunction pursuant to Paragraphs 68(a) - (h) above.

D. Enter an appropriate Order of Damages pursuant to each and every Count alleged above.

E. For Attorneys Fees and Costs to prosecute this action.

F. For any further relief the Court deems just and appropriate.

Respectfully submitted,

*/s/ Michael A. Stanfield*

Michael A Stanfield, Mo Bar # 59807

Stanfield Law LLC

1720 N. Robberson

Springfield, MO 65803

Phone: (417) 812-5094

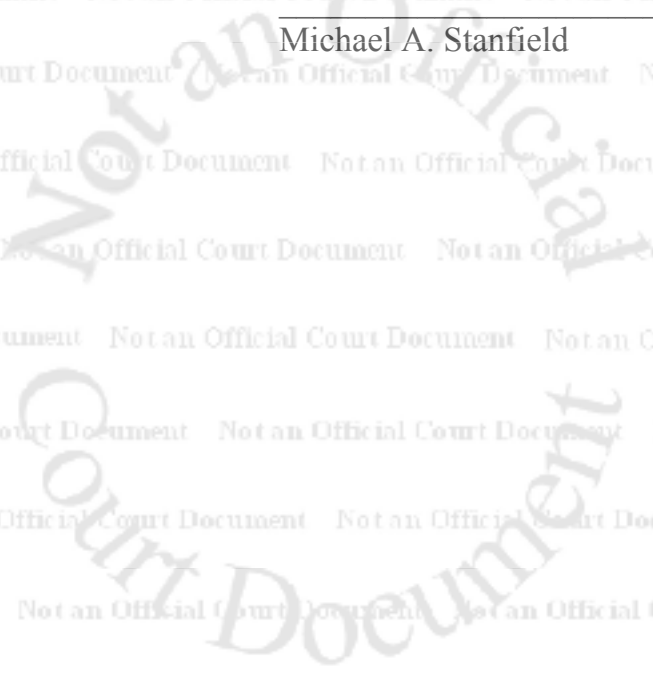
E-Mail: [mike@stanfieldlawfirm.com](mailto:mike@stanfieldlawfirm.com)

**Certificate of Service**

I hereby certify that on this 23rd day of May, 2024, an electronic copy of the foregoing was sent through the Missouri e-Filing System to the Livingston County Circuit Clerk.

/s/ Michael A. Stanfield

Michael A. Stanfield



State of Louisiana )

) ss.

Lafourche Parish )

Gypsy Rose-Alcida Anderson, of lawful age, being duly sworn on her oath, states that she is the Plaintiff named above and that the facts stated in the VERIFIED PETITION FOR INJUNCTIVE RELIEF AND DAMAGES are true according to her best knowledge and belief.

Gypsy Rose Anderson  
Plaintiff

Subscribed and sworn to before me this 22 day of April, 2024.

[Signature]  
Notary Public  
My Commission Expires: at death

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State of Louisiana )

) ss.

Lafourche Parish )

Kristy Matherne Blanchard, of lawful age, being duly sworn on her oath, states that she is the Plaintiff named above and that the facts stated in the VERIFIED PETITION FOR INJUNCTIVE RELIEF AND DAMAGES are true according to her best knowledge and belief.

Kristy Matherne Blanchard  
Plaintiff

Subscribed and sworn to before me this 22 day of April, 20 24

[Signature]  
Notary Public

My Commission Expires: at death

State of Louisiana)

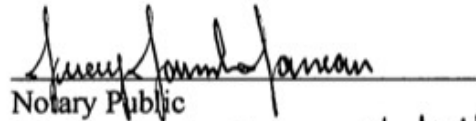
) ss.

Lafourche Parish )

Rod Joseph Blanchard Jr, of lawful age, being duly sworn on his oath, states that he is the Plaintiff named above and that the facts stated in the VERIFIED PETITION FOR INJUNCTIVE RELIEF AND DAMAGES are true according to his best knowledge and belief.

  
Plaintiff

Subscribed and sworn to before me this 22 day of April, 2024.

  
Notary Public

My Commission Expires: at death

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State of Louisiana )

) ss.

Lafourche Parish )

Mia Terese Blanchard, of lawful age, being duly sworn on her oath, states that she is the Plaintiff named above and that the facts stated in the VERIFIED PETITION FOR INJUNCTIVE RELIEF AND DAMAGES are true according to her best knowledge and belief.

Mia Blanchard  
Plaintiff

Subscribed and sworn to before me this 19 day of April, 2024.

Quay Fontaine  
Notary Public  
My Commission Expires: at death



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