

Joseph Pilchesky,

Plaintiff,

v.

Judy Gatelli, as President of Scranton City Council; as Councilwoman; and, in her Individual capacity,

Defendant,

v.

Joanne Pilchesky, John Doe, a/k/a 1 Musketeer, John Doe, a/k/a 3blindrats, John Doe, a/k/a 666, John Doe, a/k/a 1935, John Doe, a/k/a A man named Jed, Jane Doe, a/k/a abbey, John Doe, a/k/a Adam, John Doe, a/k/a Anti oppression, John Doe, a/k/a Antisystemicmovements, John Doe, a/k/a aquang, John Doe, a/k/a atty skeletor, John Doe, a/k/a baron, John Doe, a/k/a bigdaddy, John Doe, a/k/a Black helicopters, John Doe, a/k/a Black Lung, John Doe, a/k/a BoobyMcGoof, Jane Doe, a/k/a bo peep, John Doe, a/k/a Brainwashed, John Doe, a/k/a Chris, John Doe, a/k/a City Haul, John Doe, a/k/a clarks summit luv nest, John Doe, a/k/a commoner, John Doe, a/k/a Council rat, John Doe, a/k/a Crazy Otto, John Doe, a/k/a Crony watcher, John Doe, a/k/a cyberlion, John Doe, a/k/a DarthArt, John Doe, a/k/a DeerParkerLumber, John Doe, a/k/a Delaware, John Doe, a/k/a Dice Rolling 101, John Doe, a/k/a Don't fear government, John Doe, a/k/a Eye for an Eye, John Doe, a/k/a ezeddie, John Doe, a/k/a flower child, John Doe, a/k/a Freedom is not free, John Doe, a/k/a FRICKELMOIE, Jane Doe, a/k/a Gatellis blue dress, John Doe, a/k/a Gimme a break, Jane Doe, Granma, John Doe, a/k/a Hammer, John Doe, a/k/a Hitlers downfall, John Doe, a/k/a History writer, John Doe, a/k/a Intelligent thinker, John Doe, a/k/a insider, John Doe, a/k/a Irish Eyes are not Shining, John Doe, a/k/a Isnt that lovely, John Doe, a/k/a jimbu15, Jane Doe, a/k/a Judy, Jane Doe, a/k/a June Cleaver, John Doe, a/k/a JustTheFacts, Jane Doe, a/k/a Katie, John Doe, a/k/a Liberty is expensive,

: IN THE COURT OF COMMON  
: PLEAS OF LACKAWANNA  
: COUNTY, PA

: CIVIL ACTION  
: No. 2007-CV-1838

RECORDS & JUDICIAL  
2007 MAY 24 A 10: 20  
MARY F. RINALDI  
LACKAWANNA COUNTY

Jane Doe, a/k/a Lipstick and lashes, John Doe, a/k/a :  
 Lobby cyst, John Doe, a/k/a methinks4myself, :  
 John Doe, a/k/a Milo Ferlicker, John Doe, a/k/a :  
 MistyMtTop, John Doe, a/k/a Money stalks, :  
 John Doe, a/k/a Moving Forward, John Doe, a/k/a :  
 Newsroom, Jane Doe, a/k/a newgirl, John Doe, a/k/a :  
 Nobody, John Doe, a/k/a NoRepresentation, :  
 Jane Doe, a/k/a NotADumbBlonde, Jane Doe, a/k/a :  
 Once upon a secretary, John Doe, a/k/a Paul, :  
 John Doe, a/k/a peewee, John Doe, a/k/a phoenix, :  
 John Doe, a/k/a Pilcheskytics, John Doe, a/k/a :  
 Logic, John Doe, a/k/a Political sex, John Doe, a/k/a :  
 powertothepeople, John Doe, a/k/a Sacred Heart of :  
 Elvis, Jane Doe, a/k/a Scranton Girl, Jane Doe, a/k/a :  
 Stacy, John Doe, a/k/a The Judge, John Doe, a/k/a :  
 The Mole, Jane Doe, a/k/a themom, John Doe, a/k/a :  
 The next generation, John Doe, a/k/a Traditional :  
 apathy, John Doe, a/k/a TwistedBrother, John Doe, :  
 a/k/a Unionman, John Doe, a/k/a watch and ward, :  
 John Doe, a/k/a/ Waterfalls, John Doe, a/k/a We are :  
 so screwed, John Doe, a/k/a wildabeast, John Doe, :  
 a/k/a Wolf pack, Jane Doe, a/k/a Working woman, :  
 John Doe, a/k/a XraYspX, John Doe One, John Doe :  
 Two, John Doe Three, John Doe Four, John Doe :  
 Five, John Doe Six, John Doe Seven, John Doe :  
 Eight, John Doe Nine, and John Doe Ten, :

Additional Defendants. :

**NOTICE**

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this Complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the Complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

**YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER**

HARRY F. RINALDI  
 JACKSONVILLE COUNTY  
 2007 MAY 24 A 10:20  
 CLERK OF JUDICIAL  
 RECORDS CIVIL DIVISION

IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

Pa. Lawyer Referral Service  
P.O. Box 1086  
100 South Street  
Harrisburg, PA 17108  
(800) 692-7375  
(717) 238-6715

Northern Pennsylvania Legal Services Inc.  
Scranton Electric Bldg., 507 Linden Street  
Scranton, PA 18503  
(570) 342-0184

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Plaintiff,

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summit luv nest; John Doe, a/k/a commoner; John Doe, a/k/a Council rat; John Doe, a/k/a Crazy Otto; John Doe, a/k/a Crony watcher; John Doe, a/k/a cyberlion; John Doe, a/k/a DarthArt; John Doe, a/k/a DeerParkerLumber; John Doe, a/k/a Deleware; John Doe, a/k/a Dice Rolling 101; John Doe, a/k/a Don't fear government; John Doe, a/k/a Eye for an Eye; John Doe, a/k/a ezeddie; John Doe, a/k/a flower child; John Doe, a/k/a Freedom is not free; John Doe, a/k/a FRICKELLMOIE; Jane Doe, a/k/a Gatellis blue dress; John Doe, a/k/a Gimme a break; Jane Doe, a/k/a Granma; John Doe, a/k/a Hammer; John Doe, a/k/a Hitlers downfall; John Doe, a/k/a History writer; John Doe, a/k/a Intelligent thinker; John Doe, a/k/a insider; John Doe, a/k/a Irish Eyes are not Shining; John Doe, a/k/a Isnt that lovely; John Doe, a/k/a jimbu15; Jane Doe, a/k/a Judy; Jane Doe, a/k/a June Cleaver; John Doe, a/k/a JustTheFacts; Jane Doe, a/k/a Katie; John Doe, a/k/a Liberty is expensive; Jane Doe, a/k/a Lipstick and lashes; John Doe, a/k/a Lobby cyst; John Doe, a/k/a methinks4myself; John Doe, a/k/a Milo Ferlicker; John Doe, a/k/a MistyMtTop; John Doe, a/k/a Money stalks; John Doe, a/k/a Moving Forward; John Doe, a/k/a Newsroom; Jane Doe, a/k/a newgirl; John Doe, a/k/a Nobody; John Doe, a/k/a NoRepresentation; Jane Doe, a/k/a NotADumbBlonde; Jane Doe, a/k/a Once upon a secretary; John Doe, a/k/a Paul; John Doe, a/k/a peewee; John Doe, a/k/a phoenix; John Doe, a/k/a Pilcheskytics; John Doe, a/k/a Political Logic; John Doe, a/k/a Political sex; John Doe, a/k/a powertothepeople; John Doe, a/k/a Sacred Heart of Elvis; Jane Doe, a/k/a Scranton Girl; Jane Doe, a/k/a Stacy; John Doe, a/k/a The Judge; John Doe, a/k/a The Mole; Jane Doe, a/k/a themom; John Doe, a/k/a The next generation; John Doe, a/k/a Traditional apathy; John Doe, a/k/a TwistedBrother; John Doe, a/k/a Unionman; John Doe, a/k/a watch and ward; John Doe, a/k/a Waterfalls; John Doe, a/k/a We are so screwed; John Doe, a/k/a wildabeast; John Doe, a/k/a Wolf pack; Jane

Doc, a/k/a Working woman; John Doe, a/k/a XraYspX; John Doe One, John Doe Two, John Doe Three, John Doe Four, John Doe Five, John Doe Six, John Doe Seven, John Doe Eight, John Doe Nine, and John Doe Ten (collectively, "Additional Defendants") as follows:

**PARTIES**

1. Plaintiff Judy Gatelli is a competent adult individual who resides in Scranton, Pennsylvania. Plaintiff Gatelli is the President of the Scranton City Council.

2. Additional Defendant Joanne Pilchesky is an adult individual residing at 819 Sunset Street, Scranton, Pennsylvania 18509.

3. Upon information and belief, Additional Defendant, John Doe, a/k/a 1 Musketeer, is an adult individual who resides in Lackawanna County, Pennsylvania.

4. Upon information and belief, Additional Defendant, John Doe, a/k/a 3blindrats, is an adult individual who resides in Lackawanna County, Pennsylvania.

5. Upon information and belief, Additional Defendant, John Doe, a/k/a 666, is an adult individual who resides in Lackawanna County, Pennsylvania.

6. Upon information and belief, Additional Defendant, John Doe, a/k/a 1935, is an adult individual who resides in Lackawanna County, Pennsylvania.

7. Upon information and belief, Additional Defendant, John Doe, a/k/a A man named Jed, is an adult individual who resides in Lackawanna County, Pennsylvania.

8. Upon information and belief, Additional Defendant, Jane Doe, a/k/a abbey, is an adult individual who resides in Lackawanna County, Pennsylvania.

9. Upon information and belief, Additional Defendant, John Doe, a/k/a Adam, is an adult individual who resides in Lackawanna County, Pennsylvania.

10. Upon information and belief, Additional Defendant, John Doe, a/k/a Anti oppression, is an adult individual who resides in Lackawanna County, Pennsylvania.

11. Upon information and belief, Additional Defendant, John Doe, a/k/a Antisystemicmovements, is an adult individual who resides in Lackawanna County, Pennsylvania.

12. Upon information and belief, Additional Defendant, John Doe, a/k/a aquamg, is an adult individual who resides in Lackawanna County, Pennsylvania.

13. Upon information and belief, Additional Defendant, John Doe, a/k/a atty skeletor, is an adult individual who resides in Lackawanna County, Pennsylvania.

14. Upon information and belief, Additional Defendant, John Doe, a/k/a baron, is an adult individual who resides in Lackawanna County, Pennsylvania.

15. Upon information and belief, Additional Defendant, John Doe, a/k/a bigdaddy, is an adult individual who resides in Lackawanna County, Pennsylvania.

16. Upon information and belief, Additional Defendant, John Doe, a/k/a Black helicopters, is an adult individual who resides in Lackawanna County, Pennsylvania.

17. Upon information and belief, Additional Defendant, John Doe, a/k/a Black Lung, is an adult individual who resides in Lackawanna County, Pennsylvania.

18. Upon information and belief, Additional Defendant, John Doe, a/k/a BoobyMcGoof, is an adult individual who resides in Lackawanna County, Pennsylvania.

19. Upon information and belief, Additional Defendant, Jane Doe, a/k/a bo peep, is an adult individual who resides in Lackawanna County, Pennsylvania.

20. Upon information and belief, Additional Defendant, John Doe, a/k/a Brainwashed, is an adult individual who resides in Lackawanna County, Pennsylvania.

21. Upon information and belief, Additional Defendant, John Doe, a/k/a Chris, is an adult individual who resides in Lackawanna County, Pennsylvania.

22. Upon information and belief, Additional Defendant, John Doe, a/k/a City Haul, is an adult individual who resides in Lackawanna County, Pennsylvania.

23. Upon information and belief, Additional Defendant, John Doe, a/k/a clarks summit luv nest, is an adult individual who resides in Lackawanna County, Pennsylvania.

24. Upon information and belief, Additional Defendant, John Doe, a/k/a commoner, is an adult individual who resides in Lackawanna County, Pennsylvania.

25. Upon information and belief, Additional Defendant, John Doe, a/k/a Council rat, is an adult individual who resides in Lackawanna County, Pennsylvania.

26. Upon information and belief, Additional Defendant, John Doe, a/k/a Crazy Otto, is an adult individual who resides in Lackawanna County, Pennsylvania.

27. Upon information and belief, Additional Defendant, John Doe, a/k/a Crony watcher, is an adult individual who resides in Lackawanna County, Pennsylvania.

28. Upon information and belief, Additional Defendant, John Doe, a/k/a cyberlion, is an adult individual who resides in Lackawanna County, Pennsylvania.

29. Upon information and belief, Additional Defendant, John Doe, a/k/a DarthArt, is an adult individual who resides in Lackawanna County, Pennsylvania.

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31. Upon information and belief, Additional Defendant, John Doe, a/k/a Deleware, is an adult individual who resides in Lackawanna County, Pennsylvania.

32. Upon information and belief, Additional Defendant, John Doe, a/k/a Dice Rolling 101, is an adult individual who resides in Lackawanna County, Pennsylvania.

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36. Upon information and belief, Additional Defendant, John Doe, a/k/a flower child, is an adult individual who resides in Lackawanna County, Pennsylvania.

37. Upon information and belief, Additional Defendant, John Doe, a/k/a Freedom is not free, is an adult individual who resides in Lackawanna County, Pennsylvania.

38. Upon information and belief, Additional Defendant, John Doe, a/k/a FRICKELLMOIE, is an adult individual who resides in Lackawanna County, Pennsylvania.

39. Upon information and belief, Additional Defendant, Jane Doe, a/k/a Gatellis blue dress, is an adult individual who resides in Lackawanna County, Pennsylvania.

40. Upon information and belief, Additional Defendant, John Doe, a/k/a Gimme a break, is an adult individual who resides in Lackawanna County, Pennsylvania.

41. Upon information and belief, Additional Defendant, Jane Doe, a/k/a Granma, is an adult individual who resides in Lackawanna County, Pennsylvania.

42. Upon information and belief, Additional Defendant, John Doe, a/k/a Hammer, is an adult individual who resides in Lackawanna County, Pennsylvania.

43. Upon information and belief, Additional Defendant, John Doe, a/k/a Hitlers downfall, is an adult individual who resides in Lackawanna County, Pennsylvania.

44. Upon information and belief, Additional Defendant, John Doe, a/k/a History writer, is an adult individual who resides in Lackawanna County, Pennsylvania.

45. Upon information and belief, Additional Defendant, John Doe, a/k/a Intelligent thinker, is an adult individual who resides in Lackawanna County, Pennsylvania.

46. Upon information and belief, Additional Defendant, John Doe, a/k/a insider, is an adult individual who resides in Lackawanna County, Pennsylvania.

47. Upon information and belief, Additional Defendant, John Doe, a/k/a Irish Eyes are not Shining, is an adult individual who resides in Lackawanna County, Pennsylvania.

48. Upon information and belief, Additional Defendant, John Doe, a/k/a Isnt that lovely, is an adult individual who resides in Lackawanna County, Pennsylvania.

49. Upon information and belief, Additional Defendant, John Doe, a/k/a jimbu15, is an adult individual who resides in Lackawanna County, Pennsylvania.

50. Upon information and belief, Additional Defendant, Jane Doe, a/k/a Judy, is an adult individual who resides in Lackawanna County, Pennsylvania.

51. Upon information and belief, Additional Defendant, Jane Doe, a/k/a June Cleaver, is an adult individual who resides in Lackawanna County, Pennsylvania.

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56. Upon information and belief, Additional Defendant, John Doe, a/k/a Lobby cyst, is an adult individual who resides in Lackawanna County, Pennsylvania.

57. Upon information and belief, Additional Defendant, John Doe, a/k/a methinks4myself, is an adult individual who resides in Lackawanna County, Pennsylvania.

58. Upon information and belief, Additional Defendant, John Doe, a/k/a Milo Ferlicker, is an adult individual who resides in Lackawanna County, Pennsylvania.

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65. Upon information and belief, Additional Defendant, John Doe, a/k/a NoRepresentation, is an adult individual who resides in Lackawanna County, Pennsylvania.

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73. Upon information and belief, Additional Defendant, John Doe, a/k/a Political sex, is an adult individual who resides in Lackawanna County, Pennsylvania.

74. Upon information and belief, Additional Defendant, John Doe, a/k/a powertothepeople, is an adult individual who resides in Lackawanna County, Pennsylvania.

75. Upon information and belief, Additional Defendant, John Doe, a/k/a Sacred Heart of Elvis, is an adult individual who resides in Lackawanna County, Pennsylvania.

76. Upon information and belief, Additional Defendant, Jane Doe, a/k/a Scranton Girl, is an adult individual who resides in Lackawanna County, Pennsylvania.

77. Upon information and belief, Additional Defendant, Jane Doe, a/k/a Stacy, is an adult individual who resides in Lackawanna County, Pennsylvania.

78. Upon information and belief, Additional Defendant, John Doe, a/k/a The Judge, is an adult individual who resides in Lackawanna County, Pennsylvania.

79. Upon information and belief, Additional Defendant, John Doe, a/k/a The mole, is an adult individual who resides in Lackawanna County, Pennsylvania.

80. Upon information and belief, Additional Defendant, Jane Doe, a/k/a themom, is an adult individual who resides in Lackawanna County, Pennsylvania.

81. Upon information and belief, Additional Defendant, John Doe, a/k/a The next generation, is an adult individual who resides in Lackawanna County, Pennsylvania.

82. Upon information and belief, Additional Defendant, John Doe, a/k/a Traditional apathy, is an adult individual who resides in Lackawanna County, Pennsylvania.

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86. Upon information and belief, Additional Defendant, John Doe, a/k/a Waterfalls, is an adult individual who resides in Lackawanna County, Pennsylvania.

87. Upon information and belief, Additional Defendant, John Doe, a/k/a We are so screwed, is an adult individual who resides in Lackawanna County, Pennsylvania.

88. Upon information and belief, Additional Defendant, John Doe, a/k/a wildabeast, is an adult individual who resides in Lackawanna County, Pennsylvania.

89. Upon information and belief, Additional Defendant, John Doe, a/k/a Wolf pack, is an adult individual who resides in Lackawanna County, Pennsylvania.

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95. Upon information and belief, Additional Defendant, John Doe Four, is an adult individual who resides in Lackawanna County, Pennsylvania.

96. Upon information and belief, Additional Defendant, John Doe Five, is an adult individual who resides in Lackawanna County, Pennsylvania.

97. Upon information and belief, Additional Defendant, John Doe Six, is an adult individual who resides in Lackawanna County, Pennsylvania.

98. Upon information and belief, Additional Defendant, John Doe Seven, is an adult individual who resides in Lackawanna County, Pennsylvania.

99. Upon information and belief, Additional Defendant, John Doe Eight, is an adult individual who resides in Lackawanna County, Pennsylvania.

100. Upon information and belief, Additional Defendant, John Doe Nine, is an adult individual who resides in Lackawanna County, Pennsylvania.

101. Upon information and belief, Additional Defendant, John Doe Ten, is an adult individual who resides in Lackawanna County, Pennsylvania.

### **JURISDICTION AND VENUE**

102. This Court has jurisdiction over this dispute pursuant to 42 Pa. C.S.A. § 5301.

103. Venue is proper in this Court pursuant to Rules 1006 and 2130 of the Pennsylvania Rules of Civil Procedure.

### **BACKGROUND FACTUAL ALLEGATIONS AND PROCEDURAL HISTORY**

104. Joseph Pilchesky ("Pilchesky") operates and maintains a website and message board known as www.Dohertydeceit.com ("Dohertydeceit.com"). Additional Defendant Joanne Pilchesky assists him in the operation of the website and message board. Initially, Pilchesky operated his website and message board to oppose the Administration of Scranton Mayor Christopher Doherty. Since then, Pilchesky and his followers, including the Additional Defendants herein, have expanded their efforts to attack many other public and private persons, including Plaintiff Gatelli.

105. Pilchesky, a convicted felon, with the assistance of his wife, Defendant Pilchesky, operate Dohertydeceit.com to promote a political agenda based, in large part, on mean-spirited, reckless and, often, knowingly false personal attacks against public officials. Pilchesky does so in a contrived effort to substitute his will and personal agenda for that of the duly elected officials in the City of Scranton and the County of Lackawanna. In that regard, and for that purpose, Pilchesky and Additional Defendants have used the Dohertydeceit.com website and message board to, inter alia, publish, with

malice, scandalous, impertinent and often defamatory allegations against Plaintiff, the President of the Scranton City Council.

106. Additional Defendants regularly post or otherwise publish defamatory statements about Plaintiff Gatelli on Dohertydeceit.com to purposefully malign Plaintiff and otherwise disparage her in the eyes of the public.

107. Plaintiff Gatelli has been the target of a campaign of harassment and intimidation coordinated by Pilchesky and the Additional Defendants. This abusive, malicious and contrived misconduct is designed to force Plaintiff Gatelli from office or have her capitulate to Pilchesky's and the Additional Defendants' skewed and misguided political agenda.

108. This campaign of harassment and intimidation against Plaintiff has included threatening phone messages and profanity-laced emails similar to the vicious and contrived rantings published on Dohertydeceit.com.

109. Plaintiff has and continues to feel threatened by said harassment and intimidation, and has publicly voiced her concerns over same.

110. In an effort to quiet Plaintiff Gatelli's opposition to Pilchesky's campaign of harassment and intimidation, Pilchesky filed a complaint against Plaintiff alleging defamation, retaliation and harassment on or about April 9, 2007 ("Complaint").

111. In response, Plaintiff Gatelli filed an Answer, New Matter and Counterclaim to the Complaint against Pilchesky on May 24, 2007. Moreover, in an effort to remedy the entire campaign of harassment and intimidation which was waged against her on May 24, 2007, Plaintiff Gatelli also filed this action against the Additional Defendants.

**COUNT I**  
**Defamation**

112. Plaintiff Gatelli incorporates herein the allegations set forth in the foregoing paragraphs of this Joinder Complaint as if the same were set forth fully herein.

113. At all times relevant hereto, Additional Defendants uttered, published and/or caused to be published numerous false and defamatory statements about Plaintiff, thereby knowingly and falsely maligning Plaintiff in the eyes of the public.

114. The false and defamatory statements were published on Dohertydeceit.com, and include, but are not limited to, the following:

- a. Not until Judy tells the truth. And we know she never will (12/8/06);
- b. She has shown her true colors and she is NOT for the people, she is for herself (12/8/06);
- c. Gatelli is destined to be the most despised and hated woman ever elected to public office, bar none. Doherty is using her like an old condom, and she's game (12/8/06);
- d. We can now prove that Gatelli is violating the public trust by:
  1. Consistently violating civil rights;
  2. Arbitrarily applying the rules to different speakers;
  3. Arbitrarily applying the rules on the appointment of McGoff;
  4. Coaching a vote by telling Fanucci to vote no;
  5. Publicly stating that she isn't comfortable with giving the mayor more money and then voting on giving him another \$30 million;
  6. Being advised that the smoking ordinance is illegal and then voting for it;
  7. Being advised that the operating budget and the capital budget have huge discrepancies and then not investigating; and
  8. Stating over a year ago that she was going to implement some type of improved PILOT program and not presenting anything yet (12/16/06).

- e. You foul mouthed lying sack of Doobie Scum... You and Sherry spending time sharing the kneepads these days or did you get your own pair when you began kneeling before the King? Another lie from your Doobie Princess Sellout... G-F-Y (12/19/06);
- f. I'm in the business of trying to kill political careers here, but only those deserving of it, as well as recover from corrupt actions, to any degree (12/19/06);
- g. Her friends and family say she's not doing well emotionally. I guess she thought stabbing 50,000 taxpayers in the back would be as easy as voting yes to everything the mayor wanted. Her closest friends are eerie of her and politically, she's disgraced to the point of no return. She wants out of the presidents seat ASAP, but get resistance from the mayor (1/5/07);
- h. She'd never let her master down by not voting for a motion that a fellow doobe raises, no matter how insane it is!! Good, Judy, Sit, Stay!! (1/5/07);
- i. You arrogance blows me away..... You screwed us & when you get yours, don't think that anyone in this town will feel anything but disgust for you. You didn't just screw the adults in this town, you screwed the children of Scranton, Yep all those innocent children now have to do w/out because Mommy & Daddy have to figure out how to pay the bills & not lose the roof over there head... Thanks Judy (1/5/07);
- j. Judy the Doobie Hitler Butch (1/8/07);
- k. She's a betrayer like we've never seen before and should be confronted. She's near the edge now, and I don't think she's good for a lot more (1/10/07);
- l. I have some words for those two whores, but they can't be said on TV (1/10/07);
- m. This council, headed by Gatelli, has done nothing positive for the people. An unqualified, overmatched failure, Gatelli must live with the knowledge that she is not competent, a victim of her own thirst for power and piss-poor political skills. Gatelli, You asked for it. You got it. Used and owned (1/12/07);

- n. Gatelli is without question the most hated, despised and loathed person in politics today, even worse than Doherty. Doherty we knew was a thief, but that lying sack of cow dung Gatelli sold us out, every last one of us. And what for? (2/4/07);
- o. This Bag of Wind known as Judy Gatelli must have a hard enough time living with herself, let alone expecting others to respect her. It is true, however, that similar sheep associate with their own kind, so she may somehow live her life surrounded by people with a code of conduct as despicable as her own. The greed and selfishness of this historically repulsive political figure will be her own cross to bear. You have fun with *that*, Judy (2/5/07);
- p. Hear that noise? Its your political career dying. I hope you all go to jail you crooked backdoor spineless followers. Especially you Judy you lying bitch. I believed you when you ran... I know "YOU LIED" same way you lied to Janet about being council president. \*\*\*\* YOU AND YOU TAX PAYER SIPHONING FAMILY (2/5/07);
- q. That \*\*\*\*Gatelli better get the hell out of town if one-hundredth of the people who get their bills feel like I do, that Hitler SS pig. Who the hell does that crony-rotted dog think she is to pull this crap and think the sun is going to shine tomorrow (2/6/07);
- r. I'd like to send Mrs. SS Gatelli a piece of my mind. Anyone have an address for this Nazi dyke (2/6/07);
- s. Maybe Fay represents to Judy what she once was, or hoped to be. To easy to sell her soul, and turn her back on all Scrantonians, for a few crumbs. How proud your family must be of you, especially your daughters, to kneel before so corrupt and unscrupulous a vulgar thing like Doherty. I wonder what they think of you. (Were they educated at da U?) And now hubby awaits his turn. What a family. And all recorded for posterity (2/6/07);
- t. Called her a Doherty blowjob (2/6/07);
- u. Only for her to drop to her knees (and remain there) to pick up the meager crumbs thrown to her and her family. No dignity, no soul (2/6/07);

- v. I always knew she was crass, but she was acting like a complete lunatic. That was my first experience with a **GATELLI MELTDOWN** and I've lost count ever since. Let me tell you, that's one scary woman (2/7/07);
- w. Gatelli is the lowest of the lowest scum in this city (2/7/07);
- x. I would like to see the 3 rats on council, the head douche bag and his merry band of puppets stand up to the people and have a open meeting to debate the crisis in the city, then we can stone the fuc%\$#^ Nazis like the French did when paris was liberated....Judy, Sherry, Bob, Chris you can all Go FUS# YOURSELVES for none of you will ever see office again..... (2/8/07);
- y. JUDY IS AN IGNORANT BIMBO! She needs a good boot in the a\$\$ . All she proved tonight is that she is stupid. I do not use that word (stupid) lightly. She shows no education. She certainly shows she has no class (2/9/07);
- z. She has no class. We all know she is far short of possessing any trace of honesty where the working class is concerned. She was for sale and she has been bought and paid for (2/9/07);
- aa. Judy is a first class witch. Nice one you ignorant plug. You are so mean spirited I don't know how you can even stand yourself. Then you say well we gave it to the Globe (meaning big money). Hey dummy with the short memory. Remember the Globe deal? You gave the money to the *Globe* and what happened? She is a cute girl and you are a fat masculine looking individual. Then to add insult to ignorance you talk while Mrs. Krake is talking (yes we could hear you, you dummy) (2/10/07);
- bb. Judy is calling in all her favors to try to pull this off, including, from what I've heard, that she's barely able to continue on council and if hubby wins, she's outta there. How's that for a new twist? Vote one flee onto the dog and I'll jump off. Nice if you can pull it off, except Judy forgets something, the name Gatelli is the name Hitler in Scranton (2/10/07);
- cc. Yeah let's believe that like she promised that she would work for the people. The only people that she has worked for is herself and her family members. The only way that we could

believe that is that if she gave up her seat now. She's nothing but a lying sack of horse\*\*\*\*!!! And she will always be that way. Do us all a favor Judy leave while you can, or wait and let the people make a fool out of you at election time, your choice (2/11/07);

- dd. Gatelli's word isn't worth the paper it's written on. Watching last night's council I just wish I could fast forward to the next election to get that ugly bimbo out of there. The exchange with Fay Franus was unbelievable, with Gatelli looking like a bigger horse's ass than she already is (2/11/07);
- ee. I believe nothing she says. She can't even give us an answer to a question that we deserve to know. WHERE DID THAT MONEY GO JUDY? (2/11/07);
- ff. It sucks because after Gatelli will be another person waiting their turn to be Doherty's next bitch. He'll never run out of bitches to buy (2/11/07);
- gg. Butch thought she was going to clean up City Council the same way she has been cleansing South Side and the same way she 'cleaned up' Scranton when she was STEALING and land-grabbing for Connors. But she along with Sherry have become the one of city's biggest embarrassments (note, for instance, how Butch lashed out about her family being threatened and Bill couldn't prevent himself from laughing). Judy has gone through, coining the concept "belief to disbelief". Judy, no doubt, was always the ruthless and 2 faced bitch she has proven to be to the City of Scranton. Being the mayor's rubber stamper (2/11/07);
- hh. Judy is done. Her husband is done before he gets started. What is remarkable to me is that this woman doesn't learn as she goes along. She's as stupid and ignorant as ever and getting worse, as if she's doing it in spite. God save the Queen (2/12/07);
- ii. NEVER AGAIN FOR JUDY THE TWO FACED LIAR! (2/12/07);
- jj. The only way "Nazi" Gatelli {Sieg Hiel} is giving up her Council seat is when her fat, Nazi, A\$\$ doesn't fit in it anymore!!! Hey Ursula, why don't you shove another Cannoli down your fat pie-hole and decide whose rights you're gonna violate this week!!! (2/13/07);

- kk. And the name Gatelli will be burned into the mind of every voter as the name that stands for greed, selfishness, corruption and lies. THAT'S A PROMISE (2/15/07);
- ll. Judy is nothing but rotten. She is f-ing lazy... and now she is WASHED UP (2/21/07);
- mm. Gatelli refuses to do anything for the betterment of the citizens of Scranton (2/21/07);
- nn. Judy Gatelli is a lying scumbag. She is a pig (2/21/07);
- oo. Anyone associated with fat a\$\$ Gatelli is now considered a leper to me (3/22/07);
- pp. Gatelli is not a leader and never shall be. She's an insult. Let them try. Gatelli can barely read and write herself (3/22/07);
- qq. Oh that's right her and fanny have qualifications for council, thick knee pads (3/22/07);
- rr. What is that dizzy bitch doing? She's already the most disgraced elected official in the city's history. This only proves how desperate she is to get away from being council president. She's shown that she cannot handle people or the issues. Time for her to go, the fat, ugly butch that she looks like (3/22/07);
- ss. She's screwed for lying last week and it's on tape what she lied about (3/22/07);
- tt. Quote from Fatty Fanny.. "We are watching you", "Someone needs to cram the Bill of Rights/Constitution up these imbeciles' asses", "Judy should be charged with something just for being a bitch!" (3/22/07);
- uu. She's caught stone cold in her lies and she should resign. (3/22/07);
- vv. "Quote from Fatty Fanny.. "We are watching you". We are watching you is a statement made by Fanny, "Someone needs to cram the Bill of Rights/Constitution up these imbeciles' asses." Is she admitting she is an imbecile?, "Judy should be charged with something just for being a bitch!"

Where is the fear and or terror here? She is a bitch and I defy anyone to prove otherwise (3/22/07);

- ww. Judy is a liar. Judy is a cheat. Judy sold her soul to the d.i. (devil do) Judy got corny jobs for members of her family. Judy did favors to get those crony jobs. Judy abuses her position as council president. Judy has no clue how to run a meeting. Judy is the chief reason there is disruption at council meetings. Judy would not hold this office if recall were allowed in Pa. Judy is amoral. Judy has no ethics. Judy has crushed her hubby's chances of election. Judy has no respect for the taxpayers. Judy has killed her political future (3/22/07);
- xx. Prostitution is the oldest occupation (3/22/07);
- yy. You both fall miserably at what you do for us through your positions on city council (3/22/07);
- zz. Wasn't it good enough that the daughter got that cushy job at NEIU right after Doherty's loans went through? It's classic Gatelli – push and scream – use and abuse. For those who know her, this is her thumbprint (3/22/07);
- aaa. The daughter's job, how about the son-in-law's cushy job at the SSA, where she worked for a long time? She's been a sponge of the system all along, and she sold all of us out when she gave the mayor those TAN notes for 14 million dollars without even knowing where the money went (3/22/07);
- bbb. If she is afraid of anything it is that her lies, her double dealing and her rotten treatment of speakers is now out in the open. Statements that prove she has lied. Statements that prove she is a two timing double dealer (3/22/07);
- ccc. Her behavior was unprofessional and disgusting all along (3/22/07);
- ddd. Judy is the biggest joke in the city. Judy is a mess and will be either run off council or resign within 3 months (3/22/07);
- eee. The Doherty 3 aka 3 blind rats (that they are) will be able to rob the public blind (3/22/07);

- fff. Crony clown took office, and the first thing she did when she got in was put the gravy on the fries for Doherty in the form of millions in loans with no explanation of where the money was going. Now, we're 300 mil in debt. Heil Hitler to Judy Gatelli, the true anti-patriot and abuser of the people (3/22/07);
- ggg. Gatelli is gone where no politician has gone before, political lunacy (3/22/07);
- hhh. I disagree. This is Gatelli, a power freak with no brain and no ability to process what she is doing, what the consequences are and what people will think (3/22/07);
- iii. Ok Judy... How about doing something like represent 'these people' who are your constituents..! Grant the subpoena and the people won't have to call you out as the lying pig you are (3/22/07);
- jjj. And this jackass needs 2 officers cause she can't do her job (3/22/07);
- kkk. Her garbage mouth and lies have finally caught up with her. She lacks the necessary skills and training to handle the Council President's chair (3/22/07);
- lll. Judy is rude, overbearing and has no idea of the proper procedure. Judy should be charged with something just for being a bitch! (3/22/07);
- mmm. Ok, Judy...How about doing something like represent 'these people' who are your constituents..! Grant the subpoena and the people wont have to call you out as the lying pig you are.. (3/22/07);
- nnn. She was the biggest ass in this town before this incident, now she's the biggest ass/idiot/moron - you name it - she's it. (3/23/07);
- ooo. Hey Judas Gatelli, what goes around, comes around. (3/23/07);
- ppp. Ursula is a Nazi, plain and simple. (3/23/07);
- qqq. Gatelli is now the Nazi villain. (3/24/07);

- rrr. If she's there. She'll be facing a huge crowd and not one of them will be happy with her Nazi-type leadership. Who does that political grunt think she is? I'd say she's disgusting as an American, unfit to hold office and nothing short of a resignation would make the people happy. (3/24/07);
- sss. Gatelli, is the most hated woman in Scranton. How can she face all the people she f#\$%\$. And we are all going to vote for hubby ya right. (3/24/07);
- ttt. That ugly pig deserves whatever she gets from the speakers. (3/26/07);
- uuu. How desperate can you get. They are that concerned because of the lies and corruption carried out by these three evil doers? (3/26/07);
- vvv. You are very generous with your offer – but in my opinion (based on the size of the manure shovel and the depth of the \*\*\*\* hole) she's stupid enough to let the bombs drop. She's in too deep now. (3/28/07);
- www. She's a rude, ignorant and ambitious person, all the ingredients needed for a political puppet. They got her into council and into the president's seat. She did the rest as planned. She's out of control now because they didn't know she needed so much emotional maintenance. They're just as shocked as the rest of us that she can't handle the most unintimidating speakers like Lyman. That filthy mouth and pushy attitude hid the real Judy from the world – an ignorant slob. (3/28/07);
- xxx. He knows that Gatelli is a cancer to our government and has to go. (3/28/07);
- yyy. Gatelli would never take the offer. She's too stupid. (3/28/07);
- zzz. Gatelli spent the last 20 years screwing with people. Her reputation precedes her everywhere she goes. She threatened her way to a council position, and mixed in some promises she knew she'd never keep. (3/28/07);
- aaaa. This goes to her grossly unethical conduct and very poor leadership skills. (3/28/07);

- bbbb. Rattlesnakes like Judy Gatelli have to be made a fool of publicly as often as possible, be shown to be a corrupt thief as often as possible and be exposed as being stupid as often as possible. (3/28/07);
- cccc. Butch is a "ringer": she is a specialized thief charged with 'cleaning up city council' the same way she cleaned up South Side. (3/28/07);
- dddd. Gatelli is a fool for not taking my offer while it's on the table. I know she's been told she'll have governmental immunity if I sue, but that immunity does not protect officials from lying and other types of public misconduct. I hope she doesn't hang her hat on that bad advice. (3/28/07);
- eeee. Adults (Tax Paying Citizens/Concerned Citizens) are speaking here – clowns and butttttt munchers aren't scheduled to show their faces until 4 pm at Council Chambers. (3/28/07);
- ffff. She also has to many favors to pay back. (3/29/07);
- gggg. She is considered a betrayer to the utmost degree, a political maggot like we've never experienced before, a political snake or even worse, a political devil that absolutely has to be exorcised. (3/29/07);
- hhhh. The only Judy we saw last week was an overmedicated one (& don't say she wasn't, her head was bobbing more than Fanny's) Residents go there w/their concerns & she does NOTHING!!!!!! You can't rob people blind, laugh in their faces & demand respect. It doesn't work that way. (4/1/07);
- iiii. Refusing to answer legitimate questions from the citizens proves one of two things: either she is too stupid to answer; she is such a puppet she has no clue with the answer, she only knows how to vote. Calling the citizens "pathetic" and then when questions about it by a reporter her response? THEY WEREN'T SUPPOSED TO HEAR THAT! That answer justifies her disgusting attitude? She belongs out on the street on her \$\$\$, not sitting as president of a city council! (4/1/07);
- jjjj. Gatelli is abusive, insensitive, shallow, condescending; and – let's face it – never would have won election if she had shown her "true colors" during the campaign. She deceptively pseudo-apologizes to the people out of one side

of her mouth while spitting at them with the other. She's a fraud. Gatelli should RESIGN to restore character, decency, and stateliness to the Council of the City of Scranton. (4/1/07);

- kkkk. This one woman is the worst thing for the city of Scranton right now. We need to find out where all this money went and she's smack dab in the way, and that's where she likes it, serving a corrupt mayor and doing his deeds. She's no damn good, and she ought to be removed from office immediately if only there was a way to do it. The name Gatelli will ring for betrayal forever, and I hope her husband finds out the hard way how much she is detested. (4/1/07);
- llll. She's a horric councilperson and person, to boot. The VERY LEAST she can do is resign to show a hint of respect to the people she screwed in this city, and that's just about the entire population. (4/1/07);
- mmmm. Judging by the last meeting, even Gatelli thinks she's a joke. This poor woman has no clue. (4/1/07);
- nnnn. Gatelli has become very aware of the laughing stock and shame she has become to herself, her husband, her daughters, and her grandchildren. How pathetic. As a woman, I am so ashamed, but such is her legacy. (4/1/07);
- oooo. She is a mechanical manakin. With some computer chips. Of course { MISSING A FEW } Just enough for Doherty to program her to his thinking. (4/2/07);
- pppp. This poor, pathetic, broken down, useless lump of flesh and bone needs a little break. (4/3/07);
- qqqq. Hey Judas tomorrow is a big day for you... wanna kiss my cheek? Lying pig. (4/5/07);
- rrrr. You're a crony, and have done nothing for the public trust. (4/7/07);
- ssss. By those definitions alone, Judy Gatelli is as corrupt as the day is long. (4/7/07);
- tttt. Judy and Sherry down on their knees, S-E-R-V-I-N-G the King, First came the insults, Then came the lies, Then came the re-call and our good byes. (4/7/07);

- uuuu. Will the good people of this generation please cleanse this corrupt city of lowlifes and vermin like Judy Gatelli and Sherry Fanucci? (4/7/07);
- vvvv. Watch, as the politically corrupt run for cover and the likes of Judy Gatelli gets branded for life as a notorious betrayer of the people. The names Gatelli and Doherty are now identified only with deceit and corruption, and they will never survive the well deserved stigma attached by free speech. The political Gods, as you refer to them, have stepped aside to allow a political devil to do what they didn't have the backbone to do. These corrupt politicians think we've kicked down a door and entered their sacred and guarded sanctuary of corruption, but they are wrong. We've only surrounded their little sanctuary with eyes and ears, watching who has been coming and going. They really are sloppy and stupid people, and Judy Gatelli has been offered up as the first real sacrificial offering to try to distance the mayor from the justice due to him. (4/8/07);
- wwww. This concludes the citizen's participation portion of the preparation of the lawsuit against the corrupt Judy Gatelli. I especially would like to thank Chris Doherty for this wonderful opportunity to make Judy Gatelli the single most disgraced councilperson ever to have been elected to council, with Sherry Fanucci as a close second. (4/9/07);
- xxxx. The two fat-assed boneheads. (4/10/07);
- yyyy. The phoney that she really is. (4/13/07);
- zzzz. Don't take the bait this vile political pig is as self serving as they come. The woman is a pig. (4/14/07);
- aaaaa. She'll erupt sooner or later, meds or not. (4/19/07);
- bbbbb. You can only cheat us for so long. (4/15/07);
- ccccc. Ms. Piggy sucking ass and lying. (4/15/07);
- dddd. But she has NO SOUL, she is no philanthropist; and, as a Christian, will have atone for her many, many sins. Isn't that right, Judas? Her daughters and grandchildren will be constantly reminded of the legacy she left Scranton FOR AS LONG AS THEY LIVE, and how she made the

impoverished and older citizenry suffer. Her conscience will never be quiet, especially as she herself grows older. She is the epitome of greed. (4/15/07);

eeee. She hardly ever had a correct response – it was always – “I’ll check into it” – or “I don’t know” or out and out lies – think about it – when did Judy ever give us an honest answer to a question – She lies almost in every sentence – how about all the lies she was caught at. Tapes caught her in all of these lies. She knows she can’t be trusted to say the right thing anymore. If she replies she loses – if she doesn’t she looks like a fool – win win. (4/15/07);

ffff. Judas has no answers because she’s accomplished nothing! But Judas can’t keep quiet. When you’re dealing with an overbearing, egotistical lightweight who has to be in control, it’s a matter of time. Judas was told she’s not as smart as a majority of the council people by masters who are dead on with their assessment. She has to sit there silently because she knows if she speaks, she’ll be made an ass of. If you lie, bs and bully enough people, someone who knows what she’s doing will make her look like a fool. Les Spindler comes to mind. Judas can’t refute any of these people. She’s just not bright enough. You’re not that good. You’re just not that good. (4/15/07);

ggggg. Gatelli has Doherty by the nuts with him sticking up for her on Joe’s lawsuit. That means that Gatelli’s husband has a deal and will get a position on the ballot for School Director. Gatelli is not good for much more, unless it’s true about the medication. She should not be let off the hook regarding many questions. (4/17/07);

hhhhh. She is the biggest flipper around. Also she shows the Sewer Authority a lot of favors since she had her driveway done by them when Connors was Mayor and also had her house built when there was a hold on issuing permits for new residential construction in the city. (4/19/07);

iiii. You just confirmed what we already knew you filthy liar. (4/19/07);

jjjj. You’ve all exposed her for the fraud that she is. (4/19/07);

- kkkkk. She produced documentation that proved Judas was a liar. Judas is afraid of people of color, unless of course she can intimidate them. She is a rude bit#h. (4/20/07);
- lllll. Judas as the lying, disgraceful dodo mule she truly is. Judas, you are a hypocrite in practicing your Catholic faith. You are a snake. Why go to church when you have no intentions of practicing your religion outside of St. Francis' doors? (4/20/07);
- mmmmm. Judy's openly racist and hostile attitude doesn't bother me. What really makes me nervous is that the terrible inequities Judy caused during her tenure at City Hall. (4/20/07);
- nnnnn. Judy Gatelli did NOT meet with Tom Jennings!! She again LIED outright!! I personally believe she lied to have people believe she is so concerned about the people -- WRONG!! Judy lies every single week -- and we catch her every time -- Duct tape would be a nice gift for her -- We will need many fireman there pretty soon -- with all the liar liars PANTS ON FIRE. (4/20/07);
- ooooo. Judas is a liar. You must believe that. She never spoke with the reps of at least two of the city's unions. What is wrong with this woman? Why would she sit there and lie through her teeth? SHE DID NOT SPEAK WITH THE REPS OF AT LEAST TWO CITY UNIONS and I am not including the DPW. You figure it out. Hey Judas, does LIAR LIAR PANTS ON FIRE feel comfortable? Does the quote feel familiar? YOU ARE A BALD FACE LIAR! You are going to have to answer to that statement. You are digging a great big hole and guess whom you are putting in that hole?! (4/21/07);
- ppppp. She took a huge chance with her political career, her husband's potential political career, her personal assets, and her crony political associates' careers, in lying to the public on TV, in city council, on the radio, and in the newspapers about criminal conspiracy between my husband and Janet Evans. She continued the lies citing death threats to her. She couldn't stop there, she spewed out lies that Joe was responsible for vandalism and harassment to her and her property. (4/21/07);
- qqqqq. She is racist in my opinion (and her own I believe). Remember she is the one who said she would not abide her

family inter-marrying. I am firmly convinced that Judas is afraid of people of color, unless of course she can intimidate them. She is a rude bit#h. (4/22/07);

rrrr. How easily and effortlessly Judas lies. I like adding to the mix her cancellation of the Holly Thursday meeting, too. She takes her Catholic religion seriously? Yet another lie. (4/25/07);

sssss. Let's not forget how famous Judy is for making back door deals without the knowledge of all of the council members. She held a private meeting at the La Tratoria in South Side over the McGoff appointment, having her political advisor Joe Brazil there instead of all the council members. Watch your back Janet and Bill. She's probably up to no good. (4/26/07);

tttt. She's a proven liar and betrayer of the people. (4/26/07);

uuuuu. Fanucci, Gatelli and McGoff could wear Georgio Armani every week and they would still be liars and thieves. They have zero credibility. (4/27/07);

vvvvv. None of them trust her, and for good reason, as evidenced by her history. (4/27/07);

wwwww. Judy Gatelli will do whatever she can to paint herself as a unionized saint who can walk on water for the designed benefit of her husband's electability. (4/27/07);

xxxxx. Judy Gatelli has single-handedly made city council the most watched debacle in the valley. She's screwed over everyone there was to screw over, including the unions. She courted their votes when she was hanging on to DiBileo's shirt tails, making promise after promise but coming through with none of them. So, here we go again, more promises from the biggest liar ever to hold an elected seat. (4/27/07);

yyyyy. Vote for anyone connected to or with DOH & Judas and you're "NO" better than a child molester or one that assaults. (4/27/07); and

zzzzz. If she does, in fact, attempt to meet privately with the union officials independent of fellow council members, it will only be an election ploy to bolster her husband's election bid.

Smoke and Mirrors 101, Gatelli style, which is underhanded and desperate. (4/28/07).

115. At the time these false and defamatory statements were published, Additional Defendants knew or should have known that such statements were false and would cause harm to Plaintiff Gatelli, both professionally and personally.

116. Prior to the implementation of Additional Defendants' scheme to defame Plaintiff Gatelli, she was reputed, esteemed and accepted by and among members of her social, civil, professional and political communities to be a person of good name, honesty, integrity and credit.

117. The above-referenced false and defamatory statements have damaged Plaintiff Gatelli's good name and reputation in those political, civic, professional and social arenas.

118. The above-referenced false and defamatory statements about Plaintiff Gatelli were published by Additional Defendants via the Dohertydeceit.com website and message board.

119. Additional Defendants' use and abuse of Pilchesky's website and message board to publish knowingly false and self-serving statements about Plaintiff Gatelli on the world-wide web and information superhighway has ensured a perpetual and wide-spread audience, especially in Plaintiff Gatelli's professional, civil, social and political communities.

120. As a result of the foregoing defamatory misconduct, Plaintiff Gatelli has suffered, and continues to suffer, injury to her good name and reputation in her social, civic, political and professional communities, and has further suffered great personal humiliation and embarrassment, all to her loss and detriment.

121. Additional Defendants' actions were willful, wanton, reckless and taken with a callous disregard for the rights and interests of Plaintiff Gatelli.

122. Additional Defendants' defamatory statements were made and published with express and implied malice, reckless disregard for the truth and a specific intent to injure Plaintiff Gatelli's good name and reputation. As such, that an award of punitive damages against Additional Defendants is warranted. WHEREFORE, Plaintiff Judy Gatelli respectfully seeks judgment in her favor and against Additional Defendants, and further requests this Court to issue an Order granting the following relief:

- a. an award of compensatory damages in an amount in excess of \$50,000.00;
- b. punitive damages;
- c. an award of reasonable costs and disbursements incurred in connection with this action; and
- d. such other and further relief as this Court deems just and proper.

**COUNT II**  
**Civil Conspiracy**

123. Plaintiff incorporates herein the allegations set forth in the foregoing paragraphs of this Joinder Complaint as if the same were set forth fully herein.

124. The express intent of Dohertydeceit.com is to "kill political careers."<sup>1</sup> Additional Defendants have used the Dohertydeceit.com website and message board in a contrived effort to, inter alia, publish, with malice, scandalous, impertinent and defamatory allegations about Plaintiff Gatelli.

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<sup>1</sup> On December 19, 2006, in a colloquy with certain Additional Defendants, Pilchesky stated: "I'm in the business of trying to kill political careers here..."

125. Additional Defendants conspired with Pilchesky and each other to malign Plaintiff Gatelli in the manners outlined in detail above.

126. Additional Defendants and Pilchesky unlawfully conspired and agreed to falsely malign Plaintiff Gatelli's character and reputation and to cause Plaintiff Gatelli to suffer substantial emotional harm.

127. The above-referenced acts of Additional Defendants and Pilchesky constitute a wrongful combination or agreement to do unlawful acts or, alternatively, a wrongful combination or agreement to do otherwise lawful acts by unlawful means.

128. As a direct and proximate result of said conspiracy, Plaintiff Gatelli has suffered, and continues to suffer, injury to her good name and reputation in here political, professional, social, civic and personal communities, and has further suffered great personal humiliation and embarrassment, all to her loss and detriment.

129. The aforementioned acts of Additional Defendants and Pilchesky were willful, wanton, malicious and taken with reckless and/or callous disregard for the rights and interests of Plaintiff Gatelli.

WHEREFORE, Plaintiff Judy Gatelli respectfully seeks judgment in her favor against Additional Defendants, and further requests this Court to issue an Order granting the following relief:

- a. an award of compensatory damages in an amount in excess of \$50,000.00;
- b. punitive damages;
- c. an award of reasonable costs and disbursements incurred in connection with this action; and
- e. such other and further relief as this Court deems just and proper.

**COUNT III**  
**Intentional Infliction of Emotional Distress**

130. Plaintiff incorporates herein the allegations set forth in the foregoing paragraphs of this Joinder Complaint as if the same were set forth fully herein.

131. As set forth more fully above, Additional Defendants and Pilchesky intentionally engaged in a campaign of outrageous conduct that was so extreme as to go beyond all bounds of decency and intentionally and recklessly caused severe emotional distress to Plaintiff.

132. Additional Defendants and Pilchesky knew or acted with malicious intent and in reckless disregard of the fact that their unlawful conduct would produce severe emotional distress in Plaintiff.

133. Moreover, Additional Defendants and Pilchesky knew Plaintiff was susceptible or vulnerable to emotional distress due to her publicized sensitivity. In that regard, after Plaintiff was reduced to tears at a public meeting of Scranton City Council and was visibly anxious and upset, Additional Defendants, acting in concert with Pilchesky, maliciously and intentionally intensified their unjustified and baseless campaign of harassment and intimidation against Plaintiff.

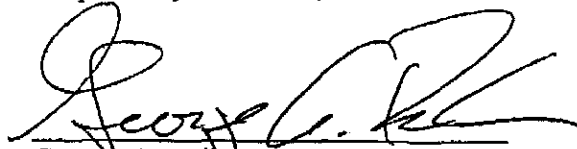
134. As a direct and proximate result of the foregoing intentional acts, Plaintiff suffered and continues to suffer from severe emotional distress and anxiety.

135. The aforementioned acts of Additional Defendants and Pilchesky were willful, wanton, malicious and recklessly indifferent to Gatelli's rights and well-being.

WHEREFORE, Plaintiff Judy Gatelli respectfully seeks judgment in her favor against Additional Defendants, and further requests this Court to issue an Order granting the following relief:

- a. an award of compensatory damages in an amount in excess of \$50,000.00;
- b. punitive damages;
- c. an award of reasonable costs and disbursements incurred in connection with this action; and
- f. such other and further relief as this Court deems just and proper.

Respectfully submitted,




George A. Reihner  
Pa. I.D. No. 48419  
Molly Dempsey Clark  
Pa. I.D. No. 89367  
**WRIGHT & REIHNER, P.C.**  
148 Adams Avenue  
Scranton, Pennsylvania 18503  
(570) 961-1166  
(570) 961-1199 - fax

DATED: May 24, 2007

**VERIFICATION**

I, Judy Gatelli, individually and as President of Scranton City Council, verify that the facts set forth in the foregoing Complaint are true and correct to the best of my knowledge, information and belief. I understand that false statements herein are subject to the penalties of 18 Pa. C.S.A. § 4904.

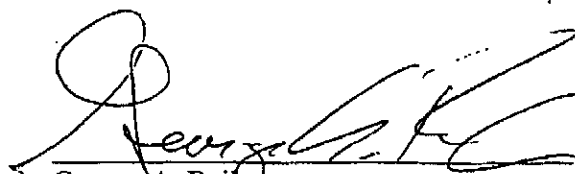
  
Judy Gatelli

Dated: 5-23-07

**CERTIFICATE OF SERVICE**

I, GEORGE A. REIHNER, hereby certify that on this day a true and correct copy of the foregoing Joinder Complaint was served upon counsel of record by hand delivery as follows:

Joseph Pilchesky  
819 Sunset Street  
Scranton, PA 18509



George A. Reihner

Dated: May 24, 2007