

**VIRGINIA:**

**IN THE CIRCUIT COURT FOR THE COUNTY OF FRANKLIN**

**CRYSTAL DAWN MUSE MINNIX )**  
**CARLTON ROY MINNIX, JR. )**  
**LINDA DARLENE MUSE )**  
**EUGENE ALLEN MUSE, JR. )**  
**ZACHARY TYLER MUSE )**  
**N.J. MINNIX, a minor male )**  
**BY NEXT FRIEND CRYSTAL MINNIX )**  
**C.T. MINNIX, a minor male )**  
**BY NEXT FRIEND CRYSTAL MINNIX )**  
**C.R. MINNIX, a minor male )**  
**BY NEXT FRIEND CRYSTAL MINNIX )**  
**T.A. MINNIX, a minor male )**  
**BY NEXT FRIEND CRYSTAL MINNIX )**  
**G.J. MINNIX, a minor male )**  
**BY NEXT FRIEND CRYSTAL MINNIX )**  
**N.L.W. MINNIX, a minor male )**  
**BY NEXT FRIEND CRYSTAL MINNIX )**  
**A.R.M. MINNIX, a minor female )**  
**BY NEXT FRIEND CRYSTAL MINNIX )**  
**CRYSTAL DAWN MINNIX, INDEPENDENT )**  
**CONSULTANT FOR SCENTSY )**  
**GOLDENS PROMISE )**

**Plaintiffs )**

**v. )**

**SINCLAIR TELEVISION GROUP, INC. )**

**Registered Agent: )**  
**C T Corporation System )**  
**4701 Cox Road, Suite 285 )**  
**Glen Allen, Virginia 23060-6808 )**

**SINCLAIR BROADCAST GROUP, INC. )**

**Registered Agent: )**  
**The Corporation Trust Incorporated )**  
**2405 York Road, Suite 201 )**  
**Lutherville-Timonium, MD 21093-2264 )**

**ACC LICENSEE, LLC )**

**File#3527804 )**  
**doing business as WJLA-TV, an )**  
**American Broadcasting Companies )**

**Case Number:**

**CL22-5029**

(ABC) affiliate )

Registered Agent: )

The Corporation Trust Company )

Corporate Trust Center )

1209 Orange Street )

Wilmington, DE 19801 )

(302)658-7581 )

DEVIN DWYER )

c/o WJLA-TV )

1100 Wilson Boulevard )

Arlington, Virginia 22209 )

ELIZABETH THOMAS )

c/o WJLA-TV )

1100 Wilson Boulevard )

Arlington, Virginia 22209 )

JACQUELINE YOO )

c/o WJLA-TV )

1100 Wilson Boulevard )

Arlington, Virginia 22209 )

BRIDGETTE CRAIGHEAD )

33 Hollyfield Road )

Rocky Mount, Virginia 24151-6196 )

BLACK LIVES MATTER FRANKLIN CO. )

Registered Agent: )

Bridgette Craighead )

33 Hollyfield Road )

Rocky Mount, Virginia 24151-6196 )

Defendants )

## COMPLAINT

Plaintiffs, Crystal Dawn Muse Minnix, Carlton Roy Minnix, Jr., Wife and Husband, Linda Darlene Muse, Eugene Allen Muse, Jr., Wife and Husband, Zachary Tyler Muse, N.J. Minnix, a minor male; C.T. Minnix, a minor male; C.R. Minnix, a minor male, T.A. Minnix, a minor male, G.T. Minnix, a minor male, N.L.W. Minnix, a minor male; A.R.M. Minnix, a

minor female, each appearing by next friend, Crystal Minnix; Crystal Minnix independent consultant for Scentsy, and Goldens Promise, hereinafter referred to collectively as Plaintiffs Minnix in support of their complaint against Defendants Sinclair Television Group, Inc.; Sinclair Broadcast Group, Inc.; ACC Licensee, LLC, doing business as WJLA-TV an ABC affiliate; Devin Dwyer; Elizabeth Thomas; Jacqueline Yoo; Bridgette Craighead and Black Lives Matter Franklin County, jointly and severally, hereby states the following:

### **NATURE OF THE ACTION**

1. This defamation action arises from a piece styled, "COP'S ROLE IN JANUARY 6 ATTACK DIVIDES VIRGINIA TOWN WITH TIES TO CONFEDERACY," by Devin Dwyer, Elizabeth Thomas and Jacqueline Yoo with dateline, January 4, 2022 at 5:00 AM, published YouTube-ABC News, on or about January 3, 2022, abcnews.go.com on or about January 3, 2022, Facebook ABCNewsLive on or about January 3, 2022, and stations owned by Defendant Sinclair Broadcast Group, Inc. located in the Washington, D.C.; Charlottesville; Harrisonburg; Lynchburg; Norfolk and Richmond viewing area, which depicts the private residence of Plaintiffs Minnix, with a minor son in front yard, with clear inferences to being engaged in violence and racism. Based on information and belief and alleged herein that the original media piece was picked up and broadcast out of American Broadcasting Companies, New York and distributed to many ABC affiliates and social media including Twitter on a global basis.
2. Plaintiffs Minnix were not and are not members of Rocky Mount, Virginia Police Department.
3. Plaintiffs Minnix did not appear, nor attend any activities at the Washington, D.C. at the capital on January 6, 2021.
4. Plaintiffs Minnix reside in the Town of Boones Mill, Virginia and not in Rocky Mount, Virginia.
5. Although the piece published did not specifically name Plaintiffs Minnix as racists, the depiction of their personal residence with a minor child outside, clearly characterized

their residence and, by clear inference, all those who reside therein as racist or having racist tendencies.

6. Any implication that Plaintiffs Minnix are racists is categorically and demonstrably false.
7. Defendants lacked permission, consent or authority to depict the personal residence of Plaintiffs Minnix.
8. Defendants lacked permission, consent or authority to depict a minor child and imply that minor child is a racist.
9. Defendants falsely accuse by implication each and every individual residing in the personal residence located in the Town of Boones Mill, Virginia as racist.
10. Plaintiff Crystal Dawn Muse Minnix hereinafter referred to as Plaintiff Crystal owns, operates and maintains at all relevant times two business ventures being named Crystal Dawn Minnix, independent consultant for Scentsy, and Goldens Promise for which she holds a Boones Mill Business License.
11. At all relevant times herein Plaintiffs Minnix reside at 50 Church Hill Street, Boones Mill, Virginia 24065.
12. At all relevant times herein Plaintiffs Minnix upon information and belief and herein allege that their residence is located within the corporate limits for the town of Boones Mill within Franklin County, Virginia.

#### PARTIES

13. Plaintiffs Crystal and Carlton Roy Minnix, Jr., hereinafter referred to as Plaintiff Carlton reside at 50 Church Hill Street, Town of Boones Mill, Virginia 24065.
14. Plaintiffs Crystal and Carlton have seven (7) minor children, being Plaintiffs N.J., age 14; C.T., age 13; C.R., age 10; T.A., age 8; G.J., age 6; N.L.W., age 4; and A.R.M., age 1; residing with them at 50 Church Hill Street, Town of Boones Mill, Virginia 24065.
15. Plaintiffs Linda Darlene Muse, hereinafter Plaintiff Linda and Plaintiff Eugene Allen Muse, Jr., hereinafter Plaintiff Eugene reside at 50 Church Hill Street, Town of Boones Mill, Virginia 24065.



16. Plaintiffs Crystal and Eugene are daughter and father, who co-own the residence located at 50 Church Hill Street, Town of Boones Mill, Virginia 24065.
17. Plaintiff Zachary Tyler Muse, hereinafter, referenced as Plaintiff Zachary is the adult son of Plaintiff Crystal and resides at 50 Church Hill Street, Town of Boones Mill, Virginia 24065.
18. The businesses, Crystal Dawn Minnix, independent consultant for Scentsy and Goldens Promise are owned, operated and maintained by Plaintiff Crystal with their principal business location at 50 Church Hill Street, Town of Boones Mill, Virginia 24065.
19. Defendant Sinclair Television Group, Inc., hereinafter referenced as Defendant Television, based on information and belief and accordingly alleged as the owner of the media piece titled "COP'S ROLE IN JAN. 6 ATTACK DIVIDES VIRGINIA TOWN WITH TIES TO CONFEDERACY" and the owner of ABC news outlets and stations. Defendant Sinclair Broadcast Group, Inc. holds the ownership and management of WJLA-TV through ACC Licensee, LLC and controls the content of productions such as the referenced media piece by and through a local marketing agreement. WJLA-TV holds itself out to the public as being owned and operated by Sinclair Broadcast Group, Inc., Sinclair Broadcast Group, Inc. advertises that it reaches 38.7% of American households, 163 television stations in 77 different markets.
20. Defendants ACC Licensee, LLC, Sinclair Television and Sinclair Broadcast Group, Inc., aired the media piece titled above on or about January 3, 2022, through its many stations, medias and markets.
21. Upon information and belief and accordingly alleged herein the above referenced media piece was published on other ABC affiliated stations owned by Defendant Television in Virginia on or about January 3, 2022, being

- a. Charlottesville WVAW, located at 999 2<sup>nd</sup> Street, SE, Charlottesville, Virginia 22902;
  - b. Harrisonburg WHSV, Post Office Box TV3, Harrisonburg, Virginia 22801
  - c. Lynchburg WSET, 2020 Langhorne Road, Lynchburg, Virginia 24501
  - d. Norfolk WVEC, located at 613 Woodis Avenue, Norfolk, Virginia 23510
  - e. Richmond WRIC, located at Arboretum Place, Richmond, Virginia 23235.
22. Based on information and belief and accordingly alleged herein Defendant Devin Dwyer, hereinafter referenced as Defendant Dwyer, acts and works as a Senior Washington Reporter, in relation to the White House, the United States Supreme Court and Politics for Defendant ACC Licensee, LLC doing business as WJLA-TV, owned and operated by Defendants Sinclair Broadcast Group, Inc. and Sinclair Television.
23. Based on information and belief and accordingly alleged herein Defendant Dwyer appears in the above referenced media piece as the reporter and interviewer.
24. Based on information and belief and accordingly alleged herein Defendants Elizabeth Thomas, hereinafter referenced as Defendant Thomas, and Defendant Jacqueline Yoo, hereinafter referenced as Defendant Yoo, act and work as producers at ACC Licensee, LLC, doing business as WJLA-TV, owned and operated by Defendants Sinclair Broadcast Group, Inc. and Sinclair Television.
25. Based on information and belief and accordingly alleged herein Defendants Thomas and Yoo produced the media piece referenced above and have responsibility for matching images and words or interview or reporting for display in the video piece.
26. Based on information and belief and accordingly alleged herein, Defendant Bridgette Craighead, hereinafter referred to as Defendant Craighead, appears in the media piece

video and audio being interviewed by Defendant Dwyer under the production of Defendants Thomas and Yoo.

27. Based on information and belief and accordingly alleged herein Defendant Craighead represents and holds herself out as an activist, founder, director and officer of Black Lives Matter Franklin County.
28. Based on information and belief and accordingly alleged herein, Defendant Black Lives Matter Franklin County is a non-stock Virginia corporation with its principal office located at 33 Hollyfield Road, Rocky Mount, Virginia 24151-6196, which is also the residence of Defendant Craighead.
29. Based on information and belief and accordingly alleged herein, Defendant Craighead appears in the media piece video and audio as a person being interviewed while acting in her capacity as a member, officer, director or activists in the service of Defendant Black Lives Matter Franklin County and collectively shall be referenced herein as Defendant Craighead, BLMFC.
30. The media piece referenced above centers its theme of racism in Rocky Mount, Virginia, referencing whites versus people of color and specifically, President Donald John Trump supporters as white supremacists being involved in a violent insurrection at the Washington, D.C. capital on January 6, 2021.
31. The piece tied the Confederacy to the supporters of President Donald John Trump, based on information and belief and accordingly alleged herein.
32. Defendant Craighead says, "Its their land and their county and we just live in it," a clear reference that white people control the land.

33. The Plaintiffs Minnix house being painted "Red," White," and "Blue" was shown on the video immediately after the Defendant Craighead's words.
34. The video depicts the Plaintiff's Minnix house and a minor male being one of the Minnix children visible in front of the house near a bicycle and family van.
35. Defamation requires the examination of the entire media piece considering the reporting and video and audio as a complete piece of work.
36. Plaintiffs Minnix house celebrates their pride in their country, depicts United States of America flag.
37. Plaintiffs Minnix house has been falsely depicted as being tied to violence in Washington, D.C. capital on January 6, 2021.
38. Plaintiffs Minnix house has been falsely depicted as being associated with the Confederacy.
39. Plaintiffs Minnix house has been falsely depicted as supporting President Donald John Trump.
40. Plaintiffs Minnix house has been falsely depicted as an inhospitable place for people of color.
41. By clear implication, the minor male child has been falsely depicted as a violent insurrectionist, a rebelling Confederacy supporter, a supporter of President Donald John Trump and as an individual who stands against or discriminates against people of color.
42. By clear implication, the residents of the Minnix house and each individual Plaintiffs Minnix has been falsely depicted as violent insurrectionists, as rebellious Confederacy supporters, as supporters of President Donald John Trump and as individuals and



businesses, who stand against or discriminate against people of color.

43. Defendants Sinclair Television, Sinclair Broadcast, ACC Licensee, LLC, Dwyer, Thomas and Yoo profited from the media piece in advertisement sales, royalties, professional advancement and other revenue streams at the expense of the minor male Minnix child and Plaintiffs Minnix.
44. Plaintiffs Minnix and Plaintiffs Minnix house are the only personal residence to be targeted in the entire media piece associating and attributing violence, insurrection, confederate rebellion, white Trump supporters and discrimination against rights of people of color.
45. Defendants Craighead, Craighead BLMFC, Dwyer, Thomas and Yoo conspired either expressly or by their actions to target, single out, identify and direct national and international derision, animus and dangerous actions against Plaintiffs Minnix and their minor children.
46. Plaintiffs Minnix have suffered significant damages and injuries amounting to fear, trespassers, stalkers and strangers near their residence, watching their comings and goings, following them and causing them at different times to feel fear, intimidation, destruction of tranquility in their personal abode and safety for family members with the onset of great mental anguish, which manifested itself in physical pain and injury.
47. The mental anguish has been so great that different adults and children have needed to consult for expert counseling and professional treatment because of physical manifestation of loss of sleep, night terrors, fear, foreboding, depression, loss of safety in the home and ridicule, all at great costs to Plaintiffs Minnix.
48. Due to the depiction in the media piece, Crystal Minnix suffered loss of revenue from

independent consulting of Scentsy products and the sales of Goldens Promise. By implication, her reputation as a safe person to exhibit products or make sale and come into people's homes has been destroyed.

#### JURISDICTION

49. This Court has specific personal jurisdiction over each Defendant named under Virginia's long-arm statute, Va. Code §8.01-328.1, as well as under the Due Process Clause of the U.S. Constitution, because, among other things, the causes of action in this Complaint arise from Defendants transacting business in this Commonwealth and causing tortious injury by an act or omission in this Commonwealth. Moreover, exercising jurisdiction would not offend traditional notions of fair play and substantial justice because Defendants could have—indeed should have—reasonably foreseen being hailed into a Virginia court to account for their false, defamatory, and reckless report on residents of Boones Mill, Virginia. Further, the Cause of Action is rooted in this Circuit. Plaintiffs Minnix and Defendants Craighead reside in Franklin County, Virginia; Defendants Dwyer, Thomas, Yoo, Sinclair Broadcast, Sinclair Television, and ACC Licensee, LLC., availed themselves by traveling to Franklin County in order to gather content for the report, which gives rise to this the Cause of Action. Furthermore, ACC Licensee, LLC, doing business as WJLA, has a physical address located in Arlington, Virginia.
50. Venue is proper in this circuit under Va. Code §8.01-262 because the causes of action asserted herein arose in this Circuit.

#### DEFAMATION PER SE



51. At common-law defamatory words which are actionable per se are those which impute to a person the commission of some criminal offense involving moral turpitude, for which the party, if the charge is true, may be indicted and punished, *Fleming v. Moore*, 221 Va 884, 2755 S.E.2d 632(1981)
52. Defendants collectively imply Plaintiffs Minnix as unindicted co-conspirators of the January 6, 2021, insurrection exhibited in Washington, D.C. and linked them to the two (2) Rocky Mount Police Department officers who have actually been indicted and convicted.
53. Plaintiffs Minnix categorically refute this claim as false.
54. Defendants collectively implying that Plaintiffs Minnix are treasonous against their country and state.
55. Plaintiffs Minnix categorically refute this claim as false.
56. Defendants collectively imply that Plaintiffs Minnix engage in activities in violation of Virginia Code Section 18.2-485, conspiring to incite one race to engage in insurrection against another race.
57. Plaintiffs Minnix categorically refute this claim as false.
58. Defendants collectively imply due to the highly charged violence surrounding racial bigotry and hatred that the adults of Plaintiffs Minnix committed child endangerment, child neglect and child abuse.
59. Plaintiffs Minnix categorically refute this claim as false.
60. Plaintiffs Minnix include as exhibit a picture taken from the media piece video depicting their house and a minor male in front of the house beside bicycle and van, as Exhibit A.
61. Defendants Dwyer, Thomas, Yoo exhibited actual malice and a reckless disregard for

the truth in reporting, videography, interviewing and slanting of a story so as to injure Plaintiffs Minnix by doing the following:

- a. Depicting the Plaintiffs Minnix house with the display of a minor male child;
- b. Depicting the Plaintiffs Minnix house as being in Rocky Mount being a falsehood;
- c. Targeting the Plaintiffs Minnix house in such a way as to endanger the health, life, safety and tranquil enjoyment of home for seven (7) minor children and adults therein;
- d. Defendants failed to consult with Plaintiffs Minnix or gain their consent prior to including the depiction of their residence and child in the media piece;
- e. Defendants used visage of minor child and Plaintiffs Minnix home for profit and gain without prior agreement or consent;
- f. Defendants acted without the knowledge of Plaintiffs Minnix;
- g. The actual malice and or careless disregard for the truth can be attributed to ACC Licensee, LLC, WJLA-TV, Sinclair Broadcast Group, Inc., Sinclair Television Group, Inc. under the doctrine of Respondent Superior. Each of the Defendants Dwyer and Thomas and Yoo acted within the scope of their respective employment.
- h. Defendants Sinclair Broadcast Group, Inc. and Sinclair Television maintain checks and balances over content to oversee and prevent the display of minors, and that failure to protect a minor child and protect privacy rights directly triggers catastrophic and permanent damages to minors and for adults charged with their care;

- i. Each plaintiff is entitled to punitive damages to the maximum prescribed by law due to the actual malice reckless disregard for truth, assault on family and minors, negligence and breach of duty to inform private individuals of actions planned and failure to gain consent.

WHEREFORE, Plaintiffs Minnix prays for this court to award judgement against each of the named defendants jointly and severally for compensatory damages in the amount of Sixty-Two Million (\$62,000,000.00) Dollars and punitive damages in the statutory maximum allowed by law being Three Hundred Fifty Thousand (\$350,000.00) Dollars for each Plaintiff totaling Four Million, Nine Hundred Thousand (\$4,900,000.00) Dollars plus Plaintiffs costs, including attorney fees, plus injunctive relief directing Defendants to redact, delete and destroy all digital or hard copy images of Plaintiffs Minnix house and of their child and direct that no further publication be made and such other and further relief as equity shall deem meet.

#### ASSAULT, ENDANGERMENT

62. Plaintiffs Minnix reallege each and every allegation set forth in paragraphs 1-61 inclusive as if set forth herein.
63. Defendants Dwyer, Thomas, Yoo, Craighead, Craighead BLMFC purposely identified and deliberately targeted the Plaintiffs Minnix house as a subject of and depiction in the media piece titled "COP'S ROLE IN JANUARY 6 ATTACK DIVIDES VIRGINIA TOWN WITH TIES TO CONFEDERACY."
64. Defendants collectively through personal action and corporate action created a racial divide or exacerbated a racial divide so as to violate the elements of Virginia Code Section 18.2-485 and incite one race to insurrection against another race.
65. Defendants collectively created a reasonable apprehension of fear, intimidation, dread,

and breach of tranquility of Plaintiffs Minnix safety in their own home by associating Plaintiffs Minnix house with violence.

66. Defendants breached duty of care not to do intentional acts that can reasonably place any member of the Minnix family in fear of imminent bodily harm.
67. Plaintiffs Minnix have been placed in imminent danger of bodily injury, trespass, stalking, child endangerment, psychological trauma by known or unknown assailants drawn to their location, drawn to their residence and drawn to them personally as a direct and proximate targeting of Plaintiffs Minnix house.
68. Plaintiffs Minnix over the last year have contacted police to request assistance and protection from individuals in vehicles parked and stalking them and their children; following their respective comings and goings; trespassing on property as a direct and proximate result of Defendants actions, words and video in the referenced media piece.
69. Defendants actions and media piece, especially; when it depicts a minor male child, invites harm and danger where none existed before.
70. Defendants careless and reckless acts creates child endangerment for all children in the Plaintiffs Minnix home.
71. Defendants created the Plaintiffs Minnix as a target for those who practice predatory acts against children by displaying a child at a known location who should not be considered on equal par to other human beings because that child or children belongs to a family that practices bigotry, violence, insurrection and have land that in the words of Defendant Craighead, "It's their land and their county and we just live in it."

WHEREFORE, Plaintiffs Minnix prays for this court to award judgement against each of the named defendants jointly and severally for compensatory damages in the amount



of Sixty-Two Million (\$62,000,000.00) Dollars and punitive damages in the statutory maximum allowed by law being Three Hundred Fifty Thousand (\$350,000.00) Dollars for each Plaintiff totaling Four Million, Nine Hundred Thousand (\$4,900,000.00) Dollars plus Plaintiffs costs, including attorney fees, plus injunctive relief directing Defendants to redact, delete and destroy all digital or hard copy images of Plaintiffs Minnix house and of their child and direct that no further publication be made and such other and further relief as equity shall deem meet.

#### NEGLIGENCE

72. Plaintiffs Minnix reallege each and every allegation set forth in paragraphs 1 through 71 inclusive as if set forth herein.
73. Each of the Defendants owe a duty of care to protect children, all children and in this instance the Plaintiffs Minnix children.
74. The common-law imposes a duty of care for children upon each and every adult.
75. Each of the Defendants owe a duty of truth and veracity in reporting about individual plaintiffs and businesses of Plaintiffs Minnix and their residence.
76. Each of the Defendants owe a duty to adequately investigate and not to accuse or imply Plaintiffs Minnix with actions or affiliations, which subject them to public ridicule, derision, public scorn, tarnish their individual and business reputations and create targets for known and unknown bad actors, or assault.
77. Each defendant violated and breached these duties owed to Plaintiffs Minnix.
78. Plaintiffs Minnix have suffered monetary damages, physical threat, mental anguish manifesting in physical injury requiring medical or professional treatment, anxiety, night terrors, fear, derision, public shame and creation of a target of attack from known or

unknown bad actors. This damage is ongoing, continuous and without interruption due to publication and republication of the media piece.

79. Plaintiffs Minnix individually have suffered permanent injury as a direct and proximate result of the breaches of duty of care owed to them by each Defendant.

WHEREFORE, Plaintiffs Minnix prays for this court to award judgement against each of the named defendants jointly and severally in the amount of compensatory damages in the amount of Sixty-Two Million (\$62,000,000.00) Dollars and punitive damages in the statutory maximum allowed by law being Three Hundred Fifty Thousand (\$350,000.00) Dollars for each Plaintiff totaling Four Million, Nine Hundred Thousand (\$4,900,000.00) Dollars plus Plaintiffs costs, including attorney fees, plus injunctive relief directing Defendants to redact, delete and destroy all digital or hard copy images of Plaintiffs Minnix house and of their child and direct that no further publication be made and such other and further relief as equity shall deem meet.

Respectfully submitted,  
Crystal Dawn Muse Minnix  
Carlton Roy Minnix, Jr.  
Linda Darlene Muse  
Eugene Allen Muse, Jr.  
Zachary Tyler Muse  
N.J. Minnix, a minor male  
C.T. Minnix, a minor male  
C.R. Minnix, a minor male  
T.A. Minnix, a minor male  
G.J. Minnix, a minor male  
N.L.W. Minnix, a minor male  
A.R.M. Minnix, a minor female  
Crystal Dawn Minnix, Independent Consultant  
for Scentsy  
Goldens Promise

  
Of Counsel

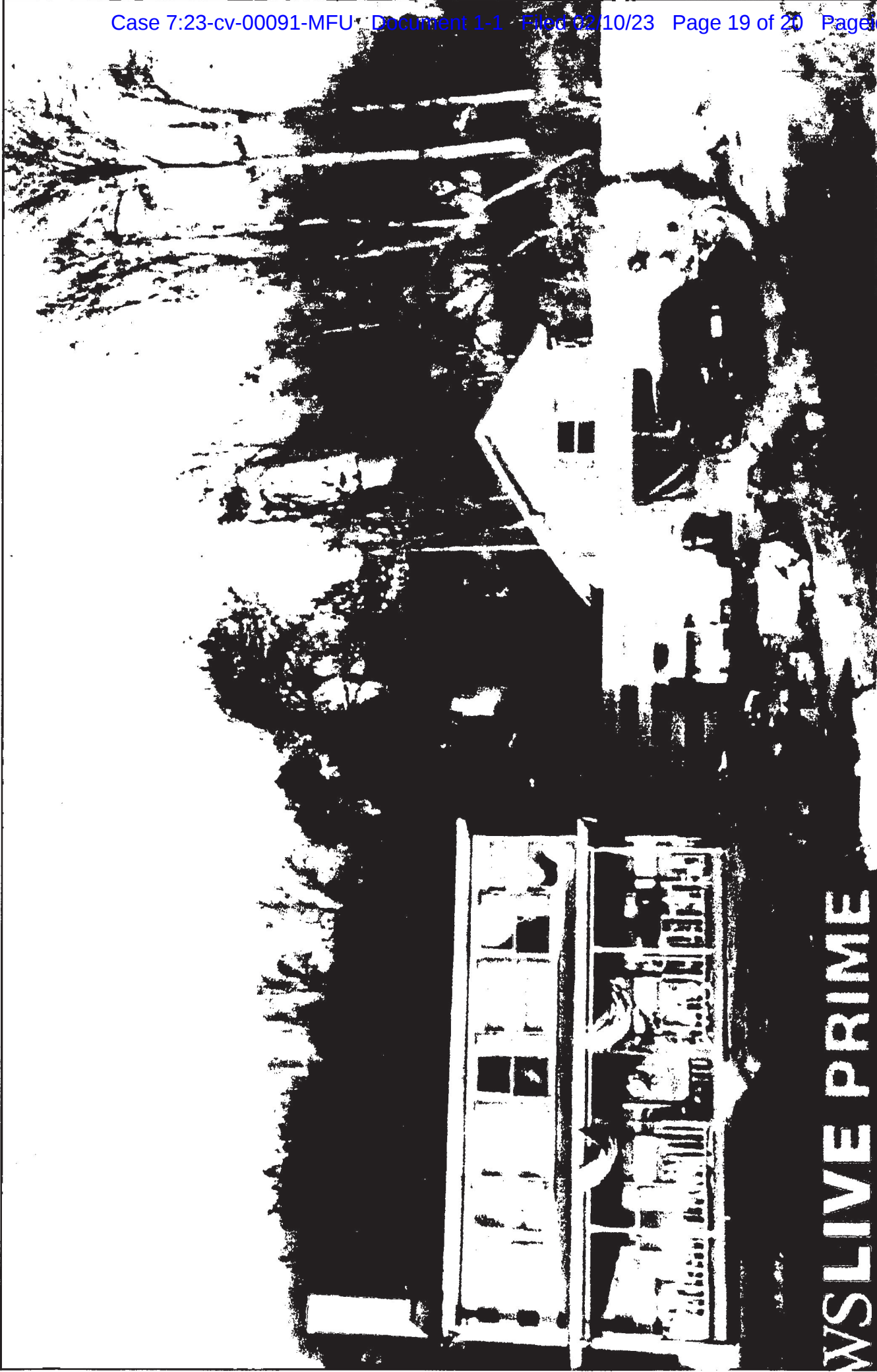


Counsel of Record:

Lance M. Hale, Esquire  
Virginia State Bar #23972  
Lance M. Hale & Associates  
P. O. Box 1721  
2615 Orange Avenue, N.E., Suite B  
Roanoke, Virginia 24008-1721  
Telephone: (540) 342-9763  
Facsimile: (540) 342-8189  
Email: [lmhale@halelawoffice.com](mailto:lmhale@halelawoffice.com)  
Co-Counsel for Plaintiffs

and

Ethan J. Koelsch, Esquire  
Virginia State Bar #96450  
Koelsch Law, PLLC  
P. O. Box 2213  
320 West Main Street  
Salem, Virginia 24153  
Phone: (540) 685-7941  
Facsimile: (540) 218-8246  
Email: [koelschlaw@gmail.com](mailto:koelschlaw@gmail.com)  
Co-Counsel for Plaintiffs



**WSLIVE PRIME**

**VIRGINIA TOWN DIVIDED OVER JANUARY 6**

**AFFIDAVIT SUPPORTING COMPLAINT**

**COMMONWEALTH OF VIRGINIA**

County OF Franklin, to wit:

On this day personally appeared before me, Teresa L. Locke, a Notary Public in the Commonwealth of Virginia, the following:

- a) CRYSTAL DAWN MUSE MINNIX,
- b) CARLTON ROY MINNIX, JR.
- c) LINDA DARLENE MUSE
- d) EUGENE ALLEN MUSE, JR. AND
- e) ZACHARY TYLER MUSE
- f) CRYSTAL MINNIX, NEXT FRIEND  
FOR MINORS, N.J. MINNIX;  
C.T. MINNIX;  
C.R. MINNIX;  
T.A. MINNIX;  
G.J. MINNIX;  
N.L.W. MINNIX;  
A.R.M. MINNIX; AND
- g) CRYSTAL DAWN MINNIX,  
INDEPENDANT CONSULTANT FOR  
SCENTSY; AND
- h) CRYSTAL DAWN MINNIX, SOLE  
PROPRIETOR OF GOLDENS PROMISE

After each individual having been first duly sworn did depose and state as follows:

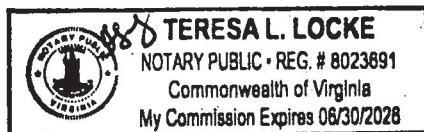
To the best of my information, knowledge and belief all of the factual allegations set forth in the attached Complaint, I hereby verify as true and correct, by my signature.

- a. Crystal Dawn Muse Minnix
- b. Carlton Roy Minnix, Jr.
- c. Linda Darlene Muse
- d. Eugene Allen Muse, Jr.
- e. Zachary Muse
- f. Crystal Dawn Muse Minnix
- g. Crystal Dawn Muse Minnix
- h. Crystal Dawn Muse Minnix

Acknowledged, sworn and subscribed to personally before me this 30<sup>th</sup> day of December, 2022.

My commission expires: June 30, 2026

My Registration Number is: 8023691



Teresa L. Locke (SEAL)  
Notary Public