

LAW

DIVISION



2014

14-L-001337

COLDWELL LEONARD

- VS -

SHABAT OMRI

J 12616

LIBEL/SLANDER



101337

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STATE OF ILLINOIS)
COUNTY OF COOK) SS
)

Attorney No. 12616

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION

LEONARD COLDWELL,

Plaintiff,

v.

OMRI SHABAT a/k/a
JASON MICHAEL JONES,

Defendant.

Case No.

2014L00013337
CALENDAR ROOM J
TIME 00:00
Libel/Slander

FILED-3
2014 FEB 10 AM 11:17
DOROTHY BROWN
CLERK OF CIRCUIT COURT
LAW DIVISION

COMPLAINT AT LAW FOR DEFAMATION PER SE

NOW COMES the Plaintiff, LEONARD COLDWELL, by and through his attorney, Dennis J. Kellogg, and in support of the above-captioned complaint against Defendant, OMRI SHABAT a/k/a JASON MICHAEL JONES (hereinafter "JASON MICHAEL JONES"), and states as follows:

1. That at all times relevant, Plaintiff, LEONARD COLDWELL, was a resident of Charleston County, South Carolina.
2. That at all times relevant, Defendant, JASON MICHAEL JONES, was a resident of Cook County, Illinois, with his principal residence located at 1250 S. Michigan Ave., Chicago, IL 60605.
3. That Plaintiff, LEONARD COLDWELL is considered a public figure in the area of health law and is an author, lecturer, clinician, radio and TV personality and founder of the IBMS Instinct-Based Medicine System.
4. That Plaintiff, LEONARD COLDWELL, is board certified in the United States as a Dr.

of Naturopathic Medicine (NMD), has been awarded the honorary degree of Doctor of Humanities, and has various other certificates and academic achievements.

5. That Defendant, JASON MICHAEL JONES, writes blogs on two websites: "Salty Droid" (saltydroid.info) and "Glancing Web" (glancingweb.com).

6. That when Defendant, JASON MICHAEL JONES, writes blog posts on Glancing Web he writes under the alias OMRI SHABAT.

7. That the Defendant, JASON MICHAEL JONES, published to the internet population on Glancing Web, articles containing false and/or defamatory statements about the Plaintiff, LEONARD COLDWELL, including words imputing the commission of a criminal offense and words that impute the Plaintiff's lack of integrity in performing his duties and/or lack of ability in his profession, examples of which are set out by dates below:

a. That on February 18, 2013, Defendant, JASON MICHAEL JONES, published an article on his blog titled, "The Leonard Coldwell Song" in which he made the following statements (a copy of this document attached hereto as *Exhibit A*):

- i. That Plaintiff was a "rogue impostor";
- i. That Plaintiff was a "molesting fraud";
- ii. That Plaintiff was a "psychopath"; and
- iii. That Plaintiff was a "fake doctor."

b. That on February 28, 2013, Defendant, JASON MICHAEL JONES, published an article on his blog titled, "Rachele Brooke Smith Entanglement with Lunatic Coldwell" in which he made the following statements (a copy of this document attached hereto as *Exhibit B*):

- i. That Plaintiff was a "pseudo-healer";

- ii. That Plaintiff “fabricated four ‘doctor degrees’”;
 - iii. That Plaintiff is the “fakest doctor in the world”;
 - iv. That Plaintiff is a “psycho”; and
 - v. That Plaintiff’s IBMS system is a “scam.”
- c. That on March 27, 2013, Defendant, JASON MICHAEL JONES, published an article on his blog titled, “Gun Control Commentary by a Psychopath” in which he made the following statements (a copy of this document attached hereto as *Exhibit C*):

- i. That Plaintiff is a “molestation-connoisseur”;
 - ii. That Plaintiff “pretends to heal” patients; and
 - iii. That Plaintiff was a “quack.”
- d. That on April 8, 2013, Defendant, JASON MICHAEL JONES, published an article on his blog titled, “The Only Answer to Becoming a Desolation” in which he made the following statements (a copy of this document attached hereto as

Exhibit D):

- i. That Plaintiff conducted “brainwash teleseminars”;
 - ii. That Plaintiff committed “horrid crimes and felonies”;
 - iii. That Plaintiff was a “fake doctor”;
 - iv. That Plaintiff lead his own “con-cult”;
 - v. That Plaintiff was “not a real doctor”; and
 - vi. That Plaintiff “portrays himself as a doctor.”
8. As a proximate result of the foregoing defamatory statements by Defendant, JASON

MICHAEL JONES, Plaintiff, LEONARD COLDWELL, suffered injuries including injuries to his personal and professional reputation as well as significant economical damages to his business.

9. Furthermore, that while the Plaintiff, LEONARD COLDWELL, suffered actual harm to his reputation, the false and defamatory statements are so obviously and materially harmful that injury to his reputation may be presumed if not proven.

10. The foregoing defamatory statements were made by Defendant, JASON MICHAEL JONES, with the knowledge of their falsity and with actual malice, so as to justify an award of punitive damages in an amount in excess of \$300,000.00.

WHEREFORE, Plaintiff, LEONARD COLDWELL, demands judgment against Defendant, JASON MICHAEL JONES, for compensatory damages in an amount in excess of fifty-thousand dollars (\$50,000.00) and for exemplary damages in an amount that will serve to punish Defendant, JASON MICHAEL JONES, and deterred the Defendant from similar conduct.

Respectfully Submitted,



Dennis J. Kellogg, Attorney for Plaintiff

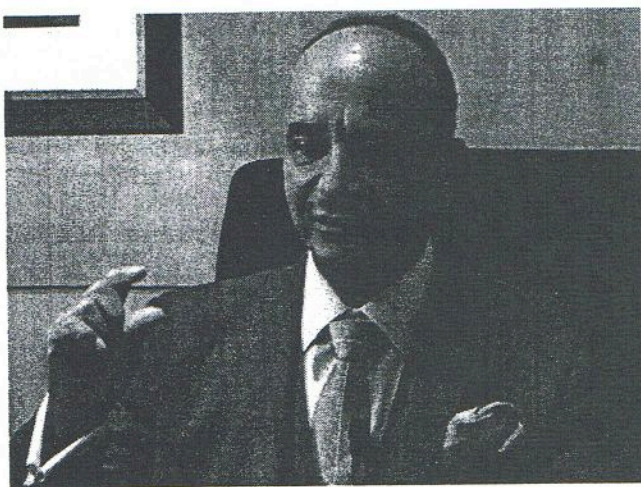
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The Leonard Coldwell Song

February 18, 2013
By Omri Shabat



GlancingWeb
The Leonard Coldwell Song (Mmm Instr...

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179

Once there was this brute who
Got into a turmoil and couldn't remain in his local
But when he finally changed his identity
His name has turned from Bernd Klein into Leonard Coldwell
He says that he is a doctor
But all he really is a rogue impostor

Mmm Mmm Mmm Mmm
Mmm Mmm Mmm Mmm

Once there was this girl who
Wouldn't go to treatment with the patients in the hospital room
But when he finally defiled her
She realized he's nothing more than a molesting fraud
She was too afraid to report him
He had threatened to destroy her reputation

Mmm Mmm Mmm Mmm
Mmm Mmm Mmm Mmm

EXHIBIT

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tabbles

But all those sufferings won't be gagged now
'Cause there are a few who will expose the psychopath

'Cause then there were these bloggers whose
Postings have divulged his exploitations to anyone in the world
And when they unveil the fake doctor's atrocities
They mock and ridicule all over his sneaky stratagems
He couldn't quite silence them
They'll always going to be there

Mmm Mmm Mmm Mmm
Mmm Mmm Mmm Mmm

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Rachele Brooke Smith Entanglement with Lunatic Coldwell

February 28, 2013

By Omri Shabat

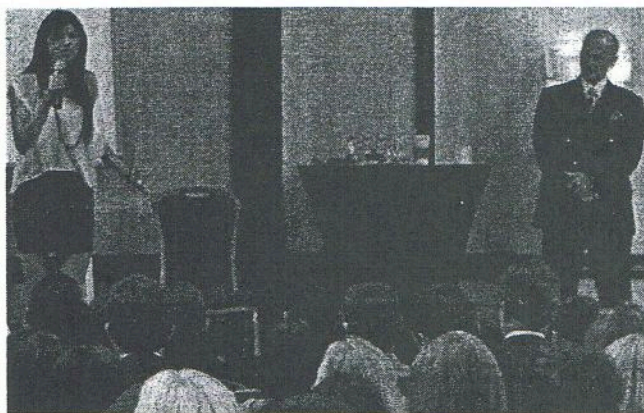


Rachele Brooke

Smith is a young aspiring Hollywood actress... and just like any other young aspiring Hollywood actress, she avidly craves for all the more media attention she could haul. And obviously it would also be nice if some guest appearance would succor defraying some of the accumulating arrears.

But no matter how thirst you are for extra heed or pressured to pay the bills, there are certain things you should never ever thrust yourself into. Something like, *I dunno*, collaborating with a fucking sadistic diablo such as the pseudo-healer Leonard Coldwell.

Sorrowfully, Rachele has been enmeshed by the talons of this pure-malice lunatic like other stray girls before her. Here she is speaking at one of the ogre's bullshit seminars as he gawks at her while sullied thoughts presumably emerge in this squalid mind of his:



Brooke Smith Entertainment and Lenny Coldwell on
http://www.granichweb.com/1456/rachele-brooke-smith-entertainment...
But merely looming at an inane private event isn't gratifying enough for delirious sociopaths who fabricate four "doctor degrees," *oh no*, those sorts of frenzied whackos need a more public endorsement to entice other credulous believers into their snare of misery and anguish.

Something like an ostensibly openhearted indebted YouTube video which would entirely exhaust the acting knack a performer could exert out of oneself ...

Rather than an appreciative message to the fakest doctor in the world, I think that this video exhibits exactly what types of persons psycho-Lenny prowls for ... the insecure, the lost, the anxious, the ones who are just susceptible enough to believe the unbelievable, to rely on the unreliable and to trust the untrustworthy.

Whether she realizes it or not, Rachele is being utilized in a reeking attempt to camouflage shit as a diamond. But this phony diamond will never shine nor shimmer. No matter how hard you try to disguise it, ultimately shit is just shit ... it's fetid and decomposable. And decompose it will.

I know that Rachele had been spurred to halt her cooperation with the Sick Machine at least once before, a suggestion she apparently rebuffed. Currently, Rachele is being planned to speak at an event of the turd's IBMS scam.

It's not too late for you, Rachele Brooke Smith. I've probed and found that there's a lot of good in you, a good which might be forever stained by your embroilment with the lesion of viciousness Leonard Coldwell if you keep striding in the same trajectory to HorrorLand.

You're very young and an ocean of opportunities may be ahead of you. Don't mangle everything you've worked and dreamed of for the horrid whims of one insanely demented lord of malady. Cancel your appearance and disengage all the cobwebs attached to this venomous centipede, or eventually you will *really* be stung.

Read Some More, Dummy:



The Leonard Coldwell Song



De-Brainwash Brainwash to



The IBMS Master's Society



The Only Answer to Becoming a

Tags: hollywood, IBMS Master's Society, leonard coldwell

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Aleksey Zuravlov • 6 months ago

Poor girl :(It's so sad. I hope her life will not be ruined by this psychopath.

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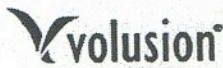


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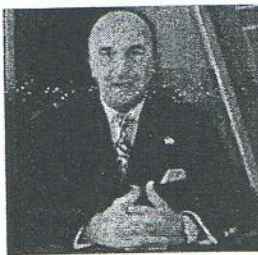
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Gun Control Commentary by a Psychopath

March 27, 2013
By [Omri Shabat](#)

Ladies and gentlemen... please give it up for the one man horror show, the lunatic co-leader of the IBMS cult, the scummiest piece of human flesh Mother Earth could originate and the molestation-connoisseur, Leonard "Falschen Arzt" Coldwell!



In a new video, the [pathogenic germ](#) with the grotesque mustache is gaudily displaying his stupendous dementia for the world to witness. And no, this isn't some sort of morbid parody... Coldwell is as serious as the cancer that kills the patients he pretends to heal.

If you can't stand the mere voice, the general appearance and/or the silly whiskers of rabid Coldwell, here's a laconic summary of the video:

- **First 1:20-** The quack frenziedly gesticulates with his desecrating hands all over the place as retro music plays (Lenny seems ominously delighted).
- **1:30-** Although it doesn't sit with the math, LoonyLenny explains how his great-grandfather found himself in a Nazi concentration camp because the Germans took all the guns away.
- **1:50-** Lenny elucidates that all liberal gun laws are illegal, end of story. "When we start to prosecute you for treason, you will see what you did wrong." Sounds totally sane.
- **2:30-** Lenny presents "facts, absolute facts" (which is apparently very different than just regular facts). But then he brings in his stupid opinions which are neither absolute facts nor just simple facts.
- **3:30-** Breaking news by Lenny: Katrina is a conspiracy of the government for gun control

EXHIBIT

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and gun confiscation. Yep.

- 5:00- Breaking news by Lenny 2: The police raped and gang-raped women in New Orleans (in addition of course to all the thefts and the looting). Okey-dokey.
- 6:00- Lenny gets confused again by facts and his own demented thoughts, "...a tyrannical government coming for you, coming to rape your wife, your children, take your children, take your food." Yeah, totally balanced.
- 6:30- The crazy shaman threatens (again) to hurl on Senators the one verdict for treason. Then he says he's a peaceful person. Right...
- 7:10- For those of you who didn't get the memo, Lenny notes that the U.S. is a corporation with jurisdiction solely within the borderlines of Washington, D.C. Take that Apple and Exxon!
- 7:45- Lenny mumbles something really incoherent about national parks and froggish endangered species, but I'm sure it's totally logical.
- 9:00- Lenny bellows some irrational warning as he compares Obama to Stalin, Hitler and Mussolini. Well, at least *this* current tantrum is not about race...
- 9:30- Delusional Lenny alleges the U.N. troops are about to infiltrate the U.S. and adds President Obama to the treason list.
- 10:00- One last tidbit by Lenny: The Fourteenth Amendment made everybody a U.S. citizen, and a U.S. citizen is a slave, and the U.S. citizens are not U.S. citizens, and the not-U.S. citizens are the people, and Coldwell is one of the people, and his friends are the people, one of the people.
- Last 1:30- This ridiculous thing

I first thought this video was super-hilarious, that it's really *SNL* material... but then I remembered all the cancer patients that dies, the young girls that being defiled and the gullible believers that being plundered by this fucking incubus who feigns to be a healer.

Fuck you Leonard Coldwell you sick bastard. Fuck you.

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The Leonard
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The Only Answer to Becoming a Desolation

April 8, 2013

By Omri Shabat



The mendacious dark enterprise of Mocktor Leonard Coldwell is attempting to expand furthermore... the cur is always famished for devouring innocent spirits in any way he could, and thereafter he farts solely malodorous gasses of misery as their tormented relics.

During one of his recent nefarious de-brainwash brainwash teleseminars, Coldwell's accomplice Peter Wink announced flamboyantly on a new perfidious endeavor they are beginning to disseminate, dubbed *Dr. C's Active Champion*:

Doctor Coldwell has done the unthinkable. He has done something that very few people will ever accomplish in their life, something that people have talked about and never were able to do it but Doctor Coldwell actually pulled it off. I remember when he first told me about this, I couldn't believe that he was gonna even go to do this himself.

Lord oh Lord, what this unthinkable thing could be? Does Coldwell wish to finally confess all his horrid crimes and felonies? Does he plan to return to his natural habitat in Abaddon? Or perhaps he just wants to declare that he shaved his Ron Jeremy-style mustache?

Not only is it a huge investment of time, it's a huge investment of money and it was an investment from his heart to everybody in the world. Yes, everybody in the world. I actually said that, everybody in the world. That's how big this man thinks. He is a big, big thinker.

This is already so incredibly shocking because up until now I didn't even imagine Lenny had a heart! And let's be honest here, Peter... Lenny never really was a big, big thinker... but mayhap just a big, big defiler.

He decided, now get this, he was going to launch his own health supplement line. His own line of health supplements.

So that's the big fucking mystery... a FDA-unapproved health supplement line contrived by a fake doctor who leads his own con-cult. Sounds promising!





The [About page](#) of this new crooked escapade says all sorts of funny stuff such as "100% Doctor Approved!" and "100% scientific and tradition backed formulas," while it doesn't allude anywhere that it's actually *not* a real doctor who had been certified to scientifically examine medical products... hilarious!

But who really gives a shit about that, it's just people's health on the line here!

Even though the [registrant](#) of activechampion.com is private, the site is being hosted on the same servers which quite interestingly also hosts three other exact websites (awesomesupplements.com, 321supplements.com and ncsupplements.com) and additional website that sells similar bogus health products (mybepure.com) owned by a company called *Universal Formulas*.

And *Universal Formulas* has a pretty intriguing historic relationship with NotDoctor Coldwell...

In September 2009, the FDA sent a [warning letter](#) to *Universal Formulas* because on its website UniversalFormulas.com there was a dangerous unauthorized medical recommendation by... Leonard Coldwell who had pretended to know shit about shit:

The FDA has determined that your website offers a product for sale that is intended to diagnose, mitigate, prevent, treat, or cure the H1N1 Flu Virus in people. This product has not been approved, cleared, or otherwise authorized by FDA for use in the diagnosis, mitigation, prevention, treatment, or cure of the H1N1 Flu Virus. This product is DR. COLDWELL'S ANTI-VIRAL/FLU PROTOCOL.

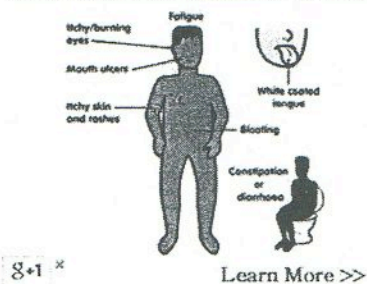
That wasn't so nice of you, Lenny... it's kinda like stating unauthorized perilous things like, *I dunno*, "100% Doctor Approved!" or "100% scientific and tradition backed formulas."

Today, all the three identical *Dr. C's Active Champion* websites are selling the shitty *Universal Formulas*' Bepure products, as the Bepure website itself [features](#) a pretty big (and stupidly spurious) endorsement of "Dr." Leonard Coldwell.

Leonard Coldwell already was reprimanded by the FDA for professing health assertions he knows nothing about. He continues to promote questionable health companies while he portrays himself as a doctor although he's just one ignominious pure festering ailment.

Now Leonard Coldwell commences his own line of threadbare unapproved health products and we need a robust remedy to rid us from this ill.

250 Million Infected in U.S.



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