Notes from Brody: **I called and visited around 15 attorneys and only ONE took it on contingency then to drop the case completely. I believe he was nefariously influenced or induced to drop it. Ever since, each attorney moving forward wanted $10K to $15K cash up front. I didn't have that!**

NOTICE: I, Brody Alan Hankinson could not get any attorney to take this case to court. They all wanted at least $10,000 cash up front.

#8 a

STATE OF NORTH CAROLINA	IN THE GENERAL COURT OF JUSTICE DISTRICT COURT DIVISION
COUNTY OF CATAWBA	17-CVD-_____
BRODY ALAN HANKINSON, Plaintiff, *vs*. RICHARD DOTY HALL, Defendant.	**COMPLAINT** **(Jury Trial Demanded)**

NOW COMES Plaintiff, complaining of Defendant, and pursuant to the North Carolina General Statutes ("N.C.G.S.") § 52-13 and the common law, says and alleges as follows:

FACTUAL BACKGROUND

1. Plaintiff, Brody Alan Hankinson (hereafter "Plaintiff"), is a citizen and resident of Mecklenburg County, North Carolina and has been for more than six (6) months preceding the institution of this action.

2. Defendant, Richard Doty Hall (hereafter "Defendant" or "Paramour"), is a citizen and resident of Catawba County, North Carolina and has been for more than six (6) months preceding the institution of this action.

3. Latosha Watts, formerly Latosha Hankinson (hereafter "Ms. Watts") is the ex-wife of Plaintiff and the girlfriend of Paramour.

4. Plaintiff and Ms. Watts were married in 2001.

5. Plaintiff and Ms. Watts are the parents of three (3) children born to the marriage of the parties, born in 2002, 2004, and 2006.

6. In July 2014, the Plaintiff and Ms. Watts separated from sexual relationships with each other. In June 2015, the parties were divorced by the Greenville, SC family court. One month later, July 2015, the Paramour moved Ms. Watts and the three (3) children into his Hickory lake home. In October 2015 the Plaintiff discovered the attached exhibits and additional proof of Paramour's affairs with Ms. Watts.

FIRST CLAIM FOR RELIEF
Alienation of Affections

7. Plaintiff hereby incorporates paragraphs one (1) through six (6) set forth above as if fully set forth herein. At all times relevant herein, pursuant to the North Carolina Rules of Civil Procedure, personal and subject matter jurisdiction is proper over the parties in this county because the cause of action arose in this county

8. Plaintiff and Ms. Watts were happily married "**Exhibit A"** from approximately 2001 to 2014, and a genuine love and affection existed between them. This genuine love and affection was evidenced by the fact that they were together for more than thirteen (13) years and had three (3) children together.

9. The genuine love and affection between Plaintiff and Ms. Watts was eliminated and destroyed. This is evidenced by the fact that the parties separated from all mutual love and affection in July 2014, and divorced "**Exhibit B"** on July 31 of 2015.

10. Paramour's wrongful and malicious conduct was the controlling and the effective cause of the alienation, or destruction of love and affection between Plaintiff and Ms. Watts. This is evidenced by the fact that Paramour had an isolated affair with Ms. Watts on or about September 2009. See the attached text message, enclosed hereto and marked "**Exhibit C**." The beginning of what would become a secret relationship between Ms. Watts and Paramour, and of which the Paramour's years of hidden ongoing seductive romantic affairs, one example marked "**Exhibit D"**, and financial inducements, one example evidenced by the fact Ms. Watts accepted gifts from the Paramour including a vehicle in 2013 marked "**Exhibit E and F**", another example from a 2013 trip marked "**Exhibit G",** another example from a second 2013 trip marked "**Exhibit H",** which eventually led Ms. Watts to leave her husband altogether and move into the Paramour's Hickory lake house marked "**Exhibit I"** only a few weeks after the South Carolina court affirmed the parties divorce.

11. Beginning in January 2013, upon information and belief Paramour and Ms. Watts were engaging in a romantic relationship hidden from Plaintiff. As evidence of this relationship, enclosed and marked "**Exhibit J, K, La, Lb, and Lc respectively**" are email messages sent between Ms. Watts and Paramour on January 25, 2013, February 26, 2013, and May 13, 2013. Specifically, the May 13, 2013, "**Exhibit La, Lb, and Lc**" message references the Paramour

providing financial gifts to Ms. Watts, the Paramour spending time with Ms. Watts, the Paramour sleeping with Ms. Watts, and the Paramour's "love" of Ms. Watts.

12. Paramour's wrongful and malicious conduct was the controlling or effective cause of the alienation experienced by Plaintiff. Upon information and belief, when Ms. Watts spent time with Paramour she would frequently abuse alcohol, and possibly other illegal drugs such as cocaine and pills that were not prescribed to her. This is further supported by the fact that, upon information and belief, in 2013 Paramour was convicted for possession of cocaine, and upon information and belief, Paramour was hospitalized in August 2015 due to alcohol abuse and overdose of cocaine-like substance.

13. Other activities that Ms. Watts engaged in as a result of Paramour's influence include working as a stripper at Platinum Plus Strip Club beginning in September 2012. During this same time period, upon information and belief, pursuant to Paramour's requests Ms. Watts was filmed in at least three (3) pornography videos. See "**Exhibit Ma, Mb, and Mc**." In the summer of 2014, Ms. Watts received a citation for driving under the influence. All of these actions taken by Ms. Watts are the result of Paramour's wrongful and malicious conduct and are inconsistent with her behavior she exhibited when a genuine love and affection existed between Ms. Watts and Plaintiff.

14. The alienation has resulted in real damages to the Plaintiff, shown in **"Exhibit N."** In December of 2014, Plaintiff learned that Paramour was visiting Ms. Watts more and more, and began to realize that Ms. Watts and Paramour were very likely having an affair. As a result, he became very mentally ill, had to seek psychological counseling, lost his ability to hold a full time job, lost his home, and since has experienced periods of homelessness. Further, Plaintiff lost ongoing financial support when Ms. Watts moved out of the home, lost his nuclear family that he had known and loved for over thirteen (13) years, lost the normally competent mother of his three (3) children who used to ensure the children maintained consistent daily habits to ensure an average growth rate and the healthy maintenance of teeth and hair, and who used to help all of the children achieve "A" and "A/B" school honor rolls. The alienation has harmed Plaintiff's relationships with his children, as the Paramour's actions directly restricted the three (3) children and the Plaintiff from spending time together, preventing the Plaintiff from exercising his fatherly love, guidance, and support to help educate, support, and structure the the children into well behaved, successful students, athletes, and social beings. In addition, the alienation has harmed his relationships with his own parents and other extended family.

SECOND CLAIM FOR RELIEF
Criminal Conversation

15. Plaintiff hereby incorporates paragraphs one (1) through fourteen (14) set forth above as if fully set forth herein.

16. As mentioned in Factual Background, above, Plaintiff and Ms. Watts were in a

lawful marriage from November 2001 until June 2015.

17. During the lawful marriage, Paramour had intimate relations with Ms. Watts without Plaintiff's knowledge or consent. This fact is evidenced by "**Exhibit La, Lb, and Lc**."

WHEREUPON, Plaintiff prays the Court as follows:

1. For the First Claim for Relief: That Plaintiff be awarded compensatory damages for the damage and harm that was caused by Paramour's wrongful and malicious conduct, including but not limited to the medical expenses that Plaintiff incurred as a result of his becoming ill upon learning about Paramour's affair with Ms. Watts; punitive damages in an amount to be determined by a jury that resulted from Paramour's wrongful and malicious conduct; and that Paramour be ordered to reimburse Plaintiff for the costs regarding these claims.

2. For the Second Claim for Relief: That Plaintiff be awarded punitive damages in an amount to be determined by a jury, and that Paramour be ordered to reimburse Plaintiff for the costs regarding these claims.

3. That this verified Complaint be taken by the Court as an Affidavit for all purposes.

4. That Plaintiff have such other and further relief as the Court may deem just and proper.

This the _____ day of _____, 20_____.

_____
Brody Alan Hankinson, *Pro Se*
Plaintiff

Exhibit N.

Latosha was persuaded by Rick to perjure to the Greenville SC family court, omitting the fact they had been having an affair, also a crime. **Damages from Rick's theft of my wife:**

- Latosha, was my lover, supporter, homemaker, and provided income for our household, with a value to our household at $70,000/year. 4 years x 70,000 = **$280,000**.
- Since Latosha was taken from me, her financial support left our household as well, and I lost our **$160,000** Greer home.
- I spent 15 weeks in jail (3 weeks in 2015, and 12 weeks in 206/2017 from past due child support which due to the Rick's theft of my wife and of her loss of income to our household). The physical and mental damage incurred from Rick's affairs causing my incarceration is $3000/week. 15 weeks x $3000/week = **$45,000**.
- Due to 15 weeks of incarceration, I didn't get to spend Christmas, New Years, or 2 Birthdays with my children. The damage incurred from Rick's affairs causing my children's loss of ALL access to me is $1500/child x 3 children x 15 weeks = **$67,500.**
- While I was most recently incarcerated, my car was repossessed because I couldn't make payment on time. My credit is now ruined requiring $5000 for an attorney to settle the credit issue and $35,000 to recover my vehicle. $35,000 + $5000 = **$40,000**.
- From 2013 to 2017, due to the mental and physical trauma from Rick's affairs I was unable to maintain a job. My last income value was $70,000/yr.. 4 x 70,000 = **$280,000**.
- From 2013 to 2015, 156 weeks, due to Rick's affairs, Latosha was taken out of my home and I was only able to spend ½ the week with my children. Damages due to MY loss of ½ the week with my children is $500/week. 156 weeks x 500/week = **78,000**. Damages due to each CHILD's loss of ½ the week with me is $500/week/child. 156 weeks x 500/week x 3 children = **224,000**.
- In 2016 and 2017, 52 weeks, due to Rick's affair, I was forced away from my children and did not get to spend ANY physical time with my children. Damages due to MY loss of ALL time with my children is $500/week. 52 weeks x 1000/week = **52,000**. Damages due to each CHILD's loss of ALL time with me is $1500/week/child. 52 weeks x 1500/week x 3 children = **234,000**.

Real Damages:

$280,000
$160,000
$ 45,000
$ 67,500
$ 40,000
$280,000

$ 78,000
$224,000
$ 52,000
$234,000
$1,460,500

Also, did Rick's actions invoke other parties to conspire to hide affairs, and/or were others financially induced to prevent notifying me of the affairs?