

FILED

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2011 DEC 22 AM 10:12

CLERK U.S. DISTRICT COURT  
CENTRAL DIST. OF CALIF.  
LOS ANGELES

BY CP

1 MARY CUMMINS  
2 Plaintiff  
3 645 W. 9th St. #110-140  
4 Los Angeles, CA 90015  
5 In Pro Per  
6 Telephone: (310) 877-4770  
7 Email: mmmaryinla@aol.com

8 UNITED STATES DISTRICT COURT  
9  
10 CENTRAL DISTRICT OF CALIFORNIA

11 MARY CUMMINS  
12 Plaintiff

13 v.

14 AMANDA LOLLAR aka BAT  
15 WORLD SANCTUARY an individual  
16 person, BAT WORLD SANCTUARY  
17 an unknown business entity, JOHN  
18 DOES 1-10  
19 Defendants

) Case No. CV11 08081 DMG (MANx)

) **FIRST AMENDED COMPLAINT**  
) **FOR DAMAGES**

) (Defamation, Defamation per se,  
) Interference with Business Relations,  
) Interference with Prospective Economic  
) Advantage, Infliction of Emotional  
) Distress)

) **DEMAND FOR JURY TRIAL**

18 Plaintiff Mary Cummins, (hereinafter "Plaintiff") alleges as follows:

19 **INTRODUCTION**

20 1. This is a diversity action against defendants Amanda Lollar, Bat World  
21 Sanctuary and John Does 1-10, asserting claims for defamation, defamation per se,  
22 interference with business relations, interference with prospective economic advantage  
23 and infliction of emotional distress. Plaintiff's action arises out of knowingly false and  
24 fraudulent statements about Plaintiff and other misconduct by Defendants Amanda  
25 Lollar aka Bat World Sanctuary, Bat World Sanctuary an unknown business entity and  
26 John Does 1-10 (hereinafter "Defendants") resulting in financial damage, public  
27 ridicule and emotional distress.  
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**JURISDICTION**

2. This court has subject matter jurisdiction based on complete diversity of citizenship pursuant to 28 U.S.C. §1332. Damages resulting from the matter exceed \$75,000 exclusive of costs.

**VENUE**

3. Venue in this district is proper under 28 U.S.C. §1391(a) because a substantial part of the events or omissions giving rise to the damages occurred in this district in Los Angeles County and Plaintiff lives in this district.

**PARTIES**

4. Plaintiff Mary Cummins is an individual, a resident and citizen of Los Angeles County, California.

5. Plaintiff is associated with Animal Advocates, a non-profit corporation with a principal place of business in Los Angeles County, California.

6. Defendant Amanda Lollar is a resident of Palo Pinto County, Texas. Amanda Lollar conducts business as Bat World Sanctuary; accordingly Bat World Sanctuary is the alter ego of Defendant Amanda Lollar.

7. Defendant Bat World Sanctuary is a unknown business entity with its principal place of business in Palo Pinto County, Texas.

8. Plaintiff does not know the true names and capacities of Defendants sued herein as DOES ONE through TEN, inclusive, and therefore sues these Defendants by such fictitious names. Plaintiff will amend this complaint to allege their true names and capacities when ascertained. Plaintiff is informed and believes and thereupon alleges that each of such fictitiously named Defendant is either an employee, volunteer, member, and or agent of Defendants, and is negligently and intentionally responsible in some manner for the occurrences herein alleged; and that Plaintiff's injuries as herein alleged were caused by these Defendant DOES' acts.

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**STATEMENT OF FACTS**

9. Plaintiff is the founder of non-profit organization Animal Advocates located in California. Plaintiff is permitted under license by the United States Department of Agriculture (USDA) and the California Department of Fish & Game (CADFG) to possess, rescue and rehabilitate ill, injured and orphaned native wildlife for release back to the wild. Plaintiff is trained, experienced and permitted under licenses to care for coyotes, bobcats, foxes, raccoons, opossums, skunks and all other small mammals including bats.

10. Plaintiff has published CADFG approved manuals on wildlife rehabilitation and instructs CADFG accredited classes to wildlife rehabilitators, veterinarians and animal care professionals.

11. Plaintiff has been trained at the Rio Hondo Police Academy and the California State Humane Association Animal Law Enforcement Academy to investigate animal cruelty and neglect. Plaintiff is currently on the Humane Society of the United States (HSUS) National Disaster Animal Response Team which handles animal cruelty and neglect cases.

12. Plaintiff's greatest asset is Plaintiff's personal business reputation and the Defendants alleged herein have made every effort to destroy Plaintiff's reputation.

13. Defendants have posted defamatory comments and articles about Plaintiff on the Internet and have emailed same to Government agencies and clients of Plaintiff. Defendants have falsely posted the following statements;

- Plaintiff "has a criminal record,"
- Plaintiff was "convicted" of "theft of property, forged name on credit card,"
- Plaintiff is a "cyberstalker," "cybersquatter,"
- Plaintiff was "picked up by police,"
- Plaintiff "hacked into our website" and "email list,"

- 1 • Plaintiff was “picked up by the LAPD anti-terrorism task force,”
- 2 • Plaintiff "posts pornography in children's chat rooms,”
- 3 • Plaintiff “commits animal cruelty,”
- 4 • Plaintiff “tortures animals,”
- 5 • Plaintiff is a “whore.”

6 All of these statements and more are false and were intentionally made with  
7 malicious intent to destroy the personal and business reputation of Plaintiff, and to  
8 destroy Plaintiff’s relationship with business contacts besides cause emotional distress.  
9 Here are but a few examples.

10 13 a. On May 10, 2011 Defendant Amanda Lollar posted on then public Yahoo  
11 group “worldbatline” (<http://pets.groups.yahoo.com/group/worldbatline>) posting as  
12 Yahoo user name “batworldsanctuary” using her Bat World Sanctuary email address of  
13 [sanctuary@batworld.org](mailto:sanctuary@batworld.org) (Exhibit 1) that Plaintiff “has a criminal record,” was found  
14 guilty of theft and forgery, “Case Number LAW95W00B78-01 Count 1 484E(A) PC  
15 PTY THFT:ACQ CRED CRD W/O CONS Count 2 484F(B) PC FORGE NAME ON  
16 CREDIT CARD Count 3 484G(A) PC THEFT BY FORG/INVALID CRED CAR  
17 Count 4 484(A) PC THEFT OF PROPERTY.” Defendant also posted that Plaintiff was  
18 involved in “cybersquatting,” and is “in contempt” of court. (Exhibit 2)

19 Plaintiff was never charged with or found guilty of petty theft, forgery, acquiring  
20 credit card without authorization, theft of property, cybersquatting or any other crime  
21 ever. Defendant was never found in contempt of court ever. Defendant accused  
22 Plaintiff of committing criminal acts which is libel, defamation per se. Defendant’s  
23 libel and defamation per se are harming Plaintiff’s business relations and causing  
24 injury to Plaintiff’s existing and future economic relationships besides inflicting  
25 emotional distress.

26 13 b. August 23, 2011 Defendant Amanda Lollar posted on her website [http://](http://www.amandalollar.com)  
27 [www.amandalollar.com](http://www.amandalollar.com) owned by Amanda Lollar (Exhibit 3) that Plaintiff made false  
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1 complaints to government agencies about Defendant, “Mary Cummins has made false  
2 complaints about Bat World Sanctuary to Texas Parks and Wildlife, the USDA, the  
3 Texas Veterinary Medical Board, the Texas Department of Health, USFWS, the  
4 Mineral Wells Department of Health, the City Manager, the Fire Marshal, Code  
5 Enforcement, the Chief of Police and we suspect the IRS.” (Exhibit 4)

6 Plaintiff did not file false complaints, reports with government agencies. It is a  
7 crime to file a false complaint to a government agency. Defendant accused Plaintiff of  
8 committing criminal acts which is libel, defamation per se. Defendant’s libel and  
9 defamation per se are harming Plaintiff’s business relations and causing injury to  
10 Plaintiff’s existing and future economic relationships besides inflicting emotional  
11 distress.

12 13 c. May 2, 2011 Defendant Amanda Lollar posted on then public Yahoo group  
13 “worldbatline” (<http://pets.groups.yahoo.com/group/worldbatline>) posting as Yahoo  
14 user name “batworldsanctuary” using her Bat World email address of  
15 [sanctuary@batworld.org](mailto:sanctuary@batworld.org) that Plaintiff “has a history of stalking and harassment,” and  
16 that Plaintiff had “claimed that she bumped her head while she was with us and that we  
17 owed her \$2,500 for a cat-scan. We refused to pay, of course, and now here we  
18 are.” (Exhibit 5)

19 Stalking is a State and/or Federal crime. Plaintiff has never been charged with or  
20 convicted of stalking or any other criminal act. Defendant has accused Plaintiff of  
21 extortion. Plaintiff never demanded \$2,500 from Defendant for a cat-scan. Defendant  
22 accused Plaintiff of committing criminal acts which is libel, defamation per se.  
23 Defendant’s libel and defamation per se are harming Plaintiff’s business relations and  
24 and causing injury to Plaintiff’s existing and future economic relationships besides  
25 inflicting emotional distress.

26 13 d. May 2, 2011 Defendant Amanda Lollar posted on then public Yahoo group  
27 “worldbatline” (<http://pets.groups.yahoo.com/group/worldbatline>) posting as Yahoo  
28

1 user name “batworldsanctuary” using her Bat World email address of  
2 sanctuary@batworld.org that Plaintiff “hacked into my email address last night as  
3 well.” (Exhibit 6)

4 Hacking is a Federal crime. Plaintiff has never been charged with or convicted  
5 of hacking or any other criminal act. Defendant accused Plaintiff of committing  
6 criminal acts which is libel, defamation per se. Defendant’s libel and defamation per se  
7 are harming Plaintiff’s business relations and causing injury to Plaintiff’s existing and  
8 future economic relationships besides inflicting emotional distress.

9 13 e. May 17, 2011 Defendant Amanda Lollar emailed from her email address  
10 sanctuary@batworld.org to the government agencies USDA, Texas Parks & Wildlife,  
11 City of Mineral Wells and others that “we are being stalked and harassed by a woman  
12 named Mary Cummins who has contacted numerous law enforcement officials over  
13 the last 10 months, making false and malicious claims against Bat WorldSanctuary and  
14 me. She is also targeting individuals whom I work closely with, including my  
15 attorney.” (Exhibit 7)

16 Plaintiff has never been charged with or convicted of stalking or any other  
17 criminal act. Stalking is a State and/or Federal crime. Plaintiff did not file false  
18 complaints, reports with government agencies. It is a crime to file a false complaint to  
19 a government agency. Defendant accused Plaintiff of committing criminal acts which  
20 is libel, defamation per se. The USDA oversees Plaintiff’s permits. Plaintiff does  
21 business with the USDA. Defendant’s libel and defamation per se are harming  
22 Plaintiff’s business relations and causing injury to Plaintiff’s existing and future  
23 economic relationships besides inflicting emotional distress.

24 13 f. May 8, 2011 Defendant John Doe posted on Victims of Miss Cummins  
25 blog http://victimsofmisscummins.blogspot.com that Plaintiff commits “animal  
26 cruelty.” (Exhibit 8)

1 Animal cruelty is a crime. Plaintiff has never been charged with or found guilty  
2 of animal cruelty or any other crime. Defendant accused Plaintiff of committing a  
3 criminal act which is libel, defamation per se. Defendant's libel and defamation per se  
4 are harming Plaintiff's business relations and causing injury to Plaintiff's existing and  
5 future economic relationships besides inflicting emotional distress.

6 14. Plaintiff sent two cease and desist emails on May 2 and May 11, 2011 to  
7 Defendant Amanda Lollar and Bat World Sanctuary in care of their attorney Randy  
8 Turner of Turner & McKenzie in Fort Worth, Texas instructing Defendant to cease and  
9 desist from libeling and defaming Plaintiff. (Exhibits 9, 10) Plaintiff stated that  
10 Defendant was committing libel and defamation per se. The libel and defamation was  
11 not removed from the Internet. Defendant did not stop emailing, posting the libel and  
12 defamation.

13 15. Defendants published a death threat against Plaintiff and extorted her on the  
14 Internet.

15 16. Defendants are instructing people to file false reports of "animal cruelty"  
16 and "animal torture" to the CADFG. Defendants have and are continuing to instruct  
17 people via posts on blogs to demand that CADFG take away Plaintiff's permits and  
18 shut down Plaintiff's animal rescue group Animal Advocates.

19 17. Defendants defamed Plaintiff on websites located in California including but  
20 not limited to Indymedia.org, YouTube.com, Yahoo.com, Google.com, Blogger.com  
21 and Facebook.com. These statements were posted by Defendants with malicious intent  
22 to harm Plaintiff's reputation, Plaintiff's business relations and Plaintiff's animal  
23 rescue group Animal Advocates.

24 18. Defendants sent emails and letters to various Governmental agencies and  
25 others making similar false statements. These agencies are the USDA, CADFG, Texas  
26 Parks and Wildlife Department, City of Mineral Wells, Bat Conservation International,  
27 friends of Plaintiff and many others. Most if not all of Defendants' statements are  
28

1 defamatory and have injured Plaintiff's reputation, thereby exposing Plaintiff to public  
2 hatred, contempt or ridicule, and financial injury.

3 **CLAIM ONE**

4 (Defamation)

5 (California Civil Code §§ 44, 45a, and 46)

6 Plaintiff realleges and incorporates herein the allegations of paragraphs 1  
7 through 18 of this complaint, as though fully set forth herein.

8 Defendants knowingly published false statements of fact such as but not limited  
9 to Plaintiff "has a criminal record," Plaintiff was "convicted" of "theft of property,  
10 forged name on credit card," Plaintiff is a "cyberstalker," "cybersquatter," Plaintiff was  
11 "picked up by police," Plaintiff "hacked into our website" and "email list," Plaintiff  
12 was "picked up by the LAPD anti-terrorism task force," Plaintiff "posts pornography  
13 in children's chat rooms," Plaintiff "commits animal cruelty," Plaintiff "tortures  
14 animals," and Plaintiff is a "whore." Defendants knew or should have known that the  
15 statements of fact made against Plaintiff were false.

16 Defendants were not privileged to publish false statements about Plaintiff.

17 The false statements published by Defendants have a natural and inherent  
18 tendency to injure Plaintiff's reputation and expose Plaintiff to public ridicule and  
19 shame.

20 Defendants acted with malice, oppression and fraud in publishing the false  
21 statements of fact as described herein.

22 As a direct result of Defendants' conduct set forth herein, Plaintiff has suffered  
23 and will continue to suffer lost income, damages to reputation, shame, humiliation, and  
24 emotional suffering.

25 **CLAIM TWO**

26 (Defamation Per Se)

27 (California Civil Code § 45a)

1 Plaintiff realleges and incorporates herein the allegations of paragraphs 1  
2 through 18 of this complaint, as though fully set forth herein.

3 Defendants knowingly published false statements of fact such as but not limited  
4 to Plaintiff “has a criminal record,” Plaintiff was “convicted” of “theft of property,  
5 forged name on credit card,” Plaintiff is a “cyberstalker,” “cybersquatter,” Plaintiff was  
6 “picked up by police,” Plaintiff “hacked into our website” and “email list,” Plaintiff  
7 was “picked up by the LAPD anti-terrorism task force,” Plaintiff “posts pornography  
8 in children's chat rooms,” Plaintiff “commits animal cruelty,” Plaintiff “tortures  
9 animals,” and Plaintiff is a “whore.” Defendants knew or should have known that the  
10 statements of fact made against Plaintiff were false.

11 Defendants were not privileged to publish false statements about Plaintiff.

12 The false statements published by Defendants have a natural and inherent  
13 tendency to injure Plaintiff’s reputation and expose Plaintiff to public ridicule and  
14 shame.

15 Defendants acted with malice, oppression and fraud in publishing the false  
16 statements of fact as described herein.

17 The false statements of fact published by Defendants constitute defamation per  
18 se, i.e. broadcast or written publication of a false statement about another which  
19 accuses him/ her of a crime, immoral acts, inability to perform his/her profession,  
20 having a loathsome disease or dishonesty in business.

21 As a direct result of Defendants’ conduct set forth herein, Plaintiff has suffered  
22 and will continue to suffer lost income, damages to reputation, shame, humiliation, and  
23 emotional suffering.

24 **CLAIM THREE**

25 (Intentional Interference with Business Relations)  
26 (California Business and Professions Code § 17200)

1 Plaintiff realleges and incorporates herein the allegations of paragraphs 1  
2 through 18 of this complaint, as though fully set forth herein.

3 Plaintiff has a real estate appraisal business and non-profit organization.  
4 Defendants intended to damage and have damaged Plaintiff personally,  
5 Plaintiff's real estate business and non-profit organization Animal Advocates.

6 **CLAIM FOUR**

7 (Intentional Interference with Prospective Economic Advantage)  
8 (California Business and Professions Code § 17200)

9 Plaintiff realleges and incorporates herein the allegations of paragraphs 1  
10 through 18 of this complaint, as though fully set forth herein.

11 Defendants' wrongful conduct are a substantial factor in causing injury to  
12 Plaintiff's existing and future economic relationships.

13 **CLAIM FIVE**

14 (Intentional Infliction of Emotional Distress)

15 Plaintiff realleges and incorporates herein the allegations of paragraphs 1  
16 through 18 of this complaint, as though fully set forth herein.

17 Defendants' conduct was outrageous.

18 Defendants intended to cause Plaintiff emotional distress and they acted with  
19 reckless disregard of the rights, privileges and economic advantages of Plaintiff.

20 As a direct consequence of Defendants' actions as described herein, Plaintiff  
21 suffered and continues to suffer severe emotional distress.

22 Defendants' conduct was a substantial factor in causing Plaintiff's severe  
23 emotional distress.

24 **REQUEST FOR PERMANENT INJUNCTION**

25 Upon final trial of the merits of this cause, Plaintiff requests that this Court enter  
26 an order permanently enjoining Defendants from allowing the false statements  
27  
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1 described above to remain on the Internet, be reposted on the Internet or  
2 communicated in any form.

3 **PRAYER FOR RELIEF**

4 Wherefore, Plaintiff prays for judgment against Defendants, and each of them,  
5 jointly and severally, for:

6 General and special damages, in an amount to be determined at trial;

7 Economic loss and loss of other benefits due as a result of defendants' wrongful  
8 conduct in the amount of \$250,000;

9 Damages of pain, suffering and emotional distress, in an amount to be  
10 determined at trial;

11 Exemplary and punitive damages;

12 Reasonable costs of suit and attorney fees if any; and

13 Such other relief as the Court may deem just and proper.

14  
15 Respectfully submitted,

16   
17 \_\_\_\_\_  
18 Mary Cummins, Plaintiff

19 Dated: September 28, 2011  
20 645 W. 9th St. #110-140  
21 Los Angeles, CA 90015  
22 In Pro Per  
23 Telephone: (310) 877-4770  
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# EXHIBIT 1

- bat-universe.com
- travelbatworldwide.com
- worldct.com **\$6,100**
- worldbc.com **\$4,388**
- batsleeves.com **\$1,499**

[View more](#)

**Add Selected to Cart**

batworld.org

Is this your domain name? [Renew it now.](#)



BOOKMARK

**IP Address:** 205.178.145.65 (ARIN & RIPE IP search)

**Record Type:** Domain Name

**Server Type:** Apache 1

**WebSite Status:** Active

Access to .ORG WHOIS information is provided to assist persons in determining the contents of a domain name registration record in the Public Interest Registry registry database. The data in this record is Public Interest Registry for informational purposes only, and Public Interest Registry does not guarantee its accuracy. This service is intended only for query-based access. You agree that you will use this data only for lawful purposes and that, under no circumstances will you use this data to: (a) allow, enable, or otherwise support the transmission by e-mail, telephone, or facsimile of mass unsolicited, commercial advertising or solicitations to entities other than the data recipient's own existing customers; or (b) enable high volume, automated, electronic processes that send queries or data to the systems of Registry Operator, a Registrar, or Afilias except as reasonably necessary to register domain names or modify existing registrations. All rights reserved. Public Interest Registry reserves the right to modify these terms at any time. By submitting this query, you agree to abide by this policy.

Domain ID:D7110894-LROR  
 Domain Name:BATWORLD.ORG  
 Created On:08-Jun-1999 21:08:14 UTC  
 Last Updated On:20-Jul-2011 00:25:14 UTC  
 Expiration Date:08-Jun-2017 21:08:51 UTC  
 Sponsoring Registrar:eNom, Inc. (R39-LROR)

Status:OK

Registrant ID:CR76230558  
Registrant Name:Bat World Sanctuary  
Registrant Organization:Bat World Sanctuary  
Registrant Street1:217 North Oak Street  
Registrant Street2:  
Registrant Street3:  
Registrant City:Mineral Wells  
Registrant State/Province:Texas  
Registrant Postal Code:76067  
Registrant Country:US

Registrant Phone:+1.940325340

Registrant Phone Ext.:

Registrant FAX:+1.999999999

Registrant FAX Ext.:

Registrant Email:sanctuary@batworld.org

Admin ID:CR76230562

Admin Name:Bat World Sanctuary

Admin Street1:217 N OAK AVE

Admin Street2:

Admin Street3:

Admin City:MINERAL WELLS

Admin State/Province:Texas

Admin Postal Code:76067-4946

Admin Country:US

Admin Phone:+1.9403253404

Admin Phone Ext.:

Admin FAX:+1.9403253404

Admin FAX Ext.:

Admin Email:sanctuary@batworld.org

Tech ID:CR76230560

Tech Name:Bat World Sanctuary

Tech Organization:Bat World Sanctuary

Tech Street1:217 North Oak Street

Tech Street2:

Tech Street3:

Tech City:Mineral Wells

Tech State/Province:Texas

Tech Postal Code:76067

Tech Country:US

Tech Phone:+1.940325340

Tech Phone Ext.:

Tech FAX:+1.999999999

Tech FAX Ext.:

Tech Email:sanctuary@batworld.org

Name Server:NS1.SUPERBREGISTRAR.NET

Name Server:NS2.SUPERBREGISTRAR.NET

Name Server:

Name Server:

Name Server:

Name Server:

Name Server:

Name Server:

Name Server:

Name Server:

Name Server:

Name Server:

# EXHIBIT 2

Hi, mary Sign Out Help

Make Y! Your Homepage

Yahoo! Mail

YAHOO! GROUPS

Search

Web Search

**SOLAR HOMES!**  
**LENNAR®**



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worldbatline · World Bat Line

Search for other groups...

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Home  
Messages



Click here for the latest updates on Groups Message search

Members Only

- Post
- Files
- Photos
- Links
- Database
- Polls
- Calendar
- Promote
- Groups Labs (Beta)

Messages

Messages Help

Message #  Go Search:  Search Advanced

Mary Cummins

Message List

Reply

Message #33659 of 33660 < Prev | Next >

Re: Mary Cummins

Tue May 10, 2011 6:49 pm

Yes, she also has a criminal record:

Show Message Option

Case Number LAW95WooB78-01  
 Count 1 484E(A) PC PTY THFT:ACQ CRED CRD W/O CONS  
 Count 2 484F(B) PC FORGE NAME ON CREDIT CARD  
 Count 3 484G(A) PC THEFT BY FORG/INVALID CRED CAR  
 Count 4 484(A) PC THEFT OF PROPERTY

**"batworldsanctuary"**  
 <sanctuary@...>  
 batworldsanc...  
 Offline  
 Send Email

Other lawsuits involve cybersquatting which she lost via default judgment (BC329942, FAA BEVERLY HILLS INC VS MARY CUMMINGS ET AL), neighbor dispute which she promptly settled (BC259366, Simas v. Cummins) and defamation which plaintiff abandoned because they were able to get rid of her defamation (LC049092).

She also goes by Mary Cummins, Mary Cummins-Cobb and Mary Katherine Cummins. And sometimes her name shows up as Mary Cummings. And she has used the same email mmmaryinla@... for years. She has hundreds of aliases she uses as well.

Right now she's encouraging her facebook friends to re-post the videos and defamation I've managed to get removed. These are the same items

Yahoo! Groups Tips

Did you know...  
 Real people. Real stories. See how Yahoo! Groups impacts members worldwide.

Best of Y! Groups



Check them out and nominate your group.

Already receiving group email?

she was ordered to remove by the court, so she is now in contempt. She's either thinks she's above the law, or that this will never catch up to her. She typically bullies and harasses her victims into giving up, but that is not going to work for her this time around.

Thank you Debbie, for your words of encouragement on our blog. That really means a lot to us!

Amanda

--- In worldbatline@yahoogroups.com, Deborah Cottrell <doctorcottrell@...>

wrote:

>

> I'm sure a lot of you have seen this, but I found this link about "Psycho

> Mary Cummins." Her cyberstalking history goes back to at least 2002. Check

> this out:

>

> <http://mary-cummins-animal-advocates-crackpo.blogspot.com/>

>

> Debbie Cottrell DVM

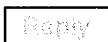
> [westendanimal.com](http://westendanimal.com)

>

>

> [Non-text portions of this message have been removed]

>



Message #33659 of 33660 < Prev | Next >

Expand Messages

Author Sort by Date

Mary Cummins

I'm sure a lot of you have seen this, but I found this link about "Psycho Mary Cummins." Her cyberstalking history goes back to at least 2002. Check this out: ...

Deborah Cottrell 6:37 pm  
deborah\_cott...



Re: Mary Cummins

Yes, she also has a criminal record: Case Number LAW95W00B78-01 Count 1 484E(A) PC PTY THFT:ACQ CRED CRD W/O CONS Count 2 484F(B) PC FORGE NAME ON CREDIT CARD ...

batworldsanctuary 6:53 pm  
batworldsanc...



< Prev Topic | Next Topic >

# EXHIBIT 3

Log In

Forgot Password? | Create Account

empty

Deals of the Day

24/7 Sales & Support (480) 505-8877  
Hablamos Español

Our Commercials

Bob's Video Blog

Help & Forums

Domains Hosting Email Websites Business SSL & Security Resellers Affiliates Auctions My Account

WHOIS search results for:  
**AMANDALOLLAR.COM**  
(Registered)

**Is this your domain?**  
Add hosting, email and more.

**Want to buy this domain?**  
Get it with our Domain Buy service.

The data contained in GoDaddy.com, LLC's WHOIS database, while believed by the company to be reliable, is provided "as is" with no guarantee or warranties regarding its accuracy. This information is provided for the sole purpose of assisting you in obtaining information about domain name registration records. Any use of this data for any other purpose is expressly forbidden without the prior written permission of GoDaddy.com, LLC. By submitting an inquiry, you agree to these terms of usage and limitations of warranty. In particular, you agree not to use this data to allow, enable, or otherwise make possible, dissemination or collection of this data, in part or in its entirety, for any purpose, such as the transmission of unsolicited advertising and solicitations of any kind, including spam. You further agree not to use this data to enable high volume, automated or robotic electronic processes designed to collect or compile this data for any purpose, including mining this data for your own personal or commercial purposes.

Please note: the registrant of the domain name is specified in the "registrant" field. In most cases, GoDaddy.com, LLC is not the registrant of domain names listed in this database.

Registrant:  
Bat World Sanctuary

217 N. Oak Ave  
Mineral Wells, Texas 76067  
United States

Registered through: Go Daddy  
Domain Name: AMANDALOLLAR.COM  
Created on: 08-May-11  
Expires on: 08-May-13  
Last Updated on: 08-Aug-11

Administrative Contact:  
Lollar, Amanda sanctuary@batworld.org  
Bat World Sanctuary  
217 N. Oak Ave  
Mineral Wells, Texas 76067  
United States  
+1.9403253404

Technical Contact:  
Lollar, Amanda sanctuary@batworld.org  
Bat World Sanctuary  
217 N. Oak Ave  
Mineral Wells, Texas 76067  
United States  
+1.9403253404

Domain servers in listed order:  
NS71.DOMAINCONTROL.COM  
NS72.DOMAINCONTROL.COM

Registry Status: clientDeleteProhibited  
Registry Status: clientRenewProhibited  
Registry Status: clientTransferProhibited  
Registry Status: clientUpdateProhibited

[See Underlying Registry Data](#)  
[Report Invalid Whois](#)

### NameMatch Recommendations

GoDaddy.com NameMatch has found similar domain names related to your search. Registering multiple domain names may help protect your online brand against internet squatters who could try to buy up these names in the hopes of selling them to you at an inflated price. It also enables you to capture more Web traffic, which you can then direct to your primary domain.

#### Domains available for new registration:

##### Similar Premium Domains

- AmandaRoot.com \$1,299.00\*
- AmandaReed.com \$1,449.00\*
- AmandaBoston.com \$1,125.00\*
- AnArmAndALeg.com \$188.00\*
- LaQuemanda.com \$11,888.00\*
- MandataRioS.com \$1,288.00\*

#### Domains available at Go Daddy Auctions®:

- freedollarcoupons.com \$25.00\*  
Ends on: 3/11/2012 6:05:00 AM PST
- threedollarmeals.com \$500.00\*  
Ends on: 3/9/2012 2:15:00 PM PST
- urthedollar.com \$7,500.00\*  
Ends on: 2/7/2012 5:03:00 AM PST
- mrdollar.net \$280.00\*  
Ends on: 1/15/2012 7:09:00 PM PST
- converteurotodollar.com \$1,172.00\*  
Ends on: 1/13/2012 2:02:00 PM PST
- thedollar diary.com \$280.00\*  
Ends on: 1/13/2012 3:18:00 AM PST

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- [Private Registration](#)
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\*Plus ICANN fee of \$0.18 per domain name year.  
\*\* CA domain names will be registered through Go Daddy Domains Canada, Inc., a CIRA certified registrar.

# EXHIBIT 4

# **Advocates, for Defamation**

## Defamation Law Suit

### **Amanda Lollar suing Mary Cummins, President of Animal Advocates, for Defamation due to Recent False and Malicious Allegations of Cruelty.**

Distasteful as we find this, we felt it necessary to create this page to counteract the defamation and harm Ms Mary Cummins, of Animal Advocates, is causing, and continues to cause, to our organization.

In brief, Ms. Cummins attended what was to be a two-week internship at Bat World Sanctuary in June of 2010. Ms.Cummins became disgruntled over the duties involved and left the internship within a few days. She then proceeded to maliciously post copyrighted and defamatory information over the Internet regarding Bat World Sanctuary and our Founder and President, Amanda Lollar. More recently, copyrighted videos from Amanda Lollar's most recent book were illegally downloaded and altered in an attempt to display cruelty, then uploaded to youtube. Bat World Sanctuary and Amanda Lollar filed a lawsuit against Mary Cummins on September 15, 2010.

Mary Cummins has made false complaints about Bat World Sanctuary to Texas Parks and Wildlife, the USDA, the Texas Veterinary Medical Board, the Texas Department of Health, USFWS, the Mineral Wells Department of Health, the City Manager, the Fire Marshal, Code Enforcement, the Chief of Police and we suspect the IRS. Each and every one of the officials who investigated her complaints found them to be completely without merit. (Note: An official report from USDA is forthcoming and will be uploaded here when available.)

A Court Injunction against Mary Cummins was granted to Bat World Sanctuary and Amanda Lollar on May 4th, 2011, demanding Mary Cummins immediately remove the defamatory and malicious statements she has made about Bat World Sanctuary and Amanda Lollar from the internet. Ms. Cummins has deliberately violated the Court's order by repeatedly ignoring the Injunction in addition to posting more defamation. A Motion for Contempt was filed on May 16, 2011. Read more about Mary Cummins and her long history of stalking and defaming others:[1](#), [2](#), [3](#)

**[Click here to view an example of the defamation](#)**

**[Click here to view the Lawsuit](#)**

**[Click here to view the Injunction](#)**

**[Click here to view the Motion for Contempt](#)**

# EXHIBIT 5

Hi, mary Sign Out Help


Make Y! Your Homepage

Yahoo! Mail

YAHOO! GROUPS

Search

Web Search



**AUSTIN RESTAURANT DEALS**

living social

GET DEALS! →

Start a Group | My Groups

worldbatline · World Bat Line

Search for other groups...

Search

Home Messages



Click here for the latest updates on Groups Message search

Members Only

- Post
- Files
- Photos
- Links
- Database
- Polls
- Calendar
- Promote
- Groups Labs (Beta)

Messages

Messages Help

Message #  Go Search:  Search Advanced

(no subject)

Message List

Reply

Message #33587 of 33590 < Prev | Next >

WBL: Re: Suzy's post

Mon May 2, 2011 2:15 pm

Show Message Option

She came to our internship and left disgruntled after four days. I suspect it was harder than she thought it was going to be and couldn't take the workload. After she returned home to CA she claimed that she bumped her head while she was with us and that we owed her \$2,500 for a cat-scan. We refused to pay, of course, and now here we are.

**"batworldsanctuary"**  
 <sanctuary@...>  
 batworldsanc...  
 Offline  
 Send Email

She has a history of stalking and harassment. We never thought about running criminal background checks on interns before she came along, but that's what we are doing now.

Amanda

--- In worldbatline@yahoogroups.com, "Radar" <fewerr@...> wrote:  
 >  
 > Why is she doing this? Did she come in as a spy for some animal rights thing  
 > or what. Does she have something against you a personal thing. Just strange  
 > she would do this. She has her own advacate group doesn't she. Thought I saw  
 > her name linked to something like that.  
 >

Yahoo! Groups Tips

Did you know...  
 Real people. Real stories. See how Yahoo! Groups impacts members worldwide.

Best of Y! Groups



Check them out and nominate your group.

Already receiving group email?

# EXHIBIT 6

Why is she doing this? Did she come in as a spy for some animal rights thing or what. Does she have something against you a personal thing. Just strange she would do this. She has her own advacate group doesn't she. Thought I saw her name linked to something like that. -----Original Message----- From: batworldsanctuary Date: 5/2/2011 3:44:32 PM To: worldbatline@yahoogroups.com Subject: WBL: ...

[Show more post info](#)

#### Reply 4: Re: WBL: Re: Suzy's post

Amanda and others - I am very sorry. The mentioned E-mail did not come from me. I was surprised when it showed up on my incoming mail with my e-mail address as sender. That was the first I had seen it. My E-mail account with AOL has been Hacked. (I am so mad I could spit.) This is not the first time, but the first time in a very long time. Amanda - I have not met you, but have been on this list a...

[Show more post info](#)

#### Reply 5: WBL: Re: Suzy's post

She came to our internship and left disgruntled after four days. I suspect it was harder than she thought it was going to be and couldn't take the workload. After she returned home to CA she claimed that she bumped her head while she was with us and that we owed her \$2,500 for a cat-scan. We refused to pay, of course, and now here we are. She has a history of stalking and harassment. We never ...

[Show more post info](#)

#### Reply 6: Re: WBL: Re: Suzy's post

Suzy, personally, I was thinking you were saying the person posting all these accusations needed to be prosecuted. Yet she is. According to what Amanda posted regarding actions being taken, both past and present, May does not seem to be this girl's month. Good luck regarding your hack investigation. On Mon, May 2, 2011 at 5:09 PM, <heckhaven@... > wrote: > Amanda and others - I am very sorry. > ...

[Show more post info](#)

#### Reply 7: WBL: Re: Suzy's post

Thank you Suzy, I appreciate your response and am very relieved to hear this wasn't from you. (And I apologize for being a smartass.) "Someone" hacked into my email address last night as well. The email you sent to wbl has been showing up all over the place, including to all the USFWS attendees I met with last summer and most of my address book. This person is web-savvy so is able to hack into ...

[Show more post info](#)

#### Reply 8: Re: WBL: Re: Suzy's post

If they trace the hack back to her keep that info and forward

[Just received an email that I won 1.5 million pounds....](#)

[I uploaded a YouTube video - No Subject video uploaded...](#)

[News: Messages - \(no subject\).mp4 Messages - \(no...](#)

[No Subject-Matter Jurisdiction = Case Dismissed - JREF...](#)

# EXHIBIT 7

**Laura Russell**

---

**From:** Karen Pianka  
**Sent:** Tuesday, May 17, 2011 9:45 AM  
**To:** Elsa Bosque  
**Cc:** Karen Pianka  
**Subject:** Responsive documentation to Open Records Request 2011-05-R15 Cummins, Mary: FW: From Bat World Sanctuary  
**Attachments:** BatWorldSanctuaryvsMaryCummins.pdf; BWS-vs-MaryCummins-Injunction.pdf; BatWorld letter-DrRosen.doc

Karen Pianka  
Wildlife Permits Coordinator  
Texas Parks & Wildlife  
4200 Smith School Road  
Austin, Texas 78744  
(512) 389-4491

---

**From:** Bat World Sanctuary [mailto:sanctuary@batworld.org]  
**Sent:** Tuesday, May 10, 2011 8:23 AM  
**To:** Karen Pianka  
**Cc:** Tad Jarrett, DVM; Cynthia.L.Digesualdo@aphis.usda.gov; David Modgling; Donna; [REDACTED]; Diane Odegard  
**Subject:** From Bat World Sanctuary

Hello Ms. Pianka,

I spoke with my local veterinarian, Dr. Tad Jarrett, yesterday evening and he stated that you had called him. I'm writing to let you know that we are being stalked and harassed by a woman named Mary Cummins who has contacted numerous law enforcement officials over the last 10 months, making false and malicious claims against Bat World Sanctuary and me. She is also targeting individuals whom I work closely with, including my attorney.

Dr. Jarrett has had three suspicious phone calls this week and disclosed to me yesterday evening that he was hesitant to speak to you. I encouraged him to contact you and let you know that he does work closely with me. I have attached a letter from another veterinarian whom I work closely with, Dr. Lynsey Rosen. I have also attached our lawsuit and a copy of our injunction that was recently granted against Mary Cummins. Unfortunately she is not complying with the court order and has instead engaged herself in more attacks on our organization. She is also encouraging her Facebook friends to do the same.

I have cc'd Dr. Jarrett, my USDA officer (who investigated us yesterday) as well as David Modgling, our local Texas Parks and Wildlife Game Warden (who investigated our facility about two weeks ago) Donna Robbins, Mineral Wells Health Inspector/Code Enforcement, and Diane Odegard, with Bat Conservation International, and my attorney, Randy Turner, all of whom have also visited Bat World Sanctuary.

I will be happy to answer any questions you may have and can also be reached at 940-325-3404.

Thank you very much.

Amanda Lollar

---

# EXHIBIT 8

Share Report Abuse Next Blog»

Create Blog Sign In

# Victims of Miss Cummins

This blog is dedicated to the many victims of Mary Cummins of Animal Advocates, located in Beverly Hills, California, who have been and continue to be harassed, threatened, stalked, tormented, defamed, slandered, blackmailed, abused, ripped off, or otherwise harmed by her. Fighting fire with fire.

*We as Americans have the right to state that someone's a jerk. We have the right to call people liars. ~ Mary Cummins (2001)*

Andy May 4 2011

## Latest videos of animal cruelty...

...and blatant abuse of her wildlife rehabilitation permit.

If people only knew this was **totally wrong and inappropriate**. What will it take for the California Department of Fish & Game or the Humane Society to get involved and stop her from doing this. She is So pathetic!

LISTEN TO THE AUDIO ON THIS CLIP

**MARY FORCES THE BABY OPOSSUM TO PERFORM TO LOOK 'SCARY' FOR THE CAMERA!**



**SUBJECTING A WILD ANIMAL TO STRESS JUST FOR THE CAMERA IS NOT ACCEPTABLE!**

at 4:53:00 PM

Recommend this on Google

## 5 comments:

**Anonymous said...**

I've been wondering about this for a long time. I can't stand seeing stressed animals being held around the throat this way, and thought I was the only one that felt uncomfortable viewing this. These poor animals are frightened out of their wits and for what? So everyone can view them and say 'awwww, how cute?'. Glad to see that others see how wrong this truly is. Thank you

### Blog Archive

- ▼ 2011 (21)
  - ▶ October (1)
  - ▶ September (4)
  - ▶ August (1)
  - ▶ June (1)
  - ▼ May (11)
    - Mary, STOP!
    - Questionable use of funds...
    - Mary Cummins labeled a cyberstalker
    - Contempt of Court
    - Bat World v Mary Cummins on IndyBay
    - Ahhhh, a look back at the good ol' days
    - A long history of cyberstalking
    - Caught in the act...
    - Justice served
    - Latest videos of animal cruelty...
    - Mary's recent conduct forces new lawsuit
- ▶ April (1)
- ▶ February (2)
- ▶ 2010 (6)

**From:** Mary Cummins <mmmaryinla@aol.com>

**To:** rañdy@turnermckenzie.com; randall@turnermckenzie.com

**Subject:** Cease and desist to Amanda Lollar

**Date:** Mon, May 2, 2011 3:24 pm

---

Because Lollar is represented by you, I cannot contact her directly. I am therefore sending this cease and desist to you.

Your client is posting the following completely untrue things on the public internet about me. She is also sending it to my FB friends and having others post it on my accounts.

She posted that I hacked her email account, I have a criminal history, I stalk people, I helped her mutilate the pregnant bat, I left Bat World after only four days because the workload was too much, I asked her to pay for a \$2,500 cat scan when I hit my head, the police are now prosecuting me... All of these things are absolutely and completely untrue. I saved copies of all of them. This is libel and defamation per se.

I have no criminal history at all. I've had numerous DOJ background checks to work with abused kids, go to the police academy and have my professional licenses. I've been the victim of a stalker. I have never stalked anyone. I videotaped Lollar mutilating the bat. I did not participate. I never had a cat scan nor did I ask her to pay for one. I just spoke with Mineral Wells police. They are not prosecuting or investigating me. They are investigating Lollar and Bat World. The USDA and Texas Parks & Wildlife are also investigating her.

Please, tell your client to cease and desist from libeling and defaming me.

I will see you Wednesday at the hearing. I leave tomorrow at 10:00 a.m. If there is any change, please, let me know before that time or as soon as possible. (310) 877-4770. Thanks.

Mary Cummins

Animal Advocates

<http://www.AnimalAdvocates.us>

<http://www.Facebook.com/AnimalAdvocatesUSA>

<http://AnimalAdvocatesWildlifeRehabilitation.Blogspot.com>

CA DFG permitted Wildlife Rehabilitator

Rio Hondo Police Academy

State Humane Association of California

Animal Law Enforcement Academy

HSUS NDART, EARS

IWRC, NWRA, CCWR

# EXHIBIT 9

# EXHIBIT 10

**From:** Mary Cummins <mmmaryinla@aol.com>

**To:** randy@turnermckenzie.com

**Subject:** Cease and desist to Amanda Lollar

**Date:** Wed, May 11, 2011 9:42 am

**Attachments:** worldbatline\_\_Message\_\_Re\_\_Mary\_Cummins-1.pdf (159K)

**Your client is now falsely posting on the public internet that I have a criminal record. I do not. I've passed numerous DOJ background checks to work with abused children, go to the police academy, have my professional licenses and my gun permit. I've never been charged with a crime or found guilty of any crime. I am not the Mary Cummins below and she knows this. I've attached a pdf of the post as well.**

"Re: Mary Cummins

Yes, she also has a criminal record:

Case Number LAW95W00B78-01

Count 1 484E(A) PC PTY THFT:ACQ CRED CRD W/O CONS

Count 2 484F(B) PC FORGE NAME ON CREDIT CARD

Count 3 484G(A) PC THEFT BY FORG/INVALID CRED CAR

Count 4 484(A) PC THEFT OF PROPERTY"

**She posted that I was involved in cybersquatting and lost the case. I was not involved in cybersquatting. I saved their domain from a cybersquatter and gave it to them. The plaintiff ended up paying me for past work on their website which was over \$2,000. Only documents faxed end up digitized in this court. I didn't fax all of my documents.**

"Other lawsuits involve cybersquatting which she lost via default judgment (BC329942, FAA BEVERLY HILLS INC VS MARY CUMMINGS ET AL),"

**She posted that I had a neighbor dispute which I promptly settled. My neighbor destroyed my property and assaulted me. I got a restraining order on him and he had to pay me for the damage. There was no settlement. He then lost his home in foreclosure and was forced to move.**

"neighbor dispute which

she promptly settled (BC259366, Simas v. Cummins) and defamation which plaintiff abandoned because they were able to get rid of her defamation (LC049092).

**I have no idea what the last case number is about at all.**

**Please, tell you client to cease and desist from libeling and defaming me. I would think by now you would have done some research on your client and realized she is not what she tells everyone. Remember, she told you she had the "largest bat sanctuary in the world" with 200-300 bats. All bat people including Lollar know the Guinness world record for largest bat sanctuary is 1.8 - 2.5 million. That is a huge difference.**

**Please, note that her complaint stated I posted my videos and photos AFTER I left. Look at the documents you submitted May 4, 2011. You can see the dates on the videos and photos. They were posted BEFORE I left except for the botched episiotomy video. She stated she gave me no permission to take or post them. She clearly did. Your client is not what she seems. She is lying to you. Do some research. You have another Steven Woods on your hands. I'm truly shocked that an animal lover like yourself would be representing someone who commits animal cruelty as evidenced by those videos.**

**Mary Cummins  
(310) 877-4770**

1 PROOF OF SERVICE BY MAIL  
2 (FRCivP 5 (b)) or  
3 (CCP 1013a, 2015.5) or  
4 (FRAP 25 (d))

5 I am Plaintiff in pro per whose address is 645 W. 9th St. #110-140, Los Angeles,  
6 California 90015-1640. I am over the age of eighteen years.

7 I further declare that on the date hereof I served a copy of:

8 **PLAINTIFF'S FIRST AMENDED COMPLAINT**

9 on the following by placing a true copy thereof enclosed in a sealed envelope  
10 addressed as follows for collection and mailing at 645 W. 9th St. #110-140, Los  
11 Angeles, CA 90015-1640.

12 **Stephen M. MacPhail**  
13 Bragg & Kuluva  
14 555 S. Flower St., #600  
15 Los Angeles, CA 90071

16 I also faxed a copy to Stephen M. MacPhail at (213) 612-5712.

17 I declare under penalty of perjury, under the laws of the State of California, that the  
18 foregoing is true and correct.

19 Executed this day, December 22, 2011, at Los Angeles, California

20 Respectfully submitted,

21   
22 Mary Cummins, Plaintiff

23 Dated: December 2, 2011

24 645 W. 9th St. #110-140

25 Los Angeles, CA 90015

26 In Pro Per

27 Telephone: (310) 877-4770  
28