

# EXHIBIT M

Westport Police distinguish **Harassment arrests** as either **Threatening** or **Non-threatening**.

Fact: There is no use of the word **threat** nor is any **threat** documented in the one count of **Second Degree Breach of Peace** Incident Report or Warrant.

Fact: There is no use of the word **threat** nor is any **threat** documented in any **past Incident Report devoid of any kind of arrest**.

Deposition of Warrant writing officer CONFIRMS I was arrested for **section #6 of Second Degree Breach of Peace** statute and CONFIRMS that there are NO THREATS within any past Incident Report.

The sole and only **Harassment charge** – Feb. 6, 2019 is depicted here as **“Non-threatening”** in the Official Police Press Release. Any attempt to describe or conflate anything in my past as **threatening** is not justice.

FACT: **Threatening** is an actual Connecticut statute.

# Westport Custodial Arrest Synopsis

02/04/2019 to 02/08/2019

CASE: 2018-019908  
 ARREST DATE: 02/06/2019  
 ARRESTED: James Lawrence AGE: 53 RESIDENCE: Westport, CT  
 CHARGE: Harassment 2<sup>nd</sup>: Non-Threatening  
 BOND: \$25,000

On 09/18/2018, the victim responded to police headquarters and reported ongoing harassment by James Lawrence of Westport, CT. The victim stated multiple requests were made to Lawrence to stop contacting her however, he continued to do so by email. The investigating officer submitted an arrest warrant application, which was later approved.

On 02/06/2019, an officer observed Lawrence at a local gas station. The officer confirmed Lawrence had an outstanding warrant and took him into custody. Lawrence was brought to police headquarters where he was charged with 53a-183 Harassment 2<sup>nd</sup> and released after posting \$25,000 court set bond. Lawrence was scheduled to appear in Norwalk Court on 02/07/2019.

CASE: [REDACTED]  
 ARREST DATE: [REDACTED]  
 ARRESTED: [REDACTED]  
 CHARGE: [REDACTED]  
 BOND: [REDACTED]

CASE: [REDACTED]  
 ARREST DATE: [REDACTED]  
 ARRESTED: [REDACTED]  
 CHARGE: [REDACTED]  
 BOND: [REDACTED]

[REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED]

## Westport Custodial Arrest Synopsis

03/02/2018 to 03/05/2018

CASE: 2017-022937  
ARREST DATE: 03/05/2018  
ARRESTED: James Lawrence AGE: 52 RESIDENCE: Westport, CT  
CHARGE: Breach of Peace  
BOND: \$5,000

On 11/05/2017, officers were dispatched to a local grocery store on a report of a suspicious person. The victim reported she was followed around the store by an unknown male who then followed her out to her car and stood by the door of her vehicle. The male was later identified as James Lawrence, 52, of Westport, CT. An arrest warrant application was submitted for approval and granted by a judge. On 03/05/2018, Lawrence turned himself on the active arrest warrant. He was charged with 53a-181 Breach of Peace and released after posting \$5,000 court set bond. Lawrence is scheduled to appear in Norwalk Court on 3/14/18.

CASE: [REDACTED]  
ARREST DATE: [REDACTED]  
ARRESTED: [REDACTED]  
CHARGE: [REDACTED]  
BOND: [REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

CASE: [REDACTED]  
ARREST DATE: [REDACTED]  
ARRESTED: [REDACTED]  
CHARGE: [REDACTED]  
BOND: [REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

## ABSOLUTELY NON-ISSUE OF **THREATENING**

### ALARMING MISTAKE BY SECOND CIRCUIT COURT IN ALTICE DECISION:

<sup>1</sup> Compare Conn. Gen. Stat. § 53a-181e(a) (third-degree stalking) (“A person is guilty of stalking in the third degree when such person recklessly causes another person to reasonably (1) fear for his or her physical safety, or (2) suffer emotional distress. . . by wilfully and repeatedly following or lying in wait for such other person.”), with *id.* § 53a-181(a) (second-degree breach of peace) (“A person is guilty of breach of peace in the second degree when, with intent to cause inconvenience, annoyance or alarm, or recklessly creating a risk thereof, such person: Engages in . . . threatening behavior in a public place.”).

WHY IS THE APPEAL COURT **NOT** QUOTING THE ENTIRE **SECOND DEGREE BREACH OF PEACE STATUTE** IN TUNE WITH THE OFFICER’S WORDING AND OBVIOUSLY WHAT HE ARRESTED ME FOR WHICH IS NOW VERIFIED FROM HIS DEPOSITION?

Deposition of Arresting Officer James Sullivan: **SEE EXHIBIT I - PAGES 25-26**

21 Q. Okay. There are six parts of the  
22 second-degree breach of peace statute, Officer. Which  
23 part of this one count of second-degree breach of peace  
24 did you arrest me for? Did it fit under section 1, 2,  
25 3, 4, 5, or 6?

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1 MR. YUHAN: Objection to form.

2 A. It was being referenced to part 6.

**FACT: I was arrested for #6** *“creates a physically offensive condition”* and NOT #1 *“... threatening behavior in a public place”*, nor #2, nor #3, nor #4, nor #5.

**Like I have written – this is a HUGE mistake (amongst many) by the Appeal Court.** I am a tough person but should any person be forced to write common sense after common sense after common sense in numerous pages and be mentally abused with a conflation like this?

Once again, here is the **Second Degree Breach of Peace Statute** COMPLETELY defined.

## 2005 Connecticut Code - Sec. 53a-181. Breach of the peace in the second degree: Class B misdemeanor.

**Sec. 53a-181. Breach of the peace in the second degree: Class B misdemeanor.** (a) A person is guilty of breach of the peace in the second degree when, with intent to cause inconvenience, annoyance or alarm, or recklessly creating a risk thereof, such person: (1) Engages in fighting or in violent, tumultuous or threatening behavior in a public place; or (2) assaults or strikes another; or (3) threatens to commit any crime against another person or such other person's property; or (4) publicly exhibits, distributes, posts up or advertises any offensive, indecent or abusive matter concerning any person; or (5) in a public place, uses abusive or obscene language or makes an obscene gesture; or (6) creates a public and hazardous or physically offensive condition by any act which such person is not licensed or privileged to do. For purposes of this section, "public place" means any area that is used or held out for use by the public whether owned or operated by public or private interests.

(6) creates a public and hazardous or physically offensive condition  
 .. CREATES **Δ** .... SINGLE NOT REPEATED OR NOT PERSISTENT –  
 with **REPEATED AND PERSISTENCE** AS THE KEY WORDS IN THE DEFINITION OF  
**HARASSMENT AND STALKING** IN LEGAL AND EVERYDAY DICTIONARIES.

**The Officer's entire Deposition verifies there NEVER was any threatening from anything in my past as well (SEE Exhibit I).**

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1     retaliation very seriously. Is there an incident  
 2     report, Officer Sullivan, that is part of your research,  
 3     sir, that documents any threat of retaliation?  
 4                     MR. YUHAN: Objection to form.  
 5                     MR. DRISCOLL: I'll join. If you  
 6                     understand what he's asking --  
 7                     THE WITNESS: I think I understand.  
 8             A.     And I'm going to have to say no to that.

So how can the Court now conflate **Third Degree Stalking** with **ONE Count Second Degree Breach of Peace**? Where is the word **stalk or harass** in any of this **Second Degree Breach of Peace statute** let alone part #6, let alone **stalk or harass** in **any past Incident Report devoid of an arrest**? 3 years of explaining common sense while having to conceal my name! Can it end?

**FACT:** The police in their **Harassment Arrests** distinguish if the **Harassment** was Threatening or Non-Threatening. shows how my later Feb. 6, 2019 **Second Degree Email Harassment Arrest** – an actual harassment arrest and only such arrest was depicted by police.

**Exhibit K** is the Official Police Press Release of the Feb. 6, 2019 arrest for **Second Degree Email Harassment** that says **Harassment - Non-threatening**. DOES HEARST EVER DISTINGUISH THIS? And notice at **Exhibit K** how the bond for an actual **Harassment** Charge is \$25,000 while the bond for my one time One Count of **Second Degree Breach of Peace** was \$5,000. **Threatening** is an actual charge in Connecticut.

**FACT:** Within the Official Police Press Release (see **Exhibit A**) and Incident Report and Warrant for the relative March 5, 2018 **ONE Count of Second Degree Breach of Peace** arrest there are no words describing the act as **Threatening**. If police take the time to distinguish actual **harassment** charges as either threatening or non-threatening logic dictates they take **threatening** serious and would document and distinguish any other charge as **threatening**. Deposition of Officer CONFIRMS my arguments (See **Exhibit I**) **And why am I even forced to debate this given Hearst is trying to subjectively interpret unprovable decades old incidents that were fully investigated resulting in NO arrest of any kind!!!**

**In the Altice Appeal, the Second Circuit Court of Appeal Decision FALSELY refers to a phantom **threatening** behavior** while attempting to conflate **Second Degree Breach of Peace** with **Third Degree Stalking**. As my new Exhibits show (that were not part of Altice Decision), we cannot conflate these two distinct charges much like we cannot conflate a **One Count of Second Degree Breach of Peace** with any **Past Incident Report devoid of any kind of arrest** for these very Incident Reports themselves also document **NO threats CONFIRMED by Officer in Deposition**. This huge mistake by Second Circuit Court of Appeal is relative because in Connecticut if there is any **evidence of harassment** outside of electronic media **Third Degree Stalking** is the charge.

**AND HERE IS HEARST LEAD LAWYER JONATHAN DONNELLAN IN THE EARLY STAGES OF THE LAWSUIT ARGUING THAT I WAS “THREATENING”.**

**FROM ECF 14 – HEARST MOTION TO DISMISS**

**INTRODUCTION**

This Court should dismiss Plaintiff James Lawrence’s lawsuit seeking to punish Hearst for publishing articles accurately recounting Lawrence’s history of arrests and threatening behavior towards women as set forth in an arrest warrant application filed in Connecticut Superior Court. Lawrence’s lawsuit against Hearst is not his first attempt to baselessly impose

**FROM ECF 29 – HEARST RESPONSE TO MOTION FOR HEARING**

**DEFENDANT’S RESPONSE TO PLAINTIFF’S “MOTION REQUESTING HEARING”**

Defendant Hearst Communications, Inc. (“Defendant” or “Hearst”), respectfully submits this response to the document filed by Plaintiff with this Court styled as “Motion Requesting Hearing for Motion to Dismiss.” (ECF No. 28.) As set forth in Hearst’s motion to dismiss and special motion to strike (ECF No. 14) and related papers (ECF Nos. 17, 27), Plaintiff seeks to impose liability on Hearst for its accurate recounting of allegations regarding Plaintiff’s history of arrests and threatening behavior towards women, as set forth in official law enforcement and judicial records. Plaintiff’s claims are thus barred by a straightforward application of the fair-report privilege.<sup>1</sup>

**AND NOTICE THE OUTRIGHT LIE HYPING “*history of arrests*”.**

AT ANOTHER TIME HEARST LEAD LAWYER JONATHAN DONNELLAN CHOSE THE FOLLOWING WORDING – “UNSETTLING” THAT CAN HARDLY BE CALLED VERITABLY THREATENING.

## FROM ECF 19 – HEARST REPLY TO RESPONSE

### INTRODUCTION

It is apparent from Lawrence’s response to Hearst’s motion to dismiss that, at its core, his quarrel fundamentally lies with the various women in the Westport area who made allegations to the Westport Police Department concerning Lawrence’s **unsettling behavior** towards them, and with the Westport Police Department’s summary of those allegations and Lawrence’s prior history of interactions with authorities throughout the country.

The screenshot shows the Merriam-Webster website interface. At the top, there are navigation links: GAMES & QUIZZES, THESAURUS, WORD OF THE DAY, and FEATURES. The Merriam-Webster logo and 'SINCE 1828' are on the left. A search bar contains the word 'unsettling'. Below the search bar are two buttons: 'Dictionary' and 'Thesaurus'. The main heading is 'unsettling adjective'. Below this is a 'Save Word' button with a bookmark icon. The phonetic transcription is given as 'un-set-tling | \,ən-ˈset-lɪŋ, -ˈse-təl-iŋ' with a speaker icon. The definition is: ': having the effect of upsetting, **disturbing**, or discomposing'. An example sentence is provided: '// *unsettling* images of the war'.

One can “unsettle” someone without **harassing** them. The statute affiliated with **Second Degree Breach of Peace – Creating a Public Disturbance** is an example:

### Connecticut General Statutes 53a-181a – Creating a public disturbance: Infraction - \$90 Fine



Current as of: 2018 | [Check for updates](#) | [Other versions](#)

(a) A person is guilty of creating a public disturbance when, with intent to cause inconvenience, annoyance or alarm, or recklessly creating a risk thereof, he (1) engages in fighting or in violent, tumultuous or threatening behavior; or (2) annoys or interferes with another person by offensive conduct; or (3) makes unreasonable noise.


**NOTICE NO USE OF THE WORD HARASS IN THE STATUTE "CREATING A PUBLIC DISTURBANCE" LIKE HOW THE ARREST WARRANT IN QUESTION DOES NOT USE THE WORD HARASS OR THREATEN TO DESCRIBE ME LET ALONE ANY PAST "CASE" FULLY INVESTIGATED RESULTING IN NO ARREST – NO THREATS, NO CRIMES.**


DICTIONARY.COM    **THESAURUS.COM**    MEANINGS | GAMES | LEARN | WRITING | WORD OF THE DAY

SYNONYMS ▾ | unsettle

**unsettle**   [See definition of unsettle on Dictionary.com](#)

verb **bother, upset**

**OTHER WORDS FOR unsettle** 

**Compare Synonyms** 

agitate	rattle	displace	rummage	dement
confuse	unnerve	down	sicken	get to
disconcert	derange	flurry	spook	psych out
disorganize	disarrange	fluster	throw	put off
disquiet	disarray	fuddle	trouble	throw off
disrupt	discomode	jumble	turn	
disturb	discompose	needle	unbalance	
perturb	disorder	ruffle	unhinge	

**WHERE ARE THE WORDS THREAT OR MORE SIGNIFICANTLY – HARASS?**

THIS CASE MUCH LIKE THE ALTICE CASE (cases that should be resting on legal terminology) IS OBVIOUSLY ABOUT THE ISSUE OF DEPLOYING WORDS ABOUT AN ARREST AND ALLEGED BEHAVIOR – VOCABULARY – AS HEARST LAWYER IS FLIRTING WITH HERE. OBVIOUSLY SOME WORDS ARE MORE DAMAGING THAN OTHERS. USING SUBJECTIVE SELF-CHOSEN WORDS THAT ARE UNRELATED LAWS/CRIMES/STATUTES (let alone deviating from the Warrant and Officer's Warrant and Deposition) IS AN ISSUE FOR THE COURT TO ADDRESS. DECISIONS IN TUNE WITH LINGUISTIC EXPERTS AND OTHER TYPES OF EXPERTS IS IN ORDER VIA A TRIAL.

**THE ONLY VERITABLE THREATS ARE HEARST'S COVERAGE THREATENING MY LIFE EVERY DAY WITH UNPROVEN AND UNPROVABLE NONSENSE. PAST MOMENTARY ACTS OF "UNWANTED ADVANCES " VS. 4 YEARS OF CONSTANT HARASSMENT AND ABUSE REDUCING MY LIFE TO BEING A GHOST. SEE ONGOING DAMAGES AT [REPLY\\_9](#) BRIEF.**