

HILLSBOROUGH, SS.
NORTHERN DISTRICT

SU

ALEXANDER J. WALKER, JR.

v.

MICHAEL GILL AND
THE MORTGAGE SPECIALISTS, INC.

**VERIFIED COMPLAINT FOR
INJUNCTIVE RELIEF AND DAMAGES**

JURY TRIAL DEMANDED

NOW COMES the plaintiff, Alexander J. Walker, Jr., by and through his attorneys, Devine, Millimet & Branch, Professional Association, and complains against the defendants, Michael Gill (“Gill”) and The Mortgage Specialists, Inc. (“Mortgage Specialists”) as follows:

INTRODUCTION

1. Defendant Gill, both in his personal capacity and in his role as the President of Mortgage Specialists, is engaged in a malicious campaign to defame Mr. Walker by falsely accusing him of crimes, including attempted murder, drug dealing and extortion in radio broadcasts, on a website Gill created known as “State of Corruption,” as well as on YouTube, Facebook, and other forms of social media. Defendants have also published and broadcast Gill’s defamatory statements on large, electronic billboards at various Mortgage Specialists locations throughout southern New Hampshire and, in particular, on an electric billboard on South Willow Street in Manchester, New Hampshire that displays a large photograph of Mr. Walker accompanied by the words “Alex Walker Attempted Murder.” Mr. Walker now seeks relief as follows.

PARTIES

2. Mr. Walker is a New Hampshire resident who lives in Manchester, New Hampshire.
3. Gill is a New Hampshire resident who lives at 69 Conleys Grove Drive, Derry, New Hampshire.
4. Mortgage Specialists is a New Hampshire corporation with a principal office address at 2 Main Street, Plaistow, New Hampshire.

JURISDICTION AND VENUE

5. This Court has jurisdiction pursuant to RSA 491:7.
6. Venue is proper in Hillsborough County pursuant to RSA 507:9.

FACTUAL ALLEGATIONS COMMON TO ALL COUNTS

7. Mr. Walker is a private citizen, lawyer and business and community leader. Prior to becoming a lawyer, Mr. Walker served his country with honor and distinction in the United States Marine Corps.

8. Over the years, Mr. Walker has devoted thousands of hours of service to many charitable and non-profit organizations throughout New Hampshire. Mr. Walker has chaired many non-profit, community service boards, including the Greater Manchester Chamber of Commerce Board of Directors, the Palace Theatre Board of Trustees, and the Granite United Way Board of Directors. Mr. Walker has served on many other charitable, community service boards, including the Business & Industry Association of New Hampshire Board of Directors, the Board of Directors of City Year-New Hampshire, the Board of Directors of the New Hampshire Business Committee for the Arts, the New Hampshire Bar Association Board of Governors, the Board of Directors of Crotched Mountain Rehabilitation Center, and, most

recently, the Board of Directors for HOPE for NH Recovery. In addition, Mr. Walker chairs the Advocacy Task Force for the New Hampshire Hospital Association, and served on the New Hampshire Supreme Court's Access to Justice Commission.

9. Mortgage Specialists is a company that is wholly owned and controlled by Gill who is its President, Vice President, Treasurer, Secretary and Director.

Gill's and Mortgage Specialists' Electronic Billboards

10. Gill and Mortgage Specialists own electronic billboards located at Mortgage Specialists locations throughout New Hampshire, including Nashua, Plaistow, Somersworth, and South Willow Street in Manchester. Gill and Mortgage Specialists currently publish false and defamatory statements about Mr. Walker on their Manchester billboard and have published defamatory statements about Mr. Walker on all of the billboards.

11. The Manchester billboard is located on South Willow Street, a heavily trafficked road adjacent to the Mall of New Hampshire. Mortgage Specialists logo and Gill's photo are prominently displayed on the billboard. The billboard is designed to, and does, attract attention because of its size, vibrant color schemes, and changing messages, and its 24-hour operation. Gill and Mortgage Specialists use the billboard to make false and defamatory statements about Mr. Walker and others.

12. The defamatory statements (which in the past have included profanity) published on the electronic billboard in Manchester are highly visible from both lanes of South Willow Street as well as from both lanes of Interstate 293. The traveling public is literally forced to view these profane and defamatory statements about Mr. Walker and others at all hours of the day and night, including children riding in cars with their parents. The defamatory statements published on the billboard include:

- A display of Mr. Walker's photograph with the word "Extortionist" adjacent to it, in or about March 2016.
- Currently, and since the beginning of April 2016, a display of Mr. Walker's photograph with the words "Attempted Murder" adjacent to it, as reflected in the below photograph:



13. Mr. Gill and Mortgage Specialists made and published these statements, without any basis in fact and with malicious intent, 24 hours per day, seven days per week since commencing to publish them.

14. During that time, hundreds of thousands of people have driven past the billboard on South Willow Street and Interstate 293, and have seen the defendants' false and defamatory statements about Mr. Walker.

Gill's and Mortgage Specialists' Radio Broadcasts

15. Gill and Mortgage Specialists also produce, sponsor and publish an hour long weekly radio talk show on 107.7 WTPL "The Pulse" known as "State of Corruption."

16. WTPL is owned by Great Eastern Radio.
17. The defendants use this radio broadcast to publish defamatory statements about Mr. Walker.
18. Defendants then re-publish the statements by posting each entire radio broadcast on various websites, including their own "State of Corruption" site as well as on Facebook and YouTube.

Gill's and Mortgage Specialists' Internet Based Defamation

19. Gill and Mortgage Specialists produce, sponsor and publish a website entitled State of Corruption at www.stateofcorruption.org.
20. Gill and Mortgage Specialists publish false and defamatory statements about Mr. Walker on the State of Corruption website and also use the website to re-publish defamatory statements from the billboards and his radio broadcasts. Gill claims his website has "5.5 million hits."
21. Gill and Mortgage Specialists also produce, sponsor and publish a Facebook page at <https://www.facebook.com/State-of-Corruption-NH-636522656419318/> on which they publish defamatory statements about Mr. Walker. Gill's Facebook page is also used to re-publish defamatory statements from the billboards, his radio broadcast and Website. Gill's Facebook page has 28,171 "likes."
22. Gill and Mortgage Specialists also publish their radio broadcasts as videos on YouTube.
23. Gill and Mortgage Specialists publication and re-publication techniques magnify the effect of their defamatory statements by disseminating them through multiple forms of media to reach a broader audience. Gill's and Mortgage Specialists' defamatory statements about Mr.

Walker are published and viewed and heard by third parties on the radio, on the internet, through social media and from their vehicles.

Gill's and Mortgage Specialists' Radio And Internet Publication Of Defamatory Statements About Mr. Walker

24. Generally, Gill's and Mortgage Specialists' defamatory campaign revolves around Gill's theme that Mr. Walker is the "Kingpin" of a vast criminal conspiracy that includes drug trafficking, money laundering, and attempted murder, and that Mr. Walker actively conspires with political leaders, judges and state officials to protect members of this criminal enterprise. Gill claims that he has uncovered this so-called "State of Corruption" and that Mr. Walker has tried to kill him on three occasions in order to shut him up.

25. On April 1, 2016, in a broadcast entitled "State of Corruption Week 17: The Gates of Hell" (<http://www.stateofcorruption.org/2016/04/state-of-corruption-week-17-gates-of.html>), Gill, recently released from the Rockingham County Jail after ten days of incarceration for contempt of court in a divorce hearing, falsely stated that:

- Mr. Walker left a note on the front seat of his car on the morning of that divorce hearing which stated: "If you don't take the deal, I am going to cut the heads off each and every one of your kids and mail them back to you."

26. In that same broadcast, Gill went on to make the following false and defamatory statements about Mr. Walker:

- That Mr. Walker is "the Godfather" of a vast criminal conspiracy to launder money and traffic heroin in New Hampshire by corrupting the New Hampshire Banking Department, the IRS, political leaders and New Hampshire courts.
- "Alex Walker, three [murder] attempts that I can prove."

- That Mr. Walker conspired to hire a hit man to bring a gun to Gill's Manchester office to kill him.
- That Mr. Walker hired a "6'7" Russian Nationalist" to assassinate him at the Ritz Carlton in Miami after receiving information of his schedule and whereabouts from an employee at Mortgage Specialists. Gill claims that he was in Miami to provide his purported evidence of corruption to the National Director of the Mortgage Association. Gill falsely claims he has video evidence of this assassination attempt.
- "This Alex Walker, I am telling you he is the devil."
- That Mr. Walker leveraged an employee in his company to become corrupt by threatening to have her children taken from her.
- That Mr. Walker "controls the money laundering."
- That "Alex Walker is not saying that he didn't try to have me killed three times."

27. The very following week, on April 8, 2016, in a broadcast entitled "State of Corruption Week 18: Search Warrant" (<http://www.stateofcorruption.org/2016/04/blog-post.html>), Gill continued his false and defamatory statements by falsely claiming Mr. Walker is a criminal "Kingpin" and is "the guy that tried to have me killed three times." In that same broadcast, Gill went on to falsely state:

- "This guy [Walker] is the brains of the operation. He runs protection."
- "This guy [Walker] has been protecting the Banking Department who has been protecting the money launderers."
- "Understand the danger of Walker . . . The DRA, that's Walker. The IRS, that's Walker, too!"

- “You want to end this corruption, start with Walker.”
- “The AG’s office is the cover team . . . Walker influences and controls them.”
- “Children are dying because of these guys.”
- “I guarantee you Walker was in chambers with Judge Francois and in communication with the officers in the jail. They were sending me in there to die.”

28. On April 15, 2016, in a broadcast entitled “State of Corruption Week 19: Death, Taxes and a Cook” (<http://www.stateofcorruption.org/2016/04/state-of-corruption-week-19-death-taxes.html>), Gill continued his false and defamatory statements about Mr. Walker being responsible for attempting to murder him. In that broadcast, Gill falsely claims:

- “He set that up. I am charging murder against that guy.”
- “Alex Walker controls the Attorney General’s Office.”
- “I only put Walker up there [on the electronic billboard] with three attempts to murder me.”

29. On April 22, 2016, in a broadcast entitled “State of Corruption Week 20: The Plant” (<http://www.stateofcorruption.org/2016/04/state-of-corruption-week-20-plant.html>), Gill’s defamatory campaign continued:

- “Alex Walker has quarterbacked this corruption throughout the entire state.”
- In addition, Gill, once again, falsely accused Mr. Walker with orchestrating three attempts on his life, including threatening the lives of Gill’s children.
- Gill falsely links Mr. Walker to the FRM Ponzi scam.

30. As mentioned, Gill broadcasts live once a week on WTPL, and then posts each one of his radio broadcasts on his State of Corruption website as well as on YouTube. Gill and

Mortgage Specialists also publish a vast array of defamatory statements about Mr. Walker on the State of Corruption website and Facebook, and also use State of Corruption website to re-publish defamatory statements from the billboards and his radio broadcasts.

COUNT I

DEFAMATION PER SE

31. Mr. Walker repeats and restates the preceding allegations as if fully set forth herein.
32. By the conduct alleged herein, Gill and Mortgage Specialists published false statements about Mr. Walker that are defamatory per se.
33. Gill and Mortgage Specialists have published these statements recklessly, wantonly, maliciously, and without privilege of any kind.
34. By the conduct alleged herein, Mr. Walker has been damaged in an amount within the jurisdictional limits of this Court.

COUNT II

ENHANCED COMPENSATORY DAMAGES

35. Mr. Walker repeats and restates the preceding allegations as if fully set forth herein.
36. When an act is wanton, malicious or oppressive, the aggravating conduct giving rise to the damages warrant the imposition of enhanced compensatory damages. Stewart v. Bader, 15 N.H. 75, 87 (2006). In an action for defamation per se, enhanced compensatory damages are warranted. Danboise v. Espinola, Case No. 2009-0159 (N.H. Oct. 27, 2010).
37. By the conduct alleged herein, Defendants maliciously published false and defamatory statements, which falsely accuse Mr. Walker of heinous crimes. The malicious

statements are abhorrent to a civilized society, were published with ill will, evil motive, with an intent to injure and with wanton and intentional disregard for Mr. Walker's rights.

WHEREFORE, Mr. Walker respectfully requests that this Court:

- A. Enter judgment against the Defendants on all claims;
- B. Award all damages to which Mr. Walker is entitled;
- C. Award Mr. Walker his reasonable attorney's fees;
- D. Enter a permanent injunction against Gill and Mortgage Specialists, and anyone acting by or through them from any further defamatory conduct;
- E. Award Mr. Walker enhanced compensatory damages; and
- F. Enter further relief as this Court deems just and proper.

Respectfully submitted,

ALEXANDER J. WALKER, JR.

By his attorneys,

DEVINE, MILLIMET & BRANCH, P.A.

Dated: April 28, 2016

By: 

Daniel E. Will
111 Amherst Street
Manchester, NH 03101
603-669-1000

I, Alexander J. Walker, Jr., hereby certify that the foregoing facts are true.



Alexander J. Walker, Jr.