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**COMPLAINT IN THE CIRCUIT COURT OF SALINE COUNTY,
ARKANSAS**

BY JM

RICHARD FRIEND

PLAINTIFF

vs.

**RICK CROSS, KEVIN COOPER and
JOHN DOES 1-5**

DEFENDANTS

Case No: 63CV-26- 601
| DIV. 31

VERIFIED COMPLAINT

COMES NOW Plaintiff Richard Friend by and through his attorney, Jennifer Lancaster, in his Complaint against Kevin Cooper, Rick Cross, and John Does 1-5 states:

NATURE OF THE ACTION

This case concerns the deliberate use of fabricated accusations of criminal conduct to influence the outcome of an election for Sheriff of Saline County, Arkansas. Defendants Kevin Cooper, Rick Cross, and John Does 1-5 publicly broadcast social media posts, including a lengthy video accusing Plaintiff Richard Friend—a veteran law enforcement officer and candidate for sheriff—of corruption, theft, abuse of authority, and other crimes. The accusations were presented as factual statements, directed at voters during an ongoing election, and accompanied by repeated exhortations that voters should not support Plaintiff. These accusations are false.

INTRODUCTION

This case arises from a calculated and malicious attack on the reputation of a candidate for public office during the final days of a contested election.

Plaintiff Richard Friend is a veteran law enforcement officer with more than two decades of service in Saline County and surrounding jurisdictions, including work in investigations, narcotics enforcement, and supervisory roles. In the March 3, 2026, Republican primary election for Saline County Sheriff, Plaintiff advanced to the runoff election scheduled for March 31, 2026.

In the days preceding the primary election, Defendant Rick Cross published a post on social media falsely stating that two Orders of Protection had been filed against Plaintiff and characterizing the matter as evidence of a “pattern of behavior” involving violence against women. These statements were false.

Only one Order of Protection was ever filed against Plaintiff, and that Order was subsequently vacated. Defendant Cross either knew this statement was false or acted with reckless disregard for the truth, and by making the statement he conveyed the defamatory impression that Plaintiff had repeatedly engaged in violent or abusive conduct toward women, thereby damaging Plaintiff’s reputation and standing in the community.

The day before early voting was to begin for the primary election, Defendant Kevin Cooper—a former colleague and supporter of Plaintiff’s opponent—published a lengthy social media video containing numerous accusations that Plaintiff

committed crimes, abused official authority, and engaged in serious professional misconduct. Defendant represented these accusations as factual statements and claimed that his knowledge derived from prior professional interactions with Plaintiff.

Defendant knew, or at a minimum recklessly disregarded, that the statements he made about Plaintiff were false. As a police detective, Defendant is trained to verify allegations through readily available public records. The matters he referenced are reflected in publicly accessible court records available through Arkansas CourtConnect and other sources¹. Defendant therefore knew, or certainly should have known, where the truth could be readily verified, yet chose to publish the statements without confirming their accuracy. This conduct demonstrates a reckless disregard for the truth and supports a finding of actual malice.

The video included numerous false statements accusing Plaintiff of corruption, theft, abuse of authority, and sexual exploitation of young women. Defendant also broadcast humiliating and degrading anecdotes intended to ridicule Plaintiff.

The video concluded with Defendant stating that he wanted to “go Aaron Spencer on him,” invoking a widely publicized incident involving lethal violence and suggesting retaliation against Plaintiff.

The timing of these accusations was not accidental. Defendant released the video shortly before the primary election and during the critical period leading into

¹ See attached Exhibit

the sheriff's runoff, when voters were actively evaluating the candidates and casting ballots.

The law protects robust political debate. It does not protect the knowing publication of false accusations of criminal conduct with the intent to cause harm.

Defendant's statements falsely accuse Plaintiff of crimes and corruption that strike at the integrity required of a law enforcement officer and candidate for sheriff. Defendants published these accusations during an active election for the purpose of influencing its outcome by misleading voters in Saline County and persuading them not to support Plaintiff's candidacy.

By presenting unsupported accusations of criminal misconduct to the electorate as statements of fact, Defendants acted with actual malice and reckless disregard for the truth. Once voters rely on fabricated accusations of criminal conduct when casting their ballots, the resulting harm to the electoral process cannot be undone.

PARTIES

1. Plaintiff Richard Friend is a resident of Saline County, Arkansas and is a Republican runoff election for Sheriff of Saline County concluding March 31, 2026.
2. Plaintiff has devoted his professional career to law enforcement and public service and has established a reputation for integrity, professionalism, and dedication to public safety.
3. Defendant Kevin Cooper is a resident of Hot Spring County, Arkansas.

4. Defendant Rick Cross is a resident of Saline County, Arkansas.
5. Defendants use social media platforms to publish commentary and statements concerning law enforcement matters and local elections.
6. Defendants published and disseminated the statements described in this Complaint to members of the public, including voters residing in Saline County.
7. Upon information and belief, John Does 1-5 include individuals who provided false information to Defendants, edited the video, or amplified its distribution via targeted social media shares to Saline County voters, knowing of its falsity.

JURISDICTION AND VENUE

8. This Court has subject-matter jurisdiction pursuant to Article 7, § 11 of the Arkansas Constitution and Ark. Code Ann. § 16-13-201, which vest circuit courts with jurisdiction over civil actions.
9. This Court has personal jurisdiction over Defendants because Defendants are residents of Arkansas and committed the tortious acts described in this Complaint within Saline County, Arkansas.
10. Venue is proper in Saline County pursuant to Ark. Code Ann. §§ 16-60-101 and 16-60-112 because the defamatory statements were disseminated to residents of Saline County and caused injury within this county.
11. Venue is also proper because the statements were intended to influence the outcome of the Saline County Sheriff election.

FACTUAL ALLEGATIONS

12. Plaintiff has built a professional reputation for integrity and public service over the course of more than twenty years in law enforcement.

13. On March 3, 2026, the Republican primary election for Saline County Sheriff was held.

14. Because no candidate received a majority of the vote, a runoff election was scheduled between Plaintiff and Dustin Robertson.

15. Early voting for the runoff begins on March 24, 2026.

16. In February 2026, Defendant Rick Cross published statements on social media alleging that Plaintiff had two Orders of Protection filed against him and that Plaintiff does not respect women. These statements were false. Only one Order of Protection was ever filed against Plaintiff, and that Order was subsequently vacated. Defendant's statements therefore conveyed a false and misleading portrayal of Plaintiff's conduct and character.

17. The day before early voting began, Defendant Kevin Cooper published a 51-minute Facebook video discussing Plaintiff and the sheriff's election.

18. Defendant Cooper's video spans more than fifty minutes and contains repeated accusations of criminal conduct. The length and detail of the broadcast demonstrates that Defendant had ample opportunity to verify the truth of his statements before publishing them.

19. In the video, Defendant Cooper made numerous false accusations presented as statements of fact concerning Plaintiff.

20. Among other things, Defendant Cooper falsely stated that Plaintiff dismissed misdemeanor marijuana charges for young college girls in exchange for sexual favors.

21. Defendant Cooper falsely accused Plaintiff of numerous acts of criminal and professional misconduct. Among other things, Cooper claimed that Plaintiff stole property during the execution of search warrants, misused county property, abused official authority, and engaged in conduct that should have resulted in his arrest and decertification as a law enforcement officer.

22. Defendant Cooper further falsely accused Plaintiff of impersonating him to obtain a county-funded position.

23. Cooper presented these false accusations to viewers as factual accounts of misconduct committed by Plaintiff.

24. Cooper attempted to explain the absence of any documentation or official record supporting these accusations by asserting that Plaintiff's alleged misconduct had been "swept under the rug because he was a yes man."

25. Cooper identified no report, investigation, disciplinary record, witness, or other evidence supporting any of these accusations. Instead of pointing to any verifiable fact, Cooper simply invented the false allegations and attempted to excuse the absence of evidence by speculating that any records must have been "swept under the rug." Having no firsthand knowledge, no witnesses, and no documentation of any

kind, Cooper nevertheless presented these fabricated accusations of criminal and professional misconduct to the public as statements of fact.

26. Cooper admitted that he did not possess firsthand knowledge of at least two of the accusations he made against Plaintiff.

27. Cooper further admitted that he possesses no tangible evidence supporting the false accusations he published against Plaintiff. He identified no documents, records, witnesses, or other verifiable proof that the alleged events ever occurred.

28. Despite the complete absence of evidence, Defendant Cooper nevertheless presented these serious false accusations of criminal misconduct to the public as factual statements.

29. Each of the accusations described above is false.

30. Plaintiff Friend has never dismissed criminal charges in exchange for sexual favors or any personal benefit.

31. Plaintiff Friend has never stolen property during the execution of a search warrant.

32. Plaintiff Friend has never misused county property or abused official authority as falsely alleged by Defendant.

33. Plaintiff Friend has never engaged in conduct that would warrant criminal prosecution or decertification as a law enforcement officer.

34. The false allegations described above were fabricated out of whole cloth and published to the public as factual statements despite the absence of any evidence supporting them.

35. Cooper also broadcast humiliating and degrading false allegations intended to ridicule Plaintiff, including the false claim that Plaintiff defecated during an investigation and used a woman's shower curtain to clean himself.

36. Cooper offered no factual basis for this false accusation. He identified no witnesses, documents, reports, disciplinary records, or other evidence supporting the false claim.

37. Cooper did not claim to have witnessed the alleged event and admitted that the supposed incident occurred more than fifteen years ago.

38. Cooper invoked the alleged age of the incident as the explanation for why no records, reports, witnesses, or other evidence existed to support the accusation.

39. Cooper has no personal knowledge of any such event and cited no verifiable source confirming that it ever occurred.

40. Despite possessing no knowledge and identifying no evidence whatsoever to support the allegation, Cooper nevertheless presented this humiliating false accusation to the public as a factual account of misconduct by Plaintiff.

41. Publishing accusations of criminal and professional misconduct while possessing no evidence, no witnesses, and no firsthand knowledge—while attempting to excuse the absence of proof by claiming the alleged incident occurred almost two

decades ago—demonstrates that the allegations were fabricated and published with reckless disregard for the truth.

42. The timing of these accusations further demonstrates Defendant Cooper's actual malice. Cooper published these false allegations immediately before early voting in the sheriff's election, during the critical period when voters were evaluating the candidates and casting ballots.

43. Cooper's video concluded with a statement that he wanted to "go Aaron Spencer on him."

44. That reference invoked a widely known incident involving a fatal shooting and suggested violent retaliation against Plaintiff.

45. Cooper repeatedly urged viewers "Don't vote for Friend."

46. Cooper directed these statements toward voters participating in the sheriff's election.

47. Cooper had previously worked with Plaintiff in law enforcement and claimed that his false accusations were based on insider knowledge. Despite invoking that supposed knowledge, Cooper conducted no investigation, ignored readily available information contradicting his allegations, and presented the accusations as established fact to voters during an ongoing election.

48. Defendants' actual malice is further demonstrated by their motive and personal stake in the election outcome. Defendant Cooper publicly expressed support for Plaintiff's opponent, Dustin Robertson, and stated in the video words to the effect

that, if Robertson wins the office of Sheriff, Robertson might bring Cooper on board to assist or serve in the Sheriff's office.

49. This admission reveals a direct personal and financial interest in undermining Plaintiff's candidacy and promoting Robertson's success. When combined with Defendants' purposeful avoidance of readily available public records, failure to investigate obvious sources of contradiction, and high degree of awareness of probable falsity, these circumstances support a finding of actual malice by clear and convincing evidence. *See Harte-Hanks Commc'ns, Inc. v. Connaughton*, 491 U.S. 657, 688–89 (1989) (holding that actual malice may be inferred from circumstantial evidence that the publisher purposefully avoided the truth); *Gertz v. Robert Welch, Inc.*, 418 U.S. 323, 342–48 (1974) (retaining actual malice for public-official and public-figure defamation claims, while allowing private-plaintiff to recover on a lesser fault standard and requiring actual malice for presumed or punitive damages); *St. Amant v. Thompson*, 390 U.S. 727, 731 (1968) (reckless disregard requires proof that the defendant actually entertained serious doubts as to the truth of the publication).

50. Defendants published these accusations with knowledge of their falsity or with reckless disregard for the truth.

51. Defendants deliberately avoided confirming the truth of the false accusations despite readily available sources that would have revealed their falsity and willfully failed to review available records or seek comment from Plaintiff.

52. Despite possessing no evidence, no witnesses, and no firsthand knowledge supporting the false allegations, Defendants nevertheless presented the accusations to voters as factual statements.

53. Defendants' false statements were not expressions of opinion, speculation, satire, or rhetorical hyperbole. Rather, Defendants made specific accusations that Plaintiff committed identifiable acts of criminal conduct, corruption, and professional misconduct. Each false accusation concerns events capable of objective verification through records, witness testimony, or other evidence and therefore constitutes a provably false statement of fact.

54. The video was widely disseminated through social media and viewed by numerous Saline County voters.

55. Defendant Cooper continued publishing false defamatory statements concerning Plaintiff as the sheriff's runoff election progressed, thereby compounding the harm to Plaintiff's reputation and campaign.

56. Defendant Cooper's actual malice and personal animus toward Plaintiff are further evidenced by his current Facebook cover photo, which consists of an AI-generated image depicting Defendant physically restraining Plaintiff in a headlock. This image remains publicly visible on Defendant's Facebook profile as of the filing of this Complaint.² When viewed in conjunction with the violent rhetoric in Cooper's video—including the statement that he wanted to “go Aaron Spencer on him”—the

² See attached Exhibit

cover photo reinforces a pattern of portraying Plaintiff as someone deserving of physical domination or harm, rather than engaging in legitimate political discourse.

57. As a result of Defendants' outrageous actions, Plaintiff has suffered substantial harm to his reputation, emotional well-being, campaign, and professional standing.

58. Prior to the release and circulation of the video, Plaintiff had developed significant voter support and was ahead in multiple public opinion polls in the race for Sheriff of Saline County. Following the publication and widespread distribution of the false accusations, Plaintiff's reputation within the community was damaged and his campaign was materially undermined. Individuals who had previously expressed support for Plaintiff reconsidered or withdrew their support after viewing or hearing the false allegations. The false accusations also caused Plaintiff significant personal distress, including anxiety, humiliation, and numerous sleepless nights.

59. Publishing serious false accusations of criminal conduct during an ongoing election while possessing no evidence to support those accusations demonstrates reckless disregard for the truth and further establishes Defendants' actual malice.

FACTUAL BASIS FOR ACTUAL MALICE

60. The following facts demonstrate that Defendants published the false statements described in this Complaint with knowledge of their falsity or with reckless disregard for the truth:

a. Defendant Cooper previously worked with Plaintiff in law enforcement and claimed that his false accusations were based on personal knowledge and professional interactions with Plaintiff.

b. The false accusations involved matters that could have been readily verified through publicly available records, including court filings accessible through the Arkansas Judiciary's CourtConnect system.

c. Defendant Cooper, as a trained law enforcement officer, knew how to verify the accuracy of allegations involving criminal conduct and court proceedings.

d. Despite having the ability to verify the truth of the accusations through readily available records, Defendants deliberately failed to review those records before publishing the allegations.

e. Defendants nevertheless presented the false accusations to the public as factual statements and urged viewers not to vote for Plaintiff.

f. Defendants published the false accusations during the critical period immediately preceding the election when voter perceptions were being formed and ballots were being cast.

g. Defendant Cooper acknowledged in the video that he hoped Plaintiff's opponent might bring him into the Sheriff's office if that opponent prevailed in

the election, demonstrating a personal stake in undermining Plaintiff's candidacy.

61. These facts demonstrate that Defendants either knew the accusations were false or acted with reckless disregard for their truth or falsity.

ANTI-SLAPP ALLEGATIONS

62. This action arises from Defendants' publication of false statements of fact concerning Plaintiff and is not based upon constitutionally protected speech made without knowledge of falsity or reckless disregard for the truth.

63. Defendants' statements were made with actual malice, including knowledge that the statements were false or with reckless disregard for whether they were true or false.

64. The protections of the Arkansas Citizen Participation in Government Act do not extend to knowingly false statements of fact or statements made with reckless disregard for their truth or falsity.

65. Defendant's statements were not expressions of opinion, rhetorical hyperbole, or protected political commentary. Rather, Defendant made and published specific factual accusations implying that Plaintiff engaged in criminal conduct and abuse of official authority. These accusations are capable of being proven true or false and were presented to the public as statements of fact. Because the statements were false and were made with knowledge of their falsity or with reckless disregard for the

truth, they fall outside the protections afforded to speech under the Arkansas Citizen Participation in Government Act and the First Amendment.

66. Plaintiff's claims are therefore not barred by the Act and are supported by substantial evidence demonstrating that Defendant knowingly or recklessly published false and defamatory statements concerning Plaintiff.

REPRESENTATIVE DEFAMATORY STATEMENTS

67. Defendant published the false statements described below during the critical period immediately preceding the primary election, when voter perceptions were being formed and finalized.

68. The following are representative examples of the false and defamatory statements of fact published by Defendant Cooper in the February 15, 2026, Facebook video and related publications:

- a) **Plaintiff dismissed criminal charges in exchange for sexual favors.**
 - Defendant framed this accusation in a manner implying that the alleged sexual favors involved very young women, suggesting ages such as eighteen or nineteen, thereby creating the false and damaging impression that Plaintiff abused his authority as a law enforcement officer to obtain sexual favors from vulnerable young women.

- b) **Plaintiff stole property during the execution of search warrants.**
- This statement falsely accuses Plaintiff of theft and criminal misconduct in the performance of his official duties as a law enforcement officer.
- c.) **Plaintiff misused county property and abused official authority.**
- This statement falsely portrays Plaintiff as corrupt and dishonest in the exercise of his public office.
- d.) **Plaintiff engaged in conduct that should have resulted in his arrest and decertification as a law enforcement officer.**
- This statement falsely implies that Plaintiff committed serious criminal or ethical violations warranting arrest and the loss of his law enforcement certification.
- e.) **Plaintiff's alleged misconduct was "swept under the rug because he was a yes man."**
- This statement falsely suggests that Plaintiff engaged in misconduct that was intentionally concealed by others due to favoritism or corruption.
- f.) **Plaintiff defecated during an investigation and cleaned himself using a woman's shower curtain.**
- This false statement was intended to ridicule and humiliate Plaintiff and to portray him as unprofessional and unfit to serve in law enforcement.

- g.) Defendant referenced an Order of Protection involving Plaintiff while omitting the fact that the Order had been vacated.**
- By omitting this material fact, Defendant created the false and misleading impression that Plaintiff had been found to have engaged in misconduct warranting the continued protection of a court order.
- h.) Defendant Rick Cross published a social media post falsely stating that two Orders of Protection had been filed against Plaintiff and describing the matter as a “pattern of behavior.”**
- This statement was false. Only one Order of Protection was ever filed against Plaintiff, and that Order was shortly thereafter vacated. By falsely claiming multiple protective orders and characterizing them as a “pattern of behavior,” Defendant Cross created the misleading impression that Plaintiff had repeatedly engaged in misconduct toward women.
- i.) Defendant stated he wanted to “go Aaron Spencer on him.”**
- This statement referenced another individual associated with public accusations of misconduct and was intended to suggest that Plaintiff had engaged in similar wrongdoing.
- j.) Defendant repeatedly urged viewers: “Don’t vote for Friend.”**
- These statements were made while publishing the false accusations described above and were intended to influence the

electorate by persuading voters to reject Plaintiff based on those defamatory allegations.

66. These statements accuse Plaintiff of criminal conduct, abuse of official authority, sexual misconduct, dishonesty, and professional misconduct. Each statement implies specific, verifiable facts capable of being proven true or false, including allegations of criminal acts and official wrongdoing. They therefore constitute actionable statements of fact and are not protected opinion, rhetorical hyperbole, or political commentary. *See Milkovich v. Lorain Journal Co.*, 497 U.S. 1 (1990).

67. Each of the accusations described above concerns events or conduct that can be objectively verified through records, witness testimony, or other evidence, and therefore constitutes a provably false statement of fact rather than protected opinion.

COUNT I – DEFAMATION

68. Plaintiff incorporates by reference the allegations contained in paragraphs 1–56 as if fully set forth herein.

69. Defendants published and communicated false statements of fact concerning Plaintiff to third parties through publicly disseminated video statements and related communications.

70. Arkansas courts recognize a cause of action for defamation where a communication is reasonably calculated to harm another's reputation. To prevail, a plaintiff must establish: (1) the defamatory nature of the statement of fact; (2)

identification of or reference to the plaintiff; (3) publication of the statement by the defendant; (4) the defendant's fault in the publication; (5) the falsity of the statement; and (6) damages. *Faulkner v. Ark. Children's Hosp.*, 347 Ark. 941, 69 S.W.3d 393 (2002).

71. Defendants' statements falsely accused or implied that Plaintiff engaged in criminal conduct, corruption, and other serious wrongdoing. Such accusations constitute statements of fact capable of being proven true or false.

72. The statements clearly referred to Plaintiff and were reasonably understood by viewers and listeners to concern Plaintiff, particularly within the context of the contested election for Sheriff of Saline County, Arkansas.

73. Defendants intentionally published these statements to a wide audience through online video and related public communications, thereby communicating the defamatory statements to numerous third parties, including voters within the relevant electoral community.

74. The statements were false.

75. The statements were presented to viewers as factual claims supported by purported knowledge or information and were not framed as speculation or opinion. Defendants intended for viewers to believe the statements as factual allegations concerning Plaintiff's integrity and conduct.

76. Defendants presented the accusations described in this Complaint as statements of fact based on their purported personal knowledge and prior professional interactions with Plaintiff. Defendants did not frame the accusations as

speculation, rumor, or opinion. Instead, Defendants conveyed to viewers that the statements were factual accounts of misconduct by Plaintiff, thereby inviting the public and the voting electorate to rely on those statements as true.

77. Defendant Cooper's training as a law enforcement officer and his knowledge of publicly available court records further demonstrate that he was aware of, or deliberately avoided, information confirming the falsity of the accusations.

78. The statements made by Defendants were statements of fact, or reasonably implied assertions of objective fact, capable of being proven true or false. The statements were not protected expressions of opinion, rhetorical hyperbole, or political commentary. Rather, Defendants conveyed specific factual allegations implying that Plaintiff engaged in criminal conduct and corruption. Reasonable viewers and listeners would understand these statements as assertions of fact about Plaintiff.

79. Defendants' actual malice is further demonstrated by the fact that the accusations involved matters that could have been readily verified through publicly available records, including court filings accessible through the Arkansas Judiciary's CourtConnect system. Despite their knowledge of these readily available sources—and despite Defendant Cooper's training and experience as a law enforcement officer—Defendants chose not to review those records before publishing serious accusations of criminal conduct. This purposeful avoidance of the truth constitutes evidence of reckless disregard for the falsity of the statements.

80. At the time the statements were made, Defendants knew the statements were false or acted with reckless disregard as to whether they were true or false.

81. Defendants acted with reckless disregard for the truth in publishing the statements concerning Plaintiff. In defamation cases involving public figures, reckless disregard exists where the defendant publishes statements while entertaining serious doubts as to their truth or with a high degree of awareness of their probable falsity. *See Palin v. N.Y. Times Co.*, 113 F.4th 245 (2d Cir. 2024); *Couch v. Verizon Commc'ns Inc.*, 105 F.4th 425 (9th Cir. 2024).

82. Defendants' conduct reflects such reckless disregard, as they made serious accusations concerning Plaintiff while failing to verify readily available information and while possessing reason to doubt the truth of the allegations he published. This conduct satisfies the constitutional actual malice standard established in *N.Y. Times Co. v. Sullivan*, 376 U.S. 254 (1964).

83. Defendants' statements were calculated to and did harm Plaintiff's reputation by portraying him as dishonest, corrupt, and engaged in criminal activity.

84. As a direct and proximate result of Defendants' defamatory statements, Plaintiff has suffered damages including but not limited to reputational injury, humiliation, embarrassment, emotional distress, and harm to his candidacy and electoral prospects.

85. Defendants' conduct was willful, malicious, and undertaken with conscious disregard for Plaintiff's rights, thereby entitling Plaintiff to recover

compensatory damages, punitive damages, and all other relief available under Arkansas law.

COUNT II – FALSE LIGHT INVASION OF PRIVACY

86. Plaintiff incorporates by reference the allegations contained in paragraphs 1–56 as if fully set forth herein.

87. Arkansas recognizes a cause of action for false light invasion of privacy. To prevail, a plaintiff must prove: (1) that the false light in which the plaintiff was placed by the publicity would be highly offensive to a reasonable person; and (2) that the defendant had knowledge of, or acted in reckless disregard as to, the falsity of the publicized matter and the false light in which the plaintiff would be placed. *See Dodrill v. Ark. Democrat Co.*, 265 Ark. 628, 633-34, 590 S.W.2d 840, 843-44 (1979); *Dodson v. Dicker*, 306 Ark. 108, 110-11, 812 S.W.2d 97,99 (1991); *Addington v. Wal-Mart Stores, Inc.*, 81 Ark. App. 441, 105 S.W.3d 369 (2003).

88. Defendants publicized statements and insinuations concerning Plaintiff that were false and misleading and that placed Plaintiff before the public in a false light.

89. Defendants' statements were presented to viewers as assertions of fact and were intended to be understood as factual allegations concerning Plaintiff's conduct, integrity, and fitness for public office. The statements conveyed, either expressly or by clear implication, that Plaintiff engaged in criminal conduct and corruption. These statements were not rhetorical hyperbole, satire, or protected

expressions of opinion, but instead implied the existence of undisclosed defamatory facts known to Defendants and capable of being proven true or false.

90. Through the publication of a widely disseminated video and related communications, Defendants conveyed the false impression that Plaintiff engaged in corruption, criminal conduct, and other serious wrongdoing.

91. These statements created a misleading portrayal of Plaintiff as dishonest, unethical, and unfit for public office.

92. The false light in which Plaintiff was placed by Defendants' publicity would be highly offensive to a reasonable person.

93. Defendants either knew the statements were false or acted with reckless disregard as to their truth or falsity and the false light in which Plaintiff would be placed.

94. Defendants' conduct placed Plaintiff before the public in a highly offensive false light and was undertaken intentionally and for the purpose of damaging Plaintiff's reputation and standing in the community.

95. As a direct and proximate result of Defendants' conduct, Plaintiff has suffered damages including injury to reputation, humiliation, embarrassment, emotional distress, and harm to his candidacy and electoral prospects.

96. Defendants' actions were willful, malicious, and undertaken with conscious disregard for Plaintiff's rights, entitling Plaintiff to recover compensatory damages, punitive damages, and all other relief available under Arkansas law.

COUNT III – TORTIOUS INTERFERENCE WITH BUSINESS EXPECTANCY

97. Plaintiff incorporates by reference the allegations contained in paragraphs 1–56 as if fully set forth herein.

98. Prior to the publication of Defendants’ defamatory statements, Plaintiff was a police chief and candidate for Sheriff of Saline County, Arkansas in a contested primary election and had developed substantial voter support within the community.

99. Plaintiff held a valid and reasonable business expectancy in obtaining the office of Sheriff through the support and votes of the electorate of Saline County.

100. Plaintiff’s business expectancy was not a generalized political aspiration but a specific and identifiable expectancy of obtaining the votes of the electorate participating in the Saline County Sheriff’s primary election. These voters constituted identifiable third parties with whom Plaintiff had developed relationships through campaign activities, public engagement, and demonstrated voter support reflected in polling and community outreach.

101. Plaintiff’s expectancy in obtaining the office of Sheriff was not a mere generalized political hope, but a future economic relationship tied to the salary, benefits, and professional opportunities attendant to that office.

102. Plaintiff’s expectancy here was grounded in existing voter support and relationships that Defendants intentionally disrupted through knowingly false and defamatory accusations, thereby rendering their interference actionable under Arkansas law.

103. Defendants intentionally and improperly interfered with this expectancy by disseminating knowingly false accusations of criminal and professional misconduct, thereby disrupting Plaintiff's relationships with the electorate and diminishing his prospects of prevailing in the runoff election.

104. Defendants' defamatory publications occurred during the critical period immediately preceding the primary election, when voter perceptions were being formed and finalized, thereby maximizing the disruptive effect of Defendants' statements on Plaintiff's relationships with the electorate.

105. Plaintiff's expectancy was specific and identifiable, consisting of the anticipated support and votes of the electorate participating in the Saline County Sheriff's primary election.

106. Prior to the publication of Defendants' statements, Plaintiff was ahead in multiple public opinion polls and had established a measurable and identifiable level of voter support within the electorate.

107. Defendants had knowledge of Plaintiff's candidacy, the ongoing election, and Plaintiff's reasonable expectancy of obtaining the office through voter support.

108. Defendants intentionally interfered with Plaintiff's expectancy by publishing and widely disseminating false statements accusing Plaintiff of corruption, criminal conduct, and other serious wrongdoing.

109. Defendants' conduct constituted improper interference under Arkansas law because it involved the dissemination of knowingly false and defamatory statements designed to damage Plaintiff's reputation and undermine his candidacy.

110. Defendants' defamatory statements were published shortly before the primary election and were directed to the same electorate whose support Plaintiff had developed, thereby intentionally disrupting Plaintiff's relationship and expectancy with those voters.

111. Defendants' actions were undertaken during the active election campaign and were intended to influence voters and disrupt Plaintiff's expectancy of obtaining the office of Sheriff.

112. Defendants' interference caused a disruption of Plaintiff's relationship with voters and undermined the support Plaintiff had developed within the electorate.

113. As a direct and proximate result of Defendants' conduct, Plaintiff suffered damages including the loss of voter support, harm to his campaign, damage to his reputation, and the loss of a substantial opportunity to obtain the office of Sheriff.

114. Defendants' conduct was willful, malicious, and undertaken with conscious disregard for Plaintiff's rights.

115. Plaintiff is therefore entitled to recover compensatory damages, consequential damages, punitive damages, and all other relief available under Arkansas law.

**COUNT IV – INTENTIONAL INFLICTION OF EMOTIONAL
DISTRESS**

116. Plaintiff incorporates by reference the allegations contained in paragraphs 1–56 as if fully set forth herein.

117. Arkansas recognizes a cause of action for intentional infliction of emotional distress, commonly referred to as the tort of outrage.

118. Defendants' conduct is so extreme in character that it goes beyond all possible bounds of decency and should be regarded as utterly intolerable in a civilized society.

119. Defendants intentionally published and disseminated false accusations implying that Plaintiff engaged in corruption, criminal conduct, and other serious wrongdoing.

120. Defendant knew these accusations were false or acted with reckless disregard as to their truth or falsity.

121. The publication of knowingly false accusations of criminal conduct about a law enforcement officer and candidate for public office during an active election campaign constitutes conduct that is extreme and outrageous and that exceeds all bounds tolerated by a civilized society.

122. Defendants' conduct was intentional and undertaken with the purpose of harming Plaintiff's reputation, credibility, and candidacy.

123. As a direct and proximate result of Defendants' extreme and outrageous conduct, Plaintiff suffered severe emotional distress, including anxiety, humiliation, reputational harm, and numerous sleepless nights.

124. Defendants' conduct was willful, malicious, and undertaken with conscious disregard for Plaintiff's rights.

125. Plaintiff is therefore entitled to recover compensatory damages, punitive damages, and all other relief available under Arkansas law.

COUNT V – CIVIL CONSPIRACY

126. Plaintiff incorporates all preceding paragraphs as though fully set forth herein.

127. Upon information and belief, Defendants Kevin Cooper and Rick Cross did not act alone in creating, promoting, and disseminating the defamatory statements described in this Complaint.

128. Rather, Defendants acted in concert with one or more individuals who knowingly assisted, encouraged, coordinated with, or otherwise participated in the planning, production, or dissemination of the defamatory video and related statements concerning Plaintiff Richard Friend.

129. These individuals may include persons who provided information, assisted in preparing the video, encouraged Defendants to publish it, or helped amplify its distribution through social media or other communications directed at voters in Saline County.

130. The participants in this coordinated effort shared the common objective of damaging Plaintiff's reputation and undermining his candidacy for Sheriff of Saline County.

131. In furtherance of that objective, Defendants and their co-conspirators agreed—either expressly or implicitly—to publish and promote false accusations of criminal conduct concerning Plaintiff.

132. Discovery will reveal communications between defendants John Does regarding video production, sharing, strategy, or campaign coordination.

133. Arkansas law recognizes a claim for civil conspiracy where two or more persons combine to accomplish an unlawful purpose or to accomplish a lawful purpose through unlawful means. *See Faulkner v. Ark. Children's Hosp.*, 347 Ark. 941, 950-51, 69 S.W.3d 393 (2002).

134. The underlying unlawful conduct supporting the conspiracy includes, but is not limited to, the publication of defamatory statements, the dissemination of false accusations of criminal conduct, and the creation of a misleading narrative intended to damage Plaintiff's reputation and interfere with his candidacy.

135. In furtherance of the conspiracy, Defendants and their co-conspirators committed overt acts including, but not limited to:

- a. planning or encouraging the creation of the defamatory video;
- b. assisting in the preparation or production of the video;
- c. promoting or amplifying the video through social media or other channels; and
- d. encouraging Defendant to repeat or republish the defamatory accusations concerning Plaintiff.

136. Once voters rely on false accusations of criminal conduct when casting ballots, the resulting harm cannot be undone. No later judgment of this Court can recall those votes or restore the election to the status quo ante.

137. This case is not merely about injury to Plaintiff's reputation. By broadcasting fabricated accusations of criminal conduct against a candidate for sheriff while urging viewers "Don't vote for Friend," Defendants Cooper and Cross sought to manipulate the electorate through falsehoods rather than legitimate political debate.

138. By coordinating the dissemination of defamatory accusations of criminal conduct against Plaintiff while urging voters not to support him, Defendants and their co-conspirators sought to influence the outcome of the election through falsehoods rather than legitimate political speech.

139. Each participant in the conspiracy is jointly and severally liable for the foreseeable consequences of the conspiratorial conduct.

140. As a direct and proximate result of the conspiracy described above, Plaintiff has suffered substantial harm to his reputation, campaign, professional standing, and emotional well-being.

141. Defendants and any co-conspirators acted willfully, maliciously, and with reckless disregard for Plaintiff's rights.

142. The identities of the co-conspirators are presently uncertain to Plaintiff but will be revealed through discovery.

143. Plaintiff reserves the right to amend this Complaint to add additional defendants as their identities become known.

144. Upon information and belief, individuals who assisted Defendants Kevin Cooper and Rick Cross in creating, promoting, distributing, or amplifying the defamatory statements described in this Complaint were aware—or consciously disregarded—that the accusations involved serious claims of criminal conduct against a candidate for Sheriff of Saline County. Any person who knowingly assisted, encouraged, republished, or otherwise participated in the dissemination of those accusations after becoming aware of their falsity is jointly responsible for the resulting harm to Plaintiff. Such participation may include sharing the video through social media, encouraging its publication, coordinating its distribution, or otherwise aiding the effort to damage Plaintiff's reputation and interfere with his candidacy. Plaintiff will identify all such participants through discovery and seek appropriate relief against any person who knowingly contributed to the dissemination of the defamatory statements.

145. The reach and dissemination of Defendants' videos and posts were significantly expanded through social media sharing, reposting, and algorithmic amplification, further multiplying the harm to Plaintiff's reputation and candidacy.

146. Defendants' conduct was not merely insulting, rude, or defamatory. Rather, Defendants intentionally fabricated and disseminated accusations of serious criminal misconduct concerning a law enforcement officer during an active election campaign, knowing that such accusations would foreseeably devastate Plaintiff's

reputation, undermine his candidacy, and subject him to public contempt and humiliation. The deliberate use of knowingly false accusations of criminal conduct for the purpose of destroying Plaintiff's reputation and electoral prospects constitutes conduct that exceeds all bounds of decency tolerated in a civilized society.

PUNITIVE DAMAGES AND JURY REQUEST

147. Defendant's conduct was undertaken with actual malice, including knowledge of falsity or reckless disregard for the truth.

148. Defendants' conduct in publishing and disseminating the defamatory statements was wanton, reckless, and undertaken with the specific intent to damage Plaintiff's reputation and undermine his candidacy for public office.

149. Defendants' actions demonstrate a conscious disregard for Plaintiff's rights and for the foreseeable harm that would result from publishing false accusations of criminal conduct.

150. Defendants knew or reasonably should have known that the statements at issue were false and that publishing them would damage Plaintiff's reputation, standing in the community, and professional integrity.

151. Defendants further knew or reasonably should have known that such statements, when circulated publicly during an active election campaign, would cause significant reputational and personal harm to Plaintiff.

152. Defendants' conduct therefore warrants punishment and deterrence in the form of punitive damages.

153. Plaintiff is entitled to recover punitive damages in addition to compensatory damages as allowed by Arkansas law.

154. Plaintiff demands a trial by jury on all issues so triable.

REQUEST FOR INJUNCTIVE RELIEF

155. Upon information and belief, Defendants continue to publish and disseminate defamatory statements concerning Plaintiff, Richard Friend.

156. As a direct and continuing result of Defendants' conduct, Plaintiff will suffer irreparable harm to his good name, reputation, and standing in the community unless this Court grants appropriate relief. Monetary damages alone cannot fully remedy the ongoing harm caused by the continued publication and circulation of the defamatory statements.

157. Plaintiff is likely to succeed on the merits of his claims for defamation against Defendants, and the only adequate means of preventing further harm is the issuance of an injunction prohibiting Defendants from continuing to publish, repeat, or otherwise disseminate defamatory statements concerning Plaintiff to members of the community.

158. The requested relief is narrowly tailored to false factual statements, not protected speech, and necessary to prevent irreparable electoral harm, as votes cannot be undone.

PRESERVATION OF EVIDENCE

Defendants are on notice that litigation has been filed and therefore have a duty to preserve all documents and electronically stored information relevant to the claims asserted in this action.

159. Plaintiff is informed and believes that Defendants possess, control, or have access to documents, electronically stored information, and other evidence relevant to the claims asserted in this action.

160. Plaintiff hereby demands that Defendants preserve all documents, data, and electronically stored information relating to the statements, publications, and communications described in this Complaint.

161. The duty to preserve evidence includes, but is not limited to, the preservation of all materials relating to the creation, editing, publication, dissemination, and promotion of the video statements and other communications referenced herein.

162. Such materials include, without limitation:

a. All video recordings, drafts, edits, and original source files relating to the videos at issue;

b. All social media posts, uploads, comments, messages, and analytics relating to the publication or distribution of the videos;

c. All emails, text messages, direct messages, and other communications relating to Plaintiff, Plaintiff's candidacy, or the subject matter of the videos;

d. All communications with third parties regarding the creation, distribution, or promotion of the videos or statements concerning

Plaintiff;

e. All documents, notes, research materials, or information Defendants claims to have relied upon in making the statements at issue;

f. All internal communications or communications with campaign personnel, political consultants, media outlets, or other individuals relating to Plaintiff or the election;

g. All metadata associated with the creation, editing, and dissemination of the videos or related communications; and

h. All records reflecting the reach, viewership, engagement, or distribution of the videos, including analytics from social media platforms or video hosting services.

163. Defendant is further directed to take reasonable steps to prevent the destruction, alteration, deletion, overwriting, or loss of any such evidence, including evidence stored on computers, mobile devices, cloud storage systems, social media accounts, or third-party platforms.

164. This duty includes the suspension of any routine document destruction or data deletion policies that might otherwise result in the loss of relevant evidence.

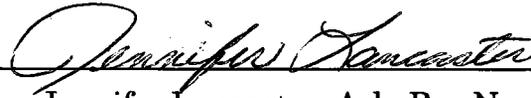
165. Plaintiff reserves the right to seek appropriate relief from the Court, including sanctions, should any relevant evidence be destroyed, altered, or otherwise rendered unavailable after Defendant becomes aware of this duty to preserve.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays that the Court enters an order in his favor and against Defendants, providing Plaintiff the relief requested in this Complaint, awarding Plaintiff compensatory in amount determined at trial in excess of \$250,000 and punitive damages in amount determined at trial in excess of \$500,000, enjoining Defendants from making additional defamatory statements about Plaintiff, ordering Defendants to remove all defamatory statements from all of social media accounts, awarding Plaintiff their costs, expenses, and reasonable attorneys' fees for prosecuting this action, and awarding Plaintiff all other relief to which he is entitled.

- a. Plaintiff prays that the Court declare the actions of the Defendants were defamatory and hurt the Plaintiff's reputation.
- b. Plaintiff prays that this court award attorney's fees, costs, and all other just and proper relief to which Plaintiff is entitled.
- c. The Court enter judgment granting permanent injunctive relief against the Defendants;
- d. The Court enter judgment in favor of Plaintiff against Defendants for emotional distress;
- e. The Court enter judgment in favor of Plaintiff for nominal damages;
- f. The Court enter judgment in favor of Plaintiff for compensatory damages;
- g. The Court enter judgment in favor of Plaintiff against Defendants for punitive damages;
- h. All other further relief as is just and equitable under the circumstances.

Respectfully submitted,
Date: March 10, 2026

A handwritten signature in cursive script that reads "Jennifer Lancaster". The signature is written in black ink and is positioned above a horizontal line.

Jennifer Lancaster, Ark. Bar No.
2011178

Counsel for Plaintiff, RICHARD FRIEND
Cornerstone Law Firm, PLLC
117 S. Market St., Benton, AR
72015
(501) 776-2224
Jennifer@CornerstoneAR.law

VERIFICATION STATEMENT OF RICHARD FRIEND

Comes the undersigned and being first duly sworn states on oath that the above and foregoing matters are true and correct.



RICHARD FRIEND

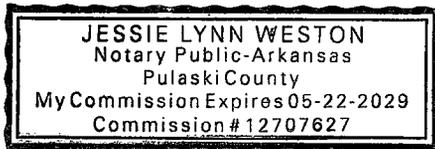
STATE OF ARKANSAS

COUNTY OF PULASKI

§
§
§

BEFORE ME, the undersigned authority, on this day personally appeared Richard Friend known to me or proven to be the person whose name is subscribed in the foregoing instrument, and acknowledged to me that he has read the foregoing, and that the above foregoing matters are true and correct as he believe, and that he executed the same for the purposes and consideration expressed therein.

GIVEN UNDER MY HAND AND SEAL OF OFFICE this 10TH day of March 2026.





NOTARY PUBLIC, STATE OF ARKANSAS
MY COMMISSION EXPIRES: 05/22/2029

UNIFORM COVER PAGE

[To be used when required by Administrative Order No. 2 (g)*]

COURT: CIRCUIT COURT OF SALINE COUNTY

Docket/Case Number:

CASE NAME:

PLAINTIFF/

PETITIONER: RICHARD JAMES FRIEND

DEFENDANT/
RESPONDENT:

RICK CROSS, KEVIN COOPER, and JOHN DOES 1
THROUGH 5

TITLE OF PLEADING OR
DOCUMENT BEING FILED

(If a multi-part file,
the designation "part _ of _"
(example, part 1 of 2)):

Exhibit to Verified Complaint

*Administrative Order No 2.

(g) *File Mark.* (1) There shall be a two inch (2") top margin on the first page of each document submitted for filing to accommodate the court's file mark. If the pleading or document must be filed in multi-parts because of size or for other reasons, the first page of each part must include the file name and file mark and shall clearly indicate the part number and number of parts (example, part 1 of 2).

(2) If a document is such that the first page cannot be drafted to provide sufficient space to satisfy the file-mark requirement, the document must include the uniform cover page developed by the Administrative Office of the Courts and found under Forms and Publications at www.arcourts.gov.

6
FILED FOR RECORD

IN THE CIRCUIT COURT OF WASHINGTON COUNTY, MISSISSIPPI
SECOND DIVISION

OCT 23 AM 9:52

WASHINGTON CO. AR
CIRCUIT CLERK
K. SPENTONER

JACKIE S. FRIEND

VS.

NO. DR 2014-1625-2

JAMES RICHARD FRIEND

DEFENDANT

ORDER OF DISMISSAL

NOW ON THIS 23rd day of October, 2014, this cause comes on for trial with:

1. Petitioner appearing pro se, and
2. Respondent appearing, with his attorney, Hadley Hindmarsh.

WHEREUPON THE COURT FINDS AND ORDERS THAT:

_____ The Petition is dismissed, and the Temporary Order of Protection vacated for failure for lack of jurisdiction.

_____ The Petition is dismissed, and the Temporary Order of Protection vacated for failure to serve the Respondent.

_____ The Petition is dismissed, and the Temporary Order of Protection vacated for Petitioner's failure to prosecute.

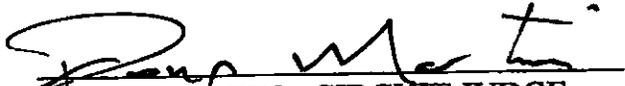
WJM ✓ _____ The allegations of the Petition are NOT sustained by proof and that the Temporary Order of Protection entered herein on September 26, 2014, **SHOULD BE VACATED**, and the Petition Dismissed.

~~_____ At the Petitioner's request, the Temporary Order of Protection entered herein on _____, 20____, is VACATED, and the Petition Dismissed.~~

The Court further orders: _____

Costs shall be assessed against () Petitioner () Respondent in the amount of
\$ _____ (/) No Costs Assessed.

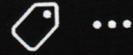
IT IS SO ORDERED.


DOUG MARTIN - CIRCUIT JUDGE

- Jury Trial.....
- Bench Trial.....
- Default Judgment.....
- Summary Judgment.....
- Non-Trial.....
- Other parties or claims.....
- Still pending.....



1 of 28



Kevin Cooper

2d · 🌐

👍 116

💬 16

➦ 2

