

137189-CV

CAUSE NO. _____

LEONARD "BO" STALLMAN,	§	IN THE DISTRICT COURT OF
	§	
Plaintiff,	§	
	§	
v.	§	BRAZORIA COUNTY, TEXAS
	§	
KEVIN HENRY, BRITTNEY	§	
ROBERSON a/k/a BRITTNEY	§	
ROBERTSON a/k/a BRITTANY	§	
DARBONNE, EMORY JOSEPH "E.J."	§	
KING, LAUREN GEDDES-KING, and	§	
BRAZOSPORT PEDIATRICS AND	§	
FAMILY CLINIC, P.L.L.C.;	§	
	§	
Defendants.	§	_____ JUDICIAL DISTRICT

PLAINTIFF'S ORIGINAL PETITION

Plaintiff Leonard "Bo" Stallman files this Original Petition complaining of the acts and omissions of Defendants Kevin Henry, Brittney Roberson a/k/a Brittney Robertson, a/k/a Brittany Darbonne, Emory Joseph "E.J." King, Lauren Geddes-King, and Brazosport Pediatrics and Family Clinic, P.L.L.C., and alleges as follows.

I. INTRODUCTION

1. Plaintiff Leonard "Bo" Stallman, the elected Sheriff of Brazoria County, Texas, brings this action against Defendants for their coordinated campaign of defamation and related torts. Just before the 2024 election, Defendants acted individually and in concert to fabricate and disseminate a false accusation: that Plaintiff had committed indecent exposure while receiving treatment at a medical clinic, Defendant Brazosport Pediatrics and Family Clinic, P.L.L.C., owned by Defendant Gerdes-King. Defendants then fabricated and disseminated a second scurrilous allegation of sexual impropriety even more lurid than the first.

2. The malicious rumors about and allegations against Sheriff Stallman are undeniably false. Originally perpetuated by his health care provider and the chief investigator for the Brazoria County District Attorney, these attacks against Sheriff Stallman have harmed not only him and his family but have harmed the entire community. People should be able to trust their health care providers and not have their confidentiality, legally enshrined under HIPPA, violated. They should be able to trust that a chief investigator will not improperly use his position in an attempt to jail them—especially not for political purposes disguised as justice. Plaintiff is bringing this lawsuit to bring an end to these rumors and restore faith in the community.

3. Acting individually and in concert, Defendants published and republished false statements about Sheriff Stallman on social media, in podcasts, and through other public communications. In short, Defendants unlawfully sought to subvert reality and the public good in furtherance of their political ambitions and score settling.

4. Defendant Kevin Henry—who lost the 2024 Brazoria County Sheriff’s election to Plaintiff—worked with his friend, Defendant Brittney Roberson, to use his conspiracy focused podcast and Facebook pages to promote and amplify a defamatory narrative, including statements and insinuations depicting Plaintiff as a “morally bankrupt sexual deviant.”

5. Defendant EJ King—a Chief Investigator at the Brazoria County District Attorney’s office and husband of Defendant Gerdes-King—not only pressured his wife’s employee to report Sheriff Stallman to law enforcement, he also shopped the case to another law enforcement department after the Texas Rangers did not bring charges against Sheriff Stallman. After those attempts to entrap Sheriff Stallman in an investigation failed, King falsely stated that investigations conducted by the Angleton Police Department and the Texas Rangers were “cover

ups” of misdeeds. All Defendants contributed to and amplified this narrative by creating, spreading, endorsing, or repeating these falsehoods online and across the community.

6. Defendants’ propagation of malicious falsehoods has harmed Sheriff Stallman’s reputation and professional standing. As a direct and proximate result of their actions, Sheriff Stallman endured reputational harm, suffered damages in trying to combat the false statements and their foreseeable harms and experienced emotional distress. In addition to monetary damages, injunctive relief is warranted to prevent further harm.

II. DISCOVERY LEVEL

7. Plaintiff intends that discovery be conducted under Discovery Level 2.

III. PARTIES

8. Plaintiff Leonard “Bo” Stallman is a resident of Brazoria County, Texas, and serves as its elected sheriff. He is a public figure. Plaintiff may be contacted via undersigned counsel.

9. Defendant Kevin Henry is a resident of Brazoria County, Texas. He may be served at 4849 County Road 747A, Brazoria, Texas 77422, or wherever he may be found. Plaintiff requests a citation.

10. Defendant Brittney Roberson, also known as Brittney Robertson and Brittany Darbonne, is a resident of Brazoria County, Texas. She may be served at 3531 Chatwood Dr., Pearland, Texas 77584, or wherever she may be found. Plaintiff requests a citation.

11. Defendant Emory Joseph “E.J.” King is a resident of Brazoria County, Texas. He may be served at 10484 County Road 505, Brazoria, Texas 77422, or wherever he may be found. Plaintiff requests a citation.

12. Defendant Lauren Geddes-King is a resident of Brazoria County, Texas. She may be served at 10484 County Road 505, Brazoria, Texas 77422, or wherever she may be found. Plaintiff requests a citation.

13. Defendant Brazosport Pediatric and Family Clinic, P.L.L.C. is a Texas entity with a mailing address of 222 North Velasco Street, Suite A, Angleton, Texas. This entity may be served via its registered agent, Lauren King, at 54 Flag Lake Plaza, Lake Jackson, Texas 77566. Plaintiff requests a citation.

14. Defendants acted individually and in concert as described here, causing the harms alleged.

IV. JURISDICTION & VENUE

15. This Court has subject matter jurisdiction because the amount in controversy is within its jurisdictional limits and Plaintiff's claims arise under Texas law. The Court has personal jurisdiction over Defendants because they are residents of Brazoria County, Texas, and their tortious conduct there is the basis of this action.

16. Venue is thus proper in Brazoria County, Texas because all or a substantial part of the events or omissions giving rise to Plaintiff's claims occurred in Brazoria County. *See* TEX. CIV. PRAC. & REM. CODE § 15.002(a)(1).

V. ALTER EGO/MISNOMER

17. In the event any parties are misnamed or not included herein, Plaintiff contends that such "misidentification" or "misnomer" does not affect the validity of this action and reserves the right to amend to correctly identify all responsible parties.

18. To the extent any undercapitalized Defendant that cannot meet existing obligations acted as the alter ego of another person or entity, Plaintiff alleges any corporate veil should be pierced in the interests of justice.

19. If any named entity has been succeeded by another person or entity, Plaintiff seeks substitution of such successor to ensure that all responsible parties are held to account.

VI. FACTS

A. General Background

20. Since 2021, Plaintiff Bo Stallman has served as Sheriff of Brazoria County. As Sheriff, his reputation for integrity and leadership is essential to maintaining public trust.

21. As a public servant and law enforcement leader, Plaintiff's professional effectiveness depends on his good name and the community's confidence in his integrity and fitness for office.

B. The Election and Defamation

22. In 2024, Defendant Kevin Henry unsuccessfully challenged Sheriff Stallman—who was seeking reelection for a second term—in the election for Brazoria County Sheriff. During Henry's campaign, he began defaming Sheriff Stallman with rumors he concocted with Defendant Brittney Roberson.

23. Plaintiff had not heard of these rumors until he was shown a post by Defendant Henry stating, "I am NOT the sheriff candidate under investigation by the Texas Rangers."



The Kevin Henry Podcast

October 14, 2024 · 🌐



Follow



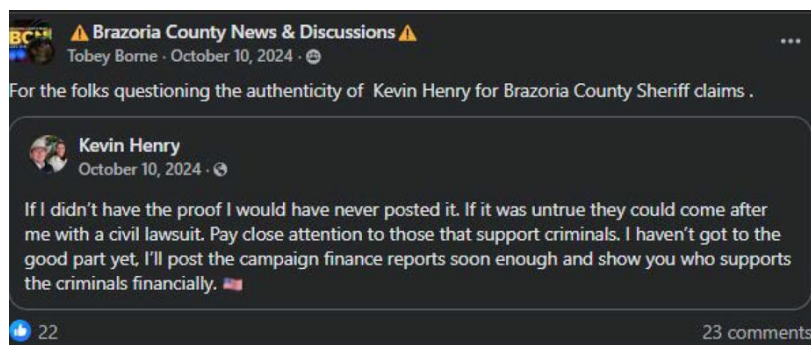
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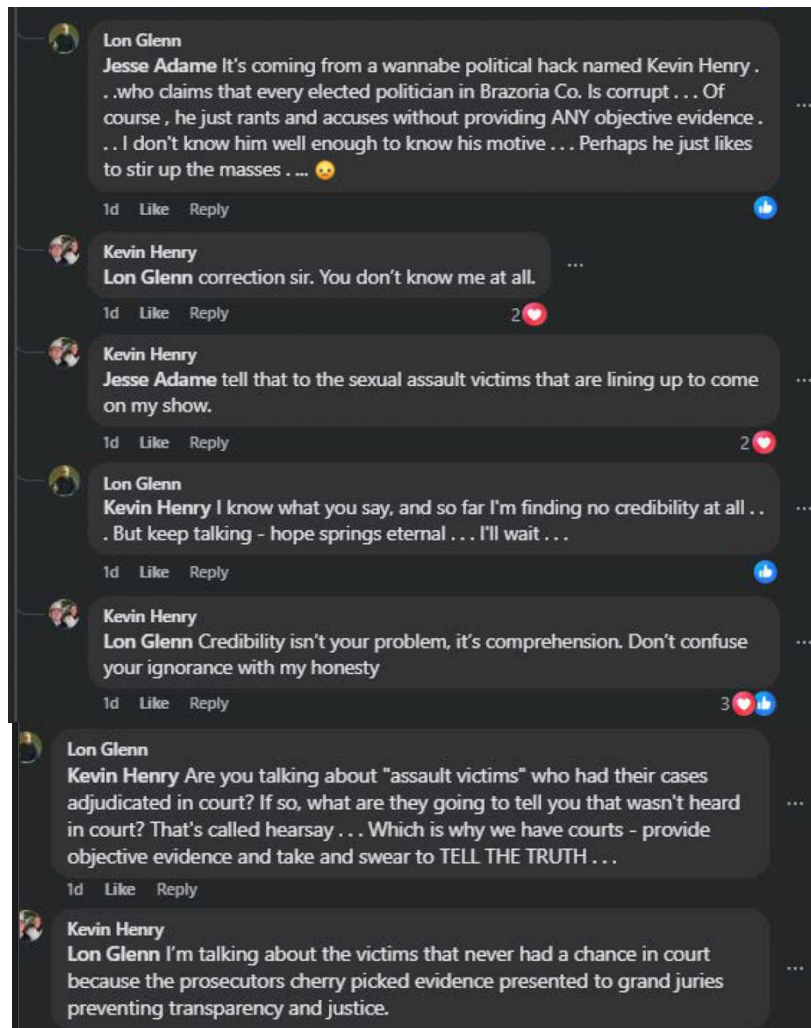
Comments

I am NOT the sheriff candidate under investigation by the Texas Rangers.

24. The rumors stemmed from accusations of sexual impropriety first spread by Defendants Emory Joseph “E.J.” King, Lauren Geddes-King, and Brazosport Pediatrics and Family Clinic, P.L.L.C., which were discussed with Defendants Henry or Roberson.

25. During the campaign, Defendant Henry repeated these unfounded accusations. Among other later false and conspiratorial claims, first Defendant Henry used social media accounts to promote a narrative that Plaintiff exposed his genitals to a young female at a medical clinic office yet was shielded from consequences by a corrupt “county swamp.”



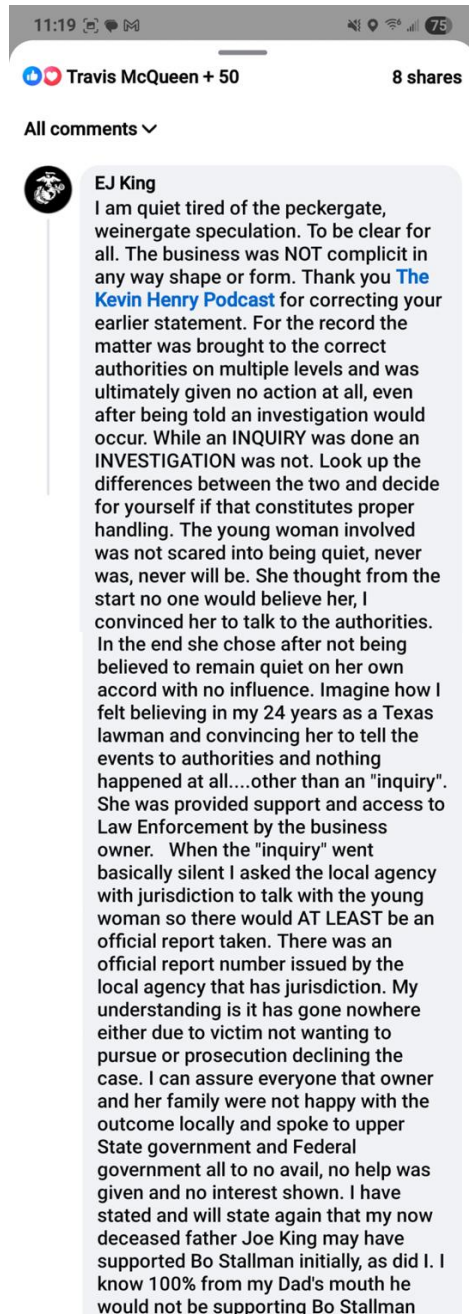


26. Defendant Henry made similar false and defamatory statements in a video statement on his campaign website and to the newspaper, *The Facts*. Defendant Henry told *The Facts* that there was “a conspiracy to protect Stallman by those in power.”

27. Despite his underhanded tactics, Defendant Henry still lost to Plaintiff in 2024. Following his defeat, Henry—through his podcast and social media accounts—escalated his public calumnies that Plaintiff was protected from the consequences of exposing his genitals to a young female at a medical clinic by a corrupt “county swamp.”

28. These statements coincided with Defendant King commenting on Defendant Henry’s post that he, Defendant King, had pressured the young female to bring charges and was

disappointed she did not—insinuating Plaintiff had committed illegal acts and was thus unfit to be sheriff.



during the most recent election but my Dad passed prior to the election. I am thankful my Dad did not have to hear of this instance and other recent events. I have changed my support and opinion about Bo Stallman as well. I do not go around bashing him but I will not turn from the truth either. I whole heartedly support the men and women of the Sheriffs Office and all Law Enforcement agencies. Not everything is the way it appears on social media and that is because most of us chose not to live our lives on FB. There are many things wrong in this county, this state and in this nation but I still believe we live in the greatest county with the greatest people in the greatest state and nation on this earth.

2h Like Reply

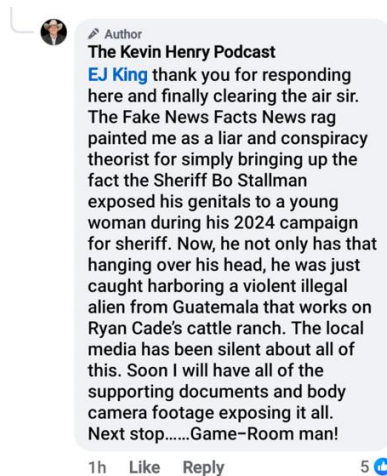
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The Kevin Henry Podcast EJ King thank you...

29. This false narrative is belied by public records reflecting that a report (Case 2024-002500) was made to the Angleton Police Department alleging an incident at a medical clinic. The report about this alleged incident was classified as “Information Only,” signifying that the purported complainant did not wish to pursue an investigation and thus the District Attorney’s office filed no criminal charges. Despite this, Defendants continued to publicize and amplify inflammatory accusations and insinuations—which originated with Defendants—on social media and via podcast all the while omitting that they were the source of the false accusations. These false accusations were included on episodes 5, 8, 10, 11, 13, 15, 16, and 17 of Henry’s podcast.

30. Defendant Henry jumped on Defendant King’s comment to support King’s baseless allegations.



31. Defendants Roberson and Henry, in concert, further circulated, or amplified other salacious false rumors—including claims that Plaintiff and others had given alcohol to a 17-year-old who they proceeded to sexually assault in an apartment above a restaurant.

32. These statements and insinuations are patently false and reckless. Their publication and repetition with malice and in reckless disregard of the truth by Defendants have undermined public trust, harmed Plaintiff's reputation and credibility, and caused him to sustain damages.

C. Coordinated Conduct and Conspiracy

33. Defendants acted in concert through coordinated actions and messaging across platforms (podcasts, social media, and public commentary) to further their shared purpose of discrediting Sheriff Stallman by casting him in a false light by repeating, promoting, and amplifying false claims of criminality, sexual impropriety, and corruption.

34. In furtherance of their shared purpose and coordinated effort, Defendants maliciously: (a) created rumors of Plaintiff committing crimes, (b) authored and posted written statements on social media; (c) produced and broadcast podcast content repeating and insinuating the same allegations; and (d) circulated or encouraged the circulation of rumors in the community. Evidence of coordination includes that information only available to Defendants Brazosport

Pediatric and Family Clinic and its principal Defendant Geddes-King—who is Defendant King’s wife—was shared with the other Defendants who propagated the allegations across platforms. It appears Defendants orchestrated their effort to align with the timing of election-related disputes and subsequent publicity.

35. Investigatory materials and public record records reflect that Defendants Brazosport Pediatric and Family Clinic and Geddes-King pressured one of their employees to seek criminal charges against Sheriff Stallman. The employee did not seek a criminal investigation. On information and belief, after the employee refused to cooperate with their smear campaign, Defendants publicized and amplified these allegations, evidencing actual malice and reckless disregard for the truth.

VII. CAUSES OF ACTION

A. Count I – Libel

36. Defendants Kevin Henry and EJ King published written statements about Plaintiff, including on social media and in fixed media associated with Defendant Henry’s podcast, that falsely asserted or insinuated criminality, sexual misconduct, and corruption.

37. These written statements are false, defamatory, and referred to Plaintiff, and were published to third parties as statements of fact or factual implications rather than mere opinion.

38. Defendants Henry and King acted with actual malice, knowing the statements were false or with reckless disregard for their truth—particularly in light of the public record that the clinic report was “Information Only” with no criminal case that followed.

39. As a direct and proximate result, Plaintiff suffered reputational harm, economic damages, and emotional distress. These publications constitute libel under TEX. CIV. PRAC. & REM. Code § 73.001.

B. Count II – Libel Per Se

40. Defendants Henry and King’s written publications falsely imputed criminal conduct and serious sexual impropriety to Plaintiff, and that he was unfit for his job, thereby constituting libel per se.

41. Because these statements are defamatory per se, harm to reputation is presumed, and Plaintiff need not plead or prove special damages.

42. As a direct and proximate result, Plaintiff suffered reputational harm, economic loss, and emotional distress.

C. Count III – Slander

43. Defendant Henry made false and defamatory oral statements in podcasts and other public forums, including allegations and insinuations that Plaintiff engaged in criminal or sexual misconduct.

44. These statements were published to third parties, were false, and were made with at least negligence and, as to a public official, actual malice.

45. As a direct and proximate result, Plaintiff suffered reputational harm, economic loss, and emotional distress.

D. Count IV – Slander Per Se

46. The paragraphs above are incorporated here by reference.

47. Defendant Henry’s oral statements falsely imputing criminal conduct and serious sexual impropriety to Plaintiff constitute slander per se under Texas law.

48. Because these statements are slander per se, harm to reputation is presumed. *See In re Lipsky*, 460 S.W.3d 579, 593, 596 (Tex. 2015) (defamation per se principles).

49. As a direct and proximate result, Plaintiff suffered reputational harm, economic loss, and emotional distress.

E. Count V – Civil Conspiracy

50. Defendants combined and agreed to accomplish an unlawful purpose—defamation—or, alternatively, a lawful purpose by unlawful means in coordinating the publication and amplification of false statements about Plaintiff’s alleged criminality, sexual misconduct, and corruption.

51. In furtherance of the conspiracy, Defendants committed overt acts including authoring and posting false written statements, broadcasting and repeating false oral statements via podcast, and disseminating and repeating false rumors in the community.

52. Defendants’ acts were committed with actual malice and reckless disregard for the truth and proximately caused Plaintiff’s damages.

F. Count VI – False Light & Invasion of Privacy

53. Defendants publicly portrayed Plaintiff in a false light highly offensive to a reasonable person by disseminating false and inflammatory allegations of criminality, sexual misconduct, and corruption to the public through social media and podcasts.

54. Defendants acted with knowledge of or reckless disregard as to the falsity of the portrayed implications and statements.

55. As a direct and proximate result, Plaintiff suffered reputational harm, emotional distress, and other damages.

VIII. DAMAGES

56. As a direct and proximate result of Defendants’ conduct, Plaintiff suffered serious and ongoing injuries including reputational harm; loss of goodwill; and emotional distress and

mental anguish. In instances of defamation per se, damages are presumed. *See In re Lipsky*, 460 S.W.3d at 593, 596.

57. Plaintiff seeks actual damages and exemplary damages due to Defendants' willful and malicious conduct and reckless disregard for the truth.

IX. VERIFIED APPLICATION FOR INJUNCTIVE RELIEF

58. The facts show that Plaintiff has valid causes of action against the Defendants and is likely to prevail on the merits of this dispute.

59. The facts also show that Defendants' conduct poses a risk of imminent and irreparable injury, loss, or damage to Plaintiff absent injunctive relief before notice of hearing on a temporary injunction can be served. Defendants' defamatory posts and statements continue to damage Plaintiff's reputation and standing in the community.

60. The potential losses of reputation and ongoing social relationships, and the resulting hassle and uncertainty cannot be fully measured with damages. Damages are inadequate as a matter of law.

61. Temporary injunctive relief is necessary to preserve the status quo before a hearing on a temporary injunction. The status quo—the last actual, peaceable, non-contested status preceding the pending controversy—is a lack of statements defaming Plaintiff in any forum. The status quo is preserved by Defendants Henry and King taking their posts down and all Defendants retracting their statements.

X. INJUNCTIVE RELIEF REQUESTED

62. Plaintiff is entitled to immediate injunctive relief pending a hearing on a temporary injunction. Plaintiff requests that the Court enjoin the Defendants to:

- a. Refrain from making any statements defaming Plaintiff in any forum or medium;

- b. Delete their defamatory writings and refrain from creating any similar version of them, including, but not limited to, Facebook or any other social media outlet;
- c. Delete their defamatory podcasts and refrain from creating any similar version of them, including, but not limited to, Facebook or any other social media outlet;
- d. Refrain from using the name Bo Stallman or any photograph or other likeness of Plaintiff in any communication through email or social media or other forms of media except for purposes of a retraction;
- e. Refrain from implying, insinuating, or otherwise accusing Plaintiff of committing crimes of any nature;
- f. Produce the contact information and copies of all communications with third parties that touch or concern Plaintiff; and
- g. Publish a retraction letter in accordance with TEX. CIV. REM. CODE § 73.057(e), enabling Plaintiff to distribute it “with a prominence and in a manner and medium reasonably likely to reach substantially the same audience as the publication complained of,” including on their Facebook pages.

63. Plaintiff has shown that he has probably suffered and will continue to suffer irreparable harm as a proximate cause of Defendants’ conduct irrespective of any remedy at law. A remedy at law is not adequate.

XI. APPLICATION FOR TEMPORARY RESTRAINING ORDER

64. Plaintiff asks the Court to issue a temporary restraining order awarding the injunctive relief requested above against Defendants.

XII. APPLICATION FOR TEMPORARY INJUNCTION

65. Plaintiff asks the Court to issue a temporary injunction awarding the injunctive relief requested above against Defendants.

XIII. APPLICATION FOR PERMANENT INJUNCTION

66. Plaintiff asks the Court to issue a permanent injunction awarding the injunctive relief requested above against Defendants.

XIV. JURY DEMAND

67. Under TEXAS RULE OF CIVIL PROCEDURE 216, Plaintiff demands a trial by jury on all issues so triable.

XV. PRAYER FOR RELIEF

68. Plaintiff respectfully requests, after a final hearing or trial, the following relief:

- a. that Defendants be cited to appear and answer;
- b. an award of actual damages in an amount within the jurisdiction of the Court;
- c. exemplary damages;
- d. injunctive relief as described above;
- e. pre-judgment and post-judgment interest;
- f. all other and further relief to which Plaintiff is entitled, whether at law or in equity.

Respectfully submitted,

THOMPSON STAM, PLLC

/s/ Alexander G. Kykta

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ATTORNEYS FOR PLAINTIFF BO STALLMAN

VERIFICATION

I, Sheriff Stallman, have read the foregoing Petition, and swear that the statements contained in the Petition are true and correct to the best of my knowledge, information, and belief.

My name is Leonard "Bo" Stallman, my date of birth is 08/15/79, and my address is 3602 County Road 45, Angleton, TX 77515, and USA. I declare under penalty of perjury that the foregoing is true and correct.

Executed in Brazoria County, State of Texas, on the 12th day of October 2025.

/s/ 
Leonard "Bo" Stallman (Oct 12, 2025 20:16:09 CDT)
Leonard "Bo" Stallman

Stallman - Original Petition_Verification

Final Audit Report

2025-10-13

Created:	2025-10-13
By:	Alex Kykta (alex@thompsonstam.com)
Status:	Signed
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"Stallman - Original Petition_Verification" History

-  Document created by Alex Kykta (alex@thompsonstam.com)
2025-10-13 - 1:10:06 AM GMT
-  Document emailed to Leonard "Bo" Stallman (bo.stallman@yahoo.com) for signature
2025-10-13 - 1:10:12 AM GMT
-  Email viewed by Leonard "Bo" Stallman (bo.stallman@yahoo.com)
2025-10-13 - 1:12:41 AM GMT
-  Document e-signed by Leonard "Bo" Stallman (bo.stallman@yahoo.com)
Signature Date: 2025-10-13 - 1:16:09 AM GMT - Time Source: server
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Status as of 10/13/2025 4:03 PM CST

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