

**IN THE CIRCUIT COURT OF THE EIGHTH JUDICIAL
CIRCUIT OF ILLINOIS, ADAMS COUNTY**

MARK LAWRENCE and CHRIS LAWRENCE,)

)

Plaintiffs,)

)

v)

)

AMBER SHAFFER, ZACH SHAFFER,)

RENEA PETERS, KEVIN R. PETERS,)

KEVIN MURPHY, and TERRA MURPHY,)

)

Defendants.)

No. 2022LA15

DEFAMATION

NOW COMES the Plaintiffs, MARK LAWRENCE and CHRIS LAWRENCE, in their own proper persons and with their attorney, DON R. SCHUERING ESQ. LLC, in the person of Donald R. Schuering, and complaining of the Defendants, AMBER SHAFFER, ZACH SHAFFER, RENEA PETERS, KEVIN R. PETERS, KEVIN MURPHY, and TERRA MURPHY, and states as follows:

1. The Plaintiffs, MARK LAWRENCE and CHRIS LAWRENCE, reside in Quincy, Adams County, Illinois and have for at least the last 20 years.

2. The Defendants, AMBER SHAFFER, ZACH SHAFFER, RENEA PETERS, and KEVIN R. PETERS are residents of Adams County, Illinois and KEVIN MURPHY, and TERRA MURPHY are residents of Hannibal, Marion County, Missouri.

3. The Defendants, AMBER SHAFFER, ZACH SHAFFER, RENEA PETERS, KEVIN R. PETERS, KEVIN MURPHY, and TERRA MURPHY are the Board of Directors of a not-for-profit organization known as 2X4's For Hope.

4. In the latter part of 2021, the Defendants, AMBER SHAFFER, ZACH SHAFFER, RENEA PETERS, KEVIN R. PETERS, KEVIN MURPHY, and TERRA

MURPHY, and each of them, sent a letter to the Illinois State Police alleging that the Plaintiffs committed a criminal act of misappropriation of funds. (See Exhibit A).

5. Not only did the Defendants submit these allegations in writing to law enforcement but also orally and verbally accused the Plaintiffs of criminal conduct.

6. The Defendants falsely accused the Plaintiffs of criminal conduct and each of them, knew said allegations to be false when they publicly made these allegations.

7. The Defendants' statements, both written or oral, directly resulted in an ongoing police investigation.

8. The accusations and allegations of misappropriation of funds were in fact false.

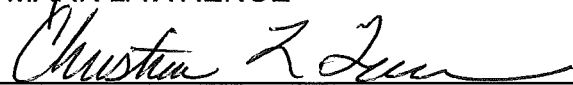
9. Defendants' statements, collectively and individually, maligned the Plaintiffs' reputation.

10. The Defendants' intentional and malicious acts proximately caused Plaintiffs' to suffer great emotional distress and embarrassment and loss of their reputation in their community.

WHEREFORE, MARK LAWRENCE and CHRIS LAWRENCE, Plaintiffs, and complaining of the Defendants, AMBER SHAFFER, ZACH SHAFFER, RENEA PETERS, KEVIN R. PETERS, KEVIN MURPHY, and TERRA MURPHY, and each of them, in a dollar amount in excess of \$100,000 and for such other and further relief as the court deems just and proper.



MARK LAWRENCE



CHRIS LAWRENCE

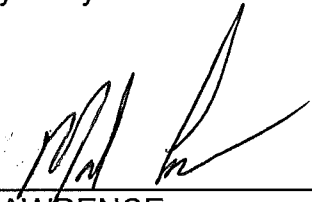
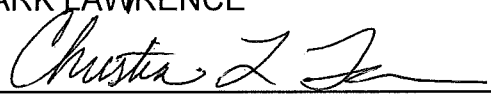
MARK LAWRENCE and CHRIS LAWRENCE, Plaintiffs,
BY DON R. SCHUERING ESQ. LLC
Their attorney

Per: 
Plaintiffs' Attorney

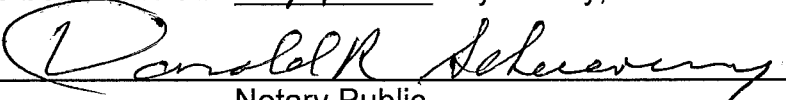
VERIFICATION

The undersigned, under penalties as provided pursuant to 735 ILCS 5/1-109, certifies that they are Defendants herein, and as such is familiar with the matters alleged in the foregoing Amended Verified Complaint, and further certifies that the statements and allegations set forth in this Amended Verified Complaint and those allegations deemed alleged by virtue of 735 ILCS 5/1504 are true and correct, except as to matters therein stated to be on information and belief, and as to such matters, the undersigned certifies as aforesaid that they verily believe the same to be true.

Date: 5-11, 2022


MARK LAWRENCE

CHRIS LAWRENCE

Subscribed and sworn to before me this 11 day of May, 2022.


Notary Public

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