

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND

ALBERT SNYDER,
Plaintiff

v.

FRED W. PHELPS, SR.,
JOHN DOEs, JANE DOEs, and
WESTBORO BAPTIST CHURCH, INC.
Defendants

Civil Action No.

COMPLAINT

Preliminary Statement

1. This is a suit for defamation, invasion of privacy and intentional infliction of emotional distress. Plaintiff Albert Snyder is a resident of York, Pennsylvania and the father of the now deceased Lance Corporal Matthew A. Snyder. He alleges that the defendant church and its members wrongfully intruded upon his son's funeral and subsequently defamed him on the defendants' webpage, causing physical and emotional damages. In addition, defendants' conduct was so intentional and outrageous that the imposition of punitive damages is appropriate to punish the defendants for their actions and to deter the defendants from further reprehensible conduct.

Jurisdiction And Venue

2. The Court has jurisdiction under 28 U.S.C. § 1332, which provides for original district court jurisdiction for diversity of citizenship and where the amount in controversy exceeds \$75,000.00.

3. Venue is proper in the District of Maryland under 28 U.S.C. § 1391, because a substantial part of the events giving rise to the claim occurred in Maryland.

4. A jury trial is demanded.

Parties

5. Plaintiff, Albert Snyder, is an adult individual who resides at 760 Spring Lane, York, Pennsylvania 17403.

6. Defendant, Fred W. Phelps, Sr., is an adult individual who has an office at 3701 SW 12th Street, Topeka, Kansas 66604.

7. Defendant, Westboro Baptist Church, Inc., is a corporation organized under the laws of the state of Kansas with its principal place of business located at 3701 SW 12th Street, Topeka, Kansas 66604.

8. The remaining defendants are various “John and Jane Does” that disrupted, funded or otherwise conspired with defendant Fred W. Phelps, Sr. for the purpose of disrupting Marine Lance Corporal Matthew A. Snyder’s funeral. Upon information and belief, all unnamed defendants reside in or around the Westboro Baptist Church compound in Topeka, Kansas.

9. The individual defendants acted as agents of defendant Westboro Baptist Church and in their individual capacities.

Summary Of Plaintiff’s Claims

10. Plaintiff, Albert Snyder, is the father of Marine Lance Corporal Matthew A. Snyder (now deceased) (“Matt”); Matt was born on July 18, 1985.

11. In or about October 2003, Matt joined the United States Marine Corps.

12. Subsequently, Matt was deployed to Iraq with his unit as part of Operation Iraqi Freedom.

13. On March 3, 2006, while conducting combat operations, Matt was killed in the line of duty.

14. Matt was transported back to the United States and plaintiff Albert Snyder and Matt's family planned and commenced a traditional funeral and burial service in honor of their son. The funeral was on March 10, 2006, at St. John's Catholic Church, in Westminster, Maryland.

15. The defendants operate and maintain several websites: (1) www.thesignsofthetimes.net; (2) www.smellthebrimstone.com; (3) www.godhatesamerica.com; (4) www.priestrapeboys.com; (5) www.godhatessweden.com; (6) www.godhatescanada.com; and lastly, (7) www.godhatesfags.com.

16. Among other things, the defendants preach and advocate a hatred for homosexuals. On numerous occasions, the defendants have protested military funerals proclaiming, for example, "God hates fags" and "Semper Fi Fags" and "thank God for dead soldiers".

17. The defendants protest military funerals because, according to the defendants:

"Here are some axiomatic matters of fact:

These turkeys are not heroes. They are lazy, incompetent idiots looking for jobs because they're not qualified for honest work.

They were raised on a steady diet of fag propaganda in the home, on TV, in church, in school, in mass media - everywhere - the two-pronged lie: 1) It's OK to be gay; and, 2) Anyone saying otherwise, like WBC, is a hatemonger who must be vilified, demonized, marginalized into silence.

Therefore, with full knowledge of what they were doing, they voluntarily joined a fag-infested army to fight for a fag-run country now utterly and finally forsaken by God who Himself is fighting against that country.

