



## AlaFile E-Notice

31-CV-2020-900401.00

To: AUGUSTA S. DOWD  
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# NOTICE OF ELECTRONIC FILING

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IN THE CIRCUIT COURT OF ETOWAH COUNTY, ALABAMA

TODD ENTREKIN V. CONNOR SHEETS ET AL  
31-CV-2020-900401.00

The following complaint was FILED on 7/8/2020 4:56:13 PM

Notice Date: 7/8/2020 4:56:13 PM

CASSANDRA JOHNSON  
CIRCUIT COURT CLERK  
ETOWAH COUNTY, ALABAMA  
801 FORREST AVENUE  
SUITE 202  
GADSDEN, AL, 35901

256-549-2150



ELECTRONICALLY FILED  
7/8/2020 4:56 PM  
31-CV-2020-900401.00  
CIRCUIT COURT OF  
ETOWAH COUNTY, ALABAMA  
CASSANDRA JOHNSON, CLERK

Case:  
**31**

Date of Filing:  
07/08/2020

Judge Code:

State of Alabama Unified Judicial System Form ARCiv-93 Rev. 9/18	<b>COVER SHEET CIRCUIT COURT - CIVIL CASE</b> (Not For Domestic Relations Cases)	Case: <b>31</b> Date of Filing: 07/08/2020	ELECTRONICALLY FILED 7/8/2020 4:56 PM 31-CV-2020-900401.00 CIRCUIT COURT OF ETOWAH COUNTY, ALABAMA CASSANDRA JOHNSON, CLERK
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### GENERAL INFORMATION

#### IN THE CIRCUIT COURT OF ETOWAH COUNTY, ALABAMA TODD ENTREKIN v. CONNOR SHEETS ET AL

**First Plaintiff:**  Business  Individual  Government  Other

**First Defendant:**  Business  Individual  Government  Other

**NATURE OF SUIT:** Select primary cause of action, by checking box (check only one) that best characterizes your action:

#### TORTS: PERSONAL INJURY

- WDEA - Wrongful Death  
 TONG - Negligence: General  
 TOMV - Negligence: Motor Vehicle  
 TOWA - Wantonness  
 TOPL - Product Liability/AEMLD  
 TOMM - Malpractice-Medical  
 TOLM - Malpractice-Legal  
 TOOM - Malpractice-Other  
 TBFM - Fraud/Bad Faith/Misrepresentation  
 TOXX - Other: \_\_\_\_\_

#### TORTS: PERSONAL INJURY

- TOPE - Personal Property  
 TORE - Real Property

#### OTHER CIVIL FILINGS

- ABAN - Abandoned Automobile  
 ACCT - Account & Nonmortgage  
 APAA - Administrative Agency Appeal  
 ADPA - Administrative Procedure Act  
 ANPS - Adults in Need of Protective Services

#### OTHER CIVIL FILINGS (cont'd)

- MSXX - Birth/Death Certificate Modification/Bond Forfeiture Appeal/ Enforcement of Agency Subpoena/Petition to Preserve  
 CVRT - Civil Rights  
 COND - Condemnation/Eminent Domain/Right-of-Way  
 CTMP - Contempt of Court  
 CONT - Contract/Ejectment/Writ of Seizure  
 TOCN - Conversion  
 EQND - Equity Non-Damages Actions/Declaratory Judgment/ Injunction Election Contest/Quiet Title/Sale For Division  
 CVUD - Eviction Appeal/Unlawful Detainer  
 FORJ - Foreign Judgment  
 FORF - Fruits of Crime Forfeiture  
 MSHC - Habeas Corpus/Extraordinary Writ/Mandamus/Prohibition  
 PFAB - Protection From Abuse  
 EPFA - Elder Protection From Abuse  
 FELA - Railroad/Seaman (FELA)  
 RPRO - Real Property  
 WTEG - Will/Trust/Estate/Guardianship/Conservatorship  
 COMP - Workers' Compensation  
 CVXX - Miscellaneous Circuit Civil Case

**ORIGIN:** F  INITIAL FILING      A  APPEAL FROM DISTRICT COURT      O  OTHER

R  REMANDED      T  TRANSFERRED FROM OTHER CIRCUIT COURT

**HAS JURY TRIAL BEEN DEMANDED?**  YES  NO

Note: Checking "Yes" does not constitute a demand for a jury trial. (See Rules 38 and 39, Ala.R.Civ.P, for procedure)

**RELIEF REQUESTED:**  MONETARY AWARD REQUESTED  NO MONETARY AWARD REQUESTED

#### ATTORNEY CODE:

DOW003

7/8/2020 4:56:16 PM

Date

/s/ AUGUSTA S. DOWD

Signature of Attorney/Party filing this form

**MEDIATION REQUESTED:**  YES  NO  UNDECIDED

**Election to Proceed under the Alabama Rules for Expedited Civil Actions:**  YES  NO



**IN THE CIRCUIT COURT OF ETOWAH COUNTY, ALABAMA**

**TODD ENTREKIN,** )  
 )  
 **Plaintiff,** )  
 )  
 **v.** )  
 )  
 **CONNOR SHEETS;ADVANCE** )  
 **LOCAL MEDIA LLC; CHARLES** )  
 **CLIFTON, in his official and individual** )  
 **capacities; JONATHON HORTON,** )  
 **in his official and individual capacities;** )  
 **CITY OF ONEONTA; CITY OF** )  
 **RAINBOW CITY, and** )

**Case No.:** \_\_\_\_\_

**JURY TRIAL DEMANDED**

**There may be other entities, whose true names and identities are unknown to Plaintiff at this time, who may be legally responsible for the claim(s) set forth herein who may be added by amendment by Plaintiff when their true names and identities are accurately ascertained by further discovery. Until that time, Plaintiff will designate these parties in accordance with ARCP 9(h). The word “entity” as used herein is intended to refer to and include without limitation any and all legal entities including individual persons, any and all forms of partnerships, and any and all types of corporations and unincorporated associations. The symbol by which these party Defendants are designated is intended to include more than one entity in the event that discovery reveals that the descriptive characterization of the symbol applies to more than one “entity.” In the present action, the party Defendants which Plaintiff must include by descriptive characterization are as follows:**

**FICTITIOUS DEFENDANTS A-C, whether singular or plural, is that individual or entity who had an affiliation, relationship, and/or participating role in the creation of the content, drafting, editing, approval, publishing, dispensing, and/or the alleged investigation of the content contained in the July 16, 2018 article titled “Police investigating allegations Alabama’s ‘Beach House Sheriff’ had sex with underage girls,” whose name, identity, role or responsibility, and participation is unknown at this time but will be added by amendment when ascertained and whose participation caused or contributed to an injury to Plaintiff including without limitation through an act of libel and/or defamation and/or a furtherance of an act of libel and/or defamation of or other related injury to Plaintiff.**

**FICTITIOUS DEFENDANTS D-F, whether singular or plural, is that individual or entity who had an affiliation, relationship and/or participating role in the creation of the content, drafting, editing, approval, publishing, and/or dispensing of the YouTube video published on July 16, 2018 titled “Police investigating allegations Alabama’s ‘Beach House Sheriff’ had sex with underage girls,” whose name, identity, role or responsibility, and participation is unknown at this time but will be added by amendment when ascertained and whose participation caused or contributed to an injury to Plaintiff including without limitation**

through an act of libel and/or defamation and/or a furtherance of an act of libel and/or defamation of or other related injury to Plaintiff.

**FICTITIOUS DEFENDANTS G-I**, whether singular or plural, is that individual or entity who had an affiliation, relationship and/or participating role in the republication of the July 16, 2018 article titled “Police investigating allegations Alabama’s ‘Beach House Sheriff’ had sex with underage girls,” on or about July 31, 2018, in the article styled “Alabama’s ‘Beach House Sheriff’ is selling his beach house” whose name, identity, role or responsibility, and participation is unknown at this time but will be added by amendment when ascertained and whose participation caused or contributed to an injury to Plaintiff including but not limited to an act of libel and/or defamation and/or a further act of libel and/or defamation of or other related injury to Plaintiff.

**FICTITIOUS DEFENDANTS J-L**, whether singular or plural, is that that individual or entity who had an affiliation, relationship and/or participating role in the republication of the July 16, 2018 article titled “Police investigating allegations Alabama’s ‘Beach House Sheriff’ had sex with underage girls,” on or about August 15, 2018, in an article styled “New state investigation into ‘Beach House Sheriff’” whose name, identity, role or responsibility, and participation is unknown at this time but will be added by amendment when ascertained and whose participation caused or contributed to an injury to Plaintiff including but not limited to an act of libel and/or defamation and/or a further act of libel and/or defamation of or other related injury to Plaintiff.

**FICTITIOUS DEFENDANTS M-O**, whether singular or plural, is that individual, entity municipality, governmental agency and/or organization who, along with named Defendants Jonathan Horton, Charles Clifton, City of Rainbow City, Alabama, and City of Oneonta, Alabama, while acting in either an official or individual capacity, caused, participated, prevented, interfered with, conspired with, and/or authorized a purported “investigation” in furtherance of personal, non-legitimate interests on behalf of all parties, both named and fictitious, and whose participation caused or contributed to an injury to Plaintiff, an act of libel and/or defamation and/or conspiracy to commit injury and/or an act of libel and/or defamation and/or a conspiracy to defame to cause significant, substantive and permanent harm to the reputation of Plaintiff and to cast Plaintiff in a false light and whose actions and/or conduct was illegally, negligently, willfully, wantonly, recklessly, maliciously and/or intentionally done and/or who are responsible to answer for the acts and/or conduct of all other parties, either named or fictitious, but whose names and/or identities and the specific roles in the events made the basis of this litigation are unknown at this time but will be added by amendment when ascertained.

Defendants.

)  
)

**COMPLAINT****PARTIES**

1. Plaintiff Todd Entrekin (“Mr. Entrekin”) is of legal age and is a citizen and resident of Etowah County, Alabama. From November 2, 2007 until January 13, 2019, Mr. Entrekin was the Sheriff of Etowah County.

2. Defendant Connor Sheets (“Sheets”) is of legal age and is, upon information and belief, a resident of Jefferson County, Alabama. At all times material to the allegations of this Complaint, Sheets was acting as an employee, agent and/or servant of Defendant Advance Local Media LLC, as he was an investigative journalist for the Alabama news website, AL.com.

3. Defendant Advance Local Media LLC (“ALM”) is, upon information and belief, a foreign corporation formed in the State of New York. According to the Alabama Secretary of State’s publicly-available corporate records, Defendant ALM has been doing business in the State of Alabama since January 9, 2018. Defendant ALM has a registered office street address of 641 South Lawrence Street, Montgomery, Alabama 36104. At all times material to the allegations of this Complaint, Defendant ALM published AL.com across the State of Alabama and elsewhere, including in Etowah County.

4. Defendant Charles Clifton (“Clifton”) is of legal age and is, upon information and belief, a resident of Blount County, Alabama. At all times material to the allegations of this Complaint, Defendant Clifton was the Chief of Police of the City of Oneonta, Alabama. Defendant Clifton is sued in both his official and individual capacities. At all times material to the allegations of this Complaint, Defendant Clifton was an employee, agent, and/or servant of the City of Oneonta, Alabama. At all times material to the allegations in the Complaint, Defendant Clifton, while acting both in his individual and official capacities, acted illegally, willfully, maliciously,

fraudulently, in bad faith, and beyond his authority when he caused, participated, prevented, interfered with, and/or purported to authorize and conduct an “investigation” in furtherance of personal, non-legitimate interests in order to harm and damage Mr. Entekin.

5. Defendant Jonathon Horton (“Horton”) is of legal age and is, upon information and belief, a resident of Etowah County, Alabama. At all times material to allegations of this Complaint, Defendant Horton was the Chief of Police of the City of Rainbow City, Alabama. Defendant Horton is sued in both his official and individual capacities. At all times material to the allegations of this Complaint, Defendant Horton was an employee, agent, and/or servant of the City of Rainbow City, Alabama. At all times material to the allegations in the Complaint, Defendant Horton, while acting both in his individual and official capacities, acted illegally, willfully, maliciously, fraudulently, in bad faith, and beyond his authority when he caused, participated, prevented, interfered with, and/or purported to authorize an “investigation” in furtherance of personal, non-legitimate interests in order to harm and damage Mr. Entekin.

6. Defendant City of Oneonta (“Defendant Oneonta”) is a municipal corporation of the State of Alabama vested with the enumerated and finite rights, privileges, powers, immunities, duties, responsibilities, and authority granted to it by the laws of the State of Alabama. Defendant Oneonta is a body “politic and corporate” that “shall sue and be sued” pursuant to Ala. Code § 11-40-1 (1975). At all times material to the allegations in the Complaint, Defendant Oneonta acted illegally, willfully, maliciously, fraudulently, in bad faith, and beyond its authority when it caused, participated, prevented, interfered with, and/or authorized a purported “investigation” in furtherance of personal, non-legitimate interests in order to harm and damage Mr. Entekin.

7. Defendant City of Rainbow City (“Defendant Rainbow City”) is a municipal corporation of the State of Alabama vested with the enumerated and finite rights, privileges,

powers, immunities, duties, responsibilities, and authority granted to it by the laws of the State of Alabama. Defendant Rainbow City is a body “politic and corporate” that “shall sue and be sued” pursuant to Ala. Code § 11-40-1 (1975). At all times material to the allegations in the Complaint, Defendant Rainbow City acted illegally, willfully, maliciously, fraudulently, in bad faith, and beyond its authority when it caused, participated, prevented, interfered with, and/or authorized a purported “investigation” in furtherance of personal, non-legitimate interests in order to harm and damage Mr. Entrekin.

8. Fictitious Defendants “A-C,” whether singular or plural, is that individual or entity who had an affiliation, relationship, and/or participating role in the creation of the content, drafting, editing, approval, publishing, dispensing, and/or the alleged investigation of the content contained in the July 16, 2018 article titled “Police investigating allegations Alabama’s ‘Beach House Sheriff’ had sex with underage girls,” whose name, identity, role or responsibility, and participation is unknown at this time but will be added by amendment when ascertained and whose participation caused or contributed to an injury to Plaintiff including without limitation through an act of libel and/or defamation and/or a furtherance of an act of libel and/or defamation of or other related injury to Plaintiff.

9. Fictitious Defendants “D-F,” whether singular or plural, is that individual or entity who had an affiliation, relationship and/or participating role in the creation of the content, drafting, editing, approval, publishing, and/or dispensing of the YouTube video published on July 16, 2018 titled “Police investigating allegations Alabama’s ‘Beach House Sheriff’ had sex with underage girls,” whose name, identity, role or responsibility, and participation is unknown at this time but will be added by amendment when ascertained and whose participation caused or contributed to

an injury to Plaintiff including without limitation through an act of libel and/or defamation and/or a furtherance of an act of libel and/or defamation of or other related injury to Plaintiff.

10. Fictitious Defendants “G-I,” whether singular or plural, is that individual or entity who had an affiliation, relationship and/or participating role in the republication of the July 16, 2018 article titled “Police investigating allegations Alabama’s ‘Beach House Sheriff’ had sex with underage girls,” on or about July 31, 2018, in the article styled “Alabama’s ‘Beach House Sheriff’ is selling his beach house” whose name, identity, role or responsibility, and participation is unknown at this time but will be added by amendment when ascertained and whose participation caused or contributed to injury to Plaintiff including but not limited to an act of libel and/or defamation and/or a further act of libel and/or defamation of or other related injury to Plaintiff.

11. Fictitious Defendants “J-L,” whether singular or plural, is that that individual or entity who had an affiliation, relationship and/or participating role in the republication of the July 16, 2018 article titled “Police investigating allegations Alabama’s ‘Beach House Sheriff’ had sex with underage girls,” on or about August 15, 2018, in an article styled “New state investigation into ‘Beach House Sheriff’” whose name, identity, role or responsibility, and participation is unknown at this time but will be added by amendment when ascertained and whose participation caused or contributed to an injury to Plaintiff including but not limited to an act of libel and/or defamation and/or a further act of libel and/or defamation of or other related injury to Plaintiff.

12. Fictitious Defendants “M-O,” whether singular or plural, is that individual, entity municipality, governmental agency and/or organization who, along with named Defendants Horton, Clifton, Rainbow City, and Oneonta, while acting in either an official or individual capacity, caused, participated, prevented, interfered with, conspired with, and/or authorized a purported “investigation” in furtherance of personal, non-legitimate interests on behalf of all



parties, both named and fictitious, and whose participation caused or contributed to an injury to Plaintiff, an act of libel and/or defamation and/or conspiracy to commit injury and/or an act of libel and/or defamation and/or a conspiracy to defame to cause significant, substantive and permanent harm to the reputation of Plaintiff and to cast Plaintiff in a false light and whose actions and/or conduct was illegally, negligently, willfully, wantonly, recklessly, maliciously and/or intentionally done and/or who are responsible to answer for the acts and/or conduct of all other parties, either named or fictitious, but whose names and/or identities and the specific roles in the events made the basis of this litigation are unknown at this time but will be added by amendment when ascertained.

#### **JURISDICTION AND VENUE**

13. This Court has jurisdiction over this action as the minimum amount in controversy is present.

14. Venue is proper in this Court pursuant to Ala. Code §§ 6-3-2 and 6-3-7 (1975).

#### **STATEMENT OF FACTS**

15. Defendant ALM is responsible for publishing the Alabama news website, AL.com, where Defendant Sheets was employed and/or otherwise worked as an investigative journalist at all times material to the allegations of this Complaint.

16. This case arises from the reckless and malicious publication by Defendants Sheets and ALM of highly-damaging allegations made by Mary Elizabeth Cross, who in 2018 falsely accused Mr. Entrekin of being a rapist and a drug dealer. Although she is named in the Article as Mary Elizabeth Cross, publicly-available sources show that at various times she has used the names Elizabeth Williams, Mary Elizabeth Buckner, Mary Shepherd, Coralla Cruz, Coralla De

Soto, and combinations of each of those names. For clarity and consistency in this Complaint, she shall be referenced herein as “Ms. Cross.”

17. Without undertaking and completing the comprehensive and probing type of investigation that is appropriate and necessary before responsibly publishing such explosive and damaging allegations, Defendants Sheets and ALM published Ms. Cross’s allegations throughout Alabama and worldwide. On July 16, 2018, Defendant ALM maliciously, recklessly, and without regard for the truth published an article on AL.com written by Defendant Sheets titled “Police investigating allegations Alabama’s ‘Beach House Sheriff’ had sex with underage girls.” (“Article”). A true and correct copy of the Article is attached hereto as Exhibit A. On or about the same date the Article was published, a video with the same title as the Article and also publishing these false allegations was posted on YouTube by AL.com. To date, the video, which remains on YouTube and is thus causing ongoing injury to Mr. Entrekin, has been viewed almost two thousand times.

18. The Article, written by Defendant Sheets and published by Defendant ALM, falsely accused Mr. Entrekin of some of the worst kinds of human behavior: statutory rape, solicitation of a minor, and dealing drugs. Further, the Article – falsely and with reckless disregard for the truth – left the reader with the impression that the investigation into Ms. Cross’s allegations was official, appropriately authorized, and legitimate, when the alleged investigation was none of these.

19. While the publication of the Article and the YouTube video disseminated Ms. Cross’s allegations around the world and caused severe injury and damage to Mr. Entrekin, the wrongs committed by all the Defendants, both named and fictitious, against Mr. Entrekin that culminated in the Article’s publication began before the Article appeared on the internet but did

not result in actual injury to Mr. Entrekin until the Article and the YouTube video were actually published.

20. Mr. Entrekin is the former Sheriff of Etowah County. At the time of the publication of the Article, Mr. Entrekin was still serving his term as Sheriff, but had recently lost his primary bid for re-election to Defendant Horton, who was at that time the Chief of Police for Defendant Rainbow City.

21. Prior to and at the time the Article and YouTube video were published, Defendant Clifton was the Chief of Police for Defendant Oneonta. Upon information and belief, Defendant Clifton has been harboring a personal grudge against Mr. Entrekin since the 1990s, when Defendant Clifton's appointment to the Etowah County Sheriff's Office's drug task force – where Mr. Entrekin worked at the time – was denied.

22. According to the Article, Ms. Cross first approached Defendant Horton sometime in March or April 2018 about the allegations that were later written about by Defendant Sheets, approved and authorized for publication by Defendant ALM, and published in the Article and on YouTube.

23. At that time (March or April 2018), Defendant Horton decided not to release these allegations to the public or request that appropriate state law enforcement investigate the allegations. Instead, according to the Article, Defendant Horton contacted Defendant Clifton to “put Cross in touch with Clifton.” (Ex. A). Because Defendant Horton was running against Mr. Entrekin for the Republican nomination for Sheriff of Etowah County at that time, according to Defendant Horton he felt that Defendant Clifton had “less of a conflict of interest, and could pursue Cross's allegations as an outside observer.” (*Id.*). Given his history of service in law enforcement, at the time that Defendant Horton made this request of Defendant Clifton, he knew or should have

known that Defendant Clifton would be conducting an unauthorized investigation, as more fully described below.

24. Although Defendant Clifton undertook the purported investigation that led to the Article, he did not have police jurisdiction to do so: he was a member of the Oneonta Police Department with police jurisdiction in Blount County, and Ms. Cross's false allegations concerned activities allegedly occurring in Etowah County. Because Defendant Clifton lacked police jurisdiction, he did not even have the authority to make an arrest in Etowah County. Accordingly, his supposed investigation was neither official nor authorized by any law enforcement agency. Defendant Clifton was at all times conducting an unofficial and unauthorized personal quest to personally benefit both Defendant Horton and himself, all under the guise of an official police investigation.

25. Defendant Clifton did not attempt to contact an appropriate and authorized state law enforcement agency for its investigative assistance. Instead, further demonstrating his personal animus towards Mr. Entrekin, and even though he lacked jurisdiction to investigate matters raised by Ms. Cross, Defendant Clifton contacted a journalist for AL.com, Defendant Sheets, who held himself out as an investigative journalist, to actively participate in the sham investigation with him. Approximately one to two months earlier, Defendant Sheets had written and published an article on AL.com attacking Mr. Entrekin titled, "Etowah sheriff pockets jail food funds, buys \$740k home." Since the publication of that article, Defendant Sheets has referred to Mr. Entrekin in his press articles as the "Beach House Sheriff."

26. As Defendant Clifton conducted this sham investigation, Defendant Sheets was an integral and active participant in the activities surrounding the process of obtaining Ms. Cross's fictional allegations against Mr. Entrekin. Defendant Sheets made himself an integral part of the

story that he was supposedly reporting on as a neutral investigative reporter, charged with conducting his own research and investigation to determine the accuracy of the extremely damaging statements he and Defendant ALM then maliciously and recklessly published and disseminated in Alabama and to a worldwide audience..

27. As this personal vendetta was an unofficial and unauthorized investigation that resulted in an article published with actual malice, Ala. Code § 13A-11-161 does not afford Defendants Sheets and ALM with any privilege to report on the sham investigation or its contents. The publication of these accusations was anything but a fair and impartial report rendered on an authorized and appropriate investigation.

28. On May 22, 2018, public records reflect Ms. Cross, a self-described long-term drug addict who claimed to no longer use drugs, was released on bond from the Tuscaloosa County Jail for stealing her brother's car, camera, and other property. The same day, upon information and belief, Defendants Clifton and Sheets picked up Ms. Cross in Defendant Clifton's SUV in Tuscaloosa, Alabama. Defendants Clifton and Sheets and Ms. Cross then drove across multiple Alabama counties as Ms. Cross told Defendants Clifton and Sheets her fabricated story of allegations regarding Mr. Entrekin. Mr. Entrekin was unaware of these events as they were transpiring.

29. Two days later, on May 24, 2018, Defendants Clifton and Sheets and Ms. Cross again rode around in Defendant Clifton's SUV as Ms. Cross continued to relate her false allegations regarding Mr. Entrekin, and Defendants Clifton and Sheets continued to jointly interview her. At no time during these discussions did Defendant Clifton have jurisdiction to conduct a police investigation into these alleged activities. At no time did Defendant Clifton seek the assistance of appropriate law enforcement personnel with jurisdiction over these allegations to

conduct an appropriate, official, and authorized investigation. Throughout this supposed investigation, Defendant Sheets was an active participant who by his actions became an integral part of the story rather than an independent journalist reporting on an official investigation.

30. According to Ms. Cross, the alleged events involving Mr. Entrekin supposedly occurred in Rainbow City, Alabama, in Etowah County, almost thirty years ago. However, on May 29, 2018, Defendant Clifton filed an incident report with the Oneonta Police Department, which is in Blount County, not in the county where the alleged events supposedly occurred or with the police department that had jurisdiction over the scene of the alleged criminal activity. Upon information and belief, Defendant Clifton did not provide his incident report to any authorized investigative agency.

31. Upon information and belief, the incident report filed with the Oneonta Police Department outlined the allegations Ms. Cross related to Defendant Clifton on May 22 and 24, 2018. Because Ms. Cross alleged conduct by Mr. Entrekin that supposedly occurred in Etowah County, neither Defendant Clifton nor the Oneonta Police Department could exercise jurisdiction over the supposed allegations. *See* Ala. Code § 15-10-1. The jurisdiction that *did* have authority over the supposed criminal activities, Rainbow City Police Department, notably declined to investigate these allegations when Defendant Horton chose to involve Defendant Clifton rather than have the Rainbow City Police Department or a state law enforcement agency investigate. Upon information and belief, the information in the self-serving police report written by Defendant Clifton was never provided to any law enforcement authority with jurisdiction to act on it. The clear goal of the supposed investigation was to glean damaging information from a highly-unreliable witness and then find a willing journalist and media outlet (Defendants Sheets and ALM) to recklessly and with actual malice publish the information as if it were legitimately

obtained pursuant to an official investigation, which it was not. Defendant Clifton's actions were illegal, malicious, willful, conducted in bad faith, fraudulent, and outside the scope of his authority as a member of the Oneonta Police Department. Defendant Horton's actions in seeking the assistance of someone without police jurisdiction but with known animus towards Mr. Entrekin to conduct a sham investigation and then cause these incendiary allegations to be published worldwide were equally illegal, malicious, willful, conducted in bad faith, fraudulent, and outside the scope of his authority.

32. On July 13, 2018, just three days before the Article was published, Defendant Sheets emailed Mr. Entrekin for his comment about certain allegations that were going to be published in the Article. A true and correct copy of the email is attached hereto as Exhibit B. That same day, Mr. Entrekin's counsel wrote a letter to the Etowah County District Attorney asking that the allegations be immediately investigated by the State Bureau of Investigation or the appropriate investigatory entity. A true and correct copy of the letter is attached hereto as Exhibit C.

33. On July 14, 2018, Mr. Entrekin's counsel replied to Defendant Sheets denying all the allegations that Defendants Sheets and ALM planned to publish in the Article. A true and correct copy of the email is attached hereto as Exhibit D.

34. On July 16, 2018, Defendants Sheets and ALM published the Article. While the Article stated, "Entrekin denied the allegations in a telephone interview Friday" and included similar quotes from Mr. Entrekin, the Article was overwhelmingly composed of incendiary and false allegations against Mr. Entrekin. Indeed, not only were there numerous false and injurious allegations throughout the Article, the entire premise of the Article was completely false and fabricated. In the very first line of the Article, Sheets states, "Police are investigating Etowah

County Sheriff Todd Entrekin for allegedly having sex with underage girls during drug-fueled parties he hosted . . . .” (Ex. A). Nowhere does the Article acknowledge that the supposed “police” was actually Defendant Clifton, who lacked jurisdiction and authority to conduct such an investigation, had demonstrated animus towards Mr. Entrekin, and was doing the bidding of Defendant Horton in a combined effort to cause irreparable harm to Mr. Entrekin, which the Article was successful in doing.

35. The Article states that “[Cross] alleged that Entrekin had sex with her four times in the late summer of 1992, when he was 29 and she was 15 years old.” (*Id.*). Throughout the Article, Defendants Sheets and ALM refer to other individuals who allegedly had sex with Ms. Cross while she was underage. However, Mr. Entrekin is the only one of these individuals who is identified by name in the entire Article. Ms. Cross’s allegations are demonstrably false, as a legitimate law enforcement investigation would have (and ultimately did) demonstrate.

36. The Article further quotes Ms. Cross: “There was drugs [cocaine], but [Entrekin] was just having sex, he was drinking and having sex.” (*Id.*). Following Ms. Cross’s assertion that she was fifteen years old at the time, the Article states, “[w]e ended up at the lake house that night, and that’s where I had sex with Entrekin.” (*Id.*). Ms. Sheets further writes, “She says that Entrekin rarely, if ever, used drugs, but that he did give her cocaine on several occasions.” (Ex. A).

37. Defendant Sheets also recounts in the Article Ms. Cross’s allegations that she watched Mr. Entrekin rape another underage girl. The Article states, “Cross alleges that she watched as Entrekin held her friend down while the other man raped her, then they switched roles and Entrekin raped her while the other man held her down.” (*Id.*). The second female was not interviewed prior to the publication of the Article to determine whether she corroborated or denied Ms. Cross’s allegations against Mr. Entrekin.



38. The Article maintains all these events allegedly took place in 1992 at Mr. Entrekin's lake property that he owned on Charada Lake Road in Rainbow City. (*Id.*). However, as publicly-accessible property records prove, Mr. Entrekin did not own lake property in 1992. Those property records show that Mr. Entrekin did not purchase his lake property on Charada Lake Road until 1995. Had even this one readily-available fact been investigated by Defendants Sheets and ALM, it would have raised substantial questions (which already should have been raised had this sham investigation instead been official and legitimate) about the legitimacy of the overall allegations against Mr. Entrekin.

39. The Article also claims that in 1992 Mr. Entrekin had a structure on the lake property and owned and kept a pontoon boat at the property. (*Id.*). However, a cursory investigation would also have uncovered that Mr. Entrekin did not own a boat in 1992, and publicly-accessible property records would have proved that he did not build a structure on his property until 2009, some seventeen years after these alleged events took place. Again, had even this one fact (among countless others) been properly investigated by Defendants Sheets and ALM, it would have raised substantial questions – which already should have been raised had the investigation been official and legitimate, which it was not – about the legitimacy of the overall allegations against Mr. Entrekin.

40. Notwithstanding Mr. Entrekin's immediate and complete denial of the allegations in the Article, the supposed facts in the Article that are easily refuted through basic investigation show Defendant Sheets and Defendant ALM failed to adhere to even the most basic journalistic practices prior to and after publishing the false allegations and statements against Mr. Entrekin in the Article.

41. On December 19, 2018, pursuant to Ala. Code § 6-5-186, Mr. Entrekin wrote to Defendants Sheets and ALM, through counsel, and demanded a retraction of the Article. Defendants Sheets and ALM refused to retract the Article at that time or at any time since. True and correct copies of these communications are attached as Exhibits E and F, respectively.

42. On March 20, 2019, Mr. Entrekin received a letter from the State of Alabama Office of the Attorney General stating that it had conducted a review of the State Bureau of Investigation's investigation into the allegations made by Ms. Cross and was closing the matter without further action. A true and correct copy of this letter is attached as Exhibit G.

43. On April 30, 2019, pursuant to Ala. Code § 6-5-186, Mr. Entrekin again demanded the retraction of the Article. This time, Mr. Entrekin included the March 20, 2019 letter from the Attorney General's Office closing its investigation, along with an article from *The Gadsden Times* titled "'No further action' on woman's claims against Entrekin." Defendants Sheets and ALM again refused to retract the Article at that time, causing further damage to Mr. Entrekin. A true and correct copy of the demand letter is attached as Exhibit H.

44. Upon information and belief, Defendants held personal animus towards Mr. Entrekin for varying reasons. When Ms. Cross first approached Defendant Horton about her allegations, Defendant Horton was actively campaigning against Mr. Entrekin to unseat him as Sheriff of Etowah County. Defendant Clifton had been harboring a personal grudge against Mr. Entrekin since the 1990s due to past professional interactions. Defendant Horton knew of Defendant Clifton's personal animus against Mr. Entrekin at the time Defendant Horton asked him to "investigate" the allegations. As a law enforcement officer, Defendant Horton knew at the time he made the request of Defendant Clifton that Defendant Clifton was not an appropriate and authorized law enforcement officer to investigate these allegations and had no jurisdiction to make

an arrest. Further, Defendant Sheets had a demonstrated dislike for Alabama sheriffs generally, and Mr. Entrekin in particular, which is evidenced by the articles written by Defendant Sheets attacking Mr. Entrekin and the creation of pejorative names such as “Beach House Sheriff” rather than reporting professionally and without added editorial color on the matters that he supposedly investigated. Likewise, Defendant Clifton knew about Defendant Sheets’s animus towards Mr. Entrekin when he asked Defendant Sheets to help “investigate” and “confirm” Ms. Cross’s false allegations. At least for malicious publication purposes, Defendant Sheets did “confirm” the allegations. These Defendants’ personal animus was ultimately the driving motivation behind the publication and dissemination of the false allegations and statements in the Article.

45. Defendants Sheets and ALM with actual malice and recklessness detoured from basic journalistic practice when, with a matter involving explosive and highly-damaging sexual allegations, they failed to even minimally investigate the allegations, the veracity of the witness asserting the injurious and false allegations against Mr. Entrekin, the persons surrounding the allegations prior to publishing, and the legitimacy of this sham investigation in which Defendant Sheets was an active participant. Later, these Defendants republished the Article on multiple occasions. Defendants Sheets and ALM further broke with basic journalistic practice and the law when they failed and refused to issue a retraction of the Article after repeated appropriate requests and with knowledge of the falsity of the very premises of the Article.

46. At all times material to the allegations in the Complaint, Defendants Clifton and Horton, while acting both in their individual and representative capacities, acted illegally, willfully, maliciously, fraudulently, in bad faith, and beyond their authority when they caused, participated, prevented, interfered with, and/or authorized an “investigation” in furtherance of personal, non-legitimate interests in order to harm and damage Mr. Entrekin.

47. At all times material to the allegations in the Complaint, Defendants Oneonta and Rainbow City, by and through Defendants Clifton and Horton and Fictitious Defendants A-O, acted illegally, willfully, maliciously, fraudulently, in bad faith, and beyond their authority when they caused, participated, prevented, interfered with, and/or authorized an “investigation” in furtherance of personal, non-legitimate interests in order to harm and damage Mr. Entrekin.

48. As a result of the publication, and then later republication on multiple occasions, of the false allegations in the Article, Mr. Entrekin’s reputation, earning capacity, and good name have been irreparably damaged. He has been wrongfully and maliciously accused of the lowliest of crimes by an adult male against a young female. As a direct result of the publication and republication of the Article and Defendants Sheets and ALM’s refusal to retract the Article, Mr. Entrekin lost employment opportunities causing him to lose future earnings.

49. Mr. Entrekin has also suffered significant embarrassment, humiliation, mental suffering, and emotional distress as a direct result of the Article.

50. After he left his position as Sheriff of Etowah County, Mr. Entrekin actively sought other employment in law enforcement, both in the public and private sectors. As a direct and specific result of the false allegations published in the Article that Defendants ALM and Sheets subsequently refused to retract, Mr. Entrekin was denied employment opportunities for which he was otherwise qualified. Thus, publication of the allegations in the Article has effectively prevented Mr. Entrekin from continuing to practice his profession as a law enforcement officer or otherwise pursuing a career in public or private service.

**COUNT I**  
**DEFAMATION**

51. Mr. Entrekin re-alleges and incorporates paragraphs 1-50 as if fully set forth herein.

52. Defendants Sheets and ALM, and/or Fictitious Defendants A-O, wrote and published on AL.com and YouTube allegations and statements accusing Mr. Entrekin of statutory rape, solicitation of a minor, and dealing drugs. These allegations and statements were republished by those Defendants on July 31, 2018 and August 15, 2018.

53. The allegations, accusations, and statements written and published by Defendants Sheets and ALM, and/or Fictitious Defendants A-O, were false and were concerning Mr. Entrekin.

54. Mr. Entrekin has consistently and fully denied all allegations contained in the Article, and expressly denied all allegations to Defendant Sheets when given the opportunity just three days before the original Article was published. Other individuals, perhaps before but certainly after the original publication of the Article, also advised Defendants Sheets and ALM of the need to properly investigate these allegations given the sources of the information. Despite being placed on notice as to the falsity of the allegations against Mr. Entrekin, Defendants Sheets and ALM and/or Fictitious Defendants A-O proceeded to publish, and then later republish on multiple occasions, the Article.

55. The false allegations and statements concerning Mr. Entrekin were written and published by Defendants Sheets and ALM, and/or Fictitious Defendants A-O, with actual malice. Defendants Sheets and ALM knew these statements were false or recklessly disregarded the truth in their zeal to obtain as wide a viewing audience as possible.

56. Defendants Sheets and ALM, and/or Fictitious Defendants A-O, purposefully avoided the truth and purposefully and intentionally avoided interviewing sources and following fundamental reporting practices in order to avoid the truth. Had Defendants Sheets or ALM, or Fictitious Defendants A-O, conducted even a simple cursory investigation, those Defendants would have easily uncovered the falsity of Ms. Cross's allegations prior to publishing, and then

later republishing on multiple occasions, the criminal and highly defamatory accusations against Mr. Entrekin. Among other things, Defendants Sheets and ALM, and/or Fictitious Defendants A-O, violated the basic journalistic practice of exhaustively investigating stories involving sexual misconduct prior to their publication, given the highly-damaging nature of such allegations to the person identified in the publication as the bad actor. This type of investigation did not happen here, undoubtedly because Defendants Sheets and ALM were more interested in receiving “clicks” from readers than in the veracity of what they were reporting and the injury and damage their publication would cause to Mr. Entrekin.

57. To the extent that any “independent” investigation was conducted by Defendants Sheets and ALM, and/or Fictitious Defendants A-O, the investigation caused or should have caused those Defendants to have serious doubts as to the truth of the statements and a high degree of awareness that they were probably false, and therefore required those Defendants to fully investigate the veracity of Ms. Cross’s claims before publishing them. Defendants Sheets and ALM’s failure to follow basic journalistic practices to act independently and neutrally, and to conduct an investigation into not only the allegations but the credibility, reputation for veracity, and background of the accusing witness and the independently verifiable aspects of the allegations she made, amounts to actual malice directed toward Mr. Entrekin.

58. The false allegations and statements concerning Mr. Entrekin which were written and published by Defendants Sheets and ALM are defamatory *per se* because they are imputations of indictable criminal offenses. *See Nelson v. Lapeyrouse Grain Corp.*, 534 So. 2d 1085 (Ala. 1988); *see, e.g.*, Ala. Code § 13A-6-62. As such, Mr. Entrekin is relieved of the requirement of proving actual harm to reputation or any other damage in order to recover nominal or compensatory damages.

59. As a direct and proximate result of the false allegations and statements concerning Mr. Entrekin which were written and published by Defendants Sheets and ALM, and/or Fictitious Defendants A-O, Mr. Entrekin has suffered damages, including injury to his reputation, embarrassment, humiliation, and emotional distress.

60. Mr. Entrekin also suffered damages in the form of lost employment opportunities and future earnings as a direct and proximate result of the false allegations and statements.

61. Pursuant to Ala. Code § 6-5-186, Mr. Entrekin twice requested a retraction from Defendants Sheets and ALM. Defendants Sheets and ALM refused both requests. As such, pursuant to Ala. Code § 6-5-186, Mr. Entrekin is entitled to punitive damages.

WHEREFORE, Todd Entrekin demands judgment against Defendants Sheets and ALM, including Fictitious Defendants A-O, in a fair and reasonable amount of compensatory and punitive damages plus attorney's fees, interest, and costs.

## **COUNT II** **CONSPIRACY**

62. Mr. Entrekin re-alleges and incorporates paragraphs 1-50 as if fully set forth herein.

63. All Defendants, including Fictitious Defendants A-O, conspired, acted in concert, and developed a scheme for the unlawful purposes of falsely accusing Mr. Entrekin of statutory rape, solicitation of a minor, and dealing drugs.

64. Defendants, including Defendants Clifton and Horton, who acted both in their individual and representative capacities, illegally, intentionally, and maliciously conspired to disparage Mr. Entrekin's reputation and embarrass and humiliate him.

65. Upon information and belief, certain Defendants had personal animus towards Mr. Entrekin.

66. Defendants' actions were motivated by their own personal desires to cause damage to Mr. Entrekin, both personally and professionally, and/or to obtain a wider readership by the publication of scandalous allegations against Mr. Entrekin.

67. As a direct and proximate result, Mr. Entrekin has suffered damages, including injury to his reputation, employment opportunities, embarrassment, humiliation, and emotional distress.

68. On December 20, 2018, which was within six months of the accrual of his injuries and in compliance with Ala. Code § 11-47-23, Mr. Entrekin notified the city clerk for Defendant Oneonta of the potential claims against it. The notice given on December 20, 2018 provided Defendant Oneonta with sufficient information regarding the claims so as to enable it to investigate the claims.

69. On December 20, 2018, which was within six months of the accrual of his injuries and in compliance with Ala. Code § 11-47-23, Mr. Entrekin notified the city clerk for Defendant Rainbow City of the potential claims against it. The notice given on December 20, 2018 provided Defendant Rainbow City with sufficient information regarding the claims so as to enable it to investigate the claims.

WHEREFORE, Todd Entrekin demands judgment against Defendants, including Fictitious Defendants A-O, in a fair and reasonable amount of compensatory and punitive damages plus interest and costs.

**COUNT III**  
**False Light/Invasion of Privacy**

70. Mr. Entrekin re-alleges and incorporates paragraphs 1-50 as if fully set forth herein.

71. Defendants Sheets and ALM, including Fictitious Defendants A-O, intentionally and with actual malice towards Mr. Entrekin publicized, and then republicized on multiple



occasions, false and defamatory statements accusing Mr. Entrekin of statutory rape, solicitation of a minor, and dealing drugs.

72. Defendants Sheets and ALM knew when they publicized, and then republicized on multiple occasions, the statements that by publishing and then republishing and failing to retract the Article Mr. Entrekin would be placed in a false light and/or they acted with reckless disregard to whether the statements would place Mr. Entrekin in a false light.

73. The statements and allegations made against Mr. Entrekin are highly offensive and Defendants knew they were false, or acted in reckless disregard as to the falsity, and knew the false light in which Mr. Entrekin would be placed.

74. The statements and allegations were published with actual malice, knowledge, and intent to harm Mr. Entrekin.

75. The statements and allegations published by Defendants Sheets and ALM placed Mr. Entrekin in a false light in the public eye and the false light would be considered highly offensive to any reasonable person.

76. The false light in which Mr. Entrekin was placed directly and proximately caused him harm in the form of injury to his reputation, embarrassment, humiliation, emotional distress, and lost employment opportunities and future earnings.

WHEREFORE, Todd Entrekin demands judgment against Defendants, including Fictitious Defendants A-O, in a fair and reasonable amount of compensatory and punitive damages plus attorney's fees, interest, and costs.

**COUNT IV**  
**Outrage**

77. Mr. Entrekin re-alleges and incorporates paragraphs 1-50 as if fully set forth herein.

78. All Defendants, including Fictitious Defendants A-O, knew or should have known that their conduct was likely to cause Mr. Entrekin emotional distress.

79. Defendants' conduct in failing to adhere to basic journalistic practices by failing to appropriately investigate the false allegations of statutory rape, solicitation of a minor, and dealing drugs prior to publishing the Article, republishing the false allegations contained in the Article, and refusing to retract the false allegations on two separate occasions was extreme and outrageous.

80. Defendants' conduct, including Defendants Clifton and Horton, who acted both in their individual and representative capacities, was so extreme in degree that it goes beyond all bounds of decency and was atrocious and utterly intolerable in a civilized society.

81. Defendants' conduct caused Mr. Entrekin to suffer emotional distress under circumstances that no reasonable person could be expected to endure it.

WHEREFORE, Todd Entrekin demands judgment against Defendants, including Fictitious Defendants A-O, in a fair and reasonable amount of compensatory and punitive damages plus interest and costs.

**COUNT V**  
**NEGLIGENCE/WANTONNESS**

82. Mr. Entrekin re-alleges and incorporates paragraphs 1-50 as if fully set forth herein.

83. Defendants Sheets and ALM, and Fictitious Defendants A-O, had a duty to follow basic journalistic practices prior to publishing, and then republishing on multiple occasions, false statements included in the Article accusing Mr. Entrekin of statutory rape, solicitation of a minor, and dealing drugs.

84. Defendants Sheets and ALM, and Fictitious Defendants A-O, breached their duty by negligently, wantonly, recklessly, or willfully failing to follow basic journalistic practices prior

to publicizing false statements included in the Article accusing Mr. Entrekin of statutory rape, solicitation of a minor, and dealing drugs.

85. As a direct and proximate consequence of Defendants Sheets and ALM's conduct, Mr. Entrekin was caused to suffer injury to his reputation, embarrassment, humiliation, emotional distress, and lost employment opportunities and future earnings.

86. Defendants Clifton, Horton, Oneonta and Rainbow City, and Fictitious Defendants A-O, had a duty to refrain from conducting an illegal, negligent, wanton, reckless, or willful investigation into the false allegations that were beyond their authority, or from illegally, negligently, wantonly, recklessly, or willfully authorizing an investigation into these false allegations.

87. Defendants Clifton, Horton, Oneonta and Rainbow City, and Fictitious Defendants A-O, breached their duty when they acted beyond their authority when they illegally, negligently, wantonly, recklessly, or willfully authorized and/or participated in the investigation of these false allegations.

88. As a direct and proximate consequence of Defendants Clifton, Horton, Oneonta and Rainbow City's, and Fictitious Defendants A-O's conduct, Mr. Entrekin was caused to suffer injury to his reputation, embarrassment, humiliation, emotional distress, and lost employment opportunities and future earnings.

WHEREFORE, Todd Entrekin demands judgment against Defendants, including Fictitious Defendants A-O, in a fair and reasonable amount of compensatory and punitive damages plus interest and costs.

**PLAINTIFF DEMANDS TRIAL BY STRUCK JURY**

Respectfully Submitted,

/s/ Augusta S. Dowd

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# EXHIBIT A

AL.com Pub. 07/16/18 By: Connor Sheets

[A](#)

## Police investigating allegations Alabama's 'Beach House Sheriff' had sex with underage girls



Mary Elizabeth Cross alleges that Etowah County Sheriff Todd Entrekin had sex with her four times in the late summer of 1992, when he was 29 and she was 15 years old. (Connor Sheets | csheets@al.com)

Police are investigating Etowah County Sheriff Todd Entrekin for allegedly having sex with underage girls during drug-fueled parties he hosted for fellow law enforcement officers and other adult men in the early nineties.

A 41-year-old woman first detailed the claims during several hours of in-person interviews with AL.com in May, during which she alleged that Entrekin had sex with her four times in the late summer of 1992, when he was 29 and she was 15 years old. In Alabama, the age of consent is 16.

An Oneonta Police Department incident report filed later in May classified the woman's claims against Entrekin as alleging second-degree rape.

Entrekin denied the allegations in a telephone interview Friday.

"I've never had sex with any 15-year-old girl or had drugs around or anything. I have never done drugs in my life," he said. "That's the most

absurd thing I've ever heard of. Never, ever has anything like that happened before."

Mary Elizabeth Cross, who grew up in Attalla but currently lives in Tuscaloosa, says that she did not attempt to refuse Entrekin's advances, but that she also personally watched him rape another underage girl who repeatedly said no. Entrekin denied ever knowing Cross, who also goes by the name Elizabeth Williams and was born Mary Elizabeth Buckner, names he also said he did not recognize.

The encounters allegedly took place in a camper on a piece of property Entrekin still owns in Rainbow City, where Cross says he also provided her and other young girls with alcohol, cocaine and cash on multiple occasions.

Cross, who is now 41, alleges that Entrekin knew she was underage when he had sex with her on four separate occasions over the course of two months while she was a student at Etowah High School. Entrekin was commander of the Etowah County Sheriff's Office's drug task force at the time.

Entrekin gained a degree of national notoriety in March, when [AL.com exposed](#) that over the past three years he personally kept more than \$750,000 in public funds allocated to feed inmates in the county jail he oversees. In September, Entrekin purchased a \$740,000 beach house in Orange Beach, earning him the nickname "beach house sheriff."

AL.com is reporting on Cross's allegations for the first time following a two-month investigation. She described the alleged encounters to an AL.com reporter during hours-long drives across multiple Alabama counties in Oneonta Police Chief Charles Clifton's SUV on May 22 and 24, during which Clifton also questioned her in his capacity as a law enforcement official.

The interviews were arranged within days of Clifton notifying an AL.com reporter that he had been made aware of a woman who said that Entrekin had sex with her when she was a minor.

Clifton pursued the claims after the Rainbow City Police Department declined to do so, and he recorded the allegations in the Oneonta Police Department incident report, which he filed on May 29. Cross has also handwritten an official statement detailing her claims for the



Oneonta Police. AL.com has obtained copies of both documents, neither of which have been released to the public.

On Friday, after AL.com interviewed Entrekin about Cross's allegations, Donald Rhea, a Gadsden attorney representing Entrekin, wrote a letter to Etowah County District Attorney Jody Willoughby. The letter, which Rhea emailed to AL.com, called for a state agency to investigate the claims.

"Sheriff Entrekin has instructed me to convey to you his request that this matter be immediately forwarded to the State Bureau of Investigation or to the appropriate investigatory entity so that the things and matters alleged to have occurred be thoroughly and immediately investigated by an independent agency," the letter says.

Rhea also called for an investigation into the emergence of Cross's claims decades after the alleged incidents took place.

"It is also requested that the circumstances surrounding the initiation of this complaint in 2018, for events alleged to have occurred in the early 1990's also be thoroughly and completely investigated. Sheriff Entrekin and I stand ready to cooperate with the appropriate investigatory agency."



Etowah County Sheriff Todd Entrekin speaks during a news conference Wednesday, Feb. 1, 2017. (William Thornton | wthornton@al.com)

Cross alleges that she also had sex with three other adult men while she was a minor: two longtime Etowah County law enforcement officers who no longer work in the county, and another local man who did not work in law enforcement.

Until charges are filed, AL.com is naming Entrekin, who is an elected official and Etowah County's top law enforcement officer, but not the

other men Cross says had sex with her.

While statutes of limitations shield the perpetrators of some crimes from prosecution, no such laws apply to the crimes alleged by Cross. Alabama state code states that "[t]here is no limitation of time within which a prosecution must be commenced for ... [a]ny sex offense involving a victim under 16 years of age, regardless of whether it involves force or serious physical injury or death," if the crime was committed after Jan. 7, 1985.

### 'I was 15'

Entrekin and several male friends were drinking together after listening to a local high school football game on the radio when Cross says she arrived at Entrekin's property on the summer night in 1992 when she alleges he first had sex with her. The men had been hanging out on the pontoon-style boat Entrekin kept docked on the water at the end of his property in Rainbow City and at some point the party moved on to his camper.

"I had shown up after the game, but that's what they had been doing. They had all been drinking, hanging out on the boat and all that," she said. "There was drugs [cocaine], but [Entrekin] was just having sex, he was drinking and having sex."

Cross - who says she was addicted to drugs and alcohol for much of her adult life but is currently clean - says she remembers the intimate details of that night, and specifically recalls that she was underage at the time of the encounter.

"I was 15. It was right before my sixteenth birthday and I remember telling everyone I couldn't wait to turn 16 so I could drive," she said. "We ended up at the lake house that night, and that's where I had sex with Entrekin."

In the early nineties, Entrekin would often host wild parties in a camper - referred to by him and his friends as "the lake house" - on a piece of waterfront land he owns on Charada Lake Road in Rainbow City, according to Cross and a female friend of hers who was also a minor at the time of the alleged incidents.

During an in-person interview with AL.com last month, Cross's friend corroborated the general circumstances that led to Cross being in a position to have sex with adult law enforcement officers while she was underage.

The friend declined to discuss any sexual encounters she or Cross allegedly had with Entrekin or any of the other men, saying that she has tried for years to put those times behind her.

But she confirmed that Cross hung out with law enforcement officers as a minor teen, that she "partied" and did drugs with them until the early morning on multiple occasions, and that Cross told her at the time that she was "hooking up" with some of the officers.

### Police investigating allegations Alabama's ...



#### Facing the past

Cross - who wears thick, black-rimmed glasses and typically pulls her reddish hair back into a ponytail - stands just over five feet tall, but she speaks with a determined confidence that she says is informed by her drive to expose her alleged abusers.

She says she only came to see herself as a victim of abuse long after Entrekin and the three other men allegedly had sex with her while she was underage. For years, Cross believed that young women commonly had sexual encounters with older men, and that the sex she had as a minor teen was consensual because she did not say no or put up a fight.

She says her newfound determination to face her past and expose the men who allegedly wronged her developed last year amid the emergence of the #MeToo movement, which has resulted in a series of high-profile men losing their careers over allegations of sexual impropriety.

As she was coming to terms with her own alleged abuse last year, the political aspirations of Etowah County's own Roy Moore were [derailed by allegations](#) that he had sexually abused teenage girls.

Cross says that though the #MeToo movement has been an inspiration, she only made the decision to tell her story after hearing Entrekin's campaign rhetoric this spring, in which he pitched himself to voters as a family man and moral authority.

Cross initially brought her rape allegations to Rainbow City Police Chief Jonathon Horton, Entrekin's challenger in the Republican primary for Etowah County sheriff, which Horton [won June 5](#) in a landslide.

Horton told AL.com that he spoke briefly with Cross about the allegations in April but decided not to investigate them or make them public. He instead put Cross in touch with Clifton. Horton said he did not want to pursue the claims himself, as he wanted to avoid being perceived as personally attacking Entrekin during the campaign.

Clifton served in various law enforcement roles in Etowah and Cherokee counties for 22 years before he accepted the police chief job last year in Oneonta, which is just over the Etowah County line in Blount County. Because Clifton no longer works or lives in Etowah County and is not a politician there, Horton felt that he had less of a conflict of interest, and could pursue Cross's allegations as an outside observer.

### **'She is telling the truth'**

On May 22, an AL.com reporter and Clifton picked up Cross in Tuscaloosa in Clifton's SUV and jointly interviewed her for over four hours as Clifton drove through Jefferson and Blount counties to Etowah County, where Cross pointed out two places where she said she had been raped in the early nineties.

An AL.com reporter and Clifton again interviewed her for over two hours on May 24 in Blount and Etowah counties, and AL.com interviewed her repeatedly over the past eight weeks via telephone and Facebook Messenger.

At the conclusion of the May 24 interview, Clifton recorded audio in an AL.com reporter's presence of Cross answering more than 20 yes-or-no questions about her allegations.

The audio recording was later uploaded onto a computer and subjected to voice stress analysis, a digital lie detection technique that has been used in numerous criminal cases but is considered a

controversial and potentially unreliable method for detecting deception.

The software suggested that Cross's answers were consistent with a high degree of truthfulness, except for her responses to two inquiries about one of the former Etowah County law enforcement officers who she said had sex with her while she was a minor. She had previously stated that she could remember few details about that man, including his name or job title, so she would be unable to provide reliable responses to the two questions about him.

"According to the examiner who administered the test to Mary Elizabeth Cross, she is telling the truth on all accounts other than the name of yet to be identified [former law enforcement officer]," Clifton wrote in the May 29 incident report. To him, the results of the stress test represented meaningful proof that Cross was telling the truth about the allegations.

Clifton also used interview techniques aimed at determining if a person is lying during the conversations he and an AL.com reporter had with Cross in Clifton's SUV on May 22 and May 24. For instance, he asked her to describe the layout and interior design of an old firehouse that served as the headquarters of the Gadsden Police Department's drug unit in the early nineties, to which she responded with detailed information that Clifton said was accurate. Cross alleges that she had sex with multiple former law enforcement officers in the bathroom of that building, and that they often gave her drugs there.

"That's where I would get my drugs and that's where a lot of times I would have sex - in that building," she said during the May 22 interview. "I had sex in the bathroom upstairs there a lot."

Clifton also asked Cross to give him directions to the building - which Clifton said was a covert space of which few people knew the location - and she did so.

He then asked her to show him how to get to a Gadsden house once occupied by one of the two former Etowah County law enforcement officers she alleges had sex with her while she was a minor. She did so without hesitation, and Clifton confirmed that he did in fact live on that street in the early nineties. Cross alleges that the former officer raped her in the house on multiple occasions.

And Clifton asked Cross trick questions that she did not fall for. For instance, he asked about a specific car driven by one of the former Etowah County officers she says had sex with her when she was underage, but did not tell her that he knew the former officer never owned that model of vehicle. She immediately responded that she never saw him driving such a car.

### **'It was drugs'**

Alcohol and cocaine were abundant at the parties in Entrekin's camper, which were frequented by multiple Etowah County law enforcement officers, according to Cross. She says that Entrekin rarely, if ever, used drugs, but that he did give her cocaine on several occasions.

On the night she says she first had sex with Entrekin, Cross says she snuck out of her parents' home to hang out with one of the other former Etowah County law enforcement officers she alleges had sex with her while she was underage.

"So by this time I'm now almost 16 years old, and I would go to the Gadsden Mall and my momma would be thinking that I was going to the Gadsden Mall or to the public library, but he would come get me," she said.

The Gadsden Mall figured into the Moore scandal last year, when women who worked at the mall [alleged that](#) the former Alabama Supreme Court chief repeatedly hit on teenage girls there.

In the late summer of 1992, on one of the nights when she left her house to spend time with the former law enforcement officer, Cross says he took her to Entrekin's Rainbow City property for the first time.

She says that she quickly developed an understanding of the relationship between the young girls who attended the parties at "the lake house" and Entrekin and his adult male friends. She alleges that during parties there the girls were given drugs - and sometimes cash - and were often expected to have sex with the men. She and the other girls felt pressured to have sex with Entrekin and his friends because of their generosity, Cross said.

"It was drugs, you know what I'm saying? It was free drugs for us. We never had to pay for drugs, so for us sex just became a payment for it," she said.

"[Entrekin] always provided the boat, the drinking - the deal was always that he provided stuff, the extravagant living. He always had money on him, he was always OK with everybody bringing drugs, he always knew that it was there. He always made me feel good, he always made me feel like I was important."

On another night at the Rainbow City "lake house," several weeks after her first alleged sexual encounter with Entrekin, Cross alleges that he and the local man who did not work in law enforcement had sex with a minor teenage friend of hers who repeatedly said no. Cross alleges that she watched as Entrekin held her friend down while the other man raped her, then they switched roles and Entrekin raped her while the other man held her down.

"They forced themselves on her. That's kind of hard for me to verbally talk about, it makes me so upset," Cross said.

"That happened at the lake house, right in the middle, on the floor ... We were there 'til it was, like, midnight. I got in trouble with my mom for coming home so late."

### **'God's work'**

For over two decades Cross was a heavy drinker and drug addict - a "doper" in Etowah County law enforcement parlance - and she spent years of her life addicted to heroin and crystal meth.

According to court records, Cross had not previously been charged with a crime in Alabama, but in April she turned herself in to Tuscaloosa County authorities on a warrant for stealing her brother's car, camera and other property in October 2014. She was jailed for a little over a month on charges of theft of property and possession of a forged instrument and is currently out on bond.

But Cross says that she kicked her heroin addiction over a year ago and no longer uses drugs or alcohol, and that she has recently come to terms with the extent of her alleged abuse. She has participated in various rehabilitative programs and become more involved in Christianity, which she says has helped her to face her demons and confront the extent of what she says was done to her as a teen and the far-reaching negative impacts she says it has had on her adult life.

Cross says she is attempting to better herself and cleanse herself of the "sin" of keeping quiet about her alleged abuse - a desire that she

says was also behind her decision to turn herself in to the authorities in Tuscaloosa County in April - so that she can overcome her troubled past and begin to "do God's work."

She also says she wants to expose what was done to her in the hope that her alleged abusers will be brought to justice.

"I want to tell all this because I don't know how many girls there were after me," she said. "I really want this off my back as well."

More than 25 years after she alleges she was repeatedly victimized, Cross says she is still trying to wrap her head around the ways that those experiences may have contributed to the tragedies and troubles that have defined much of her life.

"I tried to commit suicide when I was a teenager, too. Everything was just out of control with my life," she said. "I tried to commit suicide twice. I took 18 aspirin and I'm allergic to aspirin so I thought if I took 18 aspirin it would kill me but, no, it just ended up with them flushing my stomach out. I was just a stupid teenager, didn't know how to do it."

#### **'There were other girls'**

Clifton explained in a June 5 letter on Oneonta Police Department letterhead that he chose to look into Cross's claims "in an effort to find an investigative body who will investigate" them. The letter, which is not addressed to a specific recipient, has not been released to the public.

"Based on a general inquiry into the allegations this officer believes that enough information exists to carry this case forward with an extended criminal investigation," he wrote.

Clifton says that though he is currently investigating the allegations, he hopes they will draw the attention of a larger agency like the state attorney general's office, Alabama Law Enforcement Agency or the FBI, which would likely have more resources to dedicate to an investigation than he has available as a small-town police chief.

After the May 24 interview with Cross, Clifton told AL.com that he believed that she appeared to be telling the truth. On May 29 he drafted the official Oneonta Police Department incident report detailing her allegations.



"Ms. Cross further stated that she and other young women of her age group were attending parties at a river lot in Rainbow City, AL where they were having sex with adult police officers and where they were provided alcohol and cocaine. According to Ms. Cross, the river lot was owned by Todd Entrekin," the report states.

"Ms. Cross indicated that Todd and other officers were there having sex with underaged (sic) girls and providing them with cocaine and alcohol."

The incident report that classifies the crime allegedly committed by Entrekin as second-degree rape also details Cross's allegations that Entrekin and the local man who was not in law enforcement had sex with her friend against her will.

"During the party where cocaine and alcohol was being consumed, she observed Todd Entrekin and [the local man] ... forcibly raped (sic) [Cross's friend]," the report states. "Cross said that once the two were finished with [her friend] one of them slapped her on the butt and asked her if she enjoyed it."

Clifton hopes to interview Cross's friend, but he has not yet done so. It is unclear whether Clifton will be able to move forward with an investigation of the allegations that Cross's friend was raped if she does not discuss them with police.

Clifton also wrote in the incident report that one of Cross's family members provided additional corroboration of the general nature of her claims.

The family member "had not been made aware of the exact nature of what [Cross] had been involved in as it pertained to" Entrekin and the two former Etowah County law enforcement officers, the report states. But the report explains that the family member told Clifton that "prior to [Cross's mother] dying, she had [said that Cross] had been involved in some bad things with members of law enforcement and a (sic) Etowah County deputy."

Entrekin said Friday that Cross's allegations against him are "bogus." It is unclear what will come of his attorney's request for a state agency to investigate the claims.

Cross's handwritten statement reiterates much of what she told AL.com in May.

"When I arrived at the party at the lake there was Todd Entrekin ... There I had sexual relations with Todd Entrekin. He also allowed me to have cocaine and cash to leave with," Cross wrote. "This would not be the only night. A few weeks later I would be invited again and brought a friend."

Cross's statement proceeds to recount the details of what she alleges happened to her underage friend on a summer night in 1992.

"My friend was raped and asked to not be touched. She said no several times. Finally the drugs took over and as she became high my friend was raped by Todd Entrekin and [the local man who was not in law enforcement]," Cross wrote.

"I watched as they laid her back, forcefully on the floor and [the local man] held her hands back and Todd did the same. They acted as if it was 'OK' and afterwards slapped her on the behind and asked if she enjoyed it."

One line in her statement raises a question that haunts Cross to this day:

"There were other girls but I never knew who they were."

[MX-3501N\\_20180713\\_160420](#) by [Connor Sheets](#) on Scribd

[MX-3501N\\_20180716\\_135412](#) by [Connor Sheets](#) on Scribd

Note to readers: if you purchase something through one of our affiliate links we may earn a commission.



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CIRCUIT COURT OF  
ETOWAH COUNTY, ALABAMA  
CASSANDRA JOHNSON, CLERK

# EXHIBIT B

Debbie Cooper

---

**From:** Donald Rhea <drhea@bellsouth.net>  
**Sent:** Friday, July 13, 2018 1:47 PM  
**To:** debbie cooper  
**Subject:** Fwd: Further information and questions

Sent from my iPhone

Begin forwarded message:

**From:** Todd Entrekin <tentrekin@etowahcounty.org>  
**Date:** July 13, 2018 at 12:35:06 PM CDT  
**To:** Donald Rhea <drhea@bellsouth.net>, Karen Entrekin <karenentrekin@comcast.net>  
**Subject:** Fwd: Further information and questions

Sheriff Todd Entrekin  
Etowah County

Begin forwarded message:

**From:** Connor Sheets <CSheets@al.com>  
**Date:** July 13, 2018 at 12:08:37 PM CDT  
**To:** "tentrekin@etowahcounty.org" <tentrekin@etowahcounty.org>  
**Subject:** Further information and questions

Hi Sheriff,

Thank you for taking the time to speak with me earlier. I appreciate your time and your forthrightness.

First, can you provide me the name and phone number for your lawyer?

Here are some details of the allegations that are in the police incident report, as well as a few questions:

The woman who alleges that you had sex with her at your property in Rainbow City in 1992, when she was 15, is named Mary Elizabeth Buckner, aka Mary Elizabeth Cross or Elizabeth Williams. Have you heard any of those names before or met her before? Do you deny that you ever had sex with her?

She and another source who remained anonymous allege that you hosted parties for fellow law enforcement officers and other folks at a property of yours in Rainbow City in the early nineties. Is that correct? She alleges that drugs and alcohol were provided at those parties and that underage girls attended and were given drugs, alcohol and cash and had sex with adult men including you at them. Is that incorrect? Did you ever do drugs or provide them to others or were you ever aware that they were being done at a property of yours?

She also alleges that you and another man both raped another underage girl during that same time period, also in a camper on your property in Rainbow City. Do you deny that?

She alleges that other underage girls had sex with you and/or other men at the parties at your property in Rainbow City. Do you deny that?

I appreciate any responses and clarity you can provide about the above information and questions.

Thank you,

Connor Sheets

205-732-2260



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ETOWAH COUNTY, ALABAMA  
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# EXHIBIT C

**Law Offices of  
RHEA, BOYD & RHEA**  
930 FORREST AVENUE  
P. O. BOX 8486  
GADSDEN, ALABAMA 35902

Charles Y. Boyd  
Donald R. Rhea  
Richard A. Rhea

Phone: (256) 547-6801  
Fax: (256) 549-0271  
Email: drrhea@bellsouth.net

---

Clarence F. Rhea  
1921-2005

July 13, 2018

Jody Willoughby, District Attorney  
Etowah County, Alabama  
801 Forrest Avenue, Suite 101  
Gadsden, AL 35901

Dear District Attorney Willoughby:

Certain allegations of misconduct have been alleged with respect to Todd Entrekin, apparently occurring in or around 1992, by a citizen of the State of Alabama.

It is our understanding that a complaint has been filed with the Oneonta, Alabama, Police Department. We have not been provided with a copy of the complaint.

I have emailed to you what we understand to be the allegations included in the complaint. This email was received by us from Connor Sheets who is a reporter with al.com.

Sheriff Entrekin has instructed me to convey to you his request that this matter be immediately forwarded to the State Bureau of Investigation or to the appropriate investigatory entity so that the things and matters alleged to have occurred be thoroughly and immediately investigated by an independent agency.

It is also requested that the circumstances surrounding the initiation of this complaint in 2018, for events alleged to have occurred in the early 1990's also be thoroughly and completely investigated.

Sheriff Entrekin and I stand ready to cooperate with the appropriate investigatory agency. It is hoped that matter can be expedited.

Thank you for your attention to this matter.

Sincerely,

**RHEA, BOYD & RHEA**

Donald R. Rhea



DRR/njc

cc: Todd Entrekin



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# EXHIBIT D



Debbie Cooper

---

**From:** Donald Rhea <drhea@bellsouth.net>  
**Sent:** Saturday, July 14, 2018 12:38 PM  
**To:** Connor Sheets  
**Cc:** Debbie Cooper; Donald (drhea@bellsouth.net)  
**Subject:** Re: Sheriff Todd Entrekin inquiry

Mr. Sheets:

If you choose to write an article about the paper filed with the Oneonta police department— please note that when he learned of the filing — the FIRST thing Sheriff Entrekin did was to instruct me to immediately contact the State Bureau of Investigation to thoroughly investigate the things said about and against him— and hopefully be at least as vigorous and thorough in an investigation of the sequence of events or motivation behind the filing of the complaint at this time.

Innocent people invite this type of investigation — and rest assured Tod Entrekin is innocent of these allegations— and is anxious to meet and answer any and all questions put to him by State investigators.

It is his hope that everyone involved with precipitating this complaint will be equally cooperative.

Donald Rhea

Sent from my iPhone

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On Jul 13, 2018, at 2:19 PM, Connor Sheets <[CSheets@al.com](mailto:CSheets@al.com)> wrote:

Thank you for sending this. Appreciate the response.

One quick follow-up question: can you tell me what types of documents you/Entrekin turned over to the federal and state authorities currently investigating Entrekin in relation to the food money issue?

Thank you,

Connor Sheets  
205-732-2260

---

**From:** Debbie Cooper <[dbc@rhealaw.com](mailto:dbc@rhealaw.com)>  
**Sent:** Friday, July 13, 2018 2:04:28 PM  
**To:** Connor Sheets  
**Cc:** 'Donald Rhea'  
**Subject:** Sheriff Todd Entrekin inquiry

Please see the attached from Donald R. Rhea in response to your request for information and questions to Sheriff Todd Entrekin.

Debbie Cooper  
Legal Assistant to  
Donald R. Rhea  
Rhea, Boyd & Rhea  
930 Forrest Avenue  
Gadsden, AL 35901  
(256) 547-6801  
[dbc@rhealaw.com](mailto:dbc@rhealaw.com)



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# EXHIBIT E

**Law Offices of  
RHEA, BOYD & RHEA  
930 FORREST AVENUE  
P. O. BOX 8486  
GADSDEN, ALABAMA 35902**

Charles Y. Boyd  
Donald R. Rhea  
Richard A. Rhea

Phone: (256) 547-6801  
Fax: (256) 549-0271  
Email: [drhea@bellsouth.net](mailto:drhea@bellsouth.net)

Clarence F. Rhea  
1921-2005

December 19, 2018

(Sent Via Regular Mail, Certified Mail and E-mail)

Connor Sheets  
c/o: Alabama Media Group  
P. O. Box 2553  
Birmingham, AL 35202  
[CSheets@al.com](mailto:CSheets@al.com)

Re: Article Published Monday, July 16, 2018, by the  
Alabama Media Group Regarding Todd Entrekin  
Demand for Retraction Pursuant to Alabama Code §6-5-186 (Code 1975)

Dear Mr. Sheets:

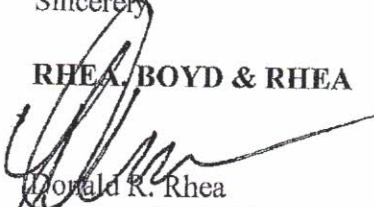
As you know from earlier correspondence, Todd Entrekin requested that you preserve, in their entirety, all notes, tape recordings, video recordings, electronically stored information or other documentation as it relates to the investigation, writing and publication of the July 16, 2018, article titled "Police Investigating Allegations Alabama's 'Beach House Sheriff' had sex with underage girls."

It is our assumption that you have and will continue to carefully preserve all notes, electronically stored information, impressions, drafts and other evidence or information as it relates to the investigation and publication of the referenced article.

At this time, pursuant to provisions of Alabama Code, 1975, § 6-5-186, we demand that you issue a public retraction of the matters contained in the referenced article and that the retraction be made within five (5) days of your receipt of this letter and that the retraction be in as prominent and public place or manner as the July 16, 2018, article and that the retraction be full and fair.

Sincerely

**RHEA, BOYD & RHEA**

  
Donald R. Rhea

Attorney for Todd Entrekin

DRR/njc

cc: Alabama Media Group  
Attention: Executive Editor  
P. O. Box 2553  
Birmingham, AL 35202

Alabama Media Group  
Attention: Executive Editor  
1731 1<sup>st</sup> Avenue North  
Birmingham, AL 35903  
[letters@al.com](mailto:letters@al.com)



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# EXHIBIT F

**Law Offices of  
RHEA, BOYD & RHEA**  
930 FORREST AVENUE  
P. O. BOX 8486  
GADSDEN, ALABAMA 35902

Charles Y. Boyd  
Donald R. Rhea  
Richard A. Rhea

Phone: (256) 547-6801  
Fax: (256) 549-0271  
Email: drrhea@bellsouth.net

---

Clarence F. Rhea  
1921-2005

December 19, 2018

(Sent Via Regular Mail, Certified Mail and E-mail)

Alabama Media Group  
Attention: Executive Editor  
P. O. Box 2553  
Birmingham, AL 35202

Alabama Media Group  
Attention: Executive Editor  
1731 1<sup>st</sup> Avenue North  
Birmingham, AL 35203  
[letters@al.com](mailto:letters@al.com)

Re: Demand for Retraction Pursuant to Provisions of Alabama Code, 1975, §6-5-186 of Article Published on July 16, 2018, titled "Police Investigating Allegations Alabama's 'Beach House Sheriff' had sex with underage girls"

Gentlemen:

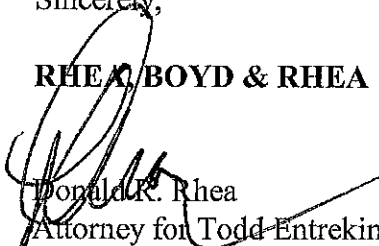
On July 16, 2018, your company published an article regarding Todd Entrekin. This article described activities attributed to Todd Entrekin that, if true, would support at least the crimes of first degree rape, second degree rape, possession of a schedule II substance, endangerment, furnishing illegal substances to a minor, and kidnapping, among others.

The allegations set out in the publication are false and the person publishing the information knew that the matter was false or otherwise published the information with reckless disregard of the truthfulness of the material published.

At this time, on behalf of Todd Entrekin we demand, pursuant to the provisions of Ala. Code § 6-5-186, that your publication retract the matter published within five (5) days upon receipt of this letter and that the retraction be in as prominent and public place or manner as the matter that was published as referenced above and that the retraction be full and fair.

Sincerely,

**RHEA, BOYD & RHEA**



Donald R. Rhea  
Attorney for Todd Entrekin

DRR/njc



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# EXHIBIT G





STATE OF ALABAMA  
OFFICE OF THE ATTORNEY GENERAL

STEVEN T. MARSHALL  
ATTORNEY GENERAL

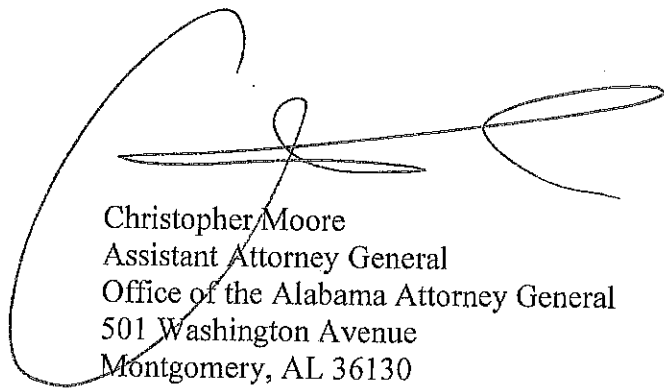
501 WASHINGTON AVENUE  
P.O. BOX 300152  
MONTGOMERY, AL 36130-0152  
(334) 242-7300  
WWW.AGO.ALABAMA.GOV

March 20, 2019

Todd Entrekin  
c/o Donald R. Rhea  
930 Forrest Avenue  
PO Box 8486  
Gadsden, AL 35902

Mr. Entrekin,

The State of Alabama Office of the Attorney General has conducted a review of the State Bureau of Investigation's investigation into the allegations made by Mary Elizabeth Cross Williams. At this time, the matter will be closed without further action.



Christopher Moore  
Assistant Attorney General  
Office of the Alabama Attorney General  
501 Washington Avenue  
Montgomery, AL 36130



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# EXHIBIT H

Law Offices of  
**RHEA, BOYD & RHEA**  
930 FORREST AVENUE  
P. O. BOX 8486  
GADSDEN, ALABAMA 35902

Charles Y. Boyd  
Donald R. Rhea  
Richard A. Rhea

Phone: (256) 547-6801  
Fax: (256) 549-0271  
Email: [drhea@bellsouth.net](mailto:drhea@bellsouth.net)

---

Clarence F. Rhea  
1921-2005

April 30, 2019

Alabama Media Group  
c/o: John G. Thompson, Jr., Esq.  
Lightfoot, Franklin & White  
The Clark Building  
400 20<sup>th</sup> Street, N  
Birmingham, AL 35203  
[jthompson@lightfootlaw.com](mailto:jthompson@lightfootlaw.com)

(By email and certified mail)

Re: Demand for Retraction Pursuant to Provisions of Alabama Code, 1975, §6-5-186 of Article Published on July 16, 2018, titled "Police Investigating Allegations Alabama's 'Beach House Sheriff' had sex with underage girls"

Dear Mr. Thompson:

As you know, on December 19, 2018, on behalf of my client, Todd Entrekin, we requested that Alabama Media Group issue a retraction and correction of the article referenced above. You did acknowledge receipt of that letter and on behalf of Alabama Media Group that there would be no retraction.

I am, today, providing a copy of an article published in *The Gadsden Times* that addresses, in detail, the substance of the subject matter that was the basis of the AL.com article that triggered the redaction request in my earlier correspondence.

I am also providing to you a copy of a letter issued by the Office of the Attorney General of the State of Alabama continuing that an investigation demanded by Todd Entrekin has been completed by the State Bureau of Investigation and that no further action would be taken.

Once again, consistent with our earlier correspondence, we ask that your client retract the article referenced above and that said retraction be in as prominent and public place and manner as the matter that was published. In all respects, we ask that this retraction be published within five (5) days of this request, consistent with Alabama law. See Ala. Code §6-5-186.

Mr. Thompson, this correspondence is being issued, in part, to insure compliance with Ala. Code §6-5-186 (Code 1975). Please advise if, in order to comply with the plain meaning of the statute, this correspondence should be personally delivered to your client.

Sincerely,

**RHEA, BOYD & RHEA**

Donald R. Rhea

DRR/njc

Attachments:

March 20, 2019 Correspondence  
(Al. Atty. Gen. Office)  
E-edition of Gadsden Times Article  
Print Edition of Gadsden Times Article