

STATE OF MICHIGAN

IN THE CIRCUIT COURT FOR THE COUNTY OF OAKLAND

ROBERT J. RITCHIE,

Plaintiff,

vs.

KELLY ANN KOZLOWSKI,

Defendant.



C: JUDGE GENE SCHNELZ
H: COUNTY RITCHIE, ROBER V KOZLOWSKI, KEI

Tenth Floor Columbia Center • 101 West Big Beaver Road • Troy, Michigan 48084-5280 • Phone (248) 457-7000 • Fax (248) 457-7001



Attorneys and Counselors at Law

WILLIAM H. HORTON (P31567)
Attorney for Plaintiff
COX, HODGMAN & GIARMARCO, P.C.
Tenth Floor Columbia Center
101 W. Big Beaver Road
Troy, Michigan 48084
☎(248) 457-7000

THERE IS NO OTHER PENDING OR RESOLVED CIVIL ACTION ARISING OUT OF THE SAME TRANSACTION OR OCCURRENCE AS ALLEGED IN THE COMPLAINT.

RECEIVED FOR FILING
OAKLAND COUNTY CLERK
2007 MAR 19 P 3:27
BY:
DEPUTY COUNTY CLERK

COMPLAINT AND JURY DEMAND

NOW COMES Plaintiff Robert J. Ritchie, and complains of Defendant as follows:

1. Plaintiff is an internationally renowned recording artist known as Kid Rock. He resides in Oakland County, Michigan.
2. Defendant Kelly Ann Kozlowski, resides in Oakland County, Michigan.
3. Venue is proper because the parties reside in Oakland County and the events giving rise to the claims occurred in Oakland County, Michigan.

FACTS

4. On or about March 8, 2007, Plaintiff and his companions visited a restaurant called the Clarkston Union Bar & Kitchen in Clarkston, Michigan. After a while at the Clarkston Union, Plaintiff and his companions decided to go to Plaintiff's home to listen to some of Plaintiff's music which had been recently recorded. Plaintiff, his companions, and Defendant and her boyfriend traveled to Plaintiff's home.

5. Shortly after arriving at Plaintiff's home, Defendant began placing drinks on Plaintiff's recording equipment and was otherwise acting inappropriately. She was asked to stop. In response, Defendant became verbally abusive and belligerent towards Plaintiff and his companions. After some discussion, Plaintiff asked Defendant and her boyfriend to leave. However, Defendant refused to do so. Only after Plaintiff threatened to call the police – to avoid allegations exactly like the ones Defendant has now made – did Defendant agree to leave Plaintiff's home. She was escorted out of the home and left Plaintiff's property without incident, except that she stated to Plaintiff that she "would sue him" or words to that effect.

6. Upon information and belief, after leaving Plaintiff's premises, Defendant filed a report with the Oakland County Sheriff, falsely stating, among other things, that she had been assaulted by Plaintiff. Thereafter, Defendant caused the false story to be widely publicized. The false story has been publicized internationally both in print and on the internet.

COUNT I

FALSE LIGHT/INVASION OF PRIVACY

7. Plaintiff incorporates the above-paragraphs by reference.
8. Defendant has stated to the public that Plaintiff assaulted her when he



UVA
HODGMAN &
GIARMARCO, P.C.

Attorneys and Counselors at Law

Tenth Floor Columbia Center • 101 West Big Beaver Road • Troy, Michigan 48064-5280 • Phone (248) 457-7000 • Fax (248) 457-7001

did not do so. Such false accusations are unreasonable and highly objectionable and have attributed to Plaintiff characteristics, conduct and beliefs that are false and have placed Plaintiff in a false light or position.

9. As a result of Defendant's actions, Plaintiff has suffered damages.

**COUNT II
DEFAMATION**

10. Plaintiff incorporates the above-paragraphs by reference.

11. Defendant's accusations that Plaintiff has committed a crime are false.

12. Defendant has published her accusations to third parties, including the media. Defendant published her statements with knowledge that they were false or in reckless disregard of the truth. The publication was not privileged.

13. Plaintiff has been damaged as a result of the publication of these false statements.

**COUNT III
TRESPASS**

14. Plaintiff incorporates the above-paragraphs by reference.

15. Plaintiff owns real estate in Independence Township.

16. On the evening of March 8, 2007, Plaintiff invited several guests, including Defendant, to his home recording studio.

17. After Defendant became verbally aggressive and belligerent, Plaintiff asked Defendant to leave his premises. Despite Plaintiff's repeated requests, Defendant would not comply and remained in his home. Only after Plaintiff threatened to call the police to remove her from his property did she finally leave.



Attorneys and Counselors at Law
Tenth Floor Columbia Center • 101 West Big Beaver Road • Troy, Michigan 48064-5280 • Phone (248) 457-7000 • Fax (248) 457-7001

18. Defendant's presence on Plaintiff's property without his permission constitutes an actionable trespass.

19. Defendant's actions have caused Plaintiff to suffer damages.

WHEREFORE, Plaintiff Robert J. Ritchie requests that this Honorable Court enter judgment in his favor and against Defendant as follows:

- A. Award Plaintiff damages in an amount to be determined by the trier of fact;
- B. Award Plaintiff his attorney fees and costs of suit; and
- C. Provide any such other and further relief as may be just and equitable.

JURY DEMAND

Plaintiff demands trial by jury.

COX, HODGMAN & GIARMARCO, P.C.

By: 

WILLIAM H. HORTON (P31567)

Attorney for Plaintiff

Tenth Floor Columbia Center

101 W. Big Beaver Road

Troy, Michigan 48084

☎(248) 457-7000

Dated: March 16, 2007



Attorneys and Counselors at Law

Tenth Floor Columbia Center • 101 West Big Beaver Road • Troy, Michigan 48084-5280 • Phone (248) 457-7000 • Fax (248) 457-7001