IN THE CHANCERY COURT OF LAFAYETTE COUNTY, MISSISSIPPI

ROBYN M. TANNEHILL and J. RHEA TANNEHILL, JR.

2017 MAY 22 PH 2: 46

PETITIONERS

V.

8757 1

Cause No.: (V2)1217A

MATTHEW REARDON

RESPONDENT

PETITION FOR EMERGENCY, TEMPORARY RESTRAINING ORDER AND PERMANENT RESTRAINING ORDER

Comes Now the Petitioners, Robyn M. Tannehill and J. Rhea Tannehill, Jr., in the above styled and numbered case, and moves this Honorable Court to grant a Temporary Restraining Order pursuant to Rule 65 of the Mississippi Rules of Civil Procedure against Respondent Matthew Reardon, on the grounds that the Petitioners have reasonable cause to believe that Respondent Matthew Reardon will violate the rights of Petitioners and cause them and/or their family immediate and irreparable injury, loss, and damage to their person or property, all as more specifically set out below. In support thereof, Defendant would show unto the Court the following:

- J. Rhea Tannehill, Jr. has practiced law in Oxford, Mississippi since 1996, and is married to Robyn Tannehill, and they are both adult resident citizens of Lafayette County, Mississippi.
- 2. Respondent Matthew Reardon is believed to be an adult resident citizen of Lafayette County, Mississippi.
- 3. In 2016, Tannehill represented an individual named Lizzie Crowder, who was charged with domestic violence in Lafayette County Justice Court based on an affidavit filed by Matthew Reardon. The charges were dismissed, but only after a contentious hearing for a

Temporary Restraining Order against Reardon, and an *Agreed Order of Paternity, Child Support* and *Visitation* was entered between the parties and filed with the Lafayette County Chancery Court on August 8, 2017.

- 4. Tannehill has not had any interaction with Reardon since this matter was completed in August, 2016.
- 5. Matthew Reardon is an advocate for the Mississippi State Flag, and as such he has mounted an aggressive campaign against the Oxford Board of Aldermen and Mayor for not flying the Mississippi State Flag.
- 6. On May 1, 2017, Reardon was arrested and charged with disorderly conduct in Lafayette County Justice Court connection with waiving the Mississippi State Flag without a permit.
- 7. Since that time Reardon has mounted an aggressive internet campaign against many people, including myself, and my wife, Robyn Tannehill, who serves as Alderman for Oxford's Ward II.
- 8. The bizarre journey that leads Tannehill to seek a restraining began on May 13, 2017, when he received a text message from Terry Warren. Warren received a threatening text message from Matthew Reardon and mentions Tannehill. See text message attached hereto as Exhibit "A" and incorporated herein by reference.
- 9. Reardon states that Tannehill is being "watched...closely" in the message and and makes threats to Warren. Reardon has also reported to people that Tannehill has placed a "bounty" on his head for \$1,000,000.00 in conjunction with Warren, which is not true.
 - 10. On May 16, 2017, Reardon posted a rant on Facebook about the Oxford

Board of Alderman at 11:18 a.m. and threatens a "Southern Fury is coming!" See Exhibit "B" attached hereto and incorporated herein by reference.

- 11. Shortly thereafter, at 11:42 a.m., Reardon posts on Facebook looking for a bullet proof vest in Oxford. See Exhibit "C" attached hereto and incorporated herein by reference.
- 12. Later that evening, Reardon posted a video on Facebook accusing Robyn Tannehill of being corrupt, a "communist" and a "social Marxist" and ranting about her and her husband despite the fact that she is a proud military spouse, and has served her country more than Respondent has ever thought about. See Exhibit "D" attached hereto and incorporated herein by reference.
- 13. On May 17, 2017, at 11:58 p.m., Reardon posted on Facebook that a "father without his child has NOTHING to lose!!" See Exhibit "E" attached hereto and incorporated herein by reference. On information and belief, Reardon has lost all visitation rights with his child (except for 20 minutes every two weeks at the Oxford Police Department) that he has with Lizzie Crowder, who Tannehill previously represented.
- 14. On May 20, 2017, Reardon made statements that he is going to "wreck havoc and carnage" on people, "[e]specially when they involve my daughter like they did!" See Exhibit "F" attached hereto and incorporated herein by reference. This is clearly a reference to Tannehill as he points out in a video this same evening.
- 15. That same date Reardon posts a photograph on Facebook holding an AR-15 assault rifle and a pistol. See Exhibit "G" attached hereto and incorporated herein by reference.
- 16. That evening Reardon posted two videos to Facebook about Tannehill and mentions his wife as well and rants about a "corruption scandal" that he believes we are involved in some way. See Exhibit "H" attached hereto and incorporated herein by reference. During these video

Reardon is extremely intoxicated and makes numerous threats against Tannehill. In fact,

Reardon sent the video to Tannehill by "tagging" him, but eventually removed it from Facebook.

- 17. It is the threats on one of these videos combined with the other posts earlier that day with a semi-automatic assault rifle that causes Tannehill to ultimately have to come to this Court to seek relief. It appears that Reardon falsely believes that Tannehill is still representing Lizzie Crowder against him or has done something to affect his ability to see his child.
- 18. Numerous people have reported this information to the Oxford Police Department and Petitioners and have reported that Respondent is "dangerous."
- 19. I do not know what this man is capable of, but long have passed the days where two men can "take an argument" outside. Reardon appears disturbed in several videos and appears to need mental health treatment.
- 20. Me and my family may not be the one who Reardon makes a statement with, but something has to be done before this dangerous individual hurts himself or someone else. Who is Reardon going to "wreck havoc and carnage" on? If not Tannehill, then who?
- 21. Reardon has also held himself out to be the "leader" of the Southern Resistance Movement that also has a Facebook Page, and on information and belief, Reardon manages the information placed on that page.
- 22. The "Southern Resistance Movement" has posted threats, negative information and lies against Robyn Tannehill. See Exhibit "I" attached hereto and incorporated herein by reference. These threats combined with the recent video Reardon posted have caused Robyn Tannehill to fear for her personal safety. See Exhibit "J" attached hereto and incorporated herein by reference.
 - 23. Petitioners support Matthew Reardon's First and Second Amendment Rights, and

Tannehill has served 25 years in the Mississippi Army National Guard (including a deployment to Afghanistan) to make sure that his rights are protected. However, Respondents' actions have been erratic, bizarre, and involved violent threats, false allegations, and lies. Respondent has lied and/or is confused about certain things he is posting on social media, and Petitioners are respectfully asking this Court to limit his ability to contact them in any way, be within 500 feet of them or their children at any time, or post about them on social media.

WHEREFORE, PREMISES CONSIDERED, Petitioners respectfully request that a temporary restraining order be issued that would prevent Matthew Reardon from coming within 500 feet of them (or their children) at any time, posting about them on social media, or contacting them in any way.

Respectfully submitted, this the 22 day of May, 2017.

ROBYN TANNEHILL,

By and through her counsel of record

J. Rhea Tannehill, Jr., MSB# 10449

TANNEHILL, CARMEAN & McKENZIE, PLLC

829 North Lamar Boulevard, Suite #1

Oxford, Mississippi 38655

Telephone (662)236-9996

Facsimile (662)234-3949

STATE OF MISSISSIPPI

COUNTY OF LAFAYETTE

This day personally appeared before me, the undersigned authority in and for the above jurisdiction, the within named, J. Rhea Tannehill, Jr., who states on his oath that the matters, things and allegations contained in the foregoing *Petition for Emergency, Temporary Restraining Order and Permanent Restraining Order* are true and correct as therein stated to the best of his knowledge and belief.

J. Rhea Tannehill, Jr.,

Sworn to and subscribed before me, his the 22 day of May, 2017.

NOTARY PUBLIC

My Commission Expires:

10/16/2020





12:07 PM

1 79%







(1/5) Just wanted to let you know that I'm on to you and your menacing behavior. And my people are on to you. I may be watched but I can assure you that you are

(2/5)being watched as well. If anything happens to me, all hell will break out on you and your businesses. More so you. So back the fuck down! 38 states stand

(3/5)behind me in the Southern **Resistance Movement! Your** power and money means nothing to me and the people and money that stands behind me! Same goes to Rhea!

(4/5)He's being watched just as closely. Everything I know and can prove is closeguarded in the hands of 3 powerful attorneys ready to open the gates of hell if



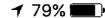








12:07 PM









(2/5)being watched as well. If anything happens to me, all hell will break out on you and your businesses. More so you. So back the fuck down! 38 states stand

(3/5)behind me in the Southern Resistance Movement! Your power and money means nothing to me and the people and money that stands behind me! Same goes to Rhea!

(4/5)He's being watched just as closely. Everything I know and can prove is closeguarded in the hands of 3 powerful attorneys ready to open the gates of hell if

(5/5) something happens to me including any police corruption -MR

Just got this from Matt Reardon

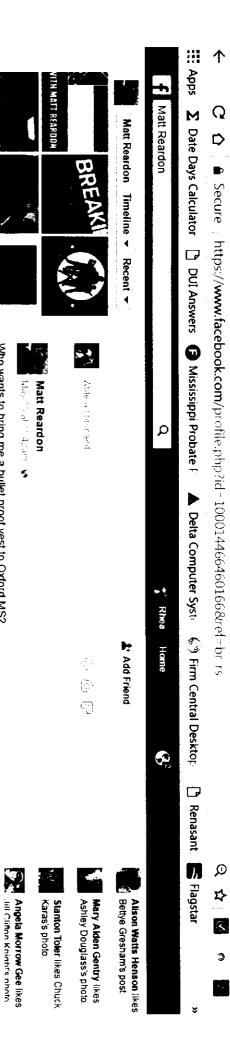






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would be stupid to try anything dumb tonight

Troops disguised in on the square and watching from above so anyone

Who wants to bring me a bullet proof vest to Oxford MS?

Will Allen

new post

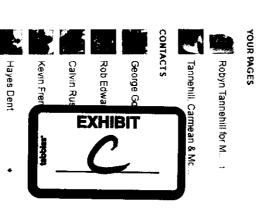
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Matt Reardon stated Southern Resistance Movement's post

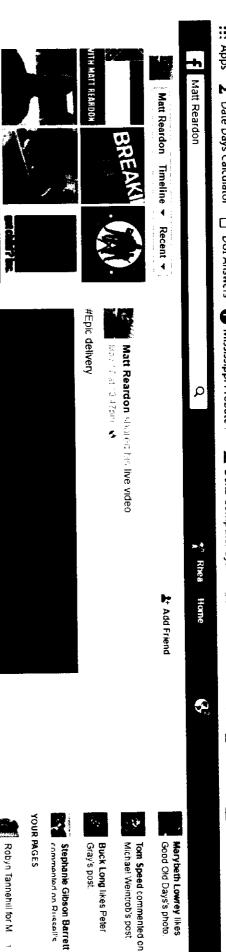
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Rosey Campbell King

Kevin French

Nicole Fowler Kamman •

Marc Boutwell

Linda Brooks

Hayes Dent

11年,1日報中華10年 - ★ Matt Reardon Acade See

Need donations to fight the corrupt establishment @ paypal.me/southernres/stance Coing after the one that needs attention the most. Robyn Tannehill our incoming mayor

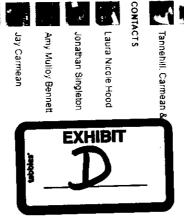
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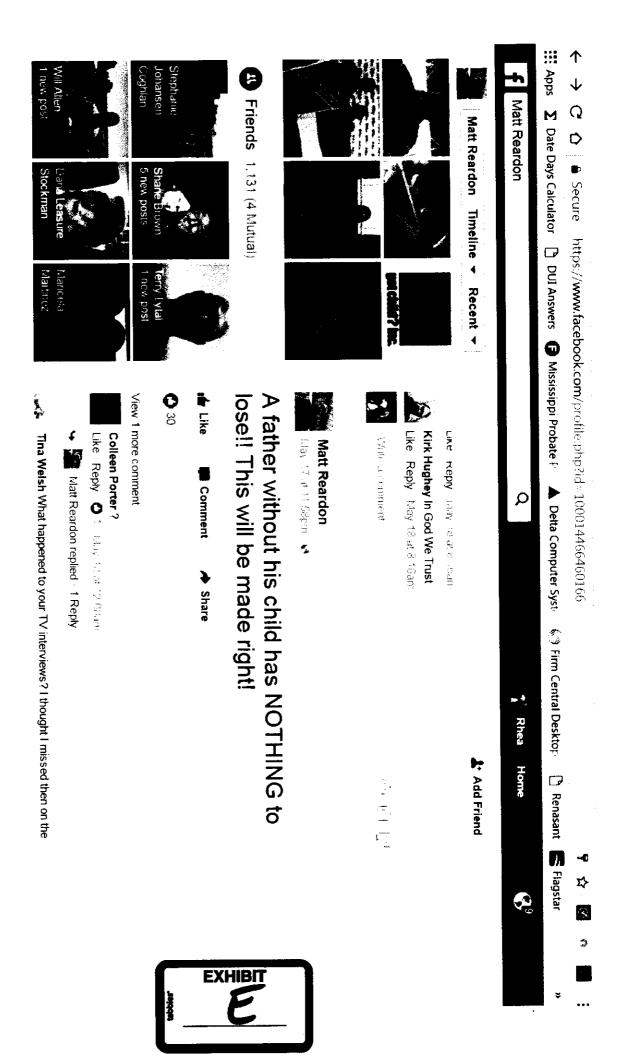


John Thomas

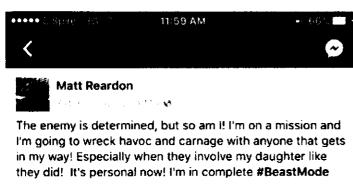
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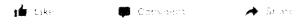
Christopher B. Knapp



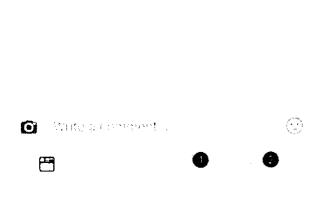


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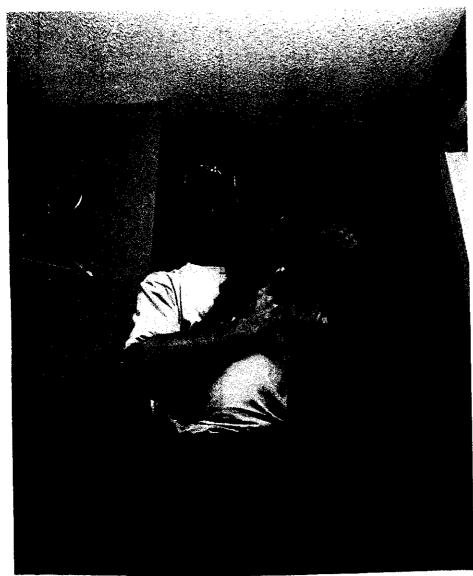














Matt Reardon

May 20 ·

Who wants to come after me and cause harm now? As the threats stepped up, the weaponry stepped up!

Like

Comment

Share

126

View 20 more comments



Matt Reardon I'm glad Clay Russell said that so my wolves could feed him the food he wanted. So ridiculous! I'm a patriot out to protect our freedoms and this communist shit bag wants to label me as a terrorist?? Won't be the first time a patriot was labeled as a terrorist. So fuck it! Feed him beans! My followers know what! stand behind! Swallow Clay Russell whole like his mother should have swallowed him!

Like Reply 1 Yester

1 · Yesterday at 12:00am · Edited



Matt Reardon At least I get to block every motherfucker that likes his bullshit post! Hahaha Like : Reply · . . . 5 · May 20 at 11:29pm

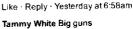


Jeremy Bell USA USA USA

Like · Reply · 1 · Yesterday at 12:14am



Maria Murray Sexy





Like · Reply · Yesterday at 9:20am



Johnny Ricke I like that holster. Is it a Unde Mike's? I heard they are the best holsters made. Looking at your side arm, it looks to me like a Taurus. Those are great. I don't know why folks waste money on more expensive guns. You should post a video of you at the range shooting that rifle. I bet it shoots real good.

Like - Reply - 19 hrs



Write a comment...



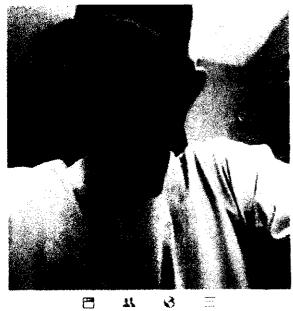
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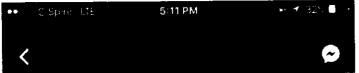
Matt Reardon was live

I'm drunker than cooter Brown! Talk to me because unfair treatment by my ex's attorney Mona Pittman whom I'm about to nail with Rhea Tannehill on something HUGE under lock and deposit doesn't count! I'll expose both! Fuck you both! Happy to see you both go down! Corrupt fucking attorneys! Hahaha, Fuck me being drunk! I got your ass! Sucks for your wite ROBYN coming in as Mayor! Coincidence? I.









person specifically asks not to. Thanks in advance!
We will prevail! The link is> paypal.me/

southernresistance



Pay Matthew Reardon using PayPal.Me

1000

3. O



Porcello Carl

I'm just going to go ahead and put this out there the mayor that is responsible for all of this you better learn to duck because there's a whole Lot of patriots looking to come collect your fucking head.



Steve Lawrence



ere attended to the to







(3)

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AFFIDAVIT OF ROBYN TANNEHILL

STATE OF MISSISSIPPI

COUNTY OF LAFAYETTE

PERSONALLY APPEARED BEFORE ME, the undersigned authority in and for the jurisdiction aforesaid, the undersigned Robyn Tannehill, who, after being by me duly sworn, states on her oath the following, to-wit:

- 1. That my name is Robyn Tannehill, and I am a resident of Oxford, Mississippi.
- 2. My husband is J. Rhea Tannehill, Jr.
- 3. That on Sunday, May 21, 2017, I received notification from a friend that Matthew Reardon had posted a video on the internet that was threatening towards my husband, J. Rhea Tannehill, Jr. and in it mentions my family.
- 4. That on the evening prior, May 20, 2017, Matthew Reardon posted a photo holding an AR-15 assault rifle and a pistol.
- 5. That on May 16, 2017, Matthew Reardon came to a meeting of Oxford Board of Aldermen and during the meeting he stared and pointed at me numerous times while he was wearing a pistol.
- 6. In addition, he posted a video on Facebook calling me a "communist," "cultural Marxist," and alleges that I am corrupt.
- 7. On May 20, 2017 in a video he posted on Facebook Reardon states that he will mount a "heavy, heavy charge against..." me.
- 8. Matthew Reardon also has a Facebook Page called the Southern Resistance Movement where he alludes to violence frequently, and his members have posted threats that appear to be directed to me. This is caused me to fear that Reardon may cause harm to me or my family.



- 9. That Matthew Reardon has been an advocate for the Mississippi State Flag, and has made numerous posts about me on social media. I support his First Amendment Right to support the Mississippi State Flag, and/or hold an opinion contrary to the position of the Oxford Board of Aldermen, where I serve Ward II.
- 10. However, Matthew Reardon's post on May 21, 2017, about my husband combined with his previous actions and words has caused me to believe that he may use violence against me, my husband, or my family.
- 11. All other allegations in the Petition for Emergency, Temporary Restraining Order and Permanent Restraining Order are true and correct.

Robyn Tannehill

SWORN TO AND SUBSCRIBED BEFORE ME, this the 22nd day of May, 2017.

Notary Public

My Commission Expires:

10/16/2020