

Court of Common Pleas of Philadelphia County
 Trial Division
Civil Cover Sheet

For Prothonotary Use Only (Docket Number)
FEBRUARY 2016
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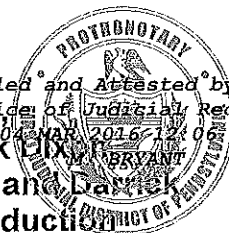
PLAINTIFF'S NAME DARRICK DIXON		DEFENDANT'S NAME ESPN, INC.	
PLAINTIFF'S ADDRESS 690 3RD AVENUE WILLIAMSPORT PA 17701		DEFENDANT'S ADDRESS ESPN PLAZA BRISTOL CT 06010	
PLAINTIFF'S NAME DARRICK DIXON, ALIAS: D/B/A PA SPORTS LIVE		DEFENDANT'S NAME TODD BARTLEY	
PLAINTIFF'S ADDRESS 402 SOUTH 3RD STREET DARBY PA 19023		DEFENDANT'S ADDRESS 1308 WARREN AVENUE WILLIAMSPORT PA 17701	
PLAINTIFF'S NAME DARRICK DIXON, ALIAS: D/B/A RIZZO PRODUCTION		DEFENDANT'S NAME ABC, INC.	
PLAINTIFF'S ADDRESS 416 HIGH STREET WILLIAMSPORT PA 17701		DEFENDANT'S ADDRESS 77 WEST 66TH STREET NEW YORK NY 10023	
TOTAL NUMBER OF PLAINTIFFS 3	TOTAL NUMBER OF DEFENDANTS 6	COMMENCEMENT OF ACTION <input checked="" type="checkbox"/> Complaint <input type="checkbox"/> Petition Action <input type="checkbox"/> Notice of Appeal <input type="checkbox"/> Writ of Summons <input type="checkbox"/> Transfer From Other Jurisdictions	
AMOUNT IN CONTROVERSY <input type="checkbox"/> \$50,000.00 or less <input checked="" type="checkbox"/> More than \$50,000.00	COURT PROGRAMS <input type="checkbox"/> Arbitration <input type="checkbox"/> Mass Tort <input type="checkbox"/> Commerce <input type="checkbox"/> Settlement <input checked="" type="checkbox"/> Jury <input type="checkbox"/> Savings Action <input type="checkbox"/> Minor Court Appeal <input type="checkbox"/> Minors <input type="checkbox"/> Non-Jury <input type="checkbox"/> Petition <input type="checkbox"/> Statutory Appeals <input type="checkbox"/> W/D/Survival <input type="checkbox"/> Other:		
CASE TYPE AND CODE 2L - LIBEL, SLANDER, MISREPRESENT			
STATUTORY BASIS FOR CAUSE OF ACTION			
RELATED PENDING CASES (LIST BY CASE CAPTION AND DOCKET NUMBER)		IS CASE SUBJECT TO COORDINATION ORDER? YES NO	
		FILED PRO PROTHY MAR 04 2016 M. BRYANT	
TO THE PROTHONOTARY: Kindly enter my appearance on behalf of Plaintiff/Petitioner/Appellant: <u>DARRICK DIXON</u> , <u>DARRICK DIXON</u> , <u>DARRICK DIXON</u> Papers may be served at the address set forth below.			
NAME OF PLAINTIFF'S/PETITIONER'S/APPELLANT'S ATTORNEY STEVEN JOSHUA. SILVER		ADDRESS MCBREEN & KOPKO 1600 MARKET STREET SUITE 1805 PHILADELPHIA PA 19103	
PHONE NUMBER (215) 864-2600	FAX NUMBER (215) 864-2610		
SUPREME COURT IDENTIFICATION NO. 316517		E-MAIL ADDRESS ssilver@mcbreenkopko.com	
SIGNATURE OF FILING ATTORNEY OR PARTY STEVEN SILVER		DATE SUBMITTED Friday, March 04, 2016, 12:06 pm	

COMPLETE LIST OF DEFENDANTS:

1. ESPN, INC.
ESPN PLAZA
BRISTOL CT 06010
2. TODD BARTLEY
1308 WARREN AVENUE
WILLIAMSPORT PA 17701
3. ABC, INC.
77 WEST 66TH STREET
NEW YORK NY 10023
4. ABC RADIO NETWORKS ASSETS, LLC
2711 CENTERVILLE ROAD SUITE 400
WILMINGTON DE 19808
5. COLONIAL RADIO GROUP OF WILLIAMSPORT, LLC
1500 SYCAMORE ROAD
MONTOURSVILLE PA 17754
6. PIONEER SPORTS PRODUCTION, LLC
460 MARKET STREET SUITE 310
WILLIAMSPORT PA 17701

McBREEN & KOPKO

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Attorney for Plaintiffs,
Darrick Dixon, Darrick Dixon
d/b/a PA Sports Live, and Darrick
Dixon d/b/a Rizzo Production

DARRICK DIXON
690 3rd Avenue
Williamsport, PA 17701

and

DARRICK DIXON d/b/a
PA SPORTS LIVE
402 South 3rd Street
Darby, PA 19023

and

DARRICK DIXON d/b/a
RIZZO PRODUCTION
416 High Street
Williamsport, PA 17701

Plaintiffs

v.

ESPN, INC.
ESPN Plaza
Bristol, CT 06010

and

TODD BARTLEY
1308 Warren Avenue
Williamsport, PA 17701

and

ABC, Inc.
77 West 66th Street
New York, NY 10023

and

COURT OF COMMON PLEAS
PHILADELPHIA COUNTY

March Term, 2016

No. _____

JURY TRIAL DEMANDED

ABC Radio Networks Assets, LLC
2711 Centerville Road, Suite 400
Wilmington, DE 19808

and

Colonial Radio Group of
Williamsport, LLC
1500 Sycamore Road
Montoursville, PA 17754

and

Pioneer Sports Production, LLC
460 Market Street, Suite 310
Williamsport, PA 17701

Defendants

CIVIL ACTION COMPLAINT - NOTICE

NOTICE

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this Complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the Plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

LAWYER REFERENCE SERVICE
One Parkway, 1515 Arch Street, 15th Floor
Philadelphia, Pennsylvania 19102-1595
215-683-5000

AVISO

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las paginas siguientes, usted tiene veinte (20) dias de plazo al partir de la fecha de la demanda y la notificacion. Hace falta asentar una comparencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se defiende, la corte tomara medidas y puede continuar la demanda en contra suya sin previo aviso o notificacion. Ademas, la corte puede decidir a favor del demandante y requiere que usted cumpla con Todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

LLEVE ESTA DEMANDA A UN ABOGADO INMEDIATAMENTE. SI NO TIENE ABOGADO O SI NO TIENE EL DINERO SUFICIENTE DE PAGAR TAL SERVICIO, VAYA EN PERSONA O LLAME POR A LA OFICINA CUYA DIRECCION SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL.

SERVICIO DE REFERENCIA LEGAL
One Parkway, 1515 Arch Street, 15th Floor
Philadelphia, Pennsylvania 19102-1595
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McBREEN & KOPKO

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Darrick Dixon, Darrick Dixon
d/b/a PA Sports Live, and Darrick
Dixon d/b/a Rizzo Production

DARRICK DIXON
690 3rd Avenue
Williamsport, PA 17701

and

DARRICK DIXON d/b/a
PA SPORTS LIVE
402 South 3rd Street
Darby, PA 19023

and

DARRICK DIXON d/b/a
RIZZO PRODUCTION
416 High Street
Williamsport, PA 17701

Plaintiffs

v.

ESPN, INC.
ESPN Plaza
Bristol, CT 06010

and

TODD BARTLEY
1308 Warren Avenue
Williamsport, PA 17701

and

ABC, Inc.
77 West 66th Street
New York, NY 10023

and

COURT OF COMMON PLEAS
PHILADELPHIA COUNTY

March Term, 2016

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JURY TRIAL DEMANDED

ABC Radio Networks Assets, LLC
2711 Centerville Road, Suite 400
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and

Colonial Radio Group of
Williamsport, LLC
1500 Sycamore Road
Montoursville, PA 17754

and

Pioneer Sports Production, LLC
460 Market Street, Suite 310
Williamsport, PA 17701

Defendants

COMPLAINT

Plaintiffs, Darrick Dixon, Darrick Dixon d/b/a PA Sports Live, and Darrick Dixon d/b/a Rizzo Production, by and through their undersigned counsel, McBreen & Kopko, state the following:

INTRODUCTION

Despite more than a decade as a community and church leader volunteering to end gang violence, mentoring troubled youth, and promoting positive messages of empowerment, Plaintiff, Darrick Dixon, could not escape the jealous wrath of his business competitors, the Defendants. The Defendants' negligent, intentional, reckless, willful, wanton, outrageous, and malicious actions in broadcasting and publishing false, defamatory, libelous, and slanderous statements on about the Plaintiffs give rise to this civil action.

The Plaintiffs and the Defendants are all in the business of broadcasting interscholastic athletic events throughout the Commonwealth of Pennsylvania. For nearly eight (8) years, PA Sports Live has built a large following of viewers for its Internet streaming broadcasts of various interscholastic athletic contests such as football, basketball, and wrestling. The success of PA Sports Live also attracted

numerous sponsorship and advertising opportunities. In addition, Rizzo Production aided hundreds of Pennsylvania students, including students from Philadelphia County, in earning college athletic scholarships. Not wanting to be outdone by his competitor, Todd Bartley, the General Manager of ESPN Radio Williamsport (hereinafter "ESPN Radio"), also began streaming interscholastic athletic events on the Internet. At all times during his competition with Mr. Dixon, Mr. Bartley was acting as an agent and/or representative of Defendants, ESPN, ABC, Inc., ABC Radio Networks Assets, LLC, Colonial Radio Group of Williamsport, LLC, and Pioneer Sports Production, LLC.

Notably, on February 1, 2016, Mr. Bartley admitted on-air that he had harbored ill-will toward Mr. Dixon since 2007. Yet despite holding a personal grudge against Mr. Dixon since 2007, Mr. Bartley agreed to work with Mr. Dixon in 2013 to bridge their businesses. On January 18, 2013, PA Sports Live, Mr. Dixon, Mr. Bartley, and ESPN Radio teamed up to jointly broadcast a boys' basketball game between St. John Neumann and Muncy High Schools.

Following that joint broadcast, all parties decided to cease working together and proceed their separate ways. During the next season, PA Sports Live did not broadcast interscholastic athletic events because Mr. Dixon was working on a book about his personal experiences with the adoption process called *The Open Adoption*. Once Mr. Dixon completed his book, PA Sports Live returned for the 2015 football season and gained unprecedented success — success ESPN Radio failed to match. For example, the most viewed football video on ESPN Radio's YouTube page during the 2015 season attracted fifty-four (54) views.¹ However, PA Sports Live's football videos, also on YouTube, often earned more than 10,000 views.² The stark contrast in popularity enraged Mr. Bartley to the point of using his position as an agent and representative of ESPN, ABC, Inc., ABC Radio Networks Assets, LLC, Colonial Radio Group of Williamsport, LLC, and Pioneer Sports Production, LLC to intentionally tarnish Mr. Dixon's reputation and ruin his businesses by broadcasting and publishing numerous defamatory falsehoods. For the past several months, the Defendants engaged in repeated reckless and malicious conduct in an attempt to derail Mr. Dixon's success.

¹ <https://www.youtube.com/channel/UCtjcULri8hg1WHCP-0pv0bg>

² <https://www.youtube.com/user/pasportslive/videos>

Through this civil action, Mr. Dixon seeks to exercise his right as a resident of the Commonwealth of Pennsylvania to protect his personal reputation and the reputations of his businesses, PA Sports Live and Rizzo Production, from the false and defamatory attacks by the Defendants.

VENUE

1. This Court has jurisdiction over the Defendants pursuant to 42 Pa.C.S. 5301 *et seq.* The Defendants and their respective agents, representatives, and employees conduct regular, continuous, and systematic business within the Commonwealth of Pennsylvania. The Defendants have caused harm and tortious injury by broadcasting and publishing defamatory statements in Pennsylvania.
2. Venue is proper in this Court under Pa.R.C.P. 1006(a), 1006(c), and 2179(a)(2-4). The Defendants conduct regular, continuous, and systematic business within Philadelphia County and the defamatory statements giving rise to this cause of action were broadcast and published in Philadelphia County.
3. At all times material hereto, the Defendants were regularly present in and regularly conducted business within Philadelphia County.

THE PARTIES

4. Plaintiff, Darrick Dixon (hereinafter "Dixon"), is an adult, private individual residing at 690 3rd Avenue, Williamsport, Pennsylvania 17701.
5. Plaintiff, PA Sports Live, is a fictitious entity registered to its owner, Darrick Dixon, with a principal place of business at 402 South 3rd Street, Darby, Pennsylvania 19023.
6. Plaintiff, Rizzo Production, is a fictitious entity registered to its owner, Darrick Dixon, with a principal place of business at 416 High Street, Williamsport, Pennsylvania 17701.
7. Defendant, ESPN, Inc. (hereinafter "ESPN"), is a Delaware Domestic Closed Corporation with a business address of ESPN Plaza, Bristol, Connecticut, 06010.

8. Defendant, Todd Bartley (hereinafter "Bartley"), is an adult individual residing at 1308 Warren Avenue, Williamsport, Pennsylvania 17701. Bartley is the General Manager of ESPN's Williamsport radio station.
9. Bartley and ESPN are also the official broadcasters of Philadelphia's Chestnut Hill College athletics.³
10. At all material times, Bartley was acting as an agent and/or representative of ESPN, ABC, Inc., ABC Radio Networks Assets, LLC, Colonial Radio Group of Williamsport, LLC, and Pioneer Sports Production, LLC.
11. Defendant, ABC, Inc. (hereinafter "ABC"), is a Delaware Domestic General Corporation with a business address of 77 West 66th Street, New York, New York 10023.
12. Defendant, ABC Radio Networks Assets, LLC (hereinafter "ABC Radio"), is a Delaware Domestic General Corporation with a registered agent address of 2711 Centerville Road, Suite 400, Wilmington, Delaware 19808.
13. Defendant, Colonial Radio Group of Williamsport, LLC (hereinafter "Colonial Radio") is a Pennsylvania Domestic Limited Liability Company with a business address of 1500 Sycamore Road, Montoursville, Pennsylvania 17754.
14. Defendant, Pioneer Sports Production, LLC (hereinafter "Pioneer"), is a Pennsylvania Domestic Limited Liability Company with a business address of 460 Market Street, Suite 310, Williamsport, Pennsylvania 17701.

FACTS AND NATURE OF CASE

15. For more than a decade, Dixon has devoted countless hours volunteering to better his church, community, and alma mater.
16. Recently, in August of 2015, Dixon organized a community gathering to end gun violence and improve relations between the Williamsport community and the police department. The event to honor victims of gun violence featured arm wrestling and food eating competitions between police officers, government officials, and community members.⁴

³ http://www.griffinathletics.com/news/2015/1/12/GEN_0112153319.aspx?path=general

⁴ <http://wnep.com/2015/05/29/where-you-at-now-williamsport/>

17. In addition to performing regular community service, Dixon also routinely speaks to youth groups throughout Pennsylvania to spread messages of positivity, self-improvement, and empowerment. Dixon's speeches focus on avoiding drugs, leadership, and overcoming obstacles.⁵
18. Dixon has devoted much of his adult life to enabling youth, particularly minority youth, to overcome obstacles because he has personally had to overcome substantial hurdles to becoming a successful entrepreneur.
19. As an adolescent, Dixon survived the trauma of having his older sister gunned down by gang violence.
20. However, Dixon went on to successfully graduate from Williamsport High School where he starred on the basketball team.
21. After college and a brief musical career, Dixon returned to his hometown to coach high school basketball.
22. In 2001, when Dixon was 23-years-old, Dixon was accused of having a sexual relationship with a female member of his basketball team.
23. Dixon's accuser claimed that the two had consensual sex on two occasions.
24. However, Dixon never engaged in the alleged sexual encounters.
25. Yet, due to racial, political, and financial considerations outside of Dixon's control, Dixon's attorney at the time advised him to accept a plea agreement.
26. Although Dixon maintained his innocence, he entered a *nolo contendere* plea to the now-repealed criminal statute 18 § 3122.
27. Dixon never pled guilty, nor did a jury ever convict him of rape.
28. Dixon is not and was never a registered sex offender.
29. Dixon is not and was never placed on Pennsylvania's Megan's Law list.
30. In the nearly 15 years since Dixon's plea, Dixon has been a model citizen with not a single arrest or run-in with the law.
31. Rather, Dixon has helped students avoid dropping out of school, prevented troubled youth from turning to drugs, and enabled improved relationships between his community and the police.

⁵ <http://clarioncallnews.com/motivational-speaker-tells-his-story-inspires-crowd/>

32. Additionally, Dixon has promoted the virtues of adoption and advocated for birth fathers' rights through his book, *The Open Adoption*, which chronicles his own journey through the adoption process.
33. Dixon authored his book under the name Darrick Cam Rizzo to honor his son and grandfather's names.
34. Specifically, Dixon has been known as "Rizzo" or "Rizz" since he was a teenager.
35. Dixon even released a music album in 2000 called "Just Rizzin."⁶
36. While working to better himself, his community, and his church, Dixon also married in 2007 and is a devoted father to his daughter and step-son.
37. Yet despite nearly two decades as a positive fixture in his community, Dixon's chief business competitors, the Defendants, have engaged in negligent, reckless, malicious, willful, wanton, outrageous and intentional attacks designed to tarnish Dixon's reputation and ruin his career.
38. Displeased by Dixon's aforementioned ability to attract higher ratings and more advertising revenue while broadcasting Pennsylvania interscholastic athletics, Bartley attempted to derail Dixon's ability to broadcast football games during the 2015 season. Bartley, at all times acting as an agent and/or representative of ESPN, ABC, ABC Radio, Colonial Radio, and Pioneer Sports, called high schools where PA Sports Live was scheduled to broadcast to spread false and defamatory statements about Dixon being on the Megan's Law list in hopes of those schools preventing Dixon from broadcasting on their premises.
39. When this malicious tactic failed, Bartley's disdain for Dixon festered until it reached a boiling point on or about January 30, 2016 when Bartley posted the following message about Dixon to his public Facebook profile:

"Sometimes in life you have to take a stand against evil when you see it and call it for what it is. I invite ALL of my Facebook friends to stand with me in this fight. There will be a very special edition of the Locker Room Show on Monday at 4 pm to address this individual who continues to portray himself in area schools as someone he is not. To the point of using an alias." See Exhibit A.

⁶ <http://www.rizz.8m.com/album.htm>

40. Bartley even promoted his eventual slanderous attack on the "evil" Dixon to attract ratings as "the single most defining show in ESPN Radio Williamsport history" in another Facebook posting on or about January 31, 2016. **See Exhibit B.**
41. Then, on February 1, 2016, Bartley took to the ESPN airwaves to launch the first of four (4) slanderous, defamatory, false, reckless, wanton, outrageous, and malicious assaults on Dixon's reputation and character.
42. Bartley's broadcasts on ESPN's "The Locker Room Show" were solely intended to attack, defame, and inflict emotional distress on Dixon as Bartley was not the usual host of the Locker Room Show.
43. The Locker Room Show, normally hosted by Ian Catherine and Justin Hawkins at 4:00 p.m. on Mondays and Wednesdays, followed fourteen (14) consecutive hours of ESPN programming including SportsCenter, Mike & Mike in the Morning⁷, The Dan Le Batard Show with Stugotz⁸, and Russillo & Kanell⁹.
44. Before, during and after his attacks on Dixon, Bartley would regularly inform listeners that they were tuning in to ESPN as he repeatedly mentioned the ESPN name.
45. In addition, there was no news value, timeliness, or newsworthiness warranting a spotlight on Dixon's past aside from Bartley's desire to harm a business competitor.
46. The Defendants, through Bartley's on-air radio show and ESPN Radio Williamsport's Facebook page, has published numerous false and defamatory statements, innuendo and implications negligently, with knowledge of their falsity, or reckless disregard for their truth or falsity as follows:

February 1, 2016 ESPN Radio Broadcast

47. Bartley introduced the February 1, 2016 broadcast with numerous disclaimers intended to cast Dixon in a negative light and portray him as a rapist and child molester such as:

⁷ <http://espn.go.com/espnradio/show?showId=mikemike>

⁸ <http://espn.go.com/espnradio/show?showId=danlebatard>

⁹ <http://espn.go.com/espnradio/show?showId=russilloandkanell>

Now for those of you that have children in the car you might want to turn the radio off now because this is not going to be for the faint of heart for about the next half hour, okay, just want to forewarn you it's not for the faint of heart. So if you're going to get squeamish over it, you don't have to have the kids hear this.

48. The broadcast, which could be heard on the radio and live on the ESPN Radio website anywhere in the world with an Internet connection, featured an initial mocking of one of Dixon's speeches espousing the virtues of Christianity.
49. After ridiculing Dixon for preaching about the need for helping the poor and feeding the hungry, Bartley launched into a tirade that included numerous slanderous, defamatory, and false statements about and concerning Dixon.
 - a. Bartley falsely stated that Dixon is currently involved in sexual relationships with student athletes he coaches: *"I just read you a story about how he betrayed the trust of one of his very own student athletes and now he's right back to doing what he was doing."*
 - b. Bartley then admitted that he had harbored ill-will and malice toward Dixon since 2007 without mentioning that he agreed to work with Dixon to jointly broadcast a basketball game in 2013: *"As I told you in the open, I got here in '07. So I learned of it very early on. This has been brewing with me for the better part of a decade. I've had enough. I've absolutely had enough of watching this."*
 - c. Bartley falsely claimed that Dixon had hired civil rights attorneys in Allentown and Philadelphia to threaten racial discrimination lawsuits against high schools for barring Dixon from broadcasting sporting events: *"I hear from different people in our beloved county and the school systems that they're being threatened with litigation from a civil rights law firm out of Allentown and Philly because well you're keeping him out because he's black. It has nothing to do with your color. It has everything to do about the crime you perpetrated on one of your student athletes and nobody's forgotten it, nobody, nor should they."*
 - d. Yet, Bartley claimed that his attacks on Dixon were not racially motivated: *"Now, if anybody wants to make this a racial thing with me, please try that*

one time, please try it. I've lived in the smallest town in Ohio that had one black person in the community, one."

- e. Bartley then compared Dixon's alleged misconduct to former Penn State football coach Jerry Sandusky's numerous forcible rapes of young boys: *"Have we forgotten about what happened at Penn State? Over a hundred million dollars has been paid out by Penn State in fines and civil litigation, settlements not to mention buying coaches out and everything else related to it. Really? We're going to relive this again in Williamsport, Lycoming County an hour away?"*
- f. Bartley then falsely accused Dixon of threatening to kill him and his family: *"Let me give you my personal experience with this joker. You ready for this? I had somebody, after I did the one game with him, want me to have a conversation, okay. Went to a location, sat down with an individual, we got him on the phone, he had somebody else in the car with him, we're in a conference call. He finds out it's not going to go his way because I'm not sticking my name next to his unless I have final say. You're never going to guess what he called me, which I can't say on the radio and then said, 'I'mma kill you Bartley.'¹⁰ Maybe that's why my wife and family should worry, huh? But listen hey, I opened with 30 seconds of him giving his testimony, he's a man of God, Darrick Dixon."*
- g. Bartley also falsely accused Dixon of lying to adoption agencies about his personal life: *"He did not have the moral character to tell them who he is."*
- h. Additionally, Bartley, who is evidently convinced that innocent criminal defendants never accept plea agreements, stated that Dixon absolutely committed the crimes alleged in 2001: *"Do you know in 2012 he put together a video that says on the title, on the title screen Darrick Dixon/Rizzo pardon video? Now, let me ask you a question, if he didn't do anything wrong, right, back in '01, '02 as a high school girls basketball coach, he didn't do anything wrong, what's he need a pardon for? What does he need a pardon video for"*

¹⁰ At this point, Bartley switched to a voice intended to portray a stereotypical African-American male.

- i. Bartley then begged Dixon to file the instant lawsuit and implied that he would uncover evidence of Dixon having a current relationship with a minor: *"He can threaten whatever he wants to threaten, threaten litigation because here's the funny one dude, sue me because I get your phone, your Facebook, your Twitter, your emails, all of it, any communication you have with a kid."*
- j. Bartley then stated as fact that Dixon raped one of the students he used to coach: *"Darrick Dixon from 2001, former girls basketball coach who raped one of his players."*
- k. Next, Bartley invented a completely false story about Dixon and Dixon's pastor bribing an unnamed woman to not report an altercation she allegedly recently had with Dixon: *"If you want to know who this guy is right now today, in the last 60 days, he was in a gym not in this market, in a coaching capacity, okay you ready? Coaching capacity, right, he ripped some kid so bad that a female, who we're going to call Mary to protect her identity, got after him and called him everything under the sun as it related to what he did in his past. You with me so far? This individual shared with me that she's received unsolicited phone calls since that day and since that exchange to come to a church here in Williamsport to have a meeting with its pastor and Mr. Dixon so they can figure something out. She's also had the opportunity to have gifts, money, given to her so she'll keep her mouth shut. Now is this really somebody we need to have in gyms and on gridirons and at cheerleading competitions and youth events in our community, is it?"*
- l. Bartley proceeded to imply that Dixon was an imminent and dangerous threat to children and that he was using his broadcasting business to perversely watch children: *"I'm telling you right now, people associated with that case have said today, in 2016, he got no business being around kids or being at a school, let alone with a camera."*
- m. Bartley next again asked Dixon to sue him and stated as a fact that Dixon raped someone in 2001: *"The guy's doing face to face interviews on the*

court, on the floor, on the mat, on the gridiron and if you tell me I can't go, I'm going to sue you because I can't make a living. Well guess what? Most people didn't rape their own player back in 2001, most people didn't do that."

50. Following the live radio and Internet broadcast of Bartley's defamatory and slanderous show, ESPN Radio then posted an audio file of the show on its Facebook page.¹¹ To date, the Internet audio file has attracted more than 4,000 listeners. **See Exhibit C.**
51. Bartley and the ESPN Radio staff have "pinned" all content related to Dixon at the top of the ESPN Radio Facebook page so it is the first content any visitor sees.¹²
52. Immediately following Bartley's February 1, 2016 broadcast, counsel for Plaintiffs sent cease and desist letters to Defendants, Bartley, ESPN, and Pioneer requesting that Bartley's content be removed from ESPN's Facebook page and that Bartley refrain from hosting any additional radio shows about Dixon.
53. Rather than cease his willful, wanton, reckless, negligent, and malicious conduct, Bartley posted Plaintiffs' counsel's letters to the ESPN Radio Williamsport Facebook page to publicly mock Plaintiffs' requests.^{13,14}
54. Despite having actual notice of Bartley's actions and intentions to return to the airwaves for additional defamatory broadcasts, Defendants ESPN, ABC, ABC Networks, Colonial Radio, and Pioneer negligently, recklessly, maliciously, and irresponsibly permitted Bartley to continue to post false statements on Facebook, and allowed him to continue acting as an agent and representative of their companies by returning to the ESPN Radio airwaves on February 8, 2016.

¹¹ <https://www.facebook.com/espnradiowilliamsport/videos/1144880945537116/>

¹² <https://www.facebook.com/espnradiowilliamsport/timeline>

¹³ <https://www.facebook.com/espnradiowilliamsport/posts/1147057368652807>

¹⁴ <https://www.facebook.com/espnradiowilliamsport/posts/1147113165313894>

February 8, 2016 ESPN Radio Broadcast

55. Bartley devoted the February 8, 2016 Locker Room Show to Dixon and his 2008 promotion of a top female basketball player, Elena Delle Donne¹⁵ with no newsworthiness, timeliness, or news value for doing so.
56. Bartley spent most of this broadcast claiming that Dixon intentionally attempted to sabotage the career of Delle Donne in 2008.
- Bartley also claimed that current athletes should avoid using Dixon's recruiting service, Rizzo Production, because Dixon does not know NCAA recruiting rules and tried to "injure" Delle Donne: *"This is who this individual tied his name to in 2008 and almost cost her her entire college eligibility. And then had the audacity to say in an article I'm not there to injure the student. You didn't even know the rules and you're running a recruiting service."*
 - Bartley never mentioned that the NCAA concluded that Dixon did not actually violate any of their rules or bylaws.
 - Lastly, Bartley concluded his broadcast by maliciously, recklessly, and falsely stating that Dixon should be on the Megan's Law list: *"Later in the week on Wednesday, again I will take the first five to ten minutes, sorry fellows of the Wednesday Locker Room Show, and address **why in fact Darrick Dixon aka Darrick Rizzo will absolutely have to and should be registered on Megan's law.**"* (emphasis added)

57. Again, following the live radio and Internet broadcast of Bartley's defamatory and slanderous show, ESPN Radio then posted an audio file of the show on its Facebook page.¹⁶ To date, the Internet audio file has drawn more than 430 listeners. **See Exhibit C.**

February 10, 2016 ESPN Radio Broadcast

58. Still undeterred by Plaintiffs' formal requests to cease his false and defamatory broadcasts, the Defendants allowed Bartley to return to the airwaves again on February 10, 2016 to attack Dixon.

¹⁵ Delle Donne is currently a star player for the Chicago Sky of the Women's National Basketball Association (WNBA).

¹⁶ <https://www.facebook.com/espnradiowilliamsport/videos/1148970558461488/>

59. Bartley opened this broadcast by touting the alleged international support of his radio assaults on Dixon: *"I want to let you know that the social media outcry from the general public, not just here in Williamsport Lycoming County, but from across the country and arguably around the world has been tremendous."*
60. Bartley again made a disclaimer intended to cast Dixon in a negative light and portray him as a rapist and child molester: *"This is a child safety issue plain and simple and what I'm going to bring you during these few moments if it doesn't send chills up your spine and just make you sick to your stomach. You might want to check for a pulse."*
61. Bartley then revisited his false and baseless attacks on Dixon's involvement with Delle Donne.
- a. First, Bartley falsely accused Dixon of trying to intentionally ruin his player's career in an attempt to derail Dixon's recruiting business: *"She almost lost her entire college eligibility because of that endorsement because Dixon/Rizzo doesn't know the rules and to this day he is still soliciting people to endorse his various websites. . . He didn't learn trying to ruin the Naismith's basketball player of the year's career at college."*
 - b. Bartley then intentionally, recklessly and maliciously implied that Dixon has had continuing and ongoing sexual relationships with female basketball players since 2001, including a WNBA player: *"Did I mention that his victim is a female back in 2001, 2002? Again, Delle Donne, 2008, a female basketball player. **Do you hear a recurring theme?**"*
 - c. Bartley went on to continue to imply that Dixon is still engaged in criminal sexual activity with his players: *"Do you hear a recurring theme? If you go online and you look at any of the videos that [Dixon] is putting out, girls or female student athletes compared to male or boy student athletes, it's about 20 to 1 girls to guys in number of videos that are online that he's putting out for recruiting purposes."*
62. Bartley next proceeded to falsely state that Williamsport High School had banned Dixon from their campus to cast Dixon in a negative light and imply that he is a threat to high school students: *"The most recent post that Mr. Dixon put*

up on one of his different social media sites referred to pending litigation which is why he wasn't allowed to do three more games in regard to Williamsport High School. Well, sources close to the situation tell me that that statement first of all was patently false. Second of all, that's probably why it was removed because sources close to me say he was basically given a notice that you're not to come around here anymore and the notices are fast and furious."

63. Dixon was never and has never been asked to refrain from filming or broadcasting athletic events at Williamsport High School.

64. Bartley also falsely accused Dixon of trying to solicit an Altoona High School basketball player and implied that this solicitation was for nefarious purposes, which resulted in a campus ban: *"Altoona doesn't want [Dixon] on their campus by the way, because he reached out to one of their girls basketball players to do one of her games. She happens to be the school board president's daughter. The man has no shame."*

a. Had Bartley actually sought the truth, he would have learned that this athlete's father hired Dixon directly to help her college basketball recruitment process.

65. The remainder of Bartley's slanderous show focused on Bartley negligently, intentionally, recklessly, and maliciously espousing, as a true fact, that Dixon must register as a sex offender on the Megan's Law list.

a. Bartley incorrectly and falsely stated that Dixon was convicted of all charges brought against him and should have to register for Megan's Law: *"He should have been a registered sex offender in 2001, 2002 according to Megan's Law because, guess what, everything he was charged with and then went to jail for is under Megan's Law."*

b. Bartley, who is not a lawyer, then incorrectly and falsely stated that Pennsylvania law requires Dixon to register for Megan's Law: *"Listen closely, others who never had to register when their cases were adjudicated must go on the registry. **Let me state that again, others who never had to register when their cases were adjudicated must go on the registry.** An Altoona attorney told his local newspaper, *The Mirror*, in*

December 2012 that at least three people who have accepted pleas keeping them off the registry want to negotiate new deals or challenge the new law that requires them to register. All of the challenges have failed. Every single challenge to being put on Megan's Law after the fact has failed."

- c. However, Bartley failed to mention that Pennsylvania appellate courts have unanimously rejected the notion of post-plea agreement and retroactive sex offender registry.
 - d. Bartley also recklessly and maliciously stated in regards to a potential Megan's Law loophole: *"If a loophole does exist which I don't believe it does, but if there is a loophole, name it after him. He wants to be famous. Name it the Darrick Dixon loophole and close it."*
66. Again, following the live radio and Internet broadcast of Bartley's defamatory and slanderous show, ESPN Radio then posted an audio file of the show on its Facebook page.¹⁷ To date, the Internet audio file has drawn more than 630 listeners. **See Exhibit C.**

February 15, 2016 ESPN Radio Broadcast

67. Bartley's infatuation with Dixon continued as he returned to the airwaves on February 15, 2016 to attack Dixon for a fourth occasion.
68. The first part of the ESPN broadcast focused on false accusations that Dixon criminally vandalized ESPN property by throwing a brick through the window of ESPN radio's van: *"Isn't it more plausible that maybe somebody heard something that they didn't like on the radio and then something happened to my truck?"*
69. Bartley then again compared Dixon's alleged consensual relationship with a teenager in 2001 to Jerry Sandusky raping young boys at Penn State: *"people continue to stick their head in the sand and do nothing. Well, you know, we've seen a case of that west of us that cost a school 100 million dollars. So if everybody wants to keep sticking their head in the sand we'll see what happens."*

¹⁷ <https://www.facebook.com/espnradiowilliamsport/videos/1150148058343738/>

70. Bartley next repeated a similar disclaimer meant to cast Dixon in a negative light and portray him as a rapist and child molester: *"The stories and the information that are coming in as it relates to this case and Darrick Dixon aka Darrick Rizzo will literally turn your stomach and like just make the hair on the back of your neck stand up with the information I'm getting on a daily basis from all over the country.*
71. Lastly, Bartley falsely, recklessly, intentionally, and maliciously stated that Dixon engaged in other criminal sexual activities since 2002: *"But if you want to let it continue to happen, **let it continue to happen**, that's on you. All of the repercussions of anything that were to transpire or **that may have since 2002 to today**, that's on you."*
72. Again, following the live radio and Internet broadcast of Bartley's defamatory and slanderous show, ESPN Radio then posted an audio file of the show on its Facebook page.¹⁸ To date, the Internet audio file has drawn more than 425 listeners. **See Exhibit C.**

False Campus Bans

73. In addition to his false statements on the February 10, 2016 broadcast about Williamsport High School banning Dixon from its campus, Bartley then falsely published stories on the Internet claiming that other schools had banned Dixon.
74. Bartley invented these school bans as a way to mask his own hypocrisy for working with Dixon in 2013.
75. Bartley claimed that his animosity toward Dixon due to the 2001 criminal plea had been brewing since 2007.
76. He then claimed that his decision to attack Dixon in 2016 was not motivated by business competition, but rather child safety concerns.
77. However, Bartley never explained why he did not voice his safety concerns for nearly one decade — and only after Dixon had established PA Sports Live as a superior outlet for streaming athletic events.

¹⁸ <https://www.facebook.com/espnradiowilliamsport/videos/1153219058036638/>

78. When confronted by several Facebook posts on the ESPN Radio Williamsport Facebook page questioning why Bartley would wait until 2016 to attack Dixon, Bartley responded with malicious, false, reckless, and defamatory statements.
79. Specifically, on February 18, 2016 at 12:06 p.m., the ESPN Radio Williamsport Facebook page read: "*ESPN RADIO WILLIAMSPORT was asked to share its audio for this game with PA Sports Live and their debut. Furthermore, Mr. Dixon/Rizzo was not permitted on the Muncy campus so another camera operator took the video.*" **See Exhibit D.**
80. ESPN's post about the Muncy ban was edited on February 19, 2016 at 12:24 a.m. to remove the false assertion about the campus ban. However, it was done without a proper retraction and apology. **See Exhibit D.**
81. Dixon was never banned from Muncy's campus at the time of the 2013 basketball game in question, nor has he ever been banned.
82. Then, on February 24, 2016, Bartley authored a story on www.espnwilliamsport.com¹⁹ in which he falsely stated that "Dixon was given specific direction not to do any girls basketball games on the Altoona or Williamsport campuses." **See Exhibit E.**
83. However, Dixon was never asked not to broadcast games from these schools.
84. Bartley has also contacted numerous media outlets to spread false and defamatory lies about Dixon in an effort to attract Dixon's advertisers to ESPN.
85. On or about February 1, 2016, Bartley contacted Plaintiff's main sponsor, *Webb Weekly*, and falsely told the publication's management that Dixon was going to be charged with another sex crime in Altoona, Pennsylvania in the near future. Bartley then proceeded to solicit *Webb Weekly* as a sponsor.
86. Throughout February of 2016, Bartley contacted numerous media outlets, including, but not limited, the *Williamsport Sun-Gazette*, PennLive.com, and WNEP Channel 16, and, holding himself out as a reporter and representative of ESPN, retold the numerous falsehoods that he broadcast on the radio.

¹⁹ <http://espnwilliamsport.com/breaking-news-dixon-visits-cd-east-girls-basketball/>

87. On or about February 15, 2016, Bartley, at all times holding himself out as a reporter and representative of ESPN, contacted producers of the Dr. Phil Show with similar false tales about Dixon in an effort to gain notoriety for himself.
88. Bartley intentionally, willfully, wantonly, recklessly, negligently, and maliciously disseminated his false tales to these media outlets with knowledge of their falsity and reckless disregard for the truth.
89. Lastly, on or about March 2, 2016, Bartley posted an article to the ESPN Williamsport website titled, "BREAKING NEWS: WASD answers ESPN RTK request about Darrick Dixon."²⁰ **See Exhibit F.**
90. Bartley's post further illustrates his malicious obsession with tarnishing Dixon's reputation, ruining his career, and inflicting emotional trauma and anguish on Dixon and his third-grade daughter by publicizing accusations made fifteen (15) years ago.
91. Bartley's March 2, 2016 article details several Right to Know Requests he filed specifically as "General Manager of ESPN Radio" with the Williamsport Area School District ("WASD") about Dixon's appearances on school property.
92. Bartley then falsely implies that the School District violated state law by allowing Dixon on campus: *"In order to fully comprehend the gravity of this situation families within the WASD are to believe an administrator is willing to go on youtube and provide an endorsement of someone (Dixon aka Rizzo) the WASD is fully aware committed crimes of a sexual nature against a student in 2001. . . According to its own RTK responses the WASD did not find it necessary to request it of Dixon aka Rizzo before he had interaction with students at Curtin Middle School in 2012. . . One can easily draw the conclusion that WASD has not asked Dixon aka Rizzo to fill any of the volunteer forms as noted in the board policy and is required under state law. Since the WASD has already responded twice that 'no such record exists.'" (sic).*
93. Bartley also alludes to Dixon appearing on school property as if he is on site for nefarious or criminal purposes: *"According to a multitude of sources he has since been seen in other WASD buildings this school year."*

²⁰ <http://espnwilliamsport.com/breaking-news-wasd-answers-espn-rtk-request-about-darrick-dixon/>

94. Bartley concludes by implying that Dixon is receiving special treatment and should not be allowed near children, even though Dixon has a daughter in the third grade of the WASD and is not on the Megan's Law list: *"So the question must be asked based on the known history of Darrick Dixon with the WASD; why doesn't he have to fill out a set of forms everyone else who interacts with children in the WASD does?"*
95. However, Bartley, who is willfully ignorant of the truth never mentioned the following undisputed facts:
 - a. Dixon is not an employee of the WASD.
 - b. Dixon is not a coach for the WASD.
 - c. Dixon is not a volunteer with the WASD.
 - d. Dixon was, at times, on school property for his child's class performances.
96. Dixon is a parent of a daughter and a step-son who both have attended WASD schools.
97. Dixon has complied with all screening procedures for media credentialing to broadcast athletic events — the same procedures ESPN's employees must go through to broadcast events.
98. Furthermore, Dixon is not, nor has he ever been, a registered sex offender on the Megan's Law list that would preclude him from broadcasting high school athletic events or entering school property.
99. Together, Bartley's four (4) radio broadcasts and numerous subsequent Internet publications falsely, recklessly, negligently, intentionally, willfully, wantonly, and maliciously attacked Dixon's character, tarnished his reputation, lowered his standing in the community and caused thousands of listeners to wrongly believe that: (a) Dixon has been banned from high school campuses throughout Pennsylvania because he is an ongoing threat to student safety; (b) he is a rapist; (c) he is a child molester; (d) he is continuing to engage in current criminal sexual relationships with athletes he coaches; (e) he is dishonest; (f) he made death threats against Bartley; (g) he has bribed women to silence their complaints; and (h) he is or should be a registered sex offender on the Megan's Law list.

100. The Defendants' negligent, reckless, intentional, willful, wanton, outrageous, and malicious conduct has caused Dixon to lose numerous corporate sponsors of his broadcasts, suffer from severe emotional and psychological trauma, receive death threats, and has greatly harmed his reputation and standing within his community.
101. The Defendants negligently, intentionally and/or recklessly failed to investigate the aforementioned defamatory statements and implications about the Plaintiffs before broadcasting them.
102. The Defendants also published the aforementioned defamatory statements and implications negligently and/or with knowledge of their falsity and/or a reckless disregard for their truth or falsity.
103. The Defendants' false, malicious, and defamatory statements, innuendo and implications have harmed Dixon in that they have tended to: (a) blacken and besmirch his reputation; (b) expose him to public contempt, hatred and ridicule; (c) convey the impression that he is currently engaged in criminal sexual misconduct with minors; (d) detract from his dignity, respect, esteem, and effectiveness as a businessman; (e) subject him to emotional distress, mental anguish, embarrassment and humiliation; and (f) interfere with his personal and professional lives.

COUNT I - DEFAMATION (ALL DEFENDANTS)

104. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth at length herein.
105. Within the context of this Complaint, at no time were Plaintiffs public officials, all-purpose public figures, or limited-purpose public figures.
106. At all material times, Bartley was acting as an agent, ostensible agent, and/or representative of ESPN, ABC, Inc., ABC Radio Networks Assets, LLC, Colonial Radio Group of Williamsport, LLC, and Pioneer Sports Production, LLC.
107. Defendants' aforementioned broadcasts and Internet publications contained numerous assertions of fact, either expressly or by implication, that were false.

108. Each of Defendants' false and defamatory statements concerning the Plaintiffs were defamatory per se in that they tended to so harm Plaintiffs' reputations as to lower them in the estimation of the business community, deter third parties from associating or dealing with them, expose them to public contempt or ridicule, and to injure them in the professions of basketball coaching, interscholastic high school athletic event broadcasting, collegiate recruiting, and adoption book promotions.
109. Each of Defendants' false and defamatory statements concerning Plaintiff Dixon was defamatory per se in that they falsely stated that Plaintiff Dixon committed and is continuing to commit sexual crimes.
110. Each of Defendants' false and defamatory statements concerning the Plaintiffs were broadcast and published publicly to third parties.
111. Each of Defendants' false and defamatory statements concerning Plaintiffs refer to the Plaintiffs.
112. The recipient(s) of each of Defendants' false and defamatory statements concerning Plaintiffs understood the communications' defamatory character.
113. Each of Defendants' false and defamatory statements concerning Plaintiffs were broadcast and published in a negligent manner.
114. Additionally, each of Defendants' false and defamatory statements concerning the Plaintiffs were published and broadcast with knowledge of its falsity, with malice, with ill intent, and with a reckless disregard for the truth.
115. Each of Defendants' false and defamatory statements concerning Plaintiffs are defamatory on their face and constitute "defamation per se" as the statements were, and are, injurious to their trade, business or profession and imply the commission of sexual crimes.
116. Bartley knew the false and defamatory statements would damage the reputation of Dixon and cause harm to PA Sports Live and Rizzo Production.
117. As a result of the negligent, malicious, reckless, outrageous, wanton, and willful actions of the Defendants, Plaintiffs have suffered and continue to suffer great harm to their reputations and ability to conduct business in the basketball

coaching, interscholastic high school athletic event broadcasting, collegiate recruiting, and publishing industries.

118. Defendants acted in an outrageous, malicious, wanton, reckless, willful, and oppressive manner warranting the imposition of punitive damages.

119. In addition, Plaintiff Dixon has suffered severe and permanent emotional and psychological harm.

120. Defendants' acts were not privileged or justified.

121. Defendants are not immune from liability for such losses or other harm.

WHEREFORE, Plaintiffs demand judgment against Defendants in an amount in excess of fifty thousand dollars (\$50,000), including compensatory and punitive damages, enforcement of a cease and desist order to prevent future broadcasts and publications, pre-judgment interest, costs, and any and all other relief that this Court deems necessary and proper.

COUNT II - FALSE LIGHT (ALL DEFENDANTS)

122. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth at length herein.

123. Defendants' radio and Internet broadcasts and publications gave publicity to one or more matters concerning Plaintiffs by communicating it with the public at large so that it is substantially certain to become public knowledge.

124. Defendants' broadcasts and publications gave publicity to such matter(s) concerning Plaintiffs to place Plaintiffs before the public in a false light.

125. Defendants' statements, innuendo, and implications concerning the Plaintiffs negligently, recklessly, and/or maliciously cast Plaintiffs in a false light offensive to a reasonable person.

126. Defendants made major misrepresentation(s) of Plaintiffs' characters, reputations, criminal history, sexual conduct, and business dealings so that it could reasonably be expected to cause a reasonable person to take serious offense.

127. At the time of their previously detailed publications and radio broadcasts, Defendants knew that Bartley's statement(s) were false and/or acted in reckless

disregard as to the falsity of the publicized matter and the false light in which Plaintiffs would be placed.

128. Defendants were on notice of Bartley's false and defamatory broadcasts, but did not stop him from returning to the radio, publishing false stories on ESPN Williamsport's website, or posting defamatory messages on Facebook.

129. Plaintiffs suffered significant financial and psychological losses as well as other harm as a result.

130. Defendants' actions and statements were not privileged or justified.

131. Defendants are not immune from liability for such losses or other harm.

132. At all material times, Bartley was acting as an agent and/or representative of ESPN, ABC, Inc., ABC Radio Networks Assets, LLC, Colonial Radio Group of Williamsport, LLC, and Pioneer Sports Production, LLC.

133. At all material times, Defendants acted in an outrageous, malicious, wanton, reckless, willful, and oppressive manner warranting the imposition of punitive damages.

WHEREFORE, Plaintiffs demand judgment against Defendants in an amount in excess of fifty thousand dollars (\$50,000), including compensatory and punitive damages, enforcement of a cease and desist order to prevent future broadcasts and publications, pre-judgment interest, costs, and any and all other relief that this Court deems necessary and proper.

COUNT III - TORTIOUS INTERFERENCE WITH CURRENT AND PROSPECTIVE BUSINESS (ALL DEFENDANTS)

134. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth at length herein.

135. At all material times, Bartley was acting as an agent, ostensible agent, and/or representative of ESPN, ABC, Inc., ABC Radio Networks Assets, LLC, Colonial Radio Group of Williamsport, LLC, and Pioneer Sports Production, LLC.

136. Defendants, with willful and reckless intent, interfered with Plaintiff Dixon's ability to carry out his professional businesses under the names PA Sports Live and Rizzo Production by directing false and defamatory statements to current

and potential future customers via telephone, text message, and email including, but not limited to, Cupp's Vacuum Center, the Donaldson Adoption Institute, Inc., The Villa Restaurant, Webb Weekly Newspapers, Renel Rodarmel Allstate Insurance, Realty World Booth & Deutsch, the Adoption Programs of Children's Home & Lutheran Social Service of Minnesota, WNEP-TV, and the Dr. Phil Show.

137. Defendants knowingly, willfully, and intentionally acted in a manner to interfere with Dixon's prospective future business and ability to attract new customers.

138. Defendants knowingly, willfully, and intentionally acted in a manner to interfere with Dixon's ability to retain current clients and carry out the business of those clients.

139. Plaintiffs suffered losses and/or other harm as a result.

140. Defendants' actions and statements were not privileged or justified.

141. Defendants are not immune from liability for such losses or other harm.

142. At all material times, Defendants acted in an outrageous, malicious, wanton, reckless, willful, and oppressive manner warranting the imposition of punitive damages.

WHEREFORE, Plaintiffs demand judgment against Defendants in an amount in excess of fifty thousand dollars (\$50,000), including compensatory and punitive damages, enforcement of a cease and desist order to prevent future broadcasts and publications, pre-judgment interest, costs, and any and all other relief that this Court deems necessary and proper.

COUNT IV - COMMERCIAL DISPARAGEMENT
(ALL DEFENDANTS)

143. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth at length herein.

144. At all material times, Bartley was acting as an agent, ostensible agent, and/or representative of ESPN, ABC, Inc., ABC Radio Networks Assets, LLC, Colonial Radio Group of Williamsport, LLC, and Pioneer Sports Production, LLC.

145. Defendants' aforementioned broadcasts and Internet publications contained numerous assertions of fact, either expressly or by implication, that were false.
146. The Defendants intended for Bartley's broadcasts on ESPN Radio and publications on ESPN's Facebook page and website to cause financial loss to Plaintiffs, PA Sports Live, and Rizzo Production.
147. The Defendants reasonably should have known that Bartley's broadcasts on ESPN Radio and publications on ESPN's Facebook page and website would result in financial loss to Plaintiffs, PA Sports Live, and Rizzo Production.
148. Plaintiffs PA Sports Live and Rizzo Production have in fact suffered significant financial harm due to Defendants' false statements and publications.
149. Each of Defendants' false and defamatory statements concerning the Plaintiffs were published and broadcast negligently, with knowledge of its falsity, with malice, with ill intent, and with a reckless disregard for the truth.
150. Defendants' acts were not privileged or justified.
151. Defendants are not immune from liability for such losses or other harm.
152. At all material times, Defendants acted in an outrageous, malicious, wanton, reckless, willful, and oppressive manner warranting the imposition of punitive damages.

WHEREFORE, Plaintiffs demand judgment against Defendants in an amount in excess of fifty thousand dollars (\$50,000), including compensatory and punitive damages, enforcement of a cease and desist order to prevent future broadcasts and publications, pre-judgment interest, costs, and any and all other relief that this Court deems necessary and proper.

COUNT V - INTENTIONAL INFLECTION OF EMOTIONAL DISTRESS
(ALL DEFENDANTS)

153. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth at length herein.
154. Defendant Bartley, acting at all times as an agent, ostensible agent, and/or representative of his Co-Defendants, recklessly, maliciously, and intentionally

broadcast and published numerous aforementioned false statements of and concerning the Plaintiffs.

155. Specifically, Defendant Bartley falsely stated that Plaintiff Dixon had been banned from multiple high school campuses throughout Pennsylvania; he is a rapist; he is a child molester; he is continuing to engage in current criminal sexual relationships with athletes he coaches; he is dishonest; he intentionally attempted to derail the career of a star athlete, he made death threats against Bartley; he has bribed women to silence their complaints; and he is or should be a registered sex offender on the Megan's Law list.

156. Defendants' actions in repeatedly broadcasting and publishing these false statements about Dixon was extreme and outrageous.

157. Defendants knew or had reason to know that there was a high probability that their conduct would cause Plaintiff Dixon severe emotional distress and mental anguish.

158. Plaintiff Dixon has suffered severe emotional distress and damages as a result of Defendants' extreme and outrageous conduct.

159. At all material times, Defendants acted in an outrageous, malicious, wanton, reckless, willful, and oppressive manner warranting the imposition of punitive damages.

WHEREFORE, Plaintiffs demand judgment against Defendants in an amount in excess of fifty thousand dollars (\$50,000), including compensatory and punitive damages, enforcement of a cease and desist order to prevent future broadcasts and publications, pre-judgment interest, costs, and any and all other relief that this Court deems necessary and proper.

COUNT VI - NEGLIGENT SUPERVISION
(DEFENDANTS ESPN and ABC, INC. AND ABC RADIO NETWORKS ASSETS, LLC)

160. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth at length herein.

161. At all material times, Bartley was acting as an agent, ostensible agent, and/or representative of ESPN, ABC, Inc., and ABC Radio Networks Assets, LLC.

162. On or about February 2, 2016, Plaintiffs notified ESPN of Bartley's defamatory and false on-air statements.
163. On or about February 8, 2016, Plaintiffs again notified ESPN and ABC that Bartley had not ceased his slanderous broadcasts, nor had he stopped posting false and defamatory statements on Facebook. Plaintiffs specifically notified ESPN and ABC that Bartley's continued conduct would result in immediate and permanent harm to the Plaintiffs.
164. On or about February 9, 2016, ESPN and ABC, Inc. negligently and recklessly notified the Plaintiffs that they would not stop Bartley from broadcasting under the ESPN brand nor would they stop Bartley from posting on Facebook using the ESPN logo.
165. On or about February 9, 2016, Plaintiffs again notified ESPN and ABC of Bartley's plans for future false and defamatory broadcasts under the ESPN brand name.
166. Then, on or about February 15, 2016, Plaintiffs notified ESPN and ABC that Bartley had contacted local and national media outlets to pitch outrageously false stories about Dixon.
167. Despite repeated notices and warnings of Bartley's conduct, ESPN and ABC negligently allowed Bartley free reign to terrorize and defame the Plaintiffs under the ESPN name and logo while holding himself out as an agent and representative of ESPN and ABC.
168. The Defendants failed to properly supervise Bartley.
169. The Defendants failed to properly monitor Bartley.
170. The Defendants failed to provide adequate guidelines, standards and policies on journalism ethics and responsibilities.
171. The Defendants failed to provide proper editing protocols before allowing Bartley to publish defamatory articles using their names and logos.
172. The Defendants failed to provide any instruction and/or training as to appropriate on-air and social media conduct while using the ESPN name.
173. The Defendants failed to exercise reasonable care in preventing Bartley from harming the Plaintiffs.

174. The Defendants breached their duty to protect the public from false and defamatory attacks on its radio station, website, and Facebook page.

175. Bartley's actions did cause serious, irreparable, and permanent harm to the Plaintiffs.

176. The harm that Bartley caused was reasonably foreseeable to the Defendants.

WHEREFORE, Plaintiffs demand judgment against Defendants in an amount in excess of fifty thousand dollars (\$50,000), including compensatory and punitive damages, enforcement of a cease and desist order to prevent future broadcasts and publications, pre-judgment interest, costs, and any and all other relief that this Court deems necessary and proper.

COUNT VII - NEGLIGENCE
(ALL DEFENDANTS)

177. Plaintiffs incorporate the preceding paragraphs by reference as if fully set forth at length herein.

178. At all material times, Bartley was acting as an agent, ostensible agent, and/or representative of ESPN, ABC, Inc., and ABC Radio Networks Assets, LLC.

179. Defendants owed a duty of care to the Plaintiffs.

180. Defendants engaged in negligent reporting and broadcasting as detailed in the preceding paragraphs incorporated by reference as if fully set forth at length herein.

181. Defendants were negligent to the truth and/or falsity of their broadcasts and publications.

182. Defendants breached their duty of care to the Plaintiffs.

183. Defendants' breach of their duty of care was the proximate cause of Plaintiffs' damages.

184. Plaintiffs sustained actual, permanent, severe, and irreparable financial, reputational, emotional, and psychological damages.

WHEREFORE, Plaintiffs demand judgment against Defendants in an amount in excess of fifty thousand dollars (\$50,000), including compensatory and punitive damages, enforcement of a cease and desist order to prevent future broadcasts and

publications, pre-judgment interest, costs, and any and all other relief that this Court deems necessary and proper.

McBREEN & KOPKO

By: /s/Steven J. Silver
Steven J. Silver, Esquire
Attorney for Plaintiffs,
Darrick Dixon; Darrick Dixon d/b/a PA
Sports Live; Darrick Dixon d/b/a Rizzo
Production

Dated: March 4, 2016

VERIFICATION

I, Darrick Dixon, individually and d/b/a as PA Sports Live and Rizzo Production, hereby verify that I am the Plaintiff in this action; I have read the foregoing Civil Action Complaint, and the statements made therein are true and correct to the best of my knowledge, information and belief. I understand that the statements made herein are subject to the penalties of 18 Pa. C.S.A. §4904 relating to unsworn falsification to authorities.


DARRICK DIXON

EXHIBIT "A"

Like Comment Share



Todd Bartley

13 mins · 🌐

Sometimes in life you have to take a stand against evil when you see it and call it for what it is. I invite ALL of my Facebook friends to stand with me in this fight.

There will be a very special edition of the Locker Room Show on Monday at 4 pm to address this individual who continues to portray himself in area schools as someone he is not. To the point of using an alias.

For the teachers and administrators in Lycoming County who know who this person is, now is the time to make your stand!

If you care at all about your children, like this post and continue to follow this developing story.

2 Likes

Like Comment Share



Danielle Hall

2 hrs · 🌐

Chase's first PSU basketball game 🏀 🏀 🏀



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EXHIBIT "B"



Todd Bartley

13 hrs ·

Less than 20 hours until the single most defining show in ESPN Radio Williamsport history goes to air!

Audience participation is a must!

ESPN 1050/1600/104.1/92.7 plus www.espnwilliamsport.com

Share the online LISTEN LIVE link with everyone



Full View Player

Listen to official online radio. Full View Player has conservative, progressive, public, news, sports, religious, jazz, classical, rock, country, business, latin, hip-hop, and pop radio stations.

PLAYER.FULLVIEWPLAYER.COM

CLICK TO JOIN NOW

Share

2 people like this.

1 share

Chat

SPONSORED

Create Ad

Breakfast for a Buck
FOURPOINTS.COM
Breakfast for \$1 is back at Four Points by Sheraton Charleston

\$39.99 at Amazon - ★★★★★
Luxury Hotel & Spa Bath Towel 100% Genuine
Turkish Cotton, 27" x 54", Set of 4... - \$39.99
26,554,305 people like this

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EXHIBIT "C"



Here are links to all of our content on the Darrick Dixon / Darrick Rizzo story. This list will be updated as needed.

WASD Answers ESPN RTK Request About Darrick Dixon (Posted 3/2/16): <http://espnwilliamsport.com/breaking-news-wasd-answers-esp.../>

Video of Dixon Running CD East Practice Emerges (Posted 2/25/16): <http://espnwilliamsport.com/breaking-news-video-of-dixon-r.../>

Dixon visits CD East Girls Basketball (Posted 2/24/16): <http://espnwilliamsport.com/breaking-news-dixon-visits-cd-.../>

Complete and unedited ESPN Radio Williamsport broadcast of the Saint John Neumann @ Muncy Boys basketball Game from January 18, 2013 (Posted 2/17/16): <https://www.facebook.com/espnradiowilliamsport/videos/1154508591241018/>

Thirld Update From Todd Bartley on the Locker Room Show (Posted 2/15/16): <https://www.facebook.com/espnradiowilliamsport/videos/1153219058036638/>

ESPN Williamsport receives letter from ESPN legal (Posted 2/12/16): <http://espnwilliamsport.com/news-post/>

Second Update From Todd Bartley on the Locker Room Show (Posted 2/10/16): <https://www.facebook.com/espnradiowilliamsport/videos/1150148058343738/>

WEA Statement on Darrick Dixon Story (Posted 2/9/16): <http://espnwilliamsport.com/breaking-news-wea-issues-state.../>

First Update From Todd Bartley on the Locker Room Show (Posted 2/8/16): <https://www.facebook.com/espnradiowilliamsport/videos/1148970558461488/>

Lycoming County Court of Common Pleas Court Summary in the Darrick Dixon Case In 2001 (Posted 2/5/16): <https://www.facebook.com/espnradiowilliamsport/photos/a.442168265808391.102112.1295941303991411/1147172781974599/?type=3&theater>

Second Email from Steven J. Silver, Esquire to ESPN Radio Williamsport General Manager Todd Bartley (Posted 2/5/16): <https://www.facebook.com/espnradiowilliamsport/posts/1147113165313894>

First Email from Steven J. Silver, Esquire to ESPN Radio Williamsport General Manager Todd Bartley (Posted 2/5/16): <https://www.facebook.com/espnradiowilliamsport/posts/1147057368652807>

The Locker Room Show with Todd Bartley (Posted 2/1/16): <https://www.facebook.com/espnradiowilliamsport/videos/1144880946537116/>

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ESPN RADIO WILLIAMSPORT
Locker Room Show has been added to the list.
Like · Reply · February 10 at 7:44pm


Brendan Jesus Anthony Amato
Like · Reply · 2 · February 11 at 4:00am

Carlos Saldvia
Brendan Jesus, if eva a name from the past!..


Good to see you man-ning up a "like" in support of protecting our girls..

Like · Reply · 1 · February 12 at 7:56pm

Write a reply...

 Alton Richards Is this a Williamsport sport page or a gossip column? This Isn't NBC and you're not the host of dateline. Just report the sports


Like · Reply · 4 · February 11 at 7:00am

 Elisha Cramer "Because pedophiles interacting with our student athletes Isn't newsworthy", said no one ever.

Like · Reply · 17 · February 11 at 8:54pm

 Alton Richards Whomp whomp!


Like · Reply · February 11 at 8:59pm

 Carlos Saldivia THIS IS sports news..HS girls in Jeopardy..

"Just report the sports," is an insidious euphemism for "keep the ongoing coercion to shield a rapist from being accountable to our community for another 13 yrs"..


What the hell is wrong with you people?..

Like · Reply · 10 · February 12 at 1:07am


 Tammy Gibbs Thank God someone brought this to the light!

Like · Reply · 3 · February 12 at 12:10pm


Write a reply...

 ESPN RADIO WILLIAMSPORT ESPN Williamsport receives letter from ESPN legal link has been posted.

Like · Reply · February 12 at 4:37pm


 Jason McCloskey why do I not see any of this in the Sun Gazette, wnept6, wbra28, WASD web site, the WPD facebook or on the local radio ???

Like · Reply · 6 · February 13 at 1:56pm

 Carlos Saldivia THAT IS A VERY GOOD QUESTION, you might want to ask them..


BTW, are you any relation to the former William "Mac" McCloskey?..

Like · Reply · February 14 at 5:48pm


 Melissa Bates I think they know that you will find out that the actual girl had too many lies. I know this story and I know what she told us. She pursued Coach D from the start of season and her parents always had them together. It's not the story Espn is putting out, however what's wrong is wrong. If he is doing other bad things now I say Close the loop hole but not from this story in 2001.

Like · Reply · February 23 at 8:24am


Write a reply...

 Nate Engel This did happen in 2001 just so everyone knows. It's not recently


Like · Reply · February 14 at 4:26am

 Jason McCloskey last week when he was at the school "working with kids is not 2001 just so you know !!


Like · Reply · 1 · February 14 at 10:42am

 Nate Engel I know that but you said why aren't all these news places covering it. Well bc he's not on megans law and it happened in 2001


Like · Reply · February 14 at 2:43pm

 Jason McCloskey Its new news now !! Also none of the mentioned EVER covered the story even in 01 !! It was swept under the rug !!


Like · Reply · February 14 at 4:22pm

 Nate Engel None of this is new news.

Like · Reply · February 14 at 5:20pm


 Nate Engel He has worked and helped a lot of kids not only in this community but all over the state. He says he didn't do it ... if he is such a danger to children wouldn't you think he would've done something in the past 15 years?

Like · Reply · February 14 at 8:41pm

 Carlos Saldivia Nate Engel We don't know what's happened in the last 15 yrs, we've been too busy being knocked over the head and coerced to keep quiet and let him operate to notice anything else, but the use of an alias is intent..Moreover, what American agrees to accept punishment for something he didn't do?..Besides, no one is

saying he didn't serve time (albeit barely a level above craven, given this week a guy got sentenced 20-40 yrs), we're just saying he stills owes a community by not being around minors in the capacity of a broadcaster and student advisor and mentor, and being reconciled to Megan's Law..He can pay his way in and watch, but if that's difficult to accept, I'm not sure there's any dialogue here..

Like · Reply · 5 · February 14 at 9:27pm

 Write a reply...



Annie Sampson Ferrari I see nothing about News or sports here!!!

Like · Reply · February 14 at 10:13am




Carlos Saldivia "nothing about News or sports here," in the same way the Sandusky case had nothing to do with news and sports either. #Rizzobots

Like · Reply · 3 · February 16 at 11:36pm · Edited



Sheri Wool-Crain I just had to re-drywall...finally caved in from my head banging on it...-SMDH

Like · Reply · 2 · February 15 at 8:40am

 Write a reply...



Grady Walker I think this is a personal vendetta on the attack of an individual . If the law that was in play at the time allowed the sentence if an individual to plea and not be registered or on the registry let it be. How long have u been working for ESPN radio ,why now? Seems to me there is more to the story than what u are making it !!! Report more on sports Instead of slander and defamation of someone's character and what u want the law to be Instead what the law was at the time !!!

Like · Reply · 5 · February 15 at 8:55am




Carlos Saldivia Grady, your cover photo is a beautiful example of a strong and joyful family, you can see it in their faces..You can tell they have support and a good man to stand by them..The girl that this man raped at 14 years old, might not have had a strong man in her life, so now the community is her man in supporting her and will do anything to reconcile this vulgar legacy BECAUSE, her family will never have what your family has..Your suspicions of vendettas and attacks are not enough to whitewash this vulgar legacy..Your stance is sending the wrong message to minors (especially girls)..Unfortunately for this man, some things never change—once your reputation is shit, you're out..He did this, not Todd and as painful as it may be to you, if you are honest, you know who's to blame..

Like · Reply · February 15 at 11:06am



Grady Walker I'm just stating the law and the facts at the time of this situation and if Mr Bartley was so against the entire situation and calling for a ban of this individual , why would he do games with him ?? Then call out other people who supported this guy , when in fact he did himself to me that doesn't make sense .

Like · Reply · February 15 at 11:35am

 Write a reply...



Grady Walker I just am mind boggled at this story because if I can recall I think I remember mr Bartley doing a game with mr rizzo few years ago , if he was so upset with the situation or was calling for schools to not allow this person in there schools why would he do games with him ?? I really don't get this entire story , I think sports reporters should report sports not things such as a story like this !!!

Like · Reply · 3 · February 15 at 9:57am



Sheri Wool-Crain He did ONE game with him prior to knowing the story/background. From that point, he's been questioning the irrational idea that any community would allow this without question.

As far as "how the law was", could you please explain it? In all seriousness, I'm still waiting to hear from those who are waiving the "leave Rizzo alone" flag when I ask this question.

REGARDLESS of whether or not he slipped the Megan's Law registration (for whatever reason), why are we allowing a statutory rapist to continue to be involved in youth sports, and moreover, why would he insist in doing so??

Like · Reply · 1 · February 15 at 2:32pm



Marvin Schmelzley The name change says it all.

Like · Reply · 2 · February 16 at 11:36am




Carlos Saldivia Marvin Schmelzley ...and the coercion of an entire community to remain silent..And the rape-victim shaming (she was a


slut you know, it was consensual, she wanted it, et al.)..And Todd's a racist..And ESPN hates competition..And the deniers..And the fa... See More

Like · Reply · 1 · February 16 at 1:35pm · Edited

 Write a reply...

 Carlos Saldivia THE ONLY THING WORSE than people trying to eliminate the 2nd Amendment is the people trying to abolish the 1st Amendment..I know this because of all the attempts of people trying to hack my Fb account and reset my password since this story broke..WE WILL ALWAYS be vulnerable to the determined..#Rizzbots


Like · Reply · 3 · February 15 at 12:00pm

 Sheri Wool-Crain You too?????!!!!


Like · Reply · 2 · February 15 at 2:33pm

 Rick Bates mine too!


Like · Reply · February 15 at 5:46pm

 Jennifer Troutman Jackson An old profile picture from my Facebook is on "Nia Kim's" Facebook page. Sounds like a Stage 5 creeper!

Like · Reply · 2 · February 17 at 3:56pm


 Carlos Saldivia Jennifer Troutman Jackson Alert Facebook right away, their security team already has an open file on this thread..

Like · Reply · 2 · February 17 at 4:24pm


 Jennifer Troutman Jackson I have reported it several times in several different ways and yet it remains!

Like · Reply · February 18 at 6:33am


 Write a reply...

 Grady Walker Can anyone answer my question , because when this story came out why didn't he say anything about doing broadcasts with the person that he is calling for a ban for. The court of common pleas and judge and jury already sentenced this person years ago an... See More


Like · Reply · 1 · February 15 at 12:36pm

 Carlos Saldivia I've asked Todd point blank--zero..He was asked twice by Rizzo and Todd turned him down both times..After Todd turned him down he told Todd, "I'm gonna kill you"..I'm thinking from that statement, he must be a very nice man..


Like · Reply · 1 · February 15 at 4:50pm · Edited

 Nate Engel That's not true they worked together at pa sports live in 2013. Todd then tried to do his own live broadcasting of games and failed.

Like · Reply · February 15 at 5:52pm


 Grady Walker Lol


Like · Reply · February 15 at 6:12pm

 Carlos Saldivia "That's not true they worked..."*


That's what Rizzo told me to say *

Like · Reply · February 16 at 1:00pm


 Write a reply...

 Heather Briggs So, Mr. Bartley has known about Mr. Rizzo's legal troubles, but did broadcasts with him, and didn't bother to expose him until it seems like Mr. Rizzo was getting more sponsors and views than him? Then all of the sudden Mr. Bartley wants to release this news? That is a true lowlife move. I hope karma makes its way to Mr. Bartley and finds out what it's like to have a reputation and career ruined!


Like · Reply · February 15 at 2:27pm


 Carlos Saldivia How many "broadcasts" exactly did Todd do?..

Like · Reply · February 15 at 4:47pm

 Carlos Saldiviastill waiting for the number of broadcasts they did together..

Like · Reply · February 16 at 1:01pm

 Write a reply...

 Sheri Wool-Crain ~gets a bigger pitcher for the Kool-Aid-

Like · Reply · 2 · February 15 at 2:34pm

Hide 34 Replies



Heather Briggs What does that mean?

Like · Reply · February 15 at 3:34pm



Sheri Wool-Crain It just means that people are so blinded by the "who" in all of this that the bigger picture isn't being looked at. That's all...

Like · Reply · February 15 at 3:41pm



Heather Briggs I don't know you, but I'm sure if you have made past mistakes you wouldn't want someone to dig them up and publicly ruin your name and reputation, would you?

Like · Reply · February 15 at 3:42pm



Sheri Wool-Crain It depends on the mistake.

Like · Reply · February 15 at 3:43pm



Heather Briggs Mr. Bartley did this to sabotage Mr. Rizzo and that fact that he was becoming gaining sponsors and views on his livestream broadcasts not because he cared about the students of the schools Mr. Rizzo was broadcasting from.

Like · Reply · February 15 at 3:55pm



Sheri Wool-Crain ok

Like · Reply · 1 · February 15 at 3:56pm



Heather Briggs I just think that sins are sins and no one is able to judge someone because you sin differently. What people's have in their background is there own to deal with and learn from. It's not fair for someone to do what Mr. Bartley is doing. He is not the judge and jury. He is not God! He is a radio broadcaster that saw someone doing better and he wanted to protect himself.

Like · Reply · February 15 at 4:06pm



Carlos Saldivia THERE IS NO COMPETITION Heather Briggs, from a media point of view..None..The profile in reach, ratings, exposure, capital outlay, # of listeners and at least a dozen other media indicators doesn't even have Rizzo's show registering in any way compared... See More

Like · Reply · 2 · February 15 at 5:01pm



Heather Briggs I think this picture speaks for itself. Mr. Bartley looks pretty happy and he knew of Mr Rizzos past when this was taken.



TODD BARTLEY ESPN & PA SPORTS
LIVE with RIZZO JAN 2013

5:25:56 AM
PA Sports
www.facebook.com/pasports

Facebook Sports
LIVE with RIZZO

Like · Reply · 2 · February 15 at 5:03pm



Heather Briggs He isn't a registered sex offender or on Megan law list.

Like · Reply · February 15 at 5:11pm



Sheri Wool-Crain So, you think he should have been on air looking furious? And it's good that Mr. Dixon provides everyone with this picture.

The reality here, like Carlos mentions is that this has NOTHING to do with ratings, etc. You're comparing PA Sports whatever to ESPN. That's like comparing a Hummingbird to a Pterodactyl!

Like · Reply · 1 · February 15 at 5:13pm



Sheri Wool-Crain and people are trying to understand WHY he isn't, who failed in this system. Why are school districts allowing him (or anyone in this scenario) into the schools?

Like · Reply · February 15 at 5:15pm



Carlos Saldivia YEAH SO, Heather Briggs, I used YouTube search to find the link to this game (based on the headline text) and could not find it..Can you post a video link to this game?..

Like · Reply · 1 · February 15 at 5:28pm



Sheri Wool-Crain I tried looking too, Carlos. Can't find it. And, that's Not Mr. Dixon in the photo anyhow?

Like · Reply · February 15 at 5:44pm



Carlos Saldivia Heather Briggs he is still a convicted sex offender and should not be around minors (esp. girls) as a safeguard to the community, no Heather?..We can agree on that, correct?..Reconciling to the Megan's List is important Heather because he decided to use an alias, which shows really bad judgment, C'mon man!, you can accuse us of racism, but we're not idiots..

Like · Reply · February 15 at 6:09pm · Edited



Carlos Saldivia Heather Briggs, Imk about the video link, I'd be very interested in seeing it..

Like · Reply · February 15 at 6:10pm



Carlos Saldivia Joshua lbs It does matter..Even his advocates must be embarrassed that the ONLY course they can take in defending his case is to remove all relevant context (the protection and care of minors and girls)..You can talk all the shit you want online (racism & motive), but when the rubber hits the road they all understand that children (especially their own) come first before this guy does..

Like · Reply · 2 · February 15 at 6:20pm · Edited



Heather Briggs I'm just done with this conversation. Like Josh said everyone is entitled to their opinion.

Like · Reply · February 15 at 6:44pm



Tammy Gibbs Heather Briggs had her kids taken so she's probably not the best judge

Like · Reply · 1 · February 15 at 7:13pm



Heather Briggs Lol. I've never had my kids taken. I suggest you know what you are talking about before you talk about me.

Like · Reply · February 15 at 7:27pm



Sheri Wool-Crain Heather, in all seriousness, do you know where to find that video? It would be interesting to see if there IS some sort of "conspiracy".

Like · Reply · February 15 at 7:31pm



Marvin Schmelzley Tammy Gibbs Oh smack!!

Like · Reply · February 15 at 11:37pm



Carlos Saldivia Heather Briggs I'm sorry you feel that way (done with convo), it looks like you have two little girls and the "context" that IMO I think everyone is trying to brush under the rug is their well-being..

The reality is, standing up to the coercion of the... See More

Like · Reply · 1 · February 16 at 10:20am



Sheri Wool-Crain #carlosforpresident

Like · Reply · February 16 at 10:45am



Malik Poleto Carlos Saldivia why is my name in parentheses? Are you saying I photoshopped a photo?

I've been done mind wrestling with everyone on this thread! Enjoy waving your torches & pitchforks ☐

Like · Reply · February 16 at 3:33pm · Edited



Carlos Saldivia Malik Poleto To alert you that the photo was doctored--you liked when Heather posted it..

Like · Reply · February 16 at 3:31pm



Malik Poleto Carlos Saldivia I understand you have some strong feelings toward this 'situation' with Mr.Dixon! I do also! With that being said,I also understand we do not agree!

I have a child in high school,middle school & in elementary here in Williamsport! I ... See More

Like · Reply · February 16 at 6:51pm



Marvin Schmelzley Malik Poleto ever visited Paradise Estates?

Like · Reply · February 16 at 7:48pm



Carlos Saldivia Malik Poleto I haven't made any false statements Malik, it's not slander, moreover I praised your loyalty to him (as misguided as I thought that was, but at least I understood IT)..

Restricting his exposure as a broadcaster & advisor to students in ... See More

Like · Reply · February 16 at 11:35pm



Malik Poeto Marvin Schmelzley Internet instigate much lol let me tell you & Carlos I'm 35 years old, married with four kids, own my home & have a career! Have fun with goggle & your witch hunt! I meant blessed in a very non religious way so once again I am excusing myself from this thread!
Have a very blessed day

Like · Reply · February 17 at 5:15am · Edited



Carlos Saldivia Malik Poeto And right here is the rub..You discount the fact that he took the guilty verdict and did jail time (WHAT INNOCENT PERSON DOES THAT??) and you totally ignore the alias..Know why Malik?.. Because it's indefensible.....You lost me on why your age, marital status, kids and owning your own home is germane to this discussion?..

Like · Reply · February 17 at 10:46am



Malik Poeto I misspoke. That portion of my comment was directed to the Troll Marvin Schmelzley! Very funny guy!
Listen Carlos Saldivia, I understand your position! We could beat our heads on this. I chose not to...I am the farthest thing from passive-aggressive nor am I religious! As I've expressed above everyone is entitled to feel the way you feel, I feel different & that's ok!

Like · Reply · February 17 at 10:58am · Edited



Carlos Saldivia Malik Poeto I'm not trying to GET YOU, I'm trying to understand why he would cop to something he didn't do, and why the alias?..

Like · Reply · February 17 at 11:09am



Malik Poeto If you'd like to understand my position. We could go out for coffee & I would be more than happy to explain it to you! I'm currently in New Jersey on business, but have no problem with that. The Internet is not the forum for true understanding when debating issues.

Like · Reply · 1 · February 17 at 11:21am



Write a reply...



ESPN RADIO WILLIAMSPORT Third Update From Todd Bartley on the Locker Room Show has been posted to the list.

Like · Reply · 1 · February 15 at 4:41pm



Sheri Wool-Crain DING DING DING, Josh! THAT'S exactly what this is about. Unfortunately, Mr. Dixon's case is the one that is most in the spotlight, but that doesn't mean that there are "good guys" all over the place and if they aren't willing to look at the obvious, who knows what else is out there.

Like · Reply · 3 · February 15 at 5:44pm



Grady Walker How many people has pasportslive.com gotten kids to college and looks from college coaches that would have never come to gym to look at these kids and give them a positive future ?? I kn for a fact they have helped poor individuals that their family would never be able to afford school or an education to further themselves in life !!

Like · Reply · 2 · February 15 at 6:28pm · Edited



Carlos Saldivia Grady I agree, but he can still do that without being present as a broadcaster in the schools..Most of the value beyond the kids' talent is the way Rizzo packages it, and that's done in an ad/lling bay..THAT can never be taken away from him, he owns tha... See More

Like · Reply · 1 · February 15 at 6:50pm



Grady Walker I am all for promotion of kids getting to college and not being able to get the exposer they need to succeed in life . I know when I was growing up we didn't have anything like what he is doing . I was recruited by every major college in the country , ... See More

Like · Reply · 5 · February 15 at 6:59pm



Grady Walker I'm done for the night I have to make troubled individuals that have had problems to succeed in life tomorrow and make a difference on the outcome of this society that we live in with all of these people that will try to cut them down for the mistakes that they have made in life and are trying to change, but if we have people that will attack them I will never make a difference !!!!

Like · Reply · February 15 at 7:46pm



Write a reply...



Terry Bollea Can someone tell me where to find a copy of "Another Wild Nigh" (feat. GIG) from the album "Just Rizzin" by the Rizzo?



Like · Reply · 2 · February 15 at 8:31pm



Marvin Schmelzley Any chance that other women might be coming forward?

Like · Reply · February 15 at 11:20pm



Tammy Gibbs Other women?

Like · Reply · February 16 at 10:34pm



Melissa Bates I think you should interview the other players on that team.

Like · Reply · February 23 at 8:13am



Write a reply...



Terry Bollea "SOUND CLIP of track #11-"WILD NIGHT" featuring FEAT & GIGI (the download is worth the wait)" <http://rizz.8m.com/wildnight.wav>



Like · Reply · February 16 at 8:25am

1 Reply



Sean Henderson Who is Todd Bartley? This rant makes him sound like a childish loser. If he put more effort into broadcasting sports and researching his market instead of researching Darrick's past then maybe his station would be a little more successful.

Like · Reply · 2 · February 16 at 8:49am



Marvin Schmelzley Sean Henderson Did you feel the same way when all the sports announcers covered the Sandusky case? Would you trust Rizzo in a gymnasium alone with your daughter? If you would, you are a fool. Your blind loyalty to this predator is very disturbing.

Like · Reply · February 16 at 10:57am



Sean Henderson Lmao you can't compare his case to Sandusky's. Sandusky was indicted on over 40 sex crimes and got 60 years... I don't have a daughter so I can't really answer your second questions. I don't know all the details of Rizzos case. What I do know is that his company was bealing ESPN Williamsport. They couldn't compete with him so they are trying to assassinate his character and destroy his name. If Todd Bartley thinks Rizzo is such a bad guy why did he try to have a phone call with him to work on some projects together??? Why is putting out this information now?? This was 15 years ago it is ancient history. Everyone in williamsport has heard of this and no one cares anymore except for Todd. If I could place a bet I would bet that somehow Todd is jealous of the success that Rizz and PA sports live is having.

Like · Reply · 1 · February 16 at 11:37am




Carlos Saldivia THE PHONE CALL is not a lie, but a friggen lie..PA Sports LIVE bealing ESPN Williamsport Radio in any manner is LO fucking LI..

Like · Reply · 2 · February 16 at 12:53pm




Rick Bates Then why are so many people coming out and stating they had no idea about any of this? Oh believe me People care.


Like · Reply · February 16 at 1:40pm

 Sheri Wool-Crain So, if there was a call, can someone provide details?

Like · Reply · February 16 at 6:55pm

 Melissa Bates I was a player on that team. I am not a rizzbot and I think all of you have a right to speak out about this. Just know the full story. Get the victims testimony and see how many different stories she told. Coach D is not a Sandusky case. However if he did this he is wrong and should not be around high school girls. I just know the girl and went to school with her and the stories seemed like lies and she was obsessed with Coach. I am just letting you know what I know from being there. I say we get all of us on this to let the real story come out.


Like · Reply · February 23 at 8:20am

 Write a reply...




Jason Seyler Wow...worried about your bank account. This is not a successful business plan. Darrick Rizzo is an outstanding citizen. You better believe the nation is watching. I will make sure it gets full attention. God bless you!


Like · Reply · 1 · February 16 at 10:55am

 Marvin Schmelzley Dude you are rizzin!


Like · Reply · February 16 at 11:25am

 Jason Seyler He didn't rape anyone. Very familiar with the case. Like I said your business plan will not work. It's a disgrace to the community. God bless you though.


Like · Reply · February 16 at 1:09pm

 Leigh Stearns the definitions of rape and statutory rape are readily available. lack of consent is a key element. minors cannot legally consent. It is confusing to me that statutory rape appears to be considered less offensive than rape.

Like · Reply · 9 · February 16 at 1:38pm

 Sheri Wool-Crain It's not only confusing, but disgusting.

Like · Reply · 1 · February 16 at 6:56pm

 Write a reply...



Sheri Wool-Crain it all comes back to #everybodyknew

Like · Reply · 1 · February 16 at 7:00pm



Heather Briggs <https://youtu.be/UJKtcX1opQA>



TODD BARTLEY ESPN & PA
SPORTS LIVE with RIZZO...

YOUTUBE.COM


Like · Reply · February 17 at 3:31pm




Nate Engel 🎮🎮🎮🎮🎮

This was a game from 2013. Don't try to say he didn't know about the background bc he already acknowledged the fact he knew in 2007/2008 when he arrived in Williamsport. You want proof this whole thing isn't about "the safety of kids" here you go. *drops the mic* I'm done

Like · Reply · 2 · February 17 at 4:11pm

 Joshua Ibbs This is fake. He posted the ESPN original broadcast minutes ago. I gotta say, the way you all synced the voice must have taken some work. FCC violations, perhaps copyright, related to ESPN. I don't know.


Like · Reply · February 17 at 5:12pm · Edited

 Nate Engel How dumb are you? Did you even watch the video?!? No you didn't, so before you make yourself look even more ignorant watch the video or even listen to the radio broadcast.

Like · Reply · February 17 at 5:11pm


 Joshua Ibbs Nate Engel sorry, your trick didn't work.

Like · Reply · February 17 at 5:17pm

 Nate Engel What trick? I'm stating facts. You're voicing an ignorant


opinion.

Like · Reply · February 17 at 5:19pm


 Nate Engel



Like · Reply · February 17 at 5:22pm

 Nate Engel Joshua Ibbs blocked me hahahahahahaha you mad or Nah???

Like · Reply · February 17 at 5:59pm

 Write a reply...

 Carlos Saldivia WOW GUYS look here!!


A video, that occurred in 2013 (3 yrs. ago!), that was posted today!... See More

Like · Reply · 2 · February 17 at 4:22pm


 Carlos Saldivia NOY TO MENTION the TOS YouTube violations..

Get a good look before it's taken down..

Like · Reply · February 17 at 4:25pm

 Sean Henderson So if he knew about this in 2007 why did he work with him?? Time to work on a new lie.


Like · Reply · 2 · February 17 at 4:55pm

 Carlos Saldivia ONE MORE THING, the video says "...with Rizzo," where is he, and why use an atlas?..


And why isn't he defending himself online--what innocent man does that?..


#RizzoDixonShouldDefendHimself

Like · Reply · 1 · February 17 at 5:39pm


 Joshua Ibbs Carlos Saldivia I'm guessing its because of the impending litigation. Like ESPN hasn't vetted this all by their general counsel before putting it onto the airways.

Like · Reply · February 17 at 6:07pm


 Write a reply...

 ESPN RADIO WILLIAMSPORT Complete and unedited ESPN Radio Williamsport broadcast of the Saint John Neumann @ Muncy Boys basketball Game from January 18, 2013 has been added to the list.


Like · Reply · 1 · February 17 at 4:46pm

 Jason McCloskey get anywhere with getting a statement from the school ??? was any of this brought up at the board meeting last night??


Like · Reply · February 17 at 4:49pm

 Nate Engel Why are you posting this now?? Shouldn't this have been talked about during your 1st broadcast? If you were so sick to your stomach why mention Pasporsilve?

Like · Reply · 1 · February 17 at 5:18pm


 ESPN RADIO WILLIAMSPORT ESPN RADIO WILLIAMSPORT was asked to share its audio for this game with PA Sports Live and their debut. Furthermore, another camera operator took the video, not Mr. Dixon/Rizzo.

Like · Reply · February 19 at 12:24am · Edited


 Annie Sampson Ferrari Okay Mr. Bartley I am a little confused. When you hit the edit button you basically took out the fact that Mr. Dixon was not allowed on Muncy campus but now it says something different ? Was he there or not with you? if he was not there with you, then yes he was a liar! I need to know because if he is lying about this I need to stop following him.

Like · Reply · February 19 at 12:23pm


Write a reply...

 Nate Engel No need to put complete or unedited. He clearly states he was working with Pa Sports live and he was happy listen to his voice. The point that I'm making is Todd Bartley was really happy and excited to be live for the first time...

Like · Reply · 1 · February 17 at 5:13pm


 Sean Henderson So they same guy that was sick to his stomach when he heard about the incident is 2006. Worked with rizzo in 2013... I'm going to guess he took some medicine and he started feeling better lol. This pretty much discredits his whole argument.

Like · Reply · February 17 at 5:26pm


 Sean Henderson Well someone posted his album artwork from 2000 so his name was Rizzo before the alleged incident... Did you watch both Videos? It looks like PA sports live edits out the commercials that's why it doesn't sync up.. Point blank he did work with a guy that made him sick to his stomach. Why would he sit next to a guy for a couple of hours to broadcast a game if this guy makes him sick to his stomach

Like · Reply · February 17 at 5:49pm

Write a reply...


 Sheri Wool-Crain ~Smth~

Like · Reply · February 17 at 6:16pm

 Carlos Saldivia WELCOME BACK Nate Engel, I fixed your mic. ..


Listen, you're right, I didn't see the video mostly because it's already debunked (you couldn't find it natively on YouTube Search before two hours ago—you must know we searched, right?), so why continue L... See More

Like · Reply · 3 · February 17 at 8:38pm · Edited


 Marvin Schmelzley Large Crowd of supporters waiting for Rizzo to speak.



Like · Reply · 1 · February 17 at 11:17pm


 Colin Hammerstein I just find it really disappointing how many people are out there supporting a man who did time for statutory rape.

Like · Reply · 1 · February 18 at 5:44am


 Sheri Wool-Crain But Colin, they are doing a great job in skirting that issue....didn't you know that one game in 2013 is the hinge pin as to guilt or innocence in this suddenly?

I just can't wait for the next round of feeding the homeless.... See More

Like · Reply · 1 · February 18 at 8:37am


 Sheri Wool-Crain For those of you "In the know", can you explain to us the reason for the name change????

Like · Reply · February 18 at 9:00am


 Jessica Lynn-Lato Honestly, who cares what Todd Bartley's motivation is in bringing this to light. What matters is what is a person who is a convicted sex offender being allowed on school property. That's the issue, plain and simple. The rest is noise.

Like · Reply · 3 · February 20 at 8:24am

Write a reply...

 Sheri Wool-Crain Can anyone put me in touch with the www.mtsoslawfirm.com that is the "sponsor" of #PAsportsLive ?

Like · Reply · February 18 at 8:34am

 Colin Hammerstein Pretty cheap looking website if you ask me.

Like · Reply · 1 · February 18 at 8:37am



Sheri Wool-Crain I can't seem to find them online

Like · Reply · February 18 at 8:38am



Colin Hammerstein That's pretty odd. It looks like they have a history...according to the website. Shouldn't they come up in a simple search?



Like · Reply · February 18 at 8:42am



Sheri Wool-Crain That's the way I understood the internet to work...but I'm just a female

Like · Reply · 1 · February 18 at 8:43am



Write a reply...



Carlos Saldvia Oh boy..

Like · Reply · February 18 at 12:30pm



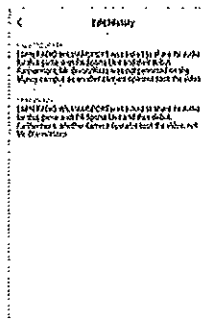
Carlos Saldvia YOU HAD ME AT FAKE..

Like · Reply · 3 · February 23 at 9:03am

1 Reply



Anna Sampson Ferrari Okay Mr. Bartley I am a little confused. When you hit the edit button you basically took out the fact that Mr. Dixon was not allowed on Muncy campus but now it says something different? Was he there or not with you? Why did you edit it? If he was not there with you, then yes he was a liar! I need to know because if he is lying about this I need to stop following him.



Like · Reply · February 23 at 4:17pm



Tammy Gibbs Any update from the school district? I'm curious as to why he was allowed around our kids? Is he still there?

Like · Reply · 1 · February 24 at 2:22pm



ESPN RADIO WILLIAMSPORT Dixon visits CD East Girls Basketball link added.

Like · Reply · 1 · February 24 at 9:29pm



Tammy Gibbs So he's no longer allowed there. Good

Like · Reply · February 24 at 9:32pm



Joshua Ibbs It said during girls BB games only.

Like · Reply · February 26 at 10:57am



Write a reply...



Sheri Wool-Crain <http://wnep.com/.../teachers-aide-accused-of-sexual.../>





Not sure why they're making a big deal about this..... See More

Like · Reply · February 24 at 11:13pm



Colin Hammerstein But isn't this kinda like another story?

Like · Reply · February 25 at 5:32am

-  Sheri Wool-Crain no....NOTHING is like that story!
Like · Reply · February 25 at 7:12am
-  Sheri Wool-Crain For the record, I don't fake threats well. I'm also not easily intimidated.
I can, however, speak to CONTINUED behavior of your "Coach D's" that puts him not so much in the best light.
Like · Reply · February 25 at 4:26pm
-  Sheri Wool-Crain Ok Jessica
Like · Reply · February 25 at 5:31pm
-  Colin Hammerstein Melissa Bates I don't care If she took her clothes off in front of him and begged for it. A 23 year old having sex with a 14 year old girl is wrong. Flat out.
Also your threat came when you said "I noticed your page has Lularoe on it and I will never... See More
Like · Reply · 2 · February 25 at 5:49pm

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www.meetearnest.com
Take the money you save & do something fun with your friends this weekend. Grab hell

Find friends



Josh Home


Find Friends


-  Colin Hammerstein Nope looks like they were removed. Although I reported her as having a fake profile so that may have happened.
Like · Reply · 1 · February 25 at 6:52pm
-  Carlos Saldivia LETS BE CLEAR HERE, the reason this is a sports story is anchored by the following:
He was a coach (abuse of his position)... See More
Like · Reply · 2 · February 25 at 7:19pm


 Write a reply...





ESPN RADIO WILLIAMSPORT Video of Dixon Running CD East Practice Emerges link added.
Like · Reply · February 25 at 6:45pm


 Carlos Saldivia O.M.G!!, this isn't even funny anymore...HOW IN THE WORLD does he get to coach minors, much less there be video of him doing so??..This is a scandal..
Like · Reply · 1 · February 25 at 8:18pm

 Joshua Ibbs Carlos Saldivia Its plausible that 90 miles away (and with an alias), they didn't know who he was. They know now.
Like · Reply · February 25 at 8:27pm

 Brendan Jesus C'mon. How can this still be going on?
Like · Reply · 1 · February 26 at 12:10am


 Carlos Saldivia Brendan Jesus #DeterminedAndFockless
Like · Reply · 1 · February 26 at 1:44am


 Sheri Wool-Crain Coach Moore Williamsport connection????? Just an opinion, mind you
Like · Reply · 23 hrs


 Write a reply...




ESPN RADIO WILLIAMSPORT WASH Answers ESPN RTK Request About Darrek Dixon link added.
Like · Reply · 1 hr

 Brendan Jesus So this was just them refusing to answer questions. Class act WASH, makes me proud I graduated from your high school
Like · Reply · 68 mins

 Jimmy Duffy Maybe Todd Bartley should request the right to know information concerning coach twigs dismissal from the WAHS baseball team after only one season and coincidentally he was asked to leave the little league complex last year during the World Series. WASH certainly knows how to cover shit up
Like · Reply · 23 mins

 Jimmy Duffy Oh that's right he resigned, LMAO
Like · Reply · 22 mins

 Write a reply...



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2 extra GB's of data per month for life when you activate/upgrade a phone on XL or higher.

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EXHIBIT "D"

Edit History



ESPN RADIO WILLIAMSPORT ESPN RADIO WILLIAMSPORT was asked to share its audio for this game with PA Sports Live and their debut. Furthermore, Mr. Dixon/Rizzo was not permitted on the Muncy campus so another camera operator took the video.

February 18 at 12:08pm



ESPN RADIO WILLIAMSPORT ESPN RADIO WILLIAMSPORT was asked to share its audio for this game with PA Sports Live and their debut. Furthermore, another camera operator took the video, not Mr. Dixon/Rizzo.

February 19 at 12:24am

Edits to comments are visible to everyone who can see this comment.

Close



TODD BARTLEY ESPN & PA SPORTS LIVE with RIZZO...

YOUTUBE.COM

Like · Reply · February 17 at 3:31pm



Nate Engel 🐼🐼🐼🐼🐼

This was a game from 2013. Don't try to say he didn't know about the background bc he already acknowledged the fact he knew in 2007/2008 when he arrived in Williamsport. You want proof this whole thing isn't about "the safety of kids" here you go. *drops the mic* I'm done

Like · Reply · 2 · February 17 at 4:11pm

6 Replies



Carlos Saldivia WOW GUYS look here!!!

A video, that occurred in 2013 (3 yrs. ago!), that was posted today!.... See More

Like · Reply · 2 · February 17 at 4:22pm

4 Replies



ESPN RADIO WILLIAMSPORT Complete and unedited ESPN Radio Williamsport broadcast of the Saint John Neumann @ Muncy Boys basketball Game from January 18, 2013 has been added to the list.

Like · Reply · 1 · February 17 at 4:46pm



Jason McCloskey get anywhere with getting a statement from the school ??? was any of this brought up at the board meeting last night??

Like · Reply · February 17 at 4:49pm



Nate Engel Why are you posting this now?? Shouldn't this have been talked about during your 1st broadcast? If you were so sick to your stomach why mention Pasportslive?

Like · Reply · 1 · February 17 at 5:18pm



ESPN RADIO WILLIAMSPORT ESPN RADIO WILLIAMSPORT was asked to share its audio for this game with PA Sports Live and their debut. Furthermore, another camera operator took the video, not Mr. Dixon/Rizzo.

Like · Reply · February 19 at 12:24am · Edited



Annie Sampson Ferrari Okay Mr. Bartley I am a little confused. When you hit the edit button you basically took out the fact that Mr. Dixon was not allowed on Muncy campus but now it says something different? Was he there or not with you? If he was not there with you, then yes he was a liar I need to know because if he is lying about this I need to stop following him.

Like · Reply · February 19 at 12:23pm



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EXHIBIT "E"

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NCAA BASKETBALL SCOREBOARD

SAINT FRANCIS U.
THE RED FLASH
◀ WAGNER COLLEGE
SEAHAWKS

TODAY
7:00PM

SCORE

▶
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BREAKING NEWS: Dixon visits CD East Girls Basketball

FEBRUARY 24, 2016 BY TODD BARTLEY



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Case ID: 16020501



Based on multiple You Tube videos posted online Darrick Dixon video recorded several CD East girls basketball games during the 2015-2016 season.

The three games were against Altoona, Williamsport and Cumberland Valley.

ESPN Radio Williamsport has confirmed through multiple sources that Dixon was given specific direction not to do any girls basketball games on the Altoona or Williamsport campuses. Officials with Cumberland Valley have not yet been reached for comment.

Central Dauphin School District, Director of Safety and Security, Nic Barrelet when made aware this morning of this situation informed ESPN Radio Williamsport. "he (Barrelet) would be looking into the matter immediately."

The "Dixon visits CD East" story comes at a time when current CD East girls basketball Head Coach Larry Moore and the wife of a CD East Principal are embroiled in an incident on a team bus with a player in recent days as reported by the Patriot News in

TUNEIN APP



UPCOMING EVENTS

FEB
25
Thu

6:45 pm Saint Francis @ Wagner (M) Stream 7

7:00 pm Thunder @ Pelicans ESPN 1050, 104.1, 92.7 & 1600

FEB
26
Fri

6:00 pm (2) Southern Columbia vs (4) Montoursville (G) at Danville D4-AA Consolation Stream 25

6:45 pm Titans @ Knights Stream 12

7:00 pm Wizards @ Sixers ESPN 1050, 104.1, 92.7 & 1600

FEB
27
Sat

12:45 pm Saint Francis @ Sacred Heart (W&M) Stream 7

1:45 pm (4) Wilkes @ (3) Delaware Valley (M) MAC-Freedom Championship Stream 4

1:46 pm (4S) Chestnut Hill @ (1N) Bloomfield (W) CACC Quarterfinal Stream 9

2:00 pm (1) Saint John Neumann vs (3) Cowardin

Harrisburg (links listed by most recent to oldest).

[Central Dauphin School District will 'appropriately' review concerns surrounding CD East girls' basketball program](#)

[What we know, what we don't know about the CD East girls' basketball incident](#)

[Central Dauphin refuses to answer questions on bus incident involving principal's wife](#)

[Wife of high school principal harassed student after game: police](#)

FILED UNDER: FEATURED STORIES, NEWS, NEWS ARCHIVE, TOP FEATURED STORY

Valley (B) at Mansfield University D4-A Championship Stream 17

2:00 pm Jets @ Penguins ESPN 1050, 104.1, 92.7 & 1600

4:15 pm (4S) Chestnut Hill @ (1N) Bloomfield (M) CACC Quarterfinal Stream 9

6:45 pm (5) Lycoming @ (3) Arcadia (M) MAC-Commonwealth Championship ESPN 1050, 104.1, 92.7 & Stream 1

7:30 pm Warriors @ Thunder ESPN 1600

8:00 pm (2) Williamsport vs (4) Abington Heights (B) at Mohegan Sun Arena D2/4-A AAA Championship Stream 26

FEB
28
Sun

5:45 pm Michigan @ Wisconsin (M) ESPN 1050, 104.1, 92.7 & 1600

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PIAA D4 BASKETBALL PLAYOFFS SCOREBOARD

EXHIBIT "F"

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SAINT FRANCIS U.
THE RED FLASH
FAIRLEIGH DICKINSON U.
KNIGHTS

TODAY
7:00PM

SCORE

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BREAKING NEWS: WASD answers ESPN RTK request about Darrick Dixon

MARCH 2, 2016 BY TODD BARTLEY



TUNEIN APP





The Williamsport Area School District through its Right to Know officer provided answers to a recent ESPN Radio Williamsport Right To Know request.

The request and answers can be reviewed by clicking this [link](#).

The second Right To Know request filed by ESPN Radio Williamsport with the Williamsport Area School District focuses on a YouTube video of current Williamsport Area High School Principal Brandon Pardoe endorsing the efforts of Darrick Dixon aka Darrick Rizzo when Pardoe was the Principal at Curtin Middle School in 2012.

The video produced and posted online by Darrick Dixon aka Darrick Rizzo was listed under a search "Darrickforpardon."

As noted in the request, Pardoe states, "Darrick has been working with some students in our school over the last couple of years."

Pardoe goes onto say "I've worked closely with Darrick in order to assist some of our students in that

MAR
2
Wed

6:45 pm (7) Saint Francis @ (2) Fairleigh Dickinson (M) NEC Quarterfinal Stream 7

7:00 pm Hornets @ Sixers ESPN 1050, 104.1, 92.7 & 1600

MAR
3
Thu

1:00 pm Blue Jays @ Pirates (Spring Training) ESPN 1050, 104.1, 92.7 & 1600

7:00 pm Rangers @ Penguins ESPN 1050, 104.1, 92.7 & 1600

MAR
4
Fri

1:00 pm Twins @ Pirates (Spring Training) ESPN 1050, 104.1, 92.7 & 1600

6:45 pm (D4-1) Saint John Neumann vs (D11-2) Shenandoah Valley (B) at Milton PIAA-A First Round Stream 2

6:46 pm Tomahawks @ Knights Stream 12

7:00 pm Heat @ Sixers ESPN 1600

7:15 pm Lycoming @ Christopher Newport (M) NCAA-D3 First Round ESPN 1050, 104.1, 92.7 & Stream 1

9:30 pm (D4-1) Saint John Neumann vs (D11-2) Shenandoah

capacity; taking students including my son out of town at basketball tournaments.”

The most disturbing answers from WASD came to questions #1 and #4:

Question #1, Please provide a list of the number of students (not names) that Darrick Lewis Dixon aka Darrick Rizzo has been in direct contact with as it relates to the video referenced above.

Answer to #1, “Regarding your first numbered request , WASD has no such records. We believe that the information you have requested pertains to extracurricular activities that were not sponsored by WASD.”

Question #4, Please provide any and all paperwork provided by Darrick Lewis Dixon aka Darrick Rizzo to allow him the ability to travel with WASD students to “basketball tournaments” since 2011.

Answer to #4, “Regarding your fourth request , WASD has no such records. Again, we believe that the information you have requested pertains to extracurricular activities that were not sponsored by WASD.”

In order to fully comprehend the gravity of this situation families within the WASD are to believe an administrator is willing to go on youtube and provide an endorsement of someone (Dixon aka Rizzo) the WASD is fully aware committed crimes of a sexual nature against a student in 2001.

Valley (B) at Milton
PIAA-A First
Round [Replay]
ESPN 1050,
104.1, 92.7 &
Stream 1

MAR
5
Sat

1:30 pm LSU @
Kentucky (M)
ESPN 1050,
104.1, 92.7 & 1600

3:00 pm (D4-3)
Hughesville vs
(D2-1) EL Meyers
(B) at Holy
Redeemer PIAA-
AA First Round

6:15 pm North
Carolina @ Duke
(M) ESPN 1050,
104.1, 92.7 & 1600

6:45 pm Rebels @
Knights Stream 12

MAR
6
Sun

1:00 pm Astros @
Pirates (Spring
Training) ESPN
1050, 104.1, 92.7
& 1600

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PIAA D4 BASKETBALL PLAYOFFS SCOREBOARD

Furthermore, allow this person back on campus with access to students to go on what the WASD calls "extracurricular activities that were not sponsored by WASD" and not disclose to parents the person directly supervising children has not provided any paperwork which is required under state law to do so.

According to its own RTK responses the WASD did not find it necessary to request it of Dixon aka Rizzo before he had interaction with students at Curtin Middle School in 2012. According to a multitude of sources he has since been seen in other WASD buildings this school year.

As provided in the RTK response the WASD is very clear on who is a volunteer and who is not. In fact, the WASD outlines the clearances that are required from all parties that have interaction with children within the district.

One can easily draw the conclusion that WASD has not asked Dixon aka Rizzo to fill any of the volunteer forms as noted in the board policy and is required under state law. Since the WASD has already responded twice that "no such record exists."

Within the response offered by the WASD is a form titled "ACT 153 VOLUNTEER AFFIDAVIT". Under Paragraph 2 it lists Title 18 offenses which include g. Statutory Sexual Assault (Section 3122.1), s. Corruption of Minors and 19 other offenses.

On page 2 of the WASD Office of Human Resources Memo dated August 2015 with the Subject Line

SCORE	PIA... Sco...
← Upcoming Games	
🔍 quick search	
Boys Varsity Basketball	
COWANE... INDI...	FRI 6:00PM
OLD FOR... BLU...	
SULLIVA... GRIF...	FRI 6:00PM
YORK CO... GRE...	
SHENAN... BLU...	FRI 7:00PM
ST JOHN... GOL...	
BLUE M... EAG...	FRI
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Volunteers and Clearances in bold lettering and underlined it reads: "IMPORTANT: If any of the clearances obtained by the volunteer show any violations/convictions, please contact Anne Logue in Human Resources for further review."

So the question must be asked based on the known history of Darrick Dixon with the WASD; why doesn't he have to fill out a set of forms everyone else who interacts with children in the WASD does?

FILED UNDER: FEATURED STORIES, NEWS, NEWS ARCHIVE, TOP FEATURED STORY

score	Loc... Sco...
-------	------------------

Wednesday, Mar 2

quick search

Mens NCAA Basketball

SAINT FR... THE... TODAY FAIRLEIG... 7:00PM KNI...

MIAMI HUR... TODAY NOTRE D... 7:00PM FIGH...

PITTSBU... PAN... TODAY VIRGINIA.. 7:00PM HOK...

Womens NCAA Basketball

BUCKNE...

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LATEST TWEETS FROM @ESPNWILPO1050

Lycoming College will take on Christopher Newport in the Opening Round of the NCAA D-III Men's Basketball tournament. [#GoWarriors](#)
February 29, 2016 5:44 pm

The Lycoming College Warriors are champions of the MAC Commonwealth [#MACchamps](#) [#GoWarriors](#) 16020501