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COMMONWEALTH OF KENTUCKY  
CAMPBELL CIRCUIT COURT  
DIVISION \_\_\_\_\_

88443

**JERRY GEARDING**  
8 Hillside Drive  
Wilder, Kentucky 41071

Plaintiff,

vs.

**DEMOCRATIC STATE  
HEADQUARTERS OF KENTUCKY,  
INC. D/B/A KENTUCKY  
DEMOCRATIC PARTY**  
*Serve:* William Richard Adams  
Kaplan Johnson Abate & Bird LLP  
710 W. Main Street, 4<sup>th</sup> Floor  
Louisville, Kentucky 40202

and

**COLMON ELRIDGE, III**  
271 Ransom Trace  
Georgetown, Kentucky 40324

and

**RACHEL ROBERTS D/B/A RACHEL  
FOR KENTUCKY**  
701 Park Avenue  
Newport, Kentucky 41071

Defendants.

Case No. \_\_\_\_\_

Judge \_\_\_\_\_

**VERIFIED COMPLAINT**

Comes now Plaintiff, Jerry Gearding, by and through the undersigned counsel,  
and for his Complaint against the above-named Defendants, states as follows:

**PARTIES, VENUE, AND JURISDICTION**

88443

1. Plaintiff Jerry Gearding (hereinafter “Plaintiff” or “Gearding”) is an individual residing at 8 Hillside Drive in Wilder, Kentucky 41071, which is located within the boundaries of Campbell County.

2. Defendant Democratic State Headquarters of Kentucky, Inc. d/b/a Kentucky Democratic Party (hereinafter referred to as “Kentucky Democratic Party”) is a company located and organized within the geographical and jurisdictional bounds of the Commonwealth of Kentucky, with a principal office address of P.O. Box 694, Frankfort, Kentucky 40602.

3. Defendant Colmon Elridge, III (hereinafter “Elridge”) is and has been at all times mentioned herein, an individual residing within the Commonwealth of Kentucky, specifically at 271 Ransom Trace, Georgetown, Kentucky 40324. Elridge is the Chairman of the Kentucky Democratic Party.

4. Defendant Rachel Roberts d/b/a Rachel for Kentucky (hereinafter “Roberts”) is and has been at all times mentioned herein, an individual residing within the Commonwealth of Kentucky. Roberts is a member of the Kentucky House of Representatives, representing the 67th District. At all relevant times, her campaign was operated from 701 Park Avenue, Newport, Kentucky 41071, located within the geographical and jurisdictional bounds of the Commonwealth of Kentucky.

5. At all times relevant to this action and as described herein, the acts and omissions by Defendants which constitute losses sustained by the Plaintiff occurred in Campbell County, therefore rendering personal jurisdiction and venue proper in Campbell County, Kentucky.

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07/19/2023 02:16:28

6. The damages sustained by Plaintiff exceed the jurisdictional minimums of this Court, rendering jurisdiction appropriate in this Court.

88443

**FACTUAL ALLEGATIONS**

7. Plaintiff repeats and incorporates each allegation set forth in this Complaint.

8. Plaintiff Gearding is a life-long resident of the Commonwealth of Kentucky.

**November 2022 Election**

9. In late 2021, Gearding decided to ask his community to elect him to serve as their representative to the Kentucky House of Representatives, 67th District.

10. Gearding was the Republican candidate for the 67th District seat in the November 2022 election.

11. Gearding’s Democratic opponent in the November 2022 election was incumbent Roberts, whose campaign “Rachel for Kentucky” was run out of Roberts’ yoga studio located at 701 Park Avenue, Newport, Kentucky 41071.

12. On January 20, 2022, soon after Gearding filed to run for the Kentucky House of Representatives, the Cincinnati Enquirer published an article (hereinafter referred to as the “Enquirer article”) that highlighted and promoted certain allegations against Plaintiff. The article is attached as Exhibit A to this Complaint.

13. The Enquirer article cited to police reports from 2018 and 2019 that referenced alleged domestic disputes between Gearding and his then-girlfriend and cohabitant. The Enquirer article noted that these charges were only allegations, and that none had been proven. Gearding responded to the allegations, asserting unequivocally that the allegations in the police reports were false and had been discredited in court.

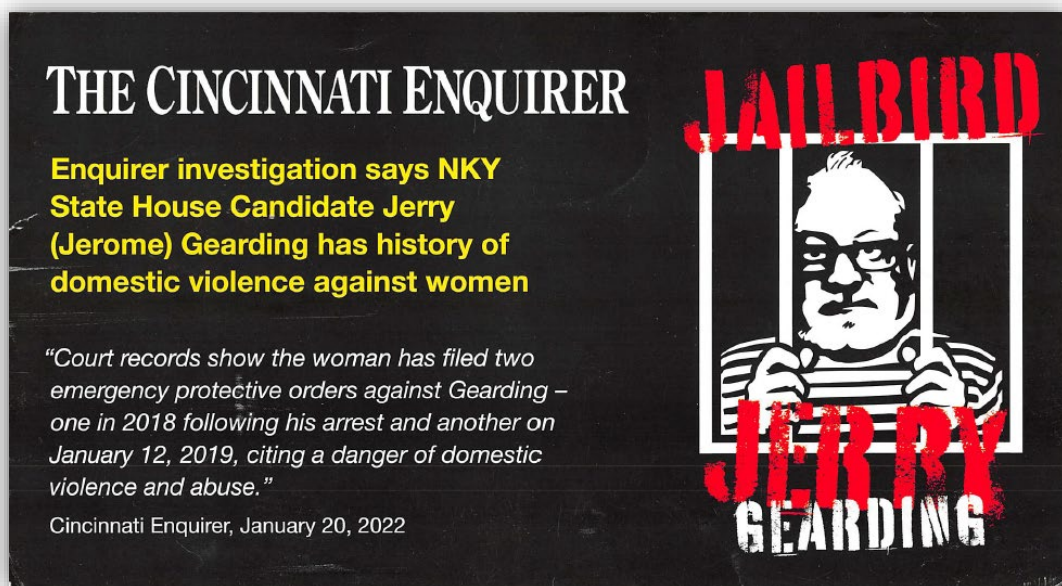
14. Starting in late July of 2022, and continuing until the election on November 8, 2022, Defendants began a course of conduct founded in false and malicious written and verbal statements regarding Gearding, designed and orchestrated to damage his reputation and cause him to lose the support of his community.

88443

15. Defendants Roberts and the Kentucky Democratic Party drafted, printed, and paid for the distribution of written materials to citizens in Campbell County, within the 67th District.

16. Despite knowing of the falsity of the written statements, Defendants Roberts and the Kentucky Democratic Party went ahead with the publication of the aforementioned written materials with the express intent to injure Gearding’s reputation and to help Roberts win the election.

17. In one of at least four separate mailings, Roberts falsely and maliciously wrote: “Enquirer investigation says NKY State house Candidate Jerry (Jerome) Gearding has a history of domestic violence against women.” See Exhibit B to this Complaint, also pictured below.





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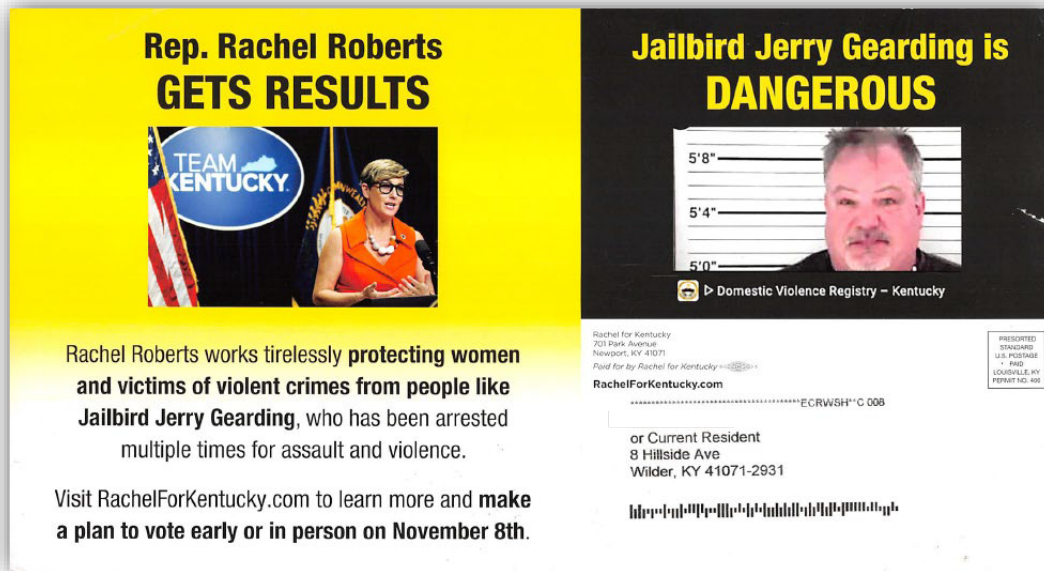
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18. Defendant Roberts knew or should have known of the falsity of this statement, as the Enquirer article noted that Plaintiff had never been found guilty of such claims, that all relevant charges against him had been dropped, and that Gearding himself stated that the allegations were false.

19. On the back of that same mailer, referenced above as Exhibit B to this Complaint, Roberts wrote “Rachel Roberts works tirelessly protecting women and victims of violent crimes from people like Jailbird Jerry Gearding.” See below.



20. By affirmatively stating that she would protect constituents from “people like [Plaintiff],” Defendant Roberts unequivocally insinuated that Gearding had committed “violent crimes.”

21. Defendant Roberts knew or should have known of the falsity of this statement, as the Enquirer article relied upon by Roberts explicitly noted that Gearding had never been found guilty of a violent crime, that all relevant charges against him had been dropped, and that Gearding himself stated that the allegations were false.

22. In a separate mailing, the Kentucky Democratic Party falsely wrote: “State House candidate Jerry (Jerome) Gearding has a history of domestic violence against women.” See Exhibit C to this Complaint, also pictured below. That statement is juxtaposed next to a middle-aged woman with a bruised lip, blackened eye, and a bruised forehead covered in a band-aid. In almost illegible print hidden at the bottom is the statement: “Photo depicted is a model, not an actual victim.”



23. The Kentucky Democratic Party knew or should have known that stating, “[Plaintiff] has a history of domestic violence against women” was false, as Gearding was never convicted of domestic abuse and all relevant charges made against him in 2018 and 2019 were dropped.

24. The Kentucky Democratic Party knew or should have known that publishing an inflammatory picture of a middle-aged woman with facial injuries, alongside the false statement that Gearding is a domestic abuser, would naturally cause recipients to believe that Gearding had inflicted the injuries depicted in the picture.

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07/19/2023 02:16:28

88443

25. In another mailing, the Kentucky Democratic Party wrote, “If you hit a woman or endanger a child, you don’t belong in Kentucky’s house of representatives,” next to the statement: “Enquirer investigation reveals state house candidate Jerry (Jerome) Gearding has long history of arrests for domestic violence.” See Exhibit D to this Complaint, pictured below.



26. The Kentucky Democratic Party knew or should have known that Gearding denied the allegations, that there was no evidence of Plaintiff ever pleading guilty to or being found guilty of hitting a woman or endangering a child, that all relevant charges made against him in 2018 and 2019 were dropped, and that recipients reading the mailer would naturally believe that Gearding had committed these crimes.

27. In a fourth mailing, Roberts published a mailer encouraging the constituents of the 67th District to vote against Gearding because: “His arrest record and pattern of behavior for assault, domestic violence, child endangerment and drunk driving speaks for itself.” See Exhibit E to this Complaint, pictured below.



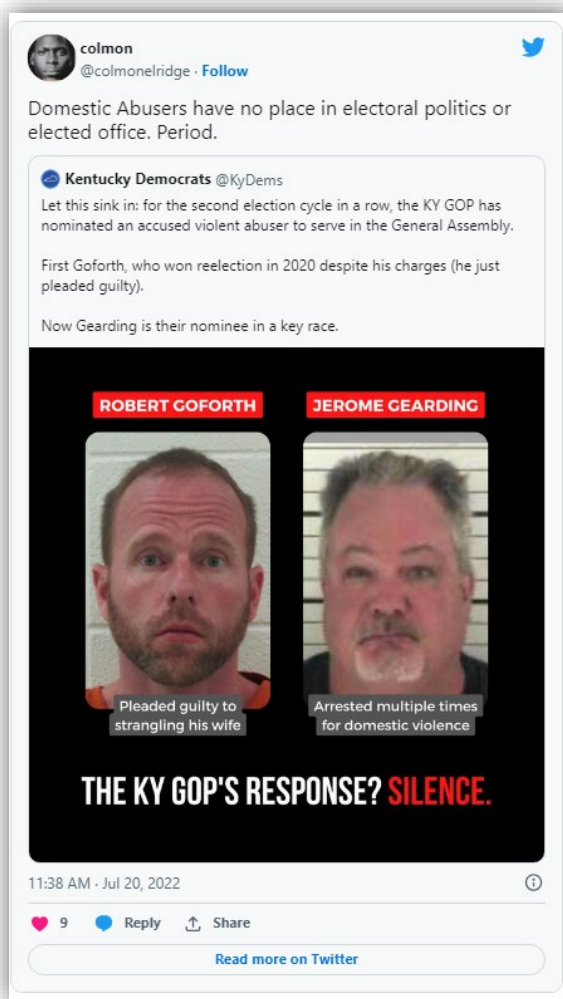
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28. By affirmatively stating that Gearding exhibited a “pattern of behavior” for “assault, domestic violence, child endangerment,” Defendant Roberts knew or should have known that recipients reading the mailer would naturally believe that Gearding had committed these crimes.

29. Defendant Roberts knew or should have known that there was no evidence of Gearding being convicted of or pleading guilty to assault, domestic violence, or child endangerment, and that all relevant charges made against him in 2018 and 2019 were dropped.

30. At all times material herein, Defendant Elridge was chair of the Kentucky Democratic Party. During this time, Defendant Elridge published at least one public statement about Gearding, including on July 20, 2022 when Elridge tweeted that, “Domestic Abusers have no place in electoral politics or elected office. Period.” Elridge’s Twitter statement was written over a side-by-side picture of Gearding and Robert Goforth, a former member of Kentucky’s House of Representatives. *See Exhibit F to this Complaint, pictured below.*





31. Defendant Elridge’s statement in his July 20, 2022 tweet made no distinction between Gearding, who has never been convicted of domestic abuse, and Robert Goforth, who pled guilty to fourth-degree domestic violence in July of 2022. Elridge used the plural description “domestic abusers” to describe both Plaintiff and Robert Goforth.

32. Defendant Elridge’s tweet, published to his Twitter followers, was seen and disseminated further through an article published in Link NKY on July 20, 2022.

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33. Defendant Elridge knew or should have known that Gearding had denied all allegations of domestic abuse and stated that they were false, that Gearding had never been found guilty of or pleaded guilty to domestic violence or abuse, and that all domestic abuse charges made against Plaintiff in 2018 and 2019 were dropped.

88443

34. The statements published by the Kentucky Democratic Party, Roberts, and Elridge in the months leading up to the November 8, 2022 election were all made with the malicious intent to injure Gearding’s reputation, to impute that he had committed crimes (e.g., assault, domestic abuse, child endangerment), to portray that he was unfit to represent the 67th District, to expose him to public hatred, and to induce an evil opinion of him in the minds of Campbell County voters.

35. On November 8, 2022, voters in the 67th District narrowly chose Defendant Roberts to represent them at the Kentucky statehouse.

36. Soon after, and based on the Defendants’ publications, Gearding was dismissed from his job.

**Falsity of Allegations against Gearding**

37. For almost two decades, Gearding has had a relationship with his now ex-girlfriend (GF)<sup>1</sup>. Together, they had a son in 2008. Gearding has sole custody of their son.

38. Gearding and GF lived together on-and-off for approximately 12 years.

39. GF has a history of mental health and substance abuse issues.

40. The false and malicious statements published by Defendants in the months leading up to the November 2022 election all relate to certain incidents involving Gearding and GF that occurred in 2018 and 2019.

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<sup>1</sup> GF’s full name is withheld out of respect for her privacy. As she is not named as a party, her name need not appear on this public-facing document.

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07/19/2023 02:16:28

41. During the time period at issue in 2018 and 2019, GF’s mental health and substance abuse issues were becoming increasingly uncontrolled.

88443

42. The first incident occurred on August 18, 2018, after Gearding had gone to lunch with a friend. When he returned to his home, GF was intoxicated and drinking out of a large, 1.75 liter bottle of vodka.

43. Gearding attempted to remove the bottle from GF’s hands. In her efforts to retain the vodka bottle, GF fell and hit the microwave in the kitchen.

44. GF called the police and made false and spurious allegations against Gearding. Gearding was arrested on the statements of GF and charged, in Campbell County District Court, with misdemeanor assault fourth degree domestic violence and alcohol intoxication in a public place.

45. In the weeks following the arrest, Gearding was led to believe, by counsel, that he was permitted to return to his home.

46. On September 13, 2018, Gearding returned to his home on the understanding that he was authorized to do so. When Gearding got home, GF called the police again.

47. Gearding was subsequently arrested again and charged with violations of conditions of release and contempt of court.

48. In order to avoid additional and prolonged litigation, Gearding pled guilty to the charge for violating the terms of his release.

49. On October 15, 2018, an order was entered permitting Gearding and GF to reside together.

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07/19/2023 02:16:28

50. On December 12, 2018, the charges against Gearding for misdemeanor assault fourth degree domestic violence and public intoxication were dismissed on motion of the prosecuting attorney. <sup>88443</sup>

51. After the misdemeanor assault fourth degree domestic violence and alcohol intoxication charges were dismissed on December 12, 2018, the only charge that remained pending against Gearding was the contempt of court charge for violating the terms of his release agreement.

52. A month later, on January 11, 2019, Gearding was at his home when GF relapsed into another drinking episode. Gearding made the decision to exit his house with his son and their dog and go to his mother's house. Gearding went to his mother's house and, while there, GF called and left several voice messages threatening to call the police if he did not return home.

53. On January 11, 2019, and after being at his mother's house for approximately four hours, Gearding returned home to find GF still in a drunken rage. Gearding decided, once again, to leave the premises and go back to his mother's house. As Gearding was attempting to leave the home with his son and their dog, GF went after Gearding's son, attempting to remove the dog and a bag of dog food from their son's hands, resulting in a minor tussle between the two. Gearding had no involvement in this interaction.

54. Gearding, his son, and their dog ultimately vacated the premises. Thereafter, GF called the police and again made false and spurious allegations against Gearding.

55. On January 12, 2019, the police arrested Gearding on the allegations of GF and charged him with misdemeanor assault fourth degree domestic violence.



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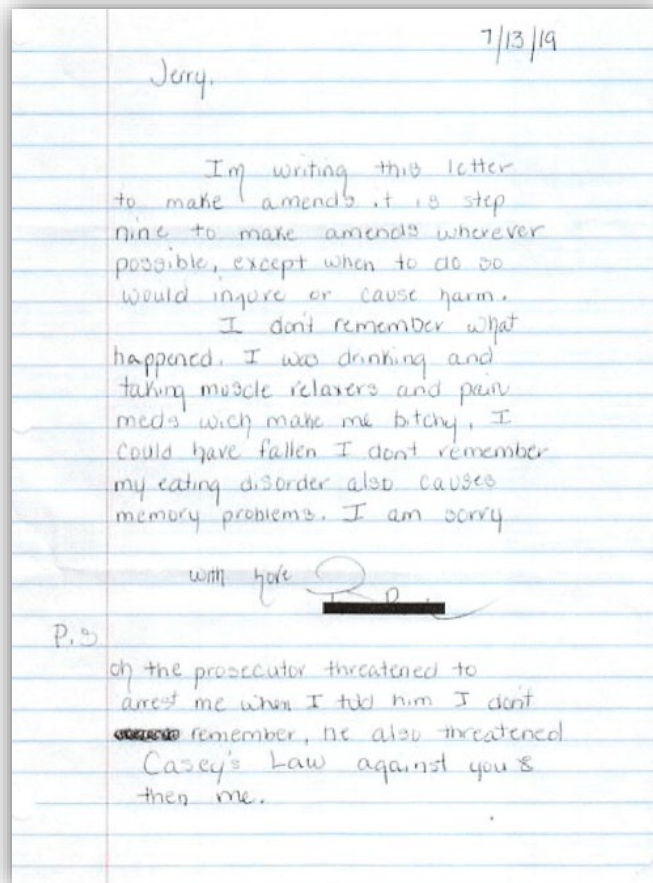
56. Thereafter, Gearding resided at his mother's house and GF resided at Gearding's home for several months.

88443

57. While GF was residing alone at Gearding's home, her substance abuse issues persisted, and her mental health deteriorated.

58. In the summer of 2019, GF moved to California and entered herself into a facility for substance abuse and mental health treatment.

59. While in treatment, and as part of a 12-step program, GF wrote Gearding a letter, dated July 13, 2019, apologizing for her false accusations. The letter is copied below and attached to this Complaint as Exhibit G:



60. On August 8, 2019, Gearding's criminal defense attorney filed a motion with the court seeking an in-camera hearing with GF to determine if she intended to assert her

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Fifth Amendment Right against self-incrimination if called to testify. Gearding had reason to believe that GF intended to assert her Fifth Amendment Right to avoid being prosecuted for filing a false claim. 88443.

61. On January 27, 2020, the charge against Gearding for misdemeanor assault fourth degree domestic violence was dismissed on motion of the prosecuting attorney.

62. Pursuant to an agreement reached with the prosecuting attorney, Gearding agreed to temporarily leave the state as part of a diversion program. Gearding agreed to do this in large part out of concern for his son's wellbeing and to remove him from a disruptive environment.

63. Gearding eventually returned to Kentucky in June of 2020.

64. The sole remaining charge against Gearding, for contempt of court, was dismissed with prejudice on June 9, 2020.

65. After spending a year in California, GF eventually returned to the Midwest.

66. GF became ill upon her return and is now permanently disabled. She splits her time (and her support network) between her immediate family and Gearding in Wilder.

67. Gearding was never convicted of any violent crime throughout the entire 2018-2019 ordeal with GF.

68. Although Gearding was twice charged with misdemeanor assault fourth degree domestic violence, the first charge was dismissed on December 12, 2018, and the second charge was dismissed on January 27, 2020. Both dismissals occurred on motion of the prosecuting attorney.

69. The dismissals of both charges for misdemeanor assault fourth degree domestic violence were a matter of public record when Defendants published their false

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07/19/2023 02:16:28

and malicious statements about Gearding in the months leading up to the November 2022 election.

88443

70. Defendants intentionally and maliciously resurrected the above-described events of 2018-2019—which in essence amount to a tragic case of GF’s spiraling substance abuse and mental health issues—in order to harm Gearding’s reputation and disparage him in the community.

71. Defendants were motivated by their desire to get Roberts reelected to the 67th District seat.

**COUNT I  
DEFAMATION (LIBEL AND SLANDER)**

72. Plaintiff repeats and incorporates each allegation in this Complaint.

73. Defendants published written and verbal defamatory and unprivileged statements against Plaintiff Gearding that included stating or implying to others that Plaintiff Gearding was a domestic abuser, had a history of violence against women, and had a history of endangering children.

74. Defendants knew or should have known that the statements made concerning Plaintiff, including that he was a domestic abuser, had a history of violence against women, and had a history of endangering children, were all false and without merit.

75. Defendants failed to adequately investigate the allegations or exercise ordinary care to determine whether the allegations were true or false.

76. The accusations made are defamatory as they tend to bring Plaintiff Gearding into public hatred, contempt, ridicule, and disgrace, and they also tend to

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induce an evil opinion of him in the mind of right-thinking people throughout Campbell County and the Commonwealth of Kentucky.

88443

77. The accusations made are defamatory as they tend to lower Plaintiff in the estimation of his community, they deter third persons from associating or dealing with him, they have caused him to be shunned and avoided, they have deprived him of friendship, intercourse, and society, they have damaged his employment and business prospects, and they have injured him in his involvement in public politics.

78. The accusations made are defamatory as they impute crime and/or unfitness to perform the duties of office for which Plaintiff was seeking to be elected.

79. The written and verbal defamatory statements against Plaintiff Gearding that were published by Defendants constitute defamation per se.

80. Defendants acted with actual malice in publishing the written and verbal statements because they knew the falsity of the statements and, in reckless disregard, went ahead and published such statements in an attempt to injure Plaintiff Gearding and sway votes to win an election.

81. The written and verbal statements by Defendants concerning the alleged criminal activity of Plaintiff were made by Defendants with knowledge that the statements would harm the Plaintiff's reputation in the community.

82. Defendants' defamatory statements directly and proximately caused damage to Plaintiff Gearding.

83. As a direct and proximate result of Defendants' conduct, Plaintiff suffered embarrassment, humiliation, mental anguish, and damage to his reputation which demands compensation.

84. Plaintiff Gearding suffered damages as a result of Defendants' actions in amount to be determined by a jury at trial in excess of the jurisdictional minimums of this Court.

88443

**COUNT III**  
**TORT OF FALSE LIGHT**

85. Plaintiff repeats and incorporates each allegation in this Complaint.

86. Defendants placed Plaintiff Gearding in a false light by stating or implying to others that Gearding was a domestic abuser, had a history of violence against women, and had a history of endangering children.

87. This false light Plaintiff Gearding was placed in by Defendants' defamatory remarks is highly offensive to a reasonable person.

88. Defendants, as the publishers of the aforementioned statements, had knowledge of, or acted in reckless disregard as to the falsity of the publicized matter and the false light in which Plaintiff Gearding was placed.

89. Defendants' actions directly and proximately caused damage to Plaintiff Gearding.

90. Plaintiff Gearding suffered damages as a result including but not limited to damage to his reputation, mental anguish, emotional and mental distress, humiliation, and embarrassment.

**COUNT III**  
**PUNITIVE DAMAGES**

91. Plaintiff repeats and incorporates each allegation in the Complaint.

92. The acts and/or omissions of Defendants were specifically intended to cause tangible and intangible injury to Plaintiff.

93. Such acts and/or omissions render Defendants liable for non-apportioned punitive damages pursuant to common law. 88443

WHEREFORE, Plaintiff Jerry Gearding prays for trial by jury and judgment against the named Defendants as follows:

- 1. Judgment for compensatory, special, and punitive damages;
- 2. For pre and post judgment interest, to the full extent permitted by law;
- 3. All legal cost to include all court costs, taxable costs, expenses, and attorney fees;

and

- 4. For any and all other relief to which he is entitled.

Respectfully Submitted,

*Cory D. Britt*

---

Cory D. Britt (95954)  
 Zachary C. Schaengold\*  
 Robbins, Kelly, Patterson & Tucker, LPA  
 312 Elm Street, Suite 2200  
 Cincinnati, Ohio 45202  
 (513) 721-3330; (513) 721-5001 fax  
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[zschaengold@rkpt.com](mailto:zschaengold@rkpt.com)  
**Attorneys for Plaintiff**

\* *pro hac vice* application forthcoming

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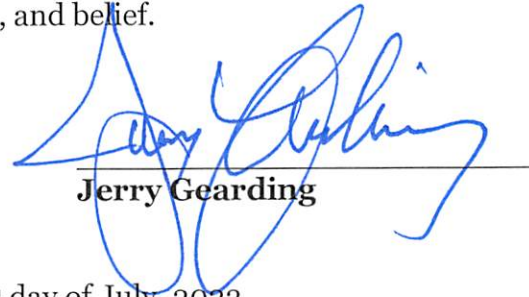
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STATE OF OHIO )  
 )SS:  
COUNTY OF HAMILTON )

VERIFICATION

88443

I, Jerry Gearding, having been first duly sworn according to law, state that I have reviewed the Verified Complaint and attest that the claims set forth therein are true and correct to the best of my knowledge, information, and belief.

  
Jerry Gearding

Sworn to and subscribed in my presence this 18<sup>th</sup> day of July, 2023.

  
Notary Public



DIANNE R BLANTON  
Notary Public  
State of Ohio  
My Comm. Expires  
December 21, 2024

POLITICS

# Northern Kentucky statehouse candidate has multiple domestic violence arrests; candidate says he is under attack by 'Socialist Left.'



**Rachel Berry**

Cincinnati Enquirer

Published 10:18 p.m. ET Jan. 20, 2022 | Updated 5:49 p.m. ET Jan. 21, 2022

Jerome Gearding, who recently filed to run for a Northern Kentucky statehouse seat, has a history of domestic violence arrests, court records show.

Gearding, a 56-year-old Wilder resident, filed to run as a Republican for the 67th House District, a Campbell County seat currently held by Democrat Rachel Roberts.

After the initial story was posted, Gearding released a statement Friday on Twitter denying the allegations against him.

"The Establishment is TERRIFIED of our Kentucky First campaign," he said in the statement. He said he was under attack by the "Socialist Left" and the "Fake News Cincinnati Enquirer," among others.

## What court records show

On Aug. 18, 2018, Gearding was arrested after a woman told police he assaulted and injured her. She told police that Gearding, her boyfriend, "punched and shoved her, knocking her head into the microwave."

Gearding was released on bond and ordered to stay away from the victim and avoid alcohol and drugs. On Sept. 13, 2018, the same woman called police saying Gearding was drunk and yelling at her. He was arrested again for violating the terms of his release.

Gearding was given diversion, and the charges were dismissed. Diversion is a rehabilitation program meant to help offenders avoid behaviors that led to their arrest.



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Court records show the woman has filed two emergency protection orders against Gearding – one in 2018 following his arrest and another on Jan. 12, 2019, citing a danger of domestic violence and abuse.

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In 2019, Gearding was arrested again and charged with fourth-degree assault (domestic violence) with minor injury. A woman said they were arguing and he knocked over dog food then pushed her head into the ground, which gave her a swollen bloody lip.

The charge was eventually dismissed.

In 2018, Gearding ran for Campbell County commissioner and lost. His campaign for the Kentucky House of Representatives focuses on "preserving individual liberties, reforming our public education system, lowering taxes and a commonsense, conservative approach to a more efficient, effective and ethical state government," according to a statement posted to his Facebook page.

## **Gearding's response Friday**

Gearding didn't immediately respond to requests for comment through email or social media on Thursday. The Enquirer tried multiple listed phone numbers for Gearding, but the numbers had been disconnected.

On Friday, Gearding emailed The Enquirer and said he hadn't received any calls or emails but added he wouldn't comment on the specific incidents.

Gearding released a statement Friday on Twitter denying the allegations against him.

"The allegations in the Cincinnati Enquirer are false, have been discredited in the court of law, and only serve to harass my family," he tweeted.

## **Filing deadline is Tuesday**

Gearding also sent out a press release Friday in support of legislation to help people struggling with mental health and addiction.

Anna Zinkhon, president of the Campbell County Republican Party, said Thursday she wasn't prepared to comment on Gearding's past charges.

Gearding and Roberts are the only candidates who have filed to run for the 67th District seat. The filing deadline is Tuesday.

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GOP leaders drew maps this year that would change the boundaries of the districts. Although currently represented by a Democrat, the new district leans Republican. In 2016, Donald Trump won the newly formed district with 54% of the vote. Precinct-level data wasn't recorded during the 2020 election.

Gov. Andy Beshear vetoed the House map, and the House overrode the veto Thursday. The Kentucky Democratic Party, House Democratic Caucus Chair Derrick Graham and Franklin County residents filed a lawsuit challenging the maps Thursday, the Courier Journal reported.

*Northern Kentucky reporter Rachel Berry can be reached at [rberry@enquirer.com](mailto:rberry@enquirer.com). Follow her on Twitter @racheldberry.*

Presiding Judge: HON. JULIE REINHARDT WARD (617222)

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# EXHIBIT B


88443

## THE CINCINNATI ENQUIRER

**Enquirer investigation says NKY State House Candidate Jerry (Jerome) Gearding has history of domestic violence against women**

*"Court records show the woman has filed two emergency protective orders against Gearding – one in 2018 following his arrest and another on January 12, 2019, citing a danger of domestic violence and abuse."*

Cincinnati Enquirer, January 20, 2022




## Rep. Rachel Roberts GETS RESULTS



Rachel Roberts works tirelessly **protecting women and victims of violent crimes from people like Jailbird Jerry Gearding**, who has been arrested multiple times for assault and violence.

Visit [RachelForKentucky.com](http://RachelForKentucky.com) to learn more and **make a plan to vote early or in person on November 8th.**

## Jailbird Jerry Gearding is DANGEROUS



Domestic Violence Registry – Kentucky

Rachel for Kentucky  
701 Park Avenue  
Newport, KY 41071  
Paid for by Rachel for Kentucky

RachelForKentucky.com

\*\*\*\*\*ECRWSH\*\*C 008

or Current Resident  
8 Hillside Ave  
Wilders, KY 41071-2931

RESORTED  
STANDARD  
U.S. POSTAGE  
PAID  
LOUISVILLE, KY  
PERMIT NO. 446



# EXHIBIT C

88443

## State House candidate Jerry (Jerome) Gearding has history of domestic violence against women

*"Court records show the woman has filed two emergency protective orders against Gearding – one in 2018 following his arrest and another on January 12, 2019, citing a danger of domestic violence and abuse."*

Cincinnati Enquirer, January 20, 2022



Photo depicted is a model, not an actual victim.



**Republican candidate Jerry Gearding has a long history of arrests for domestic violence, disorderly conduct, public intoxication and drug possession.**

## Kentucky's women deserve better.

The choice is clear.

# Vote NO!!

on Republican Jerry Gearding



Kentucky Democratic Party  
P.O. Box 694  
Frankfort, KY 40602

Raid for by Kentucky Democratic Party

Non-Profit  
U.S. Postage  
Paid  
Louisville, KY  
Permit No. 406

.....ECRWSH\*\*C 008

or Current Resident  
8 Hillside Ave  
Wilders, KY 41071-2931




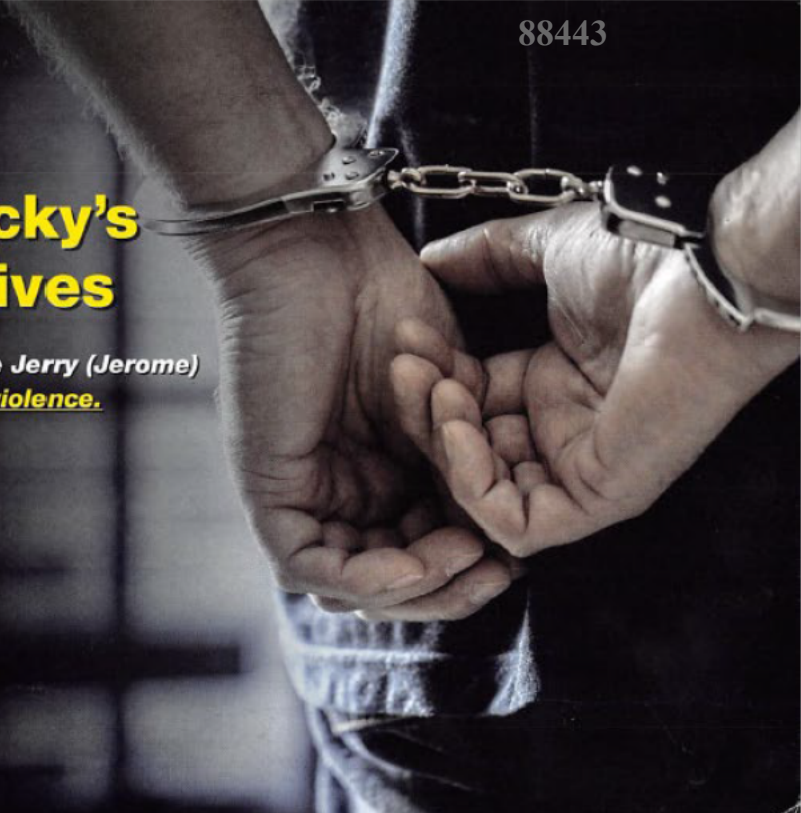


# EXHIBIT D

88443


**If you hit a woman or endanger a child, you don't belong in Kentucky's House of Representatives**

*Enquirer investigation reveals state house candidate Jerry (Jerome) Gearding has a **long history of arrests for domestic violence.***

**GET THE FACTS**

# Vote NO on Jerry Gearding

**Link NKY's Daily News Headlines July 20, 2022** 

*Gearding's first charge happened in September of 2018 when police were dispatched to a home in Wilder. According to the police report, a woman called and reported that Gearding assaulted and injured her. Gearding was attempting to leave with his 10-year old son, and when police removed Gearding from the car, he "had a strong odor of alcoholic beverages, bloodshot, watery eyes, and could not follow direction." He refused a field sobriety test, according to the report.*

*"The female caller had a swollen lip and cut on top of her head," the police report reads. "She stated (Gearding) punched her and shoved her, knocking her head into the microwave."*

*Further, the report says the son told the police that the two were fighting over a liquor bottle. "(Gearding) was a danger to self and others," the report reads.*

**Republican candidate Jerry Gearding has a long history of arrests for domestic violence, disorderly conduct, public intoxication and drug possession.**

**The choice is clear. Vote NO!! on Jerry Gearding for State Representative**



Kentucky Democratic Party  
P.O. Box 694  
Frankfort, KY 40602  
Paid for by Kentucky Democratic Party

Non-Profit  
U.S. Postage  
Paid  
Louisville, KY  
Permit No. 406

\*\*\*\*\*ECRWSH\*\*C 008

or Current Resident  
8 Hillside Ave  
Wilder, KY 41071-2931





# EXHIBIT E

PM

## Vote NO on Jailbird Jerry Gearding for State Representative

His arrest record and pattern of behavior for assault, domestic violence, child endangerment and drunk driving speaks for itself



Mug Shots: January 20, 2012 and September 14, 2018  
Campbell County Detention Center

# JAILBIRD JERRY GEARDING



Rachel for Kentucky  
701 Park Avenue  
Newport, KY 41071

Paid for by Rachel for Kentucky

RachelForKentucky.com

or Current Resident  
8 Hillside Ave  
Wilder, KY 41071-2931

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# JAILBIRD JERRY

## Republican Jerry (Jerome) Gearding isn't fit for office



## Jerry Gearding's Track Record

**Assault and Domestic Violence**  
Emergency Protective Order Issued January 2019  
Female caller had a "swollen bloody lip, he pushed her head into the ground". Fled scene in his truck with his 10-year-old son.  
"He was extremely intoxicated, slurred speech, unsteady on feet"

**Bankruptcy**  
December 2006

**Drunk Driving**  
Guilty November 2006  
Operating motor vehicle under influence of alcohol/drugs

**Disorderly Conduct**  
Arrested November 2005  
"Interfered with a police officer by causing others to attack him."

**Contempt of Court**  
December 2018

**Domestic Assault and Alcohol Intoxication**  
Arrested August 2018  
"Female had swollen lip and cut on top of her head; stated subject punched her and shoved her, knocking her head into microwave." Ordered to stay 500 feet away from victim and minor.

**Drug Possession**  
Charged May 2000

SOURCE: Court records  
MUG SHOT: Campbell County Detention Center, August 18, 2018

# EXHIBIT F

 **colmon**  
@colmonelridge · [Follow](#)

Domestic Abusers have no place in electoral politics or elected office. Period.

 **Kentucky Democrats @KyDems**


Let this sink in: for the second election cycle in a row, the KY GOP has nominated an accused violent abuser to serve in the General Assembly.

First Goforth, who won reelection in 2020 despite his charges (he just pleaded guilty).

Now Gearding is their nominee in a key race.



11:38 AM · Jul 20, 2022

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88443

Presiding Judge: HON. JULIE REINHARDT WARD (617222)

COM : 000027 of 000028



# EXHIBIT G

88443

7/13/19

Jury.

I'm writing this letter to make amends it is step nine to make amends wherever possible, except when to do so would injure or cause harm.

I don't remember what happened. I was drinking and taking muscle relaxers and pain meds wich make me bitchy, I could have fallen I don't remember my eating disorder also causes memory problems. I am sorry

with love 

P.S

oh the prosecutor threatened to arrest me when I told him I don't ~~remember~~ remember, he also threatened Casey's Law against you & then me.

Presiding Judge: HON. JULIE REINHARDT WARD (617222)

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