

STATE OF NORTH CAROLINA
COUNTY OF WAKE

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
22-CVS-14854

KENNETH BRYANT,
BRYANT ENTERPRISES, LLC
Plaintiffs,

v.

BRYAN DONALD FIELDS, and
CARSTEN JASON GALLINI
Defendants.

**PLAINTIFFS' SECOND MOTION FOR
LEAVE TO FILE SUPPLEMENTAL
PLEADING**

NOW COME Plaintiffs, Kenneth Bryant and Bryant Enterprises, LLC, by and through their counsel, pursuant to N.C. Gen. Stat. § 1A-1, Rule 15(d), and seek leave to file Supplemental Pleading, to amend the Complaint to set forth transactions, occurrences, and events which occurred after the date of the Second Amended Complaint. In support hereof, the Plaintiffs submit to the Court the following allegations which the Plaintiffs seek to plead as their Supplemental Pleading:

FURTHER AND ONGOING LIBELLOUS AND DECEPTIVE CONDUCT

263. The Plaintiffs incorporate by reference the allegations of Paragraphs 1 – 262 of the Complaint as if set forth fully herein.

264. In or about September 2023 the Defendants continued their campaign of harassing the Plaintiffs by creating and publishing further business cards, stickers, and a letter.

265. The Defendants disseminated fake business cards depicting the following:

Ken Bryant - K10MR
NORTH GEORGIA COMMUNICATIONS



SCAN FOR
DEALS!

I'M A MOTOROLA CHANNEL PARTNER! I OWN A MOTOROLA DEALERSHIP!
WWW.NGACOMS.COM

Ken Bryant - K10MR
NORTH GEORGIA COMMUNICATIONS



A FULL SERVICE TWO-WAY LAWSUIT GENERATING ENTERPRISE
WWW.NGACOMS.COM

266. The Defendants further disseminated a sticker bearing the Plaintiffs' image as follows:



267. In the Defendants' creation, use and dissemination of the aforementioned business cards and sticker, they impersonated the Plaintiff Kenneth Bryant and Bryant Enterprises, used the Plaintiffs' corporate logo, spoofed the Plaintiffs' website address, used the Plaintiffs' names, used the Plaintiffs' radio callsign, and used Plaintiff Kenneth Bryant's image.

268. The Defendants further created and disseminated a letter, attached as Exhibit A.

269. An unknown number of these letters were sent to an unknown number of individuals across the United States.

270. Attached as Exhibit B are two examples of envelopes the Defendants used to disseminate this defamatory letter and the fake business cards and sticker.

271. The Defendants, knowing that said letter contained false and defamatory content, and would subject them to further liability, wrote the letter under a pseudonym “Marc Deemer.”

272. An extensive investigation has revealed that the purported author “Marc Deemer” is a false pen name and that no such person exists as they can not be verified in the public record.

273. Said letter contains false and defamatory matters about the Plaintiffs, including but not limited to alleging that the Plaintiff Kenneth Bryant’s resume is “choked full of lies and BS claims,” that Mr. Bryant was suing ham radio operators for publishing the Plaintiff’s court records, that the Plaintiffs were removed from a network for selling radios over the air, that the Plaintiffs’ Motorola dealership sells “whored out” radios, that the Plaintiffs overcharge for Motorola products, that the Plaintiffs tamper with OEM equipment, that the Plaintiffs engage in the theft of intellectual property, and that the Plaintiffs damage OEM equipment, that Plaintiff Kenneth Bryant is a “convicted felon, serial liar and fraudster.”

274. Said letter also encourages ham radio operators and dealers to “not engage with him [i.e. the Plaintiff Kenneth Bryant and his business],” thereby intentionally advising the persons receiving this letter to not purchase Motorola and other equipment from the Plaintiffs.

275. Said letter further encouraged the recipients to distribute the business cards and stickers “at upcoming hamfests.”

276. Said letter and documents were created and published by Defendants in furtherance of the conspiracy between them.

277. Said letter further sought to enlist other conspirators by encouraging the recipients to distribute the fake business cards and stickers and specifically to distribute them “at upcoming hamfests spreading the word about Ken Bryant.”

278. Said letter further seeks to impair the Plaintiffs’ business and to discourage potential customers from purchasing equipment from the Plaintiffs by alleging that the Plaintiff Kenneth Bryant is “a sue happy individual” and “Do not engage with him, or you may find yourself the target of his lawsuit machine.”

279. Said letter further attacked the Plaintiffs’ legal counsel by falsely asserting that said counsel had been disbarred.

280. The Defendants have already referred to Wake County as a “podunk county,” and thus have expressed a willingness and intent to attack not only the Plaintiffs but to attack the court and officers of the court.

WHEREFORE, the Plaintiffs respectfully request that they be allowed to file an Amendment to their Complaint to include these allegations.

Respectfully submitted, this the 22nd day of April, 2024.



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CERTIFICATE OF SERVICE

This is to certify that the undersigned has this day served a copy of the foregoing document upon all parties of record by depositing a copy of the same in the custody of the U.S. Postal Service, first class postage prepaid, addressed as follows:

Michael J. Tadych
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This the 22nd day of April, 2024.

LAW OFFICES OF JOHN M. KIRBY, PLLC



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Exhibit A

From the Desk of Marc Deemer

Howdy,

Back at it again, raising awareness of **Ken Bryant K1DMR** and his unethical practices.

Ken Bryant¹ is a convicted felon, serial liar and fraudster. He went off on another ham via Facebook and threatened lawsuits over a meme that was posted about him. This person researched Ken and low and behold, Ken has acted this way since he was a child. His resume is chocked full of lies and BS claims. **At 22 Ken, was even convicted felony impersonation of a federal agent!**

Ken's is now suing this ham and another 18-year-old ham for publishing his court records. The only lawyer he's able to get to take his case was disbarred for impersonating another lawyer² His court filings are lies, lies and more lies.

Ken Bryant K1DMR, is this same person that previously sued over 40 hams in North Carolina for being removed from a network for selling radios over the air.³

Ken's Motorola dealership is nothing more than a front to sell "whored out" radios at full price. This is the practice of flashing radios with leaked internal Motorola Software, adding features without buying the license keys. North Georgia Communication sells it as a legitimately licensed radio for 1000's more than it cost. Ken bought over a dozen APX8000 radios with basic VHF licensing from Motorola ~\$1800 dealer cost and added "whore" features, selling them to unsuspecting amateurs and professional radio buyers for over \$8000 per radio. We can know the radios had blank Bluetooth addresses, leaving it broken once enabled by unsuspecting buyers!

He's a sue happy individual, and has no business in ham radio. If he shows up at your meeting or hamfest, show him the exit. Do not engage with him, or you may find yourself the target of his lawsuit machine.

Please enjoy the included awareness cards and feel free to hand them out at upcoming hamfests spreading the word about Ken Bryant.

73 de Marc Deemer
dmrmarc@proton.me

¹ <https://ngacoms.com>

² <https://www.ncbar.gov/Orders/Kirby,%20John%20M%20Consent%20Order%20of%20Discip%20OCR.pdf>

³ <https://forums.radioreference.com/threads/ham-banned-from-dmr-network-sues-in-state-court-to-regain-access.333212/>

Exhibit B

