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IN THE COURT OF COMMON PLEAS
FIRST JUDICIAL DISTRICT OF PENNSYLVANIA
PHILADELPHIA COUNTY – CIVIL TRIAL DIVISION

Bryce B. Bubbleton, individually and on behalf)
of all others similarly situated,)

Plaintiff(s),)

vs.)

Ryan Waters, individually and in his capacity as)
Moderator for Philadelphia Roleplay,)

Parker Anderson, individually and in his)
capacity as Moderator for Philadelphia)
Roleplay,)

Nelson Winters, in his official capacity as)
Senior Moderator for Philadelphia Roleplay,)

Defendant(s).)

Case No.: CP-51-CV-352351-2025

CLASS ACTION COMPLAINT

**FOR DECLARATORY AND INJUNCTIVE
RELIEF, RETALIATION, AND ABUSE OF
AUTHORITY UNDER COLOR OF LAW**

PRELIMINARY STATEMENT

This complaint arises from the retaliatory issuance of an unjustified warning against a member of PRP, Jack Williams, who raised concerns about police misconduct. Plaintiff Bryce B. Bubbleton, a Moderator for Philadelphia Roleplay (PRP), brings this action on behalf of himself and others similarly situated who have faced biased and retaliatory discipline. The Defendants, moderators who also hold leadership positions in the Pennsylvania State Police (PSP), excluding Winters, used their authority to suppress valid criticism by labeling it as slander. Plaintiff, the only moderator online at the time, stated that no misconduct occurred. The warning was issued under vague standards, without due process, and upheld despite internal disagreement. This action

1 seeks to reverse the punishment, prevent similar abuse, and restore fairness within PRP's
2 moderation system.

3 **JURISDICTION AND VENUE**

- 4 1. This Court has jurisdiction over this matter because the events giving rise to this
5 complaint occurred within Philadelphia County, where the Philadelphia Roleplay (PRP)
6 community is based and operates its moderation infrastructure.
- 7 2. Venue is proper under the jurisdiction of this Court because all acts, communications, and
8 moderation actions occurred within the operational scope of PRP, which is headquartered
9 in and governed from Philadelphia County.

10 **PARTIES**

- 11 3. Plaintiff Bryce B. Bubbleton is a Moderator for PRP and the only moderator present who
12 challenged the legitimacy of the warning issued to Jack Williams.
- 13 4. Defendant Ryan Waters is a Moderator for PRP, sued individually and in his official
14 capacity for upholding and contributing to improper disciplinary action.
- 15 5. Defendant Parker Anderson is a Moderator for PRP, sued individually and in his official
16 capacity for initiating unjustified discipline.
- 17 6. Defendant Nelson Winters is the Senior Moderator for PRP, uninvolved with PSP but
18 sued in his official capacity for failing to provide oversight or corrective action.

19 **FACTUAL ALLEGATIONS**

- 20 7. On or about May 10, 2025, a PSP trooper pepper-sprayed a civilian in an incident under
21 disputed circumstances.
- 22 8. Jack Williams, a civilian and off-duty officer for the city of Philadelphia, asked a brief
23 and appropriate question on May 11, 2025 in #chat regarding the justification for the
24 action.
- 25 9. Instead of conducting a fair review, Defendant Parker Anderson issued warning #351 to
26 Jack Williams, citing “instigating drama” as the justification. This action was not made
27 independently but was done at the direction of Ryan Waters, suggesting coordinated
28 enforcement intended to suppress criticism.

- 1 10. Senior Moderator Nelson Winters initially opposed the warning and called for its
2 revocation. After a brief exchange, Ryan Waters re-issued it as warning #352, citing
3 “common sense.” This reversal, despite internal disagreement, shows a pattern of biased
4 enforcement and top-down retaliation.
- 5 11. Plaintiff, the only moderator online at the time, reviewed the full conversation and clearly
6 stated that no misconduct had occurred.
- 7 12. Moderators have routinely allowed personal disputes, off-topic debates, and even
8 political arguments to proceed without formal discipline. However, when criticism is
9 directed at PSP, especially its command staff, warnings are issued quickly. This selective
10 enforcement reflects favoritism and retaliation intended to suppress scrutiny of the
11 department.
- 12 13. Internal staff chat messages confirm the warning was based on incomplete information
13 and reflect a pattern of moderators using power to suppress criticism of PSP personnel
14 and shield their department from oversight. (see Attachment A)
- 15 14. Defendants, acting as both PSP officials and PRP moderators, created an appearance and
16 practice of biased enforcement, which isn’t uncommon (see Attachment B), selectively
17 applying rules to silence PSP critics.
- 18 15. This misuse of moderator authority directly harmed Jack Williams’ reputation and
19 undermined confidence in fair governance within PRP.

20 **CLASS ACTION ALLEGATIONS**

- 21 16. Plaintiff brings this action as a class action on behalf of himself and other members of
22 Philadelphia Roleplay who have been subject to unfair, retaliatory, or selectively enforced
23 disciplinary action for raising concerns about departmental conduct.
- 24 17. While the proposed class is not extraordinarily large, joining of all affected individuals
25 would be inefficient and inconsistent with principles of judicial economy. The class
26 shares common questions of law and fact, including whether moderators have applied
27 discipline in a biased or retaliatory manner and whether such enforcement violates
28 community rules or fairness standards.
18. Plaintiff’s claims are typical of those in the class, and he will fairly and adequately
protect the interests of all similarly situated members.
19. Class treatment is the most appropriate and efficient method for resolving these issues
uniformly and preventing future harm to the community.

1 **CLAIMS FOR RELIEF**

2
3 Count I – Declaratory Judgment

4 20. Plaintiff requests a declaration that the warning issued against Jack Williams was
5 retaliatory, unsupported by rule, and procedurally improper.

6 Count II – Injunctive Relief

7 21. Plaintiff seeks a permanent injunction prohibiting the use of undefined rules like
8 “common sense” as a basis for discipline without policy support and due process.

9 Count III – Abuse of Moderator Authority

10 22. Defendants Ryan Waters and Parker Anderson abused their moderator roles by retaliating
11 against protected criticism of PSP conduct, violating their duty of impartiality. Acting
12 under color of authority, their conduct reflects principles of 42 U.S.C. § 1983, which
13 prohibits retaliation and unequal enforcement by those in official positions.

14 **PRAYER FOR RELIEF**

15 WHEREFORE, Plaintiff respectfully requests that this Honorable Court:

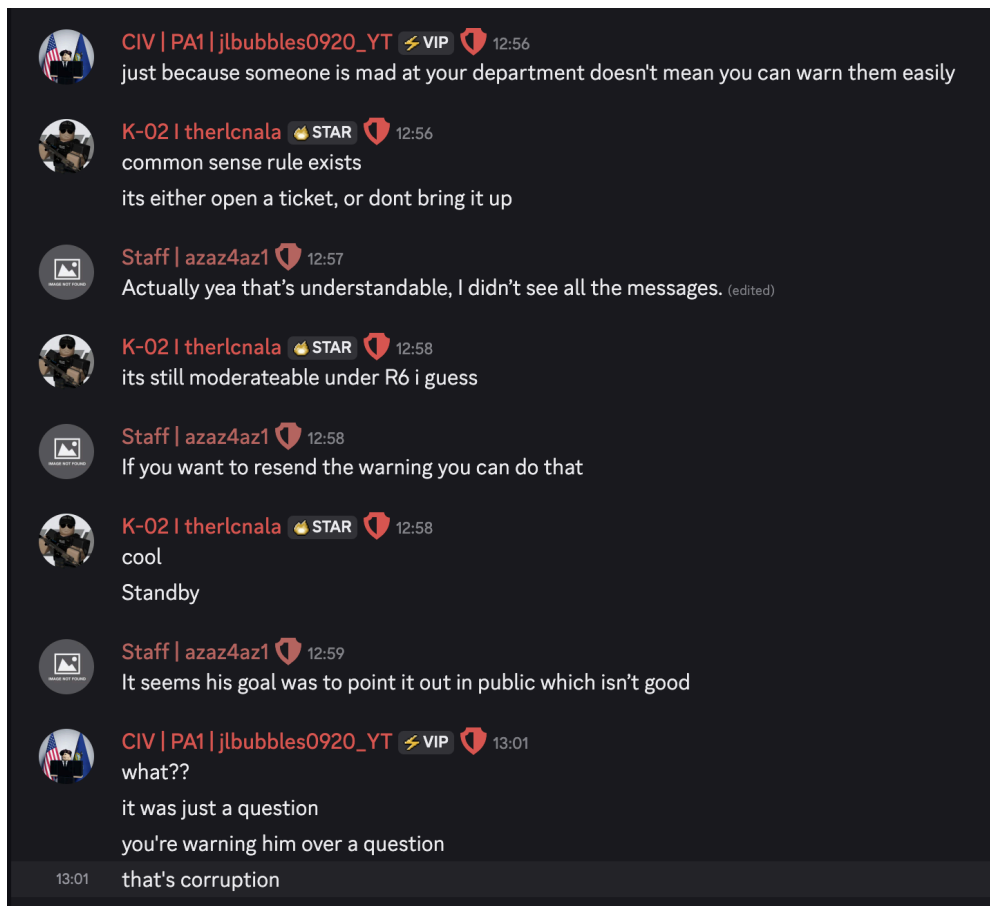
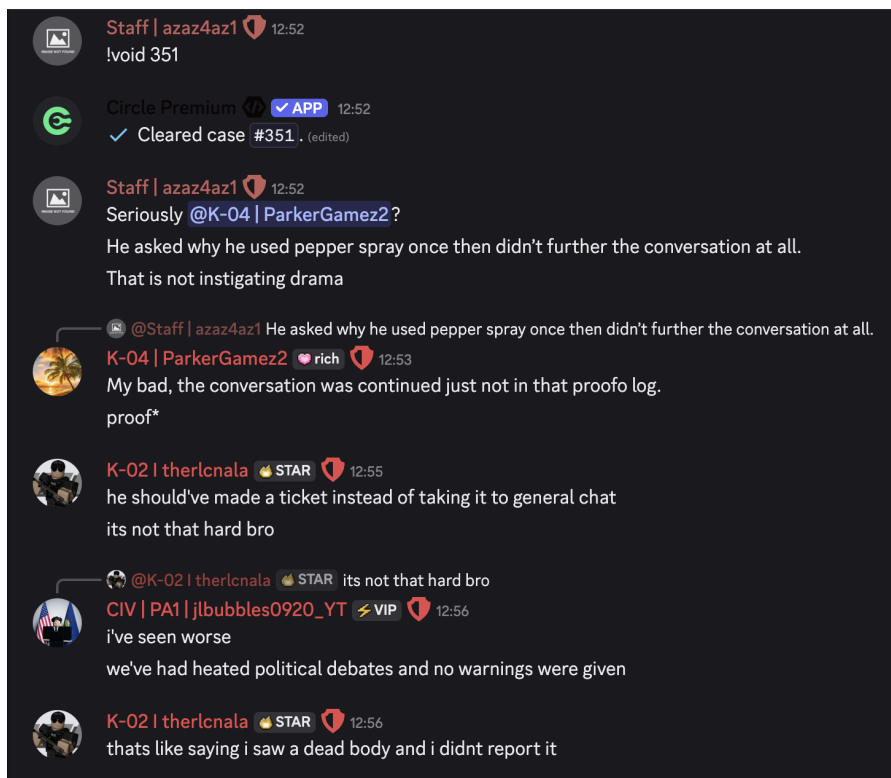
- 16 a. Declare the May 11, 2025, warning against Jack Williams invalid and retaliatory;
17 b. Order the immediate removal of the warning from all records;
18 c. Enjoin all moderators from issuing discipline based on vague or subjective standards
19 without clear rule violation and documentation;
20 d. Direct PRP staff to initiate a review of all disciplinary actions involving PSP leadership
21 conflict of interest.
22 e. Certify this action as a class action and appoint Plaintiff as class representative.

23 DATED: May 11, 2025


24 /s/ Bryce B. Bubbleton

25 Bryce B. Bubbleton, Esq.
26 Bubbleton & Associates
27 Attorney for Plaintiff
28


Attachment A





Attachment B


 **K-02 I therlcnala** 🔥 STAR The types of rules we require are those for which we can mo...
5/6/25, 11:29
^^


such as department slander etc


 **LOA** 🔥 STAR 5/6/25, 11:30
What do you mean in other places
department slander problem already has been solved


 **5A-307 | greenzwolf** ⚡ 5/6/25, 11:30
i think department slander needs to be properly defined then


 **K-02 I therlcnala** 🔥 STAR 5/6/25, 11:30
im saying it needs to be both moderatable and infractionable


 **5A-307 | greenzwolf** ⚡ 5/6/25, 11:30
because saying that a department needs to have changes should not be
classified as slander


 **3A-210 | DJ_B0rn** 🎮 SOUL 5/1/25, 18:32
Would it be a fun idea to have PSP and PSO post YouTube videos to get their
POVs? (edited)


 **@5A-307 | greenzwolf** i dont want to get warned again 🦴

 **Ballerboy81two3** 🔥 STAR 5/1/25, 18:32
What did u do?

 **5A-307 | greenzwolf** ⚡ 5/1/25, 18:32
idk theyll make it into department slandering or smt no matter what i say 🧑
better safe than sorry

 **3A-210 | DJ_B0rn** 🎮 SOUL 5/1/25, 18:32
Somehow they'll turn it into "slandering".

 **@406 | End3r234** • No one here seems to care about PSO, we are forgotten • We don't get shit

 **K-02 I therlcnala** 🔥 STAR 5/5/25, 11:48
atleast i make changes in ur department
like perms cuz this fat jid **@its_juelzz**
can't do perms to save his life