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

9 Bryce B. Bubbleton,

10 Plaintiff(s),

11 vs.

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

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

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

18 Defendant(s).  
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) Case No.: CP-51-CV-352351-2025

) **CIVIL COMPLAINT**

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

21 **PRELIMINARY STATEMENT**

22 This complaint arises from the retaliatory issuance of an unjustified warning against a member of  
23 PARP for raising concerns about police misconduct. Plaintiff Bryce B. Bubbleton, a Moderator  
24 for Philadelphia Roleplay (PRP), brings this suit after witnessing Defendants, moderators who  
25 also hold command roles in the Pennsylvania State Police (PSP), except Winters, use their  
26 authority to suppress valid criticism by mislabeling it as slander to shield their department.  
27 Plaintiff was the only moderator online who openly stated that Jack Williams had done nothing  
28 wrong. The warning was based on vague standards, issued without due process, and upheld

1 despite clear signs of bias. This complaint seeks to reverse the punishment, restore fairness, and  
2 prevent further abuse of authority within PRP.

### 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 CLAIMS FOR RELIEF

### 21 Count I – Declaratory Judgment

- 22 16. Plaintiff requests a declaration that the warning issued against Jack Williams was  
23 retaliatory, unsupported by rule, and procedurally improper.

### 24 Count II – Injunctive Relief

- 25 17. Plaintiff seeks a permanent injunction prohibiting the use of undefined rules like  
26 “common sense” as a basis for discipline without policy support and due process.

### 27 Count III – Abuse of Moderator Authority

- 28 18. Defendants Ryan Waters and Parker Anderson abused their moderator roles by retaliating  
against protected criticism of PSP conduct, violating their duty of impartiality. Acting  
under color of authority, their conduct reflects principles of 42 U.S.C. § 1983, which

1 prohibits retaliation and unequal enforcement by those in official positions.

2  
3 **PRAYER FOR RELIEF**

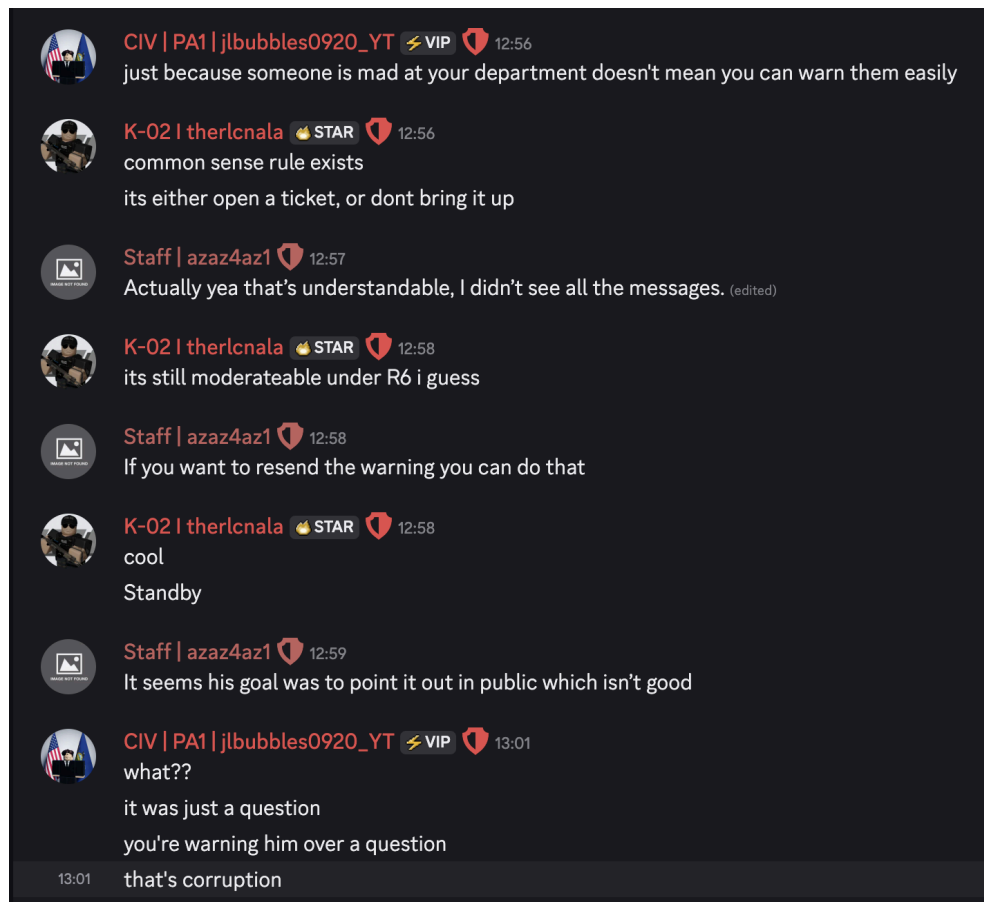
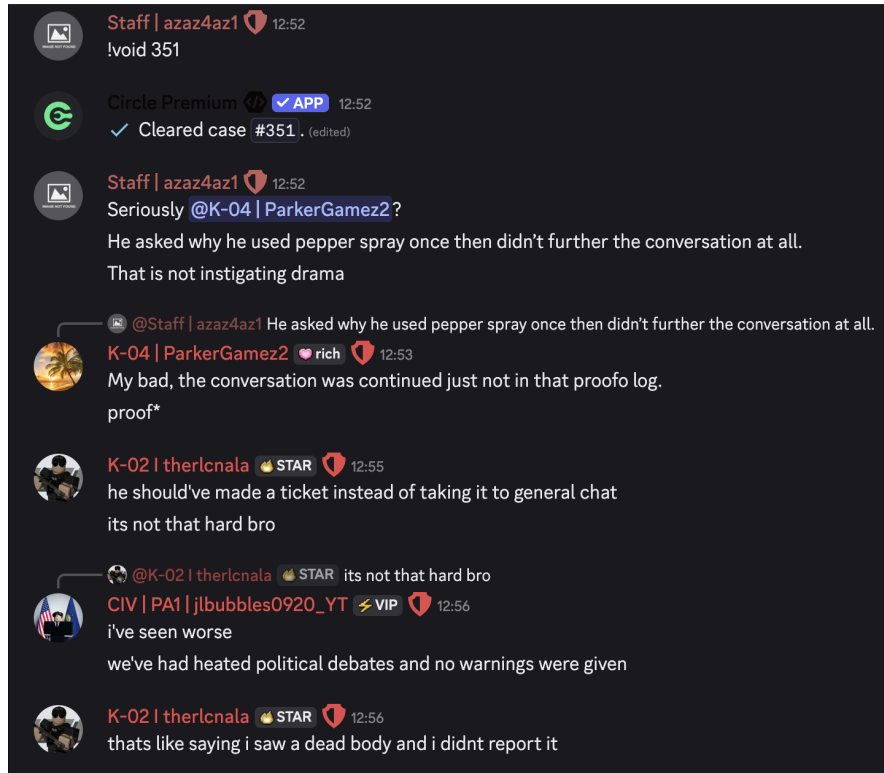
4 WHEREFORE, Plaintiff respectfully requests that this Honorable Court:

- 5 a. Declare the May 11, 2025, warning against Jack Williams invalid and retaliatory;  
6 b. Order the immediate removal of the warning from all records;  
7 c. Enjoin all moderators from issuing discipline based on vague or subjective standards  
8 without clear rule violation and documentation;  
9 d. Direct PRP staff to initiate a review of all disciplinary actions involving PSP leadership  
10 conflict of interest.


11 DATED: May 11, 2025

12  
13 /s/ Bryce B. Bubbleton  
14 Bryce B. Bubbleton, Esq.  
15 Bubbleton & Associates  
16 Attorney for Plaintiff  
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## Attachment A





## Attachment B


 **K-02 | 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 | 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 | 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