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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

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

JURISDICTION AND VENUE

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

PARTIES

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

FACTUAL ALLEGATIONS

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

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

CLASS ACTION ALLEGATIONS

16. Plaintiff brings this action as a class action on behalf of himself and other members of Philadelphia Roleplay who have been subject to unfair, retaliatory, or selectively enforced disciplinary action for raising concerns about departmental conduct.
17. While the proposed class is not extraordinarily large, joining of all affected individuals would be inefficient and inconsistent with principles of judicial economy. The class shares common questions of law and fact, including whether moderators have applied discipline in a biased or retaliatory manner and whether such enforcement violates 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.

CLAIMS FOR RELIEF

Count I – Declaratory Judgment

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

Count II – Injunctive Relief

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

Count III – Abuse of Moderator Authority

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

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that this Honorable Court:

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

DATED: May 11, 2025

/s/ Bryce B. Bubbleton
Bryce B. Bubbleton, Esq.
Bubbleton & Associates
Attorney for Plaintiff

Attachment A

Attachment B