



1 Summary.” The other major update is a completed Causes of Action / Counts  
2 Section VI. New additions should clear up any confusion and void all arguments  
3 of failure to state claim(s). The other foremost argument for dismissal, was “Res  
4 Judicata,” which should already be considered void for multiple reasons not  
5 limited to what is supported by new exhibits, previous arguments that the elements  
6 are not met, and most importantly this case being a valid exception.

7  
8 ii. Plaintiff also made minor changes to a few statements, removed corrected some  
9 spelling and grammar errors, removed conclusory statements, had more evidence  
10 and statements of recent violations to add if another amendment is required, and  
11 most importantly Plaintiff requests that this case be granted to move forward.

12  
13 iii. "To **state a [Civil RICO] claim**, a Plaintiff must allege (1) that the Defendant  
14 received money from a pattern of racketeering activity, (2) invested that money in  
15 an enterprise, (3) the enterprise affected interstate commerce, and (4) an injury  
16 resulting from the investment of racketeering income distinct from an injury  
17 caused by the predicate acts themselves." Johnson v. GEICO Cas. Co., 516 F.  
18 Supp. 2d 351 (D. Del. 2007).

19  
20 **STATEMENT OF CLAIM; RICO:** (Also See Counts 1 & 2; Section “VI”)

21 iv. Plaintiff alleges that through an obvious pattern of racketeering activity,  
22 conspiring Defendants have been defrauding the Plaintiff of civil rights, life/time,  
23 money, relationships, and interstate to intergalactic business. Defendants received  
24 money from this pattern of racketeering activity, invested money into the  
25 enterprise, related business and crime affects interstate commerce, and injury not  
26 limited to market dilution resulting from the investment of racketeering income  
27 distinct from an injury caused by the predicate acts themselves have been causing  
28 major problems for the Plaintiff. Defendants, their criminal enterprise, and

1 racketeering activity have directly and indirectly caused serious injury and  
2 irreparable damage to the Plaintiff.

3  
4 v. Russell Rope's claim is brought pursuant to The Racketeer Influenced and  
5 Corrupt Organizations Act of 1970 (RICO), Title 18 USC §§ 1961 et seq., and  
6 more specifically under the civil law cause of action at § 1964(a)(c).

7  
8 vi. This court has jurisdiction over federal and state laws referenced throughout  
9 the complaint as further detailed in section "**II. JURISDICTION.**" Moreover,  
10 federal District Court is the exclusive venue empowered to award triple monetary  
11 awards, equitable orders preventing and restraining violations, including  
12 divestiture of an interest in any enterprise, restrictions on future activities or  
13 investments of any person, and the dissolution or reorganization of the enterprise.

14  
15 vii. Plaintiff demands relief as outlined in the original complaint at section "**IX.**  
16 **REQUEST FOR RELIEF.**" Relief sought in this unique to anything previously  
17 filed claim can only be awarded in this court, which has subject matter jurisdiction.  
18 Plaintiff is also reserving his rights to add Defendants and request more relief.

19  
20 viii. **F.C.R.P. Title 3, Rule 8. General Rules of Pleading: "(a) Claim for Relief.**  
21 **A pleading that states a claim for relief must contain:** (1) a short and plain  
22 statement of the grounds for the court's jurisdiction, unless the court already has  
23 jurisdiction and the claim needs no new jurisdictional support; (2) a short and plain  
24 statement of the claim showing that the pleader is entitled to relief; and (3) a  
25 demand for the relief sought, which may include relief in the alternative or  
26 different types of relief."

1 ix. Defendants have received money from not only through unfair competition, but  
2 also by stealing it directly from the Plaintiff's bank account. Defendants have also  
3 invested money and other resources into unfair competition connected to the  
4 enterprise, which has caused serious problems for the Plaintiff not limited to those  
5 endured from the predicate acts. Injury is of a personal, competitive, and  
6 commercial nature. The enterprise affects interstate commerce in that both the  
7 Plaintiff and Defendants' businesses are not just national, but more so international  
8 and beyond.

9  
10 x. Direct causation of damages is proven by clear and convincing facts and  
11 evidence. The injury was proximately caused and would not have occurred but for  
12 the activity of the enterprise first noticed at Facebook, which is where the nexus to  
13 affairs connecting the conspiracy and pattern of racketeering activity appears to  
14 have emerged. Defendants were able commit the offenses solely by virtue of their  
15 positions in both the enterprise and at Defendant corporations where power is still  
16 being abused.

17  
18 **THIS IS A NEW CLAIM**

19  
20 xi. This case is not identical to anything previously filed in any court and contains  
21 a significant number of new allegations since anything filed prior. Plaintiff has not  
22 previously/successfully stated or originally filed a RICO claim in any court, nor  
23 has Plaintiff previously filed a case against these specific Defendants. Not only  
24 does district court have exclusive jurisdiction over this claim and state court, but  
25 the extraordinary circumstances of this claim, specifically fraud, deception, and  
26 obstruction of justice aspects, are exception to res judicata even when the elements  
27 are met, which they are not in this unique claim brought before the court with  
28 proper jurisdiction.

1 **Case Law: Exception To Res Judicata:**

2 xii. “The United States Supreme Court has stated for at least ninety years that only  
3 ‘in the absence of fraud or collusion’ does a judgment from a court with  
4 jurisdiction operate as res judicata... The exception mentioned by the Fourth  
5 Circuit in Resolute Insurance Co.—one for fraud, deception, accident, or  
6 mistake—is a classic example...” All causes of action and counts in this case are  
7 brought under RICO LAW.

8  
9 **Memorandum (FYI)**

10 xiii. Corrected 1<sup>st</sup> Amended Complaint only fixes basic indexing typos and very  
11 few grammar errors.

12  
13 xiv. Plaintiff had no option but to write original complaints in a basic text editor  
14 without spelling or grammar check and then to edit and format the final drafts with  
15 graphics software. First Amended Complaint was taken from an earlier draft and  
16 then re-edited on a new computer, which is part of the reason Plaintiff needed so  
17 much time. Plaintiff probably would have been amended the complaint, but the  
18 computer used to produce it has been in storage on the other side of the county  
19 since Plaintiff filed this case. It took every minute to get the complaint to where it  
20 is, and there is a lot more than can be amended, which is possible and regarding  
21 new violations and evidence, but should no longer be necessary. Please permit this  
22 case to move forward.

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1 **I. INTRODUCTION**  
2

3 \*Disclaimer\* The following information and story is copyrighted intellectual  
4 property belonging to Plaintiff who will take most severe legal action against any  
5 violator. Please keep an open mind to this action being brought in pro per because  
6 justice has been obstructed. This is probably going to be amended again, so please  
7 excuse errors caused by lack of support and know there is even more evidence, to  
8 be provided as necessary, which can probably refute any opposition.  
9

10 1. This new case is a mashup of three separate but interconnected and originally  
11 incorrectly filed cases versus fraud Internet and technology corporations, criminals  
12 trying to defraud Plaintiff of a domain name, business, and freedom, and against  
13 fraudulent government actors. These interconnected groups of bad people have  
14 been terrorizing and defrauding Plaintiff through repetitive patterns of criminal  
15 conduct for at least the past ten years.  
16

17 2. Major damage rooted in corruption at Facebook and Apple spread to  
18 Google/YouTube (Alphabet Inc.), and then to most other social networks and  
19 offline life. Plaintiff business, finances, intellectual property, personal  
20 relationships, and physical health have all suffered tremendously as a direct result  
21 of Defendant violations.  
22

23 3. Plaintiff is a good man and hardworking genius who minds his own innovative  
24 business and is completely underserving of this treatment. Defendants are mostly  
25 hiding behind what they perceive to be anonymity of abusing power mostly at but  
26 not limited to Internet, technology, and communication corporations. Overall  
27 Defendant responsibility is easily established where more information can be  
28 subpoenaed about multiple John Does.

1 4. Money, control, and power are obvious motives of Defendants/suspects whose  
2 identities and connections are detailed in a background history/testimony lodged  
3 under seal. An undeniable amount of clear and convincing facts and evidence (69  
4 exhibits attached) against Defendants, plus the original genius history of Plaintiff  
5 scientifically supports the accuracy of statements in this complaint. Sincerely  
6 filing this case is once again as a last resort and most peaceful course of action in  
7 defense of not so peaceful crime that must be brought to justice.

8  
9 \*THIS COMPLAINT SHOULD MAKE COMMON SENSE TO ANY  
10 RATIONAL AND MODERN PERSON, CAN BE FURTHER EXPLAINED,  
11 ARGUED, &/OR AMENDED BY PLAINTIFF VERBALLY OR ON PAPER  
12

## 13 **II. JURISDICTION**

14  
15 5. This action is brought under the federal Racketeer Influenced and Corrupt  
16 Organization (“RICO”) statute, 18 USC §§ 1961-1964 and various other state  
17 common law doctrines or statutes. Jurisdiction is vested in the Court by virtue of  
18 28 USC § 1331.

19  
20 6. Plaintiff claims brought under California law are so related to Plaintiff federal  
21 claims, over which the Court has original jurisdiction, that they form part of the  
22 same case or controversy. Under Article III of the United States Constitution, the  
23 Court has jurisdiction over Plaintiff state common law and statutory claims  
24 pursuant to 28 USC § 1367.

25  
26 7. In the alternative, this Court has jurisdiction over the subject matter of this  
27 action under 28 USC § 1332 in that the parties are citizens or enterprises from  
28



1 different states and the amount in controversy exceeds the sum of  
2 \$100,000,000,000.00 exclusive of costs and interests.

3  
4 8. This action is timely filed within the applicable statutes of limitation, which is  
5 10 years from the date of the most recent ancillary RICO violation under 18 USC  
6 §§ 1961(5).

7  
8  
9 **III. VENUE AND PERSONAL JURISDICTION**

10  
11 9. Venue is proper in this District and Division pursuant to 28 USC § 1391(b)(2).  
12 A substantial part of the events and omissions giving rise to the claims stated  
13 herein occurred in this District and a substantial part of the property that is subject  
14 of this action is situated in this District. Defendants and suspects are located  
15 multiple states and unknown locations, which fall under jurisdiction of this court.  
16 This is in the district where Plaintiff both lives and was located during the  
17 violations of Plaintiff's rights.

18  
19 10. Pursuant to 18 USC § 1965(b), the ends of justice require that the Court  
20 exercise personal jurisdiction over Defendants.

21  
22 11. Defendants engaged in a multi-district conspiracy to defraud Plaintiff of  
23 money and property. In particular, Plaintiff's money or property, which was the  
24 target of Defendant's conspiracy, consisted of (among other things): a) Money, b)  
25 Business, c) Intellectual Property, d) Domain Name, e) Relationships

1 12. The multi-district nature of Defendants’ conspiracy is further evidenced by  
2 Defendants’ multiple acts of interstate fraud and by all the events and  
3 circumstances described infra at paragraphs 13-365.  
4

5 13. This district and court have the most relevant personal jurisdiction over a  
6 majority of the Defendants and suspected conspirators referred to as the “Bad  
7 Karma Enterprise” and further identified under seal.  
8  
9

#### 10 **IV. PLAINTIFF & DEFENDANTS**

##### 11 **A. PLAINTIFF**

12  
13  
14 14. Plaintiff’s full legal name is Russell Rope. Plaintiff resides within the city and  
15 county of Los Angeles at a confidential address that is protected by the California  
16 Secretary of State’s Safe at Home program (CGC § 6205-6210), which also  
17 provided for confidential name change.  
18

19 15. Plaintiff is a brilliant and innovative entrepreneur with traditional credentials  
20 plus more than twenty years of professional experience in the fields of technology,  
21 arts, and media. Plaintiff is clairvoyant, grew up an ethical hacker turned  
22 multimedia whiz, and quickly both recognized what was going on and started  
23 logging evidence with screen shots and video. Plaintiff attempted to communicate  
24 with Defendants before reporting illegal actions of Defendants to the authorities.  
25 Plaintiff continues to try and settle this on an occasional basis where the violations  
26 are nonstop with more than daily nuisance. The following honest statements come  
27 directly from a professional expert, witness, and victim in pro per.  
28

1 16. Plaintiff is a legitimate businessman and serial entrepreneur with a policy of  
2 truth. Plaintiff declares under all possible penalties of perjury, fraud or other, to  
3 the best of his knowledge, that all these statements and evidence are verifiably real  
4 and true. Plaintiff will competently and supported by science, testify against all  
5 Defendants or suspects; however, this complaint also serves as personal testimony  
6 and declaration/affidavit by the Plaintiff.

## 7 8 **B. DEFENDANTS**

### 9 10 **1. ABSOLUTELY “IDENTIFIED” DEFENDANTS**

- 11 17. Defendant Facebook, Inc. is located in Menlo Park, CA.  
12 18. Defendant Apple, Inc. is located in Cupertino, CA.  
13 19. Defendant Alphabet, Inc. is located in Mountain View, CA.  
14 20. Defendant Twitter, Inc. is located in San Francisco, CA.  
15 21. Defendant JPMorgan Chase & Co. is located in New York, NY.

### 16 17 **2. SUSPECTS & UNKNOWN DEFENDANTS**

- 18 22. Suspect John Doe Defendant Mark Zuckerberg, CEO @ Facebook, Inc.  
19 23. Suspect John Doe Defendant Tim Cook, CEO @ Apple, Inc.  
20 24. Suspect John Doe Defendant Larry Page &/or Sergey Brin @ Alphabet, Inc.  
21 25. Suspect John Doe Defendant Jack Dorsey, CEO @ Twitter, Inc.  
22 26. Suspect John Doe Defendant James Diamon, CEO @ JPMorgan Chase & Co.  
23 27. Suspect John Doe Defendant, Tom Tate @ Domain Name Dispute  
24  
25 28. There are extenuating circumstances preventing Plaintiff from identifying all  
26 Defendants and John Does at this point. Additional Defendant John Doe locations  
27 range from mostly local to Plaintiff, being Los Angeles County, to scattered across  
28 the United States of America and possibly international. Additional suspected

1 conspirators/John Does are identified in attached exhibits and mostly located in  
2 proximity of this court and to the Plaintiff.

3  
4 29. Defendants causing the most damage are primarily known hackers accused of  
5 much more than maliciously abusing power/hacking Plaintiff for at least ten years.  
6 John Doe 1 and John Doe 2 are most probably responsible for and/or enabled  
7 subsequent John Does and additional suspects. The original civil and intentionally  
8 not directly identifying list of suspected John Does is attached hereto as Exhibit  
9 “1” and by this reference made a part hereof.

10  
11 30. Bad Karma Enterprise (not an actual foundation/organization) is a nickname  
12 given by Plaintiff to the enterprise that accounts for several groups of alleged more  
13 than suspected conspirators who have violated Plaintiff not only in attempts to  
14 steal, sabotage, and control business, but who have also gone so low as to interfere  
15 with personal relations. Listed as suspects rather than defendants or John Does for  
16 reasons of safety, security, lack of funds, and not to give undeserved credits, but  
17 referenced so the court is prepared for additional foreseen problems and requests  
18 for relief. The original civil and intentionally not directly identifying list of  
19 suspected Bad Karma Enterprise conspirators as indicated by intuition, supported  
20 by evidence, and mostly deserving of no less than injunctions is attached hereto as  
21 Exhibit “2” and by this reference made a part hereof. Also, new and more detailed  
22 TESTIMONY titled “Individuals Named & Connections Log” is lodged under seal  
23 and attached hereto as Exhibit “52” and by this reference made a part hereof.

24  
25 31. Defendant slash John Doe, allegedly known by the name Tom Tate, is/or was  
26 the alleged technical contact responsible for administering material facts, which  
27 is/was the registration information for the domain name and web-hosting of  
28 “DomainNameInDispute.com,” which has been cyber-squatted on for several years

1 in since before and since the first attempts of the Plaintiff in taking legal action.  
2 Defendant is/was assumed to reside in northern California based on a mailing  
3 address in Sunnyvale.  
4

5 32. Domain Name Fraud John Does are conspirators, some probable influencers,  
6 of all violations in this complaint. These suspected John Does live mostly in  
7 mostly in California and possibly Arizona and New York. Network Solutions,  
8 LLC and their Executive Support Office employee allegedly named Rick Rabuck  
9 (suspected name hack), and GoDaddy.com, LLC possibly account for John Does.  
10 Several additional suspected John Does may be of personal relation or third party  
11 to Plaintiff, so names have been omitted from this part of the complaint until  
12 further discovery mostly for the safety and security of Plaintiff. Other suspected  
13 John Does include attorneys, employees of the Government, specifically the US  
14 Postal Service, etc. More suspected John Does from Plaintiff's personal network  
15 are identified in the log attached to this case. Possible unaccounted for John Does  
16 could have taken control of domain name or may play other roles in the RICO  
17 violations. Plaintiff should be able to definitively name John Does with subpoenas.  
18

19 33. Late in joining the hate is unfortunately JPMorgan Chase & Co. whom  
20 Plaintiff had a lifelong history of perfect credit with before termination of business  
21 then personal checking accounts without notice and most definitely in an effort to  
22 sabotage Plaintiff's credit. They are withholding a few thousand dollars because  
23 Plaintiff refused to allow the bank to trick him into signing an indemnity  
24 agreement. Defendants tried to steal all the Plaintiff's money right before Plaintiff  
25 was forced to surrender into false imprisonment and after retaliation entrapment, so  
26 Plaintiff would lose stored (both online and physical) possessions and evidence.  
27 JPMorgan Chase & Co. intentionally conspired with Defendants.  
28

1 34. All Defendants can legally be held accountable for all crimes, claims, counts,  
2 torts, and causes of action based on conspiracy. Plaintiff mostly seeks civil  
3 retribution based on levels of responsibility, but will not give up on pressing  
4 criminal charges for all causes of action/counts, specifically against all domain  
5 name frauds and CEOs to be added as Defendants if justice is not served as  
6 requested.

## 7 8 9 **V. STATEMENT OF FACTS**

10 \*Plaintiff can competently and verbally explain and argue all the following  
11 statements where there may be any miscommunication in what is read or written.

### 12 13 **A. BACKGROUND**

#### 14 15 **1. SUMMARY**

16  
17 35. Evolving in severity over at least a decade, Defendants have been literally  
18 terrorizing the plaintiff in their conspiracy to sabotage and control both business  
19 and personal life through incessant and illegal actions not limited to fraud,  
20 espionage, defamation, theft, harassment, stalking, threats, physical assault,  
21 entrapment, false imprisonment, and obstruction of justice.

22  
23 36. Defendants are causing irreparable damages to Plaintiff in the killing of  
24 business, relationships, income, communications, time, and liberty. Plaintiff has  
25 personally suffered much stress and anxiety as a direct result of Defendants, which  
26 have led to new health issues and exacerbation of preexisting conditions.  
27 Defendants are intentionally bleeding Plaintiff to death by a thousand cuts in the  
28 back while forcing him to watch as others abduct and rape his pioneering claims.

1 Defendants' unwarranted actions are like a customized form of terroristic torture,  
2 which have been preventing Plaintiff from achieving what he has devoted a  
3 lifetime of both education and hard work. That which is not growing is dying, and  
4 this is attempted murder.

5  
6 37. Defendant actions have been adapting and responding to Plaintiff complaints;  
7 significantly since reporting to authorities and coerced publication. Obvious effort  
8 has been made to cover up crimes and misdirect others while fraudulently  
9 positioning Defendants and suspects in a place where they would have rank over  
10 Plaintiff in areas where they have no justifiable claim.

11  
12 38. Plaintiff owns and operates several connected business ventures, all of which  
13 rely upon fair use of the Internet. The most damaging to development of business  
14 and personal growth since initial and illegal disabling and hacking of social media  
15 accounts is the dark cloud surrounding a major part of this complaint being domain  
16 name fraud. Plaintiff has been held up for years due to a dispute undoubtedly  
17 caused by suspects trying to steal, control, and defraud the Plaintiff of that for  
18 which they have no just claim.

19  
20 39. A timeline of events for reader reference, which is evidence of the linear and  
21 evolving pattern of RICO fraud and conspiracy is attached hereto as Exhibit "39"  
22 and by this reference made a part hereof.

23  
24 40. Money and power are the motive and evidence of original business files  
25 loaded with relevant information is attached hereto as Exhibit "65" and by this  
26 reference made a part hereof. Timing makes certain suspects look very guilty and  
27 simple subpoenas should prove them to be in violation of the Plaintiff's rights;  
28 possibly to be added as Defendants at a later point.

1 **2. MAIN STATEMENTS**

2  
3 41. This case was originally filed incorrectly as three individual cases. It now  
4 makes most sense to refile as a single new case. This is an upgraded consolidation  
5 featuring much more new/recent evidence and testimony to ignoring the problems  
6 Defendants are causing is only making them worse. This court should have  
7 previously been more lenient towards an unexperienced Plaintiff in pro per who is  
8 now working in reference to several past, successful, and unaffiliated RICO  
9 complaints. For the record, Russell was informed that refileing with payment  
10 bypasses the bogus screening process, which is allegedly a trick used against pro se  
11 litigants legitimately filing in forma pauperis, [and Plaintiff corrected the alleged  
12 pleading technicalities] so there should be no legal excuse for this case not to be  
13 accepted by this court.

14  
15 42. LA-CV14-04002, filed on 5/23/2014, was the first federal case filed in pro per.  
16 It is very serious, but was also being used by Plaintiff as a test/practice filing. The  
17 case was against corrupt government/actors accused of obstruction justice through  
18 their role in the RICO enterprise. The foundation of this case was a fraud board of  
19 government actors at CalVCP in combination with intentionally neglectful corrupt  
20 law enforcement. LA-CV14-04002 was opened and closed, which partially  
21 mislead an unexperienced Plaintiff in pro per into misfiling the next two cases.  
22 Plaintiff recently started a new application, which was pending at the time of the  
23 original complaint and then fraudulently denied. LA-CV14-04002 is attached  
24 hereto as Exhibit “43” and by this reference made a part hereof.

25  
26 43. Plaintiff was fraudulently denied victim compensation by the boards of both  
27 CalVCP and CalVCB. Plaintiff was going to file more action against the  
28 individual members, but then decided once again to pursue the main offenders;



1 however, Plaintiff and victim is still in a position where it was necessary to reapply  
2 and did reapply around the time this complaint was originally filed. Upon starting  
3 a second application, Plaintiff discovered that CalVCP changed their name to  
4 CalVCB; mostly probably because of their own fraud. The most recently  
5 processed CalVCB application #A17-6438238 (for emergency award within 30  
6 days) was received by CalVCB on 6-7-2017 and contains more evidence in support  
7 of damages for which Plaintiff is seeking relief. The CalVCB application was  
8 fraudulently denied by people who were playing into aspects of the complaint with  
9 more than harassing name hacks. It is attached hereto as Exhibit "66" and by this  
10 reference made a part hereof.

11  
12 44. LA-CV14-04232, filed on 6/2/2014, was the second case, first for the domain  
13 name dispute (DomainNameInDispute.com), based mostly on fraud, and with  
14 timing that plays into an even bigger part of the overall conspiracy. This fraud has  
15 worse than stunted personal and professional growth of Plaintiff, and the pattern of  
16 crime connecting all three originally separately filed cases has become so  
17 intertwined in continuous damage to Plaintiff that it now requires joint action  
18 inclusive to all similar complaints under the new claim. LA-CV14-04232 is  
19 attached hereto as Exhibit "42" and by this reference made a part hereof.

20  
21 45. LA-CV14-04900, filed on 6/24/2014, was the third case, which was the main  
22 and most recent complaint filed in this court. That case was mostly versus the  
23 Internet and technology companies that have directly caused damage while  
24 enabling others to share in the pattern of racketeering activity. LA-CV14-04900  
25 was originally supposed to be pursuant to claims of civil conspiracy and fraud with  
26 additional causes of action, but Plaintiff both filed incorrectly and was tricked by a  
27 corrupt judge before learning about RICO and attempting to amend the original  
28 cases only to meet more resistance, all of which could have but should not have

1 had to be easily avoided if the Plaintiff were in pro per not in forma pauperis. LA-  
2 CV14-04900 is the most similar to this complaint, which now includes LA-CV14-  
3 04232 with LA-CV14-04002 on the back burner, all falling under jurisdiction of  
4 this court both civilly and criminally at the federal and state levels pursuant to 18  
5 USC §§ 1961-1964 and 28 USC § 1367. LA-CV14-04900 is attached hereto as  
6 Exhibit “41” and by this reference made a part hereof.

7  
8 46. Defendants’ original motives were probably social turned financial supported  
9 by bad moral justification most probably based on a socioeconomic perversion and  
10 exaggeration of misunderstood and private personal facts turned fraudulent  
11 conspiracy resulting in serious damages to Plaintiff and empowerment of a chain  
12 of fools committing further errors in judgement by trying to cover it all up and  
13 perpetuating problems including a disturbing obstruction of justice.

14  
15 47. Reported violations are currently ongoing despite numerous requests for help  
16 from nearly all branches of law enforcement including: LAPD, Los Angeles  
17 County Sheriffs incident #GTA-236 or #TAG-236, ic3.gov, FBI, SS, CIA, FCC,  
18 FTC, DA/High Tech Crime Division, attorneys and referral services, politicians  
19 including governor, congressman, senator, president, and the perpetrators  
20 themselves. Plaintiff suspects both sheriff and congressman [and now judges and  
21 police chief] retirements have something to do with their involvement in this  
22 conspiracy. Plaintiff went so far as to give Defendants and their affiliates  
23 opportunities to end the lies and join what they were fighting; in the form of  
24 collaboration and investment opportunities, which would not have been necessary  
25 if Defendants were not causing problems.

26  
27 48. Plaintiff is the true original genius responsible for this testimony in pro per is  
28 an offensive defense. Plaintiff has clear and convincing evidence, which supports

1 all claims against both Defendants and most suspects, including evidence of both  
2 authenticity of evidence and damages endured as a result of Defendants. None of  
3 the groups mentioned in the previous paragraph have followed up on intake reports  
4 with questions or requests for evidence before fraudulently dismissing/neglecting,  
5 which really says a lot about obstruction of justice.

6  
7 49. Defendants are accused of conspiracy based on similarly repetitive attacks,  
8 which the Plaintiff has both endured and repelled for years. Some Defendants  
9 have enabled other defendants including a chain of fools not limited to both known  
10 and unknown John Does and copycats. Defendants are accused of more than  
11 attempting to defame and frame the plaintiff's character as a method of immoral  
12 justification. Not only have Defendants obstructed justice in terms of seeking legal  
13 representation and proper assistance from the authorities, but Defendants have also  
14 interfered with the health care process, thus exacerbating health issues, which this  
15 conspiracy most probably played part in creating. (See Paragraphs 109 to 112)  
16 Defendants have attacked Plaintiff in almost every way possible and in more ways  
17 than one person could have imagined or executed on their own. Defendants and  
18 suspects have broken almost every rule in the written and unwritten books with  
19 complete disregard for the law.

20  
21 50. First defendant, Facebook, Inc., from Plaintiff perspective, is the root of all  
22 evil when it comes to this case. All the Defendants could have basically allowed  
23 themselves to be socially engineered, a form of hacking where the mark is  
24 manipulated into revealing information like a password, or in this case into  
25 sabotaging Plaintiff accounts based on false justification. If a civilian suggests to a  
26 cop that they shoot and kill a bad guy, and the cop listens and pulls the trigger, but  
27 it turns out that the target was a good guy, the cop is person who committed  
28 murder. In this case, Facebook shot to kill first, and although Plaintiff must have

1 nine lives or something, Facebook is being permitted to get away over and over  
2 again, and their virus has spread to other connected but separate networks.  
3 Socially engineered or not, Plaintiff informed Facebook as to what is going on, and  
4 Facebook chose to both ignore and intentionally continue and aggravate conflict.

5  
6 51. Indisputable Actions by Facebook: (1) Disabling of personal account multiple  
7 times and termination of business/fan page, (2) Disabling of advertising and  
8 suggest/invite to fan page features, (3) Threatening, harassing, insulting number,  
9 name, and word hacks, (4) Interference with private messages, instant messaging,  
10 and friend requests, (5) Interference with smart phone connectivity, news feed, and  
11 likes, (6) Sabotaging of events (invites), (7) Advertising former clients and  
12 enabling competitors via above stated actions (8) This partial list is limited to what  
13 is indisputable based on supporting proof. Evidence of Defendant Facebook  
14 disabling personal account, fan/business pages, and advertising interference is  
15 attached hereto as Exhibit “3” and by this reference made a part hereof.

16  
17 52. Facebook allegedly disabled Plaintiff’s account multiple times because  
18 Plaintiff was “adding friends,” which was being done selectively and for  
19 networking purposes; well within Facebook’s original terms of service and  
20 intended usage. Plaintiff alleges that he was singled out by haters who put social  
21 pressure on an immature company that inevitably followed Plaintiff suggestions  
22 for upgrading their code instead of attacking people for adding friends. Facebook  
23 is still interfering with friend requests and filtering/censoring posts, and they are  
24 messing with views, likes, and followers on Instagram, etc. \*(See New  
25 Evidence/Friend Request Video = Exhibit “40”) Evidence of Defendant Facebook  
26 repetitively harassing/threatening the Plaintiff with number hacks is attached  
27 hereto as Exhibit “4” and by this reference made a part hereof.

1 53. Defendant Instagram, a subsidiary of Facebook, and other social web apps  
2 followed the leader off the bridge and are doing the same stuff within their  
3 capabilities. Indisputable Actions by Instagram: (1) Disabling of hash tags, (2)  
4 Interference with likes, (3) Interference with followers, (4) Name and number  
5 hacks, (5) Feed hacks, (6) Service attacks and app shutdown hacks during use, (7)  
6 Conspiracy to enable both fraudulent and unfair competition. Evidence of  
7 Defendant Instagram maliciously hacking and harassing the Plaintiff is attached  
8 hereto as Exhibit “5” and by this reference made a part hereof. \*(See New  
9 Evidence/Likes Videos = Exhibit “40”)

10  
11 54. Defendant Alphabet, Inc., including but not limited to subsidiaries Google,  
12 YouTube, Google Plus, and AdSense also joined in with both similar and different  
13 attacks that took a while to become recognizable as an obvious conspiracy.  
14 Alphabet and subsidiaries are also accused of actions including: (1) Termination of  
15 YouTube Business Account, (2) Sabotaging Personal YouTube Account and  
16 AdSense, (3) YouTube Interfering with Tags, Search, and View Counts, (4)  
17 Suspected Google Search Interference, (5) Google Plus Sabotage (Name and  
18 Number Hacks), etc. Evidence of Alphabet maliciously hacking and harassing the  
19 Plaintiff is attached hereto as Exhibit “6” and by this reference made a part hereof.

20  
21 55. Defendant Twitter Inc., and all other defendants are accused of name and  
22 number hacks including cryptic message harassment such as modifying URLs or  
23 hyperlinks in tweets to form harassing messages like <http://twit.us/iAMguna187u>.  
24 Additionally, Twitter and other social platform operating defendants are accused of  
25 interfering with Plaintiff’s ability to connect with other users. Evidence of  
26 Defendant Twitter maliciously hacking and harassing the Plaintiff is attached  
27 hereto as Exhibit “7” and by this reference made a part hereof.

1 56. Defendant Apple, Inc. could have been involved as long as Facebook. Apple  
2 is both directly causing problems and equally responsible for each social web  
3 app/hack on iTunes. Apple, their API, and iTunes gatekeepers are undoubtedly  
4 enabling some of the Defendants corresponding criminal actions. Apple is also  
5 accused of: (1) Interfering with smart phone service and connectivity, (2) Blocking  
6 use of apps and shutting apps down during use, (3) Apps: notification and message  
7 hacks, (4) Blue tooth mouse and keyboard hacks (5) Remote access screen  
8 watching or enabling screen watchers on all devices, (6) Somehow responsible for  
9 smart phone GPS being used to stalk plaintiff in person, (7) Fraudulently  
10 misrepresenting facts in lying and trying to cover it up. Evidence of Defendant  
11 Apple maliciously hacking and harassing the Plaintiff is attached hereto as Exhibit  
12 “8” and by this reference made a part hereof.

13  
14 57. It is obvious that Defendants and John Does are conspiring based on  
15 similarities mostly in use of Plaintiff’s personal and private information in the  
16 name, number, and harass hacks, both on the social web and in person. Evidence  
17 of malicious and harassing “number” hacks related to suspects is attached hereto as  
18 Exhibit “9” and by this reference made a part hereof. Also, evidence of malicious  
19 and harassing “name” hacks related to suspects is attached hereto as Exhibit “10”  
20 and by this reference made a part hereof.

21  
22 58. Defendants and John Does are more than both sexually harassing Plaintiff and  
23 engaging in a type of sex trafficking violations by interfering with all online dating  
24 activity and trying to cast and control the people Plaintiff’s life through control of  
25 events. Defendants are also using GPS and interference with messaging and/or  
26 phone communications to control people and relationships. Additionally,  
27 Defendants are suspected of collecting video surveillance footage and private  
28 messages because they are sick people who think they can exploit a connection to

1 Plaintiff in the event of error and/or tragedy, which they have certainly at least  
2 tried to cause or lure the Plaintiff into on several occasions. Defendants are also  
3 using the aforementioned tactics to interfere with business and relationships not  
4 only with prospective attorneys and law enforcement, which has been a major  
5 contribution to the obstruction of justice complaint, but also with both prospective  
6 and former clients, inventors, family, friends, fans, etc.

7  
8 59. Defendants and John Does are using slander, libel, complete exaggerations,  
9 and suspected bribes to frame Plaintiff's character in their corruption of  
10 relationships including turning law enforcement and other authorities against the  
11 Plaintiff in attempt at rendering the Plaintiff defenseless. John Does most probably  
12 include law enforcement who have attempted to entrap an innocent Plaintiff as  
13 well as others who simply did not do their job or interfered with others doing their  
14 jobs. Evidence exists and can be subpoenaed, which links John Does, law  
15 enforcement, other government, and Defendants based on indisputable similarities  
16 between violations and reported conspiracy.

17  
18 60. John Does/suspects MySpace, and Superb Internet are suspected of conspiring  
19 to trade advertising and possibly more for access to Plaintiff's personal and  
20 business web and email hosting. Evidence of suspect Superb maliciously hacking  
21 and harassing the Plaintiff is attached hereto as Exhibit "11" and by this reference  
22 made a part hereof. Further evidence suggests conspiracy related name and  
23 number hacks in communications with Superb's technical support. Defendants and  
24 John Does are enabling each other while disabling and damaging the Plaintiff, and  
25 in so doing have made Plaintiff a target for cheap shots designed to further  
26 empower inferiority.

1 61. Additional Problems, Suspicions, and Accusations (some evidence limited to  
2 plaintiff testimony): (1) Google Maps/iPhone Hack, (2) Car Accident Theory in  
3 SD and SF, (3) Freeway Traffic and Attempted Phone/Accident Entrapment, (4)  
4 Car Computer Hack False System Malfunction Errors, (5) Car Window Regulator  
5 and Battery Attacks, (6) Pharmacy and Doctor Office Harassment, (7) Health  
6 Insurance Denied for BS, (8) Gov./DPSS Number Hacks, (9) Surveillance  
7 Cameras, (10) Spam Phone Calls and Emails, (11) Feed Programming Hacks, (12)  
8 License Plate Stalking Hacks, (13) Stalking at the Courthouse, (14) Parking Cop  
9 Hack, (15) Domain Name Dispute and Related Crimes, (16) Third Party iPhone  
10 Spies, (17) Screen Watching/Broadcasting, (18) Casting Hacks, (19) Email  
11 Newsletter Service Hacks, (20) Food, Gas Station, and Entertainment Hacks,  
12 (21) etc.

13  
14 62. Defendant Facebook started these problems. Defendant Apple has probably  
15 caused as many problems as Facebook and for the same amount of time. John Does  
16 are probably responsible for putting pressure on Defendants to start and perpetuate  
17 these violations, but Defendants had and abused the power to process actions  
18 responsible for causing the problems for Plaintiff. Mark Zuckerberg and Tim  
19 Cook must have played some part in this conspiracy based on their positions and  
20 having made every possible attempt to connect with Defendants in effort of  
21 resolving these issues only to be ignored and neglected by the responsible parties.  
22 Plaintiff believes true and untainted databases queries and phone records can  
23 provide access to any missing evidence or connections, which can be useful for  
24 incrimination of all Defendants and John Does. Plaintiff plans to subpoena data.

25  
26 63. Some attached evidence has been slightly modified with originals intact. Edits  
27 are mostly limited to cropping and highlighting of violations. Much more evidence  
28 including photos, videos, emails, and possible testimonies. Plaintiff literally has



1 4,000+ more pieces/files of evidence, each equaling individual counts, which  
2 technically only represent a fraction of violations. Few screen shots used as  
3 examples in exhibits may have been natural errors, but help prove a point, which  
4 may be hard to see. Some sequential screen shots exist for purpose of clearly  
5 demonstrating actions and violations by Defendants. Many sequential and time  
6 stamped screen shots also show how seemingly common appearing errors are  
7 misdirection. Evidence of more and well-organized evidence in form of original  
8 image/video files and screen shots/video (not including trail of emails, audio  
9 recordings and written docs) is attached hereto as both Exhibit "12" and Exhibit  
10 "13" and by this reference made a part hereof.

11  
12 64. Evidence of Damages Includes: (1) Visible scarring to more than Plaintiff's  
13 face, (2) Physician, witness, and professional testimony, (3) Bank account records  
14 easily verified via smart phone, (4) Resume/portfolio and obvious arrested  
15 development, (5) Analysis of messages, emails, web stats, and docs, (6) Analysis  
16 of competition success and suspect activity, (7) General social analysis, (8)  
17 Witnesses to multiple physical assaults, (9) Telephone record proof of declining to  
18 toxic and tainted relationships (10) Time is irreplaceable \*(See New  
19 Evidence/CalVCB App/Damages)

### 20 21 **3. DOMAIN NAME FRAUD (DomainNameInDispute.com)**

22  
23  
24 65. In January 2012 Plaintiff created a new business, which is Plaintiff's third or  
25 fourth mainstream digital publication depending on your definition of mainstream;  
26 fifth if your count his blog. More than a decade of planning, much design, and  
27 original development have gone into building a mostly functional prototype.  
28 Further registrations and launch are pending results of this case. Evidence of new

1 business is attached hereto as Exhibit “15” and Exhibit “16” and by this reference  
2 made a part hereof.

3  
4 66. In early February 2012 plaintiff discovered that “DomainNameInDispute.com”  
5 was both not being used and in state of abandonment. Evidence of discovery and  
6 state of either abandonment or intentionally fraudulent misrepresentation of  
7 abandonment are attached hereto as Exhibit “17” and by this reference made a part  
8 hereof.

9  
10 67. Although many have attempted to trick him into revealing the domain name,  
11 Plaintiff has only communicated “DomainNameInDispute.com” to three family  
12 members who swore on their lives to keep it secret. Additionally, Defendants not  
13 interfering or competing is a legal assumption based on both the relationships and  
14 cease and desist demands, some if not all of which have undoubtedly been  
15 violated. A few attorneys may have discovered the name if they were smart  
16 enough to zoom in on one of the images attached as evidence for review. Attorney  
17 client confidentiality was in effect. The mentioned attorneys include a family  
18 member who so far confessed to no more than bidding on the domain name behind  
19 Plaintiff’s back. None of the attorneys took the case. Plaintiff suspects all  
20 attorneys Plaintiff contacted of conspiracy involving at least one of the John Does  
21 and actions not limited to obstruction of justice. Some suspected Defendants are  
22 accused of espionage through actions not limited to screen watching Plaintiff’s  
23 computer via remote access since before domain name discovery.

24  
25 68. Despite Plaintiff’s secrecy, it is alleged that conspiring Defendants leaked the  
26 name to people in the entertainment industries and to some members of Plaintiff’s  
27 personal network on the down low as if to both cover their tracks while harassingly  
28 attempting to mess with the Plaintiff’s head. Since this all started: movies, shows,

1 advertisements, and many other real life and social media etc. references have been  
2 making exorbitant use of or hints to the word “DomainNameInDispute.” Other  
3 than Plaintiff, the common link between all suspected John Does is the only  
4 immediate family member who was not included in discovery of the name because  
5 that member has the most motive and least integrity, plus Plaintiff suspects this  
6 John Doe of conspiring with powerful connections who could and would illegally  
7 get away with these claims if the Plaintiff were not smart enough to learn how to  
8 file these complicated legal actions in pro per. Defendants have been continuously  
9 demonstrating an unfairly competitive will to copy and steal both business and  
10 intellectual property with complete disregard for the law.

11  
12 69. The point of this paragraph was originally to give the judges a heads up on the  
13 third case (#04900), which was in queue to be filed against the root of all the  
14 Plaintiff’s legal problems at the time the domain name complaint was written. The  
15 root of all evil being the Internet/social web, technology, and communication  
16 companies accused of more personal and professional sabotage. Those companies  
17 are the Defendants who stand accused of much more than espionage. Defendants  
18 are suspected to have been involved in the domain name fraud since initial  
19 fraudulent domain name actions based on the recognizable and repetitive patterns  
20 and similarities between the violations.

21  
22 70. At the time of discovery by Plaintiff, all contact information registered to the  
23 domain name was inaccurate and misrepresentative. Additionally, it is suspected  
24 that Network Solutions, LLC deceitfully withheld information or worse. Evidence  
25 of how inaccurate contact information was communicated is attached hereto as  
26 Exhibit “18” and by this reference made a part hereof. \*Plaintiff is going to  
27 subpoena Network Solutions for more information.

1 71. At the time of its discovery by Plaintiff, the domain name had been registered  
2 to the same company since September 1996. That company has been out of  
3 business since 1999. Evidence of registered company not being in business is  
4 attached as both Exhibit "19" and Exhibit "20" and by this reference made a part  
5 hereof.

6  
7 72. Utilizing all means possible including but not limited to phone, social web,  
8 private investigator, and snail mail, Plaintiff made several attempts at resolving this  
9 issue directly with the primary Defendant(s)/John Doe(s). In or about February 15,  
10 2012, the mailing address represented by the Defendant, in the registration  
11 information for the domain name, was involved in another act of  
12 misrepresentation, and as indicated by evidence, appears to be connected to a  
13 scheme designed to defraud the Plaintiff. Evidence of the mail fraud is attached  
14 hereto as Exhibit "21" and Exhibit "22" and Exhibit "23" and by this reference  
15 made a part hereof.

16  
17 73. Defendant/John Doe miraculously reemerged, updated contact information,  
18 and has been conducting activity ranging from shady to fraudulent since around the  
19 time of the mail fraud, which is also when the Plaintiff was investigating legal  
20 action against the registrar for release of the domain name. Evidence of updated  
21 activity with domain name is attached hereto as both Exhibit "24" and Exhibit "25"  
22 and by this reference made a part hereof.

23  
24 74. Defendants are causing a great deal of problems not only by delaying launch  
25 of Plaintiff's new business, but also by costing Plaintiff much valuable time and  
26 stress in seeking justice. In so doing, Defendant actions contributed to  
27 exacerbation of health issues and damaging of Plaintiff's reputation. The health  
28 part includes injury to and scarring of Plaintiff's face. Additional evidence

1 suggests that Defendant(s) obstructed justice in Plaintiff's seeking both  
2 representation and proper health care. Defendant was instructed that lack of  
3 communication would result in legal action and waive rights to countersuits or  
4 recovery damages from Plaintiff in unlikely event of any errors. Defendant  
5 responded by welcoming legal action. Evidence of communications between  
6 Plaintiff and Defendant are attached hereto as Exhibit "26" through Exhibit "30"  
7 and by this reference made a part hereof.

8  
9 75. Defendants are acting guilty like cowards hiding behind the anonymity of the  
10 Internet. Plaintiff suspects Defendants will continue attempting to obstruct justice  
11 including the possibility of a fraudulent defense considering the amount of fraud  
12 already involved and leaving Defendants with nothing additional to lose by lying.  
13 Defendants are currently using GoDaddy.com, LLC for hosting and domain name  
14 registration concealment. Plaintiff subpoenaed GoDaddy.com, LLC, who returned  
15 shady information, and Plaintiff plans to subpoena others as necessary, for the  
16 purposes of acquiring relevant information and confirmation of facts. Plaintiff  
17 already confirmed some suspicions and allegations based on information received  
18 from subpoenas and plans to file more as soon as possible.

19  
20 76. Clear and convincing facts and evidence support allegations of domain name  
21 fraud Defendants and their engaging RICO/conspiracy/fraud inclusive but not  
22 limited to their misrepresentation, deceit, mail fraud, computer/Internet/wire fraud,  
23 forgery, intentional infliction of emotional distress, cybersquatting, and unfair  
24 competition. Related harassment, stalking, and obstruction of justice has been  
25 relentless, and all of this is causing an accumulation of damages to Plaintiff.  
26 Anyone currently connected to this domain name other than the Plaintiff is most  
27 probably a criminal and certainly without a just legal claim. In the alternative,  
28 anyone other than Plaintiff, most probably already lined up to move in pending an

1 unfavorable judgement, should be assumed to be in violation of RICO.  
2 Furthermore, this complaint is based on multiple nucleuses of common facts, and  
3 this part is both linked to all Defendants and has not been dismissed in any court.  
4 There are also several new aspects of this claim detailed later on.

## 5 6 7 **B. BACKGROUND CONTINUED**

8  
9 77. Since the initial domain name fraud, the biggest problems have been involving  
10 housing and money related fraud with law enforcement being influenced by  
11 Defendants both in attempt to control and as retaliation for legal action. What was  
12 amended to the incorrectly filed case and mostly lodged under seal is surrounded  
13 by similar patterns of fraud and corruption, specifically described infra at  
14 paragraphs 78 to 365.

### 15 16 **1. FALSE IMPRISONMENT / ENTRAPMENT**

17  
18 78. Lost Hills / LA County Sheriffs Fraud: Plaintiff drafted a long white paper  
19 with evidence explaining the situation and took it to the local authorities. The Lost  
20 Hills Sheriffs, who had been suspected of trying to entrap Plaintiff for years,  
21 refused to do anything to help when Plaintiff reported serious crimes over several  
22 friendly meetings with watch commanders and the head detective. Their neglect  
23 was not because they did not believe Plaintiff, whom they directed to civil court,  
24 but most definitely because of illegal corruption. A copy of the original report for  
25 LASD is attached hereto as Exhibit "51" and by this reference made a part hereof.

26  
27 79. Plaintiff filed lawsuits in pro per, took a class and studied gun laws, purchased  
28 a firearm for self-defense (because of death threats), and then was defrauded of the

1 right to a carry and conceal permit before being tricked into revisiting the Lost  
2 Hills Sheriff station where they lied and put Plaintiff on a 5150 to deny the right to  
3 bear arms and/or worse. Plaintiff barely escaped lying authorities and was released  
4 to being kicked out of his home because of the lies. Plaintiff predicted results of  
5 alleged bribery became reality when the arresting lieutenant was promoted to head  
6 detective, the head detective retired, and the watch commander was promoted to  
7 work at a major Hollywood studio. Several other neglectful/high ranking  
8 authorities have retired in similar fashions. Plaintiff in pro per challenged both the  
9 Sheriffs and 5150 in a corrupt mental health court, where he lost (gun rights for  
10 five years) despite sound arguments against the frauds. Original and updated 5150  
11 defense and evidence is attached hereto as Exhibit "44" and by this reference made  
12 a part hereof.

13  
14 80. Defendants have been abusing their power over the Internet and financial  
15 resources to control where the Plaintiff lives and they have been using landlords  
16 and others to defraud the Plaintiff. The first situation was in old apartment on  
17 Argyle Avenue at the top of a Hollywood Hills foothill and only resulted in  
18 Plaintiff moving to escape the crazy roommate/landlord who would go from  
19 threatening one day to the polar opposite the next day like someone was pulling his  
20 strings. Worse than the threats were the roommate's quoting of things from  
21 Plaintiff unpublished and suspected to have been leaked book. All these problems  
22 are happening in a linear fashion, as if being controlled by one person or group,  
23 with similar patterns like name and number hacks connecting everything, and the  
24 next situation was worse

25  
26 81. The next residence, operated by a crazy and more foolish landlord/roommate,  
27 was a new top of the Hollywood Hills villa on Quebec Drive. Plaintiff lived in this  
28 house on an out of the way and hard to find cul-de-sac for around a year and a half.

1 The entire experience was shady, but it was impossible to find a better living  
2 situation; because of the RICO frauds. The landlord was definitely having strings  
3 pulled, was insane on her own merit, and instigated situations with neighbors and  
4 police, all of whom are suspect of playing a role in this fraud in one way or  
5 another. Intentionally disturbing construction was used to harass Plaintiff at  
6 Argyle and Quebec, which is a tactic that was used against Plaintiff when he lived  
7 with his parents. Interference with the Internet connection and a lot of other  
8 patterns of name and number and fashion hack harassment were other things that  
9 made it obvious RICO/housing fraud. Plaintiff both lost his room and missed a  
10 court date that he would have won against the crazy landlord because Plaintiff was  
11 in custody (falsely imprisoned) due to entrapment fraud. Evidence of fraud related  
12 to this was lodged under seal in a motion to reconsider the original complaint, but  
13 defense to the false imprisonment/entrapment case #BA437791 is more thorough  
14 and is attached hereto as Exhibit "47" and by this reference made a part hereof.

15  
16 82. The criminal court was completely corrupt including public defenders and the  
17 judge. Corrupt criminal court fraudulently denied Plaintiff (at the time  
18 Defendant)'s Marsden Motion for a new public defender and then the right to  
19 defend himself by sending Plaintiff back to the corrupt mental health court for no  
20 just reason other than his honest defense being too good and incriminating corrupt  
21 law enforcement. The public defenders were frauds and the first deputy district  
22 attorney at MHC was the same fraud from the gun case where neither case should  
23 have been connected based on confidential name changes. All these frauds and  
24 court rooms appear to be cast and planned based on the same pattern of name and  
25 number hacks. This nightmare is thoroughly documented in Plaintiff's defense  
26 blog/log, which is attached hereto as Exhibit "54" and by this reference made a  
27 part hereof. A copy of the mental health court case #ZM029514 defense is  
28 attached hereto as Exhibit "48" and by this reference made a part hereof.



1 83. The criminal landlord from Quebec Drive cost the Plaintiff a lot of time and  
2 money, so Plaintiff stopped paying rent until an eviction case was filed. Plaintiff  
3 then filed counter claims in response, but then missed court dates because of false  
4 imprisonment by a corrupt mental health court with strings being pulled by RICO  
5 violators. This extraordinary situation also caused Plaintiff to miss appearing in  
6 superior court for separate cases against both the bank who stole Plaintiff's money  
7 and other Defendants, but state court was not the proper venue and does not have  
8 jurisdiction over this claim, so appealing at that level would be a waste of time and  
9 resources. A copy of the counter eviction case and evidence is attached hereto as  
10 Exhibit "49" and by this reference made a part hereof. More housing related crime  
11 is described infra at paragraphs 128 to 134.

## 12

## 13

## 14 **2. BANK CRIME**

15  
16 84. JPMorgan Chase & Co., headquartered in New York, fraudulently terminated  
17 a business checking account and withheld a couple thousand dollars from the  
18 Plaintiff whom they also tried trick into signing an indemnity agreement free  
19 themselves from legal responsibility for their criminal actions, which have caused  
20 a chain of reactions including destroying the Plaintiffs excellent credit and further  
21 enabling housing fraud. In trying to deal with the bank, which was playing into the  
22 name and number hacks, they also went so far as to change the name of the CEO  
23 on their website to try and evade legal action, and in the past, they had done stuff  
24 like remove jobs Plaintiff was going to apply to from their job board overnight  
25 probably as directed by the same screen watchers who persuaded Chase to  
26 terminate the account.

1 85. The bank only gave reason of not having funds to pay off the credit card, but  
2 that makes no sense because at least half of those funds were in the terminated  
3 checking account, and Plaintiff was making steady and regular deposits that could  
4 have come through at any time. The account was in good standing for nearly ten  
5 years and there was no notification or contact from the bank before the  
6 termination. Plaintiff had a history of always finding a way to completely pay off  
7 his credit cards in similar instances of reaching the limit on his cards over the  
8 years. Fraudulent termination of the account is most seriously criminal and was  
9 obviously triggered by the same pattern of RICO activity and abuse of power at the  
10 bank. A copy of the first case filed against JPMorgan Chase & Co. and their CEO  
11 is attached hereto as Exhibit "45" and by this reference made a part hereof. Also, a  
12 copy of the trick indemnity agreement JPMorgan Chase & Co. tried to get Plaintiff  
13 to sign is attached hereto as Exhibit "46" and by this reference made a part hereof.

14  
15 86. Prior to the bank fraud, with great-to-excellent credit, Plaintiff was somehow  
16 defrauded of the ability to get a loan from every company online until he finally  
17 connected with one who straight up stole his money. Although very convincing,  
18 Plaintiff knew the thieves were probably corrupt because of the noticeably similar  
19 patterns of name and number hack fraud on the business website and licensing  
20 (another New York based company, allegedly with offices in Los Angeles etc.),  
21 but Plaintiff had no options or time and losing the amount lost made no difference  
22 in that situation where the payoff would have saved Plaintiff's life. It only seemed  
23 planned at the time, but in retrospect and given what has been happening with  
24 similar housing fraud, it all had to have been a setup. New evidence of loan and  
25 credit fraud are attached hereto as Exhibit "34" and Exhibit "38" and by this  
26 reference made a part hereof.

1 87. The frauds have attacked too many times, with a strategy where options are  
2 limited, and then a choice is forced on someone who thinks it was based on free  
3 will, but, it is an illusion following calculated steps to produce a designated result.  
4 This technique is like a basic con art slash magic trick called “equivocal” with an  
5 exception to this scenario because the mark or Plaintiff knows his free will is being  
6 interfered with while at the same time having no choice but to play along or  
7 become worse off than homeless. Frauds have been trying to control the Plaintiff  
8 for at least ten years using a pattern of crime based on variations of this tactic  
9 specifically concerning money, employment, housing, health, and relationships.  
10 Most of these things are or at least can be controlled by communication technology  
11 that Defendants are abusing power over to defraud the Plaintiff. Entrapment fraud  
12 was and is being based on a similar tactic where they threw as many cues as  
13 possible at the Plaintiff in effort of luring him into the designated trap, but what  
14 they did not count on is having all those tricks documented, reported, and then  
15 reported again and again until obstruction of justice is served in pro per.

16  
17 88. In March of 2017 PayPal fraudulently terminated multiple accounts in  
18 response to Plaintiff launching a new fundraiser. That forced Plaintiff to switch to  
19 the alternative called Stripe, which unlike PayPal does not have an option to send  
20 or receive money without getting charged per transaction. Defendants and  
21 suspects are invested in both PayPal and Stripe where they have the ability to  
22 abuse power to sabotage the Plaintiff’s business, as is obviously the case here  
23 based on the timing and all too familiar pattern of name and number hacks  
24 embedded in the email notifications from PayPal. PayPal refuses to discuss their  
25 actions and is also suspected of other sabotage, which only be alleged, such as  
26 interference with money requests. Defendants and some suspects are widely  
27 known as the “PayPal Mafia,” which is a group of people ranking at the top of the

1 Pay Pal pyramid and who are financially rooted in Silicon Valley, which includes  
2 most of the companies that have abused power to attack Plaintiff.

3  
4 89. Google AdSense & Amazon have not been paying for affiliate advertising.  
5 Amazon stopped crediting Plaintiff for associate bookstore in 2011 and has hacked  
6 their widgets. See screen shot. Google AdSense has not been giving credit for  
7 clicks for an unknown amount of time and has been placing intentionally  
8 competitive and harassing advertisements on Plaintiffs websites despite advanced  
9 settings that should prevent this from happening. Much of this was not discovered  
10 until March 6, 2017.

## 11 12 13 **C. COMPLAINT**

### 14 15 **1. ONGOING & MISCELLANIOUS HACKS**

16  
17 90. Plaintiff is two hundred and something pages into producing a book/movie  
18 with an ending pending conflict resolution. This book was also designed a defense  
19 mechanism under the assumption that it would be leaked. Several members of  
20 suspected parties have reference the unfinished work of art, which has not been  
21 shared with anyone. Plaintiff alleges that Defendants/John Does pirated (stole and  
22 distributed) this intellectual property.

23  
24 91. Based on timing, Alphabet is suspected to have restructured the name of their  
25 parent company to evade legal trouble connected to case # LA-CV14-04900. On  
26 the date of August 12, 2016, Alphabet/Google/YouTube unfairly terminated  
27 another account, which was already being hacked by the Defendants, and resulted  
28 in hundreds of videos/posts with these videos embedded into video player widgets

1 (on multiple websites) to display “terminated” error messages, which is still  
2 affecting Plaintiff due to the time it would take to fix everything. This definitely  
3 occurred in response to someone hating on a recent video in addition to their prior  
4 jealousy. Many hours of work are lost each time Defendants attack like this etc.  
5 Think about how many hours they have shaved off Plaintiff’s life by forcing all the  
6 legal drama; this complaint alone accounts for years of work. Even after  
7 reuploading videos, Plaintiff is damaged by loss of subscribers, view counts, and  
8 originality confirming postdates.

9  
10 92. Defendants have been attacking most of the widgets and components of  
11 Plaintiffs websites and blogs not limited to YouTube. Prior to most recent  
12 termination, Google/YouTube hacked the Plaintiff by disabling the code he was  
13 using to embed videos on websites. This took all of his videos offline and forced  
14 more redevelopment. This is also represented by and not limited to hacked  
15 widgets at SoundCloud, Yelp, iTunes, AdSense, Amazon, PayPal, etc. Alphabet  
16 is also illegally placing advertisements on Plaintiff’s videos, not sharing revenue,  
17 and additionally hacking AdSense advertisements on sites and blogs belonging to  
18 the Plaintiff with suspected non-payment. AdSense ads used to generate minor  
19 income and traffic has at least been consistent. New evidence against Alphabet is  
20 attached hereto as Exhibit “33” and by this reference made a part hereof.

21  
22 93. Around the date of June 1, 2016, Facebook deleted all the likes on multiple  
23 websites belonging to the Plaintiff. This is a major deal to someone in the  
24 business of social media marketing; to anyone really. Defendants have been  
25 sabotaging Plaintiff’s likes etc. since likes were invented; suspected to have started  
26 with fraudsters conspiring back in college before family and Defendants began  
27 conspiring and foolishly abusing power and relation to try and steal/control  
28 business. In the alternative, family and John Does not only turned friends and

1 possibly Defendants against Plaintiff well before likes existed, but they had long  
2 been choosing/casting friends before they entered Plaintiff's life. Plaintiff had to  
3 remove like counts from social widgets on all sites. Video evidence of prior  
4 existence of likes and abuse of power hacks disabling likes (and friend requests) is  
5 attached hereto as Exhibit "40" and by this reference made a part hereof.

6  
7 94. Ongoing: Facebook has modified, delayed, or prevented posts from Twitter to  
8 Facebook. This is intentional censorship fraud and obviously in preparation to  
9 attempt to further render Plaintiff defenseless in the event that Plaintiff starts  
10 publishing more truth. This can be demonstrated through more evidence not  
11 attached.

12  
13 95. Instagram is targeting and disabling both higher quality videos and those  
14 which display technical skills such as motion graphics and advanced editing most  
15 probably to influence employers viewing as portfolio in comparison to frauds who  
16 are cheating through use of expensive third-party plugins. Instagram have reduced  
17 quality in photographs shared to other social networks such as Facebook, etc. A  
18 video example of this is connected to Exhibit 40.

19  
20 96. Plaintiff alleges that Defendants are filtering or messages, emails, and  
21 communications across all services including but not limited to Instagram,  
22 Facebook, Snap Chat, self-hosted Word Press blog probably via code stored on  
23 servers belonging to corrupted plugin developers, and phone services. This is  
24 highly noticeable through analyzation of DMs (direct messages) on Instagram,  
25 where the haters trying to control relationships appear to not be delivering  
26 messages to the more attractive half of Plaintiff's personal real-life friends.  
27 Defendants are doing the same thing with phone text messages and trying to  
28 control who follows and friends on social media. The news and photo feeds on

1 Instagram and Facebook, which were reprogrammed from display of all posts in  
2 linear order to allegedly showing content based on popularity, do not make these  
3 services better, but rather enable censorship on both ends being distributor and  
4 receiver of information. Defendants are also intentionally placing harassment etc.  
5 posts they want Plaintiff to see on the top of social media feeds.

6  
7 97. Continued name hacks, number hacks, twitter feed hacks, email/spam hacks,  
8 phishing attempts, employment discrimination fraud, more housing fraud have  
9 become a more than daily thing. A “Number Hack Key Code” is attached hereto  
10 as Exhibit “37” and by this reference made a part hereof. Evidence of more recent  
11 social media name and number hacks attached hereto as Exhibit “31” and Exhibit  
12 “32” and by this reference made a part hereof.

13  
14 98. Many phishing attempts have followed the RICO pattern and have been  
15 targeted to banks where Plaintiff has accounts, which is information that could  
16 have only been acquired through espionage. The frauds have also been trying to  
17 phish the Plaintiff’s iCloud where important data is stored. Plaintiff alleges that  
18 Defendants have already been accessing this information, so phishing attempts are  
19 probably a diversion tactic to place blame on random John Does. Defendants’  
20 recent attempts have been reported through proper channels only to be neglected  
21 due to obstruction of justice. Evidence of numerous targeted phishing attempts is  
22 attached hereto as Exhibit “35” and by this reference made a part hereof.

23  
24 99. Around the date of August 10, 2016, and after Plaintiff was released from false  
25 imprisonment caused by Quebec fraud, community service was forced by the  
26 corrupt public defender who criminally refused to present any defense at the  
27 corrupt preliminary trial. Community service was supposed to have options, but  
28 the only sane choice was Carriage Hope (thrift store/charity) over the early

1 morning chain gang style alternative. Carriage Hope had no web presence, so  
2 Plaintiff naturally volunteered, suspected to have been planned exploitation. The  
3 owner had another shady company with similar “RR” logo as the Plaintiff and  
4 there were a few other suspect connections. The person represented by hack  
5 number “3” tried to communicate via email around the same time, which was  
6 shady on several recent levels not limited to recent number hacks specifically  
7 concerning MHC defense and address of community service being “11311” and  
8 state doctor address being “311” where both venues connected Quebec case.  
9 Without getting into all of the details, the person represented by hack number “3”  
10 is not acting alone in trying to exploit the connection to Plaintiff and is  
11 demonstrably connected to both the corrupt courts and both instances of  
12 entrapment/false imprisonment. Furthermore, testimony was given in the first  
13 corrupt court that at least the wife of number 3 was feeding character framing  
14 slander to law enforcement when there should not have been any communication.

15  
16 100. Past to Ongoing: Apple was abusing power over Plaintiff’s phone to prevent  
17 capturing of photographs and video. The camera shutter would freeze in the shut  
18 position during concerts and at nightclubs, which had been witnessed on multiple  
19 occasions. The first time that happened was when the Plaintiff passed an accident  
20 on the freeway where there were a lot of fire trucks and other responders. Apple  
21 probably misdirected engineers into thinking they were doing something good, but  
22 it was still illegal, so the underlying motive was most probably fraud and  
23 censorship. This evolved into remotely deleting data from Plaintiff’s smart phone.

24  
25 101. Ongoing: Apple has been deleting video and at least one very important  
26 phone number from Plaintiff’s phone. This is highly illegal computer fraud (smart  
27 phones are computers) and censorship. The phone number belonged to the owner  
28 of a popular nightclub who gave Plaintiff that number specifically for purpose of



1 not getting banned from the club, so frauds could not move in and steal business  
2 like they had been doing with other venues. The hack enabled corrupt manager(s)  
3 to ban Plaintiff multiple venues. Videos that disappear are mostly of females who  
4 gave permission to film; another instance of where someone is probably being  
5 tricked into thinking they are doing the right thing by hacking Plaintiff, but the  
6 underlying motive is both trying to sabotage work and Plaintiff's ability to  
7 collaborate with females/models. There are frauds trying to steal business not  
8 limited to nightlife media and art where using attractive females in the product  
9 makes a huge difference in quality. This is also a relationship control tactic.  
10 Apple has also hacked the Plaintiffs devices so specific video clips do not import  
11 from smart phone to computer.

12  
13 102. 2016/Present: Apple iPhoto photo/video import hack prevents transfer of  
14 images from phone/camera to computer. Gives error message saying X number of  
15 space is needed for import and still gives the same error freeing up much more  
16 memory than is required, restarted app and computer etc. This forces Plaintiff to  
17 delete irreplaceable data. Part of this hack appears to make the computer display a  
18 fake number for hard disk space. Plaintiff also noticed a memory problem with  
19 Apple software creating duplicates or more of photos and photo libraries, but  
20 unlike most hacks in this complaint, this could be more of a glitch than intentional.  
21 A problem with many of the attacks throughout the RICO fraud is that they are  
22 being conducted by people trying to make things look natural, so they can evade  
23 responsibility for criminal action more than going undetected. Deleting a hidden  
24 190 gigabyte duplicate photo library and restarting the computer only freed up  
25 about 30 gigabytes. This same thing happens with memory management  
26 pertaining to smaller files.

1 103. Apple has been removing Plaintiff's books from iTunes for bogus reasons  
2 obviously connected to RICO fraud and attempted censorship. The have also left  
3 books in a state of "in review" for months and over a year and then ignore  
4 communications through the proper channels. This is intentional and criminal.  
5 New evidence of Apple computer fraud in the form of video and screen shots is  
6 attached hereto as Exhibit "62" and by this reference made a part hereof.  
7

8 104. Spotify programmed their software to freeze Plaintiff's computer upon  
9 launch even after uninstalling, new download, and reinstall. Previous Spotify hack  
10 deleted all followers. Spotify made hacked Plaintiff playlists to make them play  
11 the worst songs most frequently. Spotify was playing custom advertisements to  
12 harass Plaintiff after he stopped paying for the service, which Plaintiff was glad to  
13 support but the frauds stole Plaintiff's money. Members of the venture capital firm  
14 Founders Fund are mutual connection between (Plaintiff and) Defendant Facebook  
15 and other racketeers not limited to Spotify. Spotify is also violating EEO rights  
16 and is a portfolio investment of the Founders Fund also known as the "PayPal  
17 Mafia."  
18

19 105. Comm100 is a Canadian Internet based email marketing and CRM provider  
20 who has been filtering the delivery, etc., of emails and who also admitted that  
21 emails were being delayed due to an approval queue, which is fraudulent  
22 censorship. Also suspected of sharing Plaintiff's private list of more than 40,000  
23 contacts. Comm100's email statistics/reports appear to have been reprogrammed  
24 to display misrepresentative number hack stats. Plaintiff still uses Comm100  
25 because it is free (as part of a trade deal), but Plaintiff also created an email  
26 newsletter accounts with GoDaddy.com for purpose of running a paid campaign  
27 for a client. The campaign was sabotaged, more than number hacked, and then  
28 frauds convinced the client to stop paying the Plaintiff for no logical reason.

1 Plaintiff has recently been using Mail Chimp, which also appear to be acting very  
2 shady. Plaintiff alleges that Defendants are both bribing and investing into  
3 software companies etc. for purpose of luring them into the dark side of  
4 racketeering activity.

5  
6 106. Uber definitely and intentionally has been casting drivers with license plate  
7 and name hacks. Sometimes it seems like those drivers are trying to interrogate  
8 Plaintiff. Sometimes drivers appeared to be tricks to stall Plaintiff or steal money  
9 through forced cancellation charge, or to see if the Plaintiff would get into a car  
10 that did not match the ID on the app. There was a period when Apple appeared to  
11 be disconnecting cell service, killing the smart phone battery, and increasing rates,  
12 all for purpose of causing transportation problems. Through swapping sim cards in  
13 multiple phones, restarting phones, and reinstalling apps, these interferences, like  
14 most others, were scientifically tested and proven to be intentional. Uber had been  
15 generous with what appears to be a hack that gives Plaintiff free rides from use of  
16 his promo-code, so given the fact that they are kind of paying Plaintiff where  
17 harassing name and plate hacks have become a daily annoyance, Plaintiff is just  
18 mentioning this and not currently seeking RICO relief directly from Uber;  
19 however, they are also violating EEO rights and Plaintiff is considering charges.  
20 Evidence to be attached later if necessary.

21  
22 107. More evidence of recent hack attacks on website privately hosted at Superb is  
23 attached hereto as Exhibit "63" and by this reference made a part hereof. These  
24 attacks have been happening more frequently, and based on the timing, the sites are  
25 going down at a time when specific suspects would be in the nightclubs trying to  
26 look cool by showing off their ability to abuse power thereby framing the  
27 Plaintiff's character as inferior and creating false justification to steal business.  
28 More subpoenas should easily identify Defendants already listed as suspects.

1 108. Defendants and suspects are the fake news fraudsters of the swamp. They  
2 have been using fake news for at least a decade in failed attempt of controlling a  
3 headstrong Plaintiff through reverse psychology. Specific examples include but  
4 are not limited to a fake television news fear tactic broadcast about a death at a  
5 nightclub Plaintiff's chronic liar of a brother worked at, fraud family members  
6 emailing fake news stories that also played into name and number hacks, and  
7 questionable material that appears to intentionally be given preferred placement on  
8 Plaintiff social media feeds. This and previous similar statements are supported by  
9 more evidence, which has yet to be compiled because Plaintiff does not have  
10 resources to take legal action against everyone right now. Plaintiff is still going  
11 after the worst Defendants and not trying to engage less problematic John Does at  
12 this point.

## 13 14 15 **2. HEALTH CARE FRAUD**

16  
17 109. Evolving Health Care Fraud has been plaguing the Plaintiff from at least  
18 2006 to present, probably since 1995, and possibly since birth 1982: Defendants  
19 are alleged to be using dermatology and other health care related fraud to control  
20 the Plaintiff; to literally trap the Plaintiff in his own skin. Plaintiff would be  
21 completely sabotaged by this alone, possibly killed by or because of it, if not for  
22 the mind of a genius and utilizing multiple licensed medical doctors including one  
23 of whom is fortunately a trade of service client (who would also be paying if not  
24 for previously mentioned email fraud @ GoDaddy).

25  
26 110. Dermatologist 1: Original long-term family dermatologist for no reason  
27 forced Plaintiff to change doctors to a shady dermatology group in the adjacent  
28 office in the same building. Dermatologist 2 ended up sending Plaintiff to a

1 privately practicing at the time also next-door Dermatologist 3, but what really  
2 matters is what has been happening more recently, which was probably planned  
3 since the first dermatologist. Dermatologist 3: Did not provide proper treatment,  
4 suspected of illegally communicating with family, and aged Plaintiff's face  
5 through malpractice involving overly expensive and scarring treatment. Used to  
6 make the Plaintiff, who was always on time or early, wait an examination room  
7 literally for up to hours for no reasons other than to waste time and intentionally  
8 provide second class service, and to try and trick Plaintiff into stealing medicine to  
9 justify malpractice. Dermatologist 4: Tried to prescribe medication with side  
10 effects that would have made the Plaintiff appear to have symptoms of terminal  
11 illness. The doctor/office additionally and intentionally did stuff like prescribe  
12 medication on the Plaintiff's allergy list. Waiting room name hacks of other  
13 patient on appointment dates, but not during walk-in clinic hours. Dermatologist 4  
14 for no reason other than RICO fraud terminated service saying "there is nothing  
15 more we can do to help/for you" like the Plaintiff was going to die from acne,  
16 which really just forced Plaintiff go through a lengthy process of changing  
17 insurance providers, getting a new primary caregiver, visiting them for a referral to  
18 a new dermatologist, waiting for insurance to approve that, and then schedule an  
19 appointment for the new shady doctor. The public social services and health care  
20 systems are rigged not limited to bottom feeding on dumb poor people.

21 Dermatologist 5: Also tried to prescribe medication with side effects that would  
22 have made the Plaintiff appear to have symptoms of terminal illness. Similar  
23 waiting room fraud and cancellation of walk-in clinic hours as previous physician.  
24 Partner doctor prescribed new common pharmaceutical that completely cured the  
25 problem. That good doctor (named Christian?) is no longer with Dermatologist  
26 number 5. The good medicine not only abruptly stopped working, but also  
27 simultaneously poisoned Plaintiff with severe stomach aches while there was other  
28 intolerable housing fraud attacking the Plaintiff. That is not what happens when

1 you develop tolerance to a substance. Dermatologist 5 then used the same tactic of  
2 making the patient wait in an examination room, for an extended duration (over an  
3 hour sometimes) with medicine left on the counter, to see if Plaintiff would steal  
4 and justify malpractice. Dermatologist 5 then made a comment about that  
5 medicine on the counter before treating with patient with the same medicine but  
6 from a different container, probably because the trap medication was tainted.  
7 Dermatologist 5 then got Plaintiff hooked on less effective sample medication not  
8 covered by insurance, which would cost thousands of dollars monthly if Plaintiff  
9 did not buy it from one specific shady pharmacy. The “blue” pill also causes a  
10 suspect side effect of oily skin, which makes Plaintiff appear icky if the face is not  
11 washed frequently. Medication recently doubled in price, which is suspect of  
12 being an intentional increase in the cost of living; which is another approach of  
13 attempted pigeon hole control of Plaintiff that started with Plaintiffs mother while  
14 living at home. Dermatologist 6: New dermatologist, without seeing the patient,  
15 tried to have the physician’s assistant do all the work including prescribing  
16 medicine. Plaintiff told them that their recommended pharmaceuticals had been  
17 ineffective in the past, but they still insisted. The medicine is not helping, so  
18 Plaintiff has been forced to revert to more harmful pharmaceuticals prescribed by  
19 the client physician with another Dermatologist 6 appointment coming up soon.  
20 This section was modified, and paragraph added in February of 2018.

21  
22 111. Plaintiff also alleges that dermatology issues are additionally result of food  
23 allergies being controlled by Defendants who have been stalking Plaintiff and  
24 tainting/poisoning meals each time Plaintiff’s skin clears up. In the alternative,  
25 Defendants are both interfering with health care and for sure stalking, harassing,  
26 and playing mind games to make Plaintiff fear eating from limited sources and or  
27 appear to have a mental health issues in making these accusations. Plaintiff also  
28 suspects that there is a scheme within the health sector and use of different

1 manufacturers of pharmaceuticals serving fake medicine. Medical doctors have  
2 agreed that these are not far-fetched allegations.

3  
4 112. The recent pattern of RICO events, specifically attacks on health and fitness,  
5 not limited to dermatology and psychiatry fraud, give weight to a theory that the  
6 racketeering activity dates to when the Plaintiff suddenly fell very physically ill  
7 with more serious than the illness side effects being caused by poison (bad  
8 pharmaceuticals) resulting in no other option but major surgeries to reconstruct the  
9 digestive system in 1995-6. Since then and throughout the span of the Plaintiff's  
10 adult life, there has been a pattern of problems causing health or fitness issues  
11 occurring each time Plaintiff peaks/physically rehabilitates and hits a new level of  
12 performance. Much like the information technology attacks, health care fraud is a  
13 growth/reach/control hack. That which is not growing is dying, and that statement  
14 is a fact making this case about attempted murder if you want to get technical.

### 15 16 17 **3. STALKERS ETC**

18  
19 113. Model Mayhem is both a subsidiary of Internet Brands and the premiere  
20 model/creative professional/social networking site. Through this site and other  
21 social networking sites, for good reasons, Plaintiff was accepted as a "friend" to a  
22 few thousand of the most attractive models on the planet. One would assume that  
23 a good number of models accepted connection requests because they at least  
24 considered collaboration. Plaintiff alleges that Defendants were both filtering  
25 messages and trying to use the models to extract information in attempt of stealing  
26 intellectual property. John Does have been sending many of these models to stalk  
27 Plaintiff in real life without permission. Plaintiff called Model Mayhem out on it  
28 and they fraudulently terminated the account. This fraud could only be

1 accomplished through abuse of power over the site or by someone messaging all of  
2 the Plaintiff's connections with very convincing lies. Given the amount of people  
3 involved, and the fact that many of them deal with their own "haters," it is safe to  
4 assume that this crime, like other similar fraud, is being caused internally because  
5 in the alternative someone would have spilled the beans and the Internet Brands  
6 legal department would not have ignored communications mostly requesting an  
7 administrator to run queries on the database to see who could have been messaging  
8 all of the models on Plaintiff's friend list. More than the racketeering pattern of  
9 name and number hacks proves this to be part of the RICO conspiracy.

10  
11 114. Ongoing stalker fraud originally consisted mostly of females, a lot of them  
12 from Model Mayhem (sent by John Does trying to exploit connection to Plaintiff  
13 for personal gain under false good and more so damaging intentions), possibly  
14 security as requested from the government, and people harassingly trying to take  
15 photographs or video of Plaintiff. There has been a lot of stalking at places the  
16 Plaintiff frequented but does not mention publicly; such as the gym and grocery  
17 store. Much of the time stalkers are wearing clothes that make some dumb  
18 statement through fashion connecting it to the pattern of racketeering, like shirts  
19 with number hack patches sewn on, custom slogans like "we are watching all of  
20 you," or "revenge," or "attractive distraction," or "death," etc. Plaintiff must  
21 accept being followed and being in the background of random photos in public  
22 places, but all this negativity, threats, constant harassment, creepy stalking, and  
23 retaliation for living have never been justified. Furthermore, Plaintiff does not  
24 usually take pictures of stalkers or fashion hacks mostly to avoid more conflict, but  
25 fraudsters often go out of their way to get noticed. There is evidence of a stalker  
26 fashion hack connected domain name fraud evidence attached infra at paragraph  
27 152 with more recent photographs available as necessary.



1 115. At one or more points in time during the early fashion hacks, there was an  
2 unrealistic number of people wearing New York swag. Plaintiff is still unsure of  
3 what John Does meant by this obvious and redundant display of stalking ability.  
4 New York took a break and was replaced with Florida. Plaintiff has a connection  
5 with a female from Florida whose multiple employers are all suspect John Doe  
6 corporations of the Bad Karma Enterprise. Cars with vanity Florida license plates  
7 have been stalking Plaintiff all around tinsel town. One of the cars was a van full  
8 of extra obese fem thugs camped directly outside of Plaintiff's undisclosed home  
9 location on a specific night where the Plaintiff visited said female from Florida.  
10 Stalkers with harassing and threatening license plate number hacks started out as  
11 not so random 187 etc. threats/hacks and has evolved into a daily nuisance. New  
12 and recent evidence of license plate stalker/threat etc. hacks is attached hereto as  
13 Exhibit "61" and by this reference made a part hereof.

14  
15 116. Half of the stalking is not possible without GPS hacks, and John Does within  
16 Plaintiff's social networks could have conspired to pull of the rest through  
17 following in person, but GPS from Plaintiff's smart phone over tracking device or  
18 triangulation has been scientifically detected to be the root of almost all stalking.  
19 This is happening while location services are turned off, so one would have to  
20 believe Apple is not only responsibly for abusing power to GPS hack Plaintiff, but  
21 that probably also supports more than suspicion of Apple enabling espionage  
22 through screen watching on multiple devices without sharing or remote computing  
23 turned on. Plaintiff also conducted tests with multiple phones, switched and  
24 removed sim cards, used a device to block signals from anything that may have  
25 been placed in his car, and went so far as to question if a device could have been  
26 planted in his crowned tooth (too damp, no power supply) in the process of  
27 elimination. Plaintiff knows his technology is being actively monitored because  
28 the frauds have responded to things he does and types or says with not so cryptic

1 messages embeded into name and number hacks on the social media; specifically,  
2 in the Twitter feed constantly streaming to the side of his desktop.

3  
4 117. Prior to Florida stalkers, just before the first entrapment, and after pursuing  
5 Bad Karma Enterprise’s failed female insurance policy from Australia, Plaintiff  
6 was being stalked by Australians most noticeably because of their funny accents.  
7 There were two instances of Australians following Plaintiff into businesses where  
8 he was placing promotional materials in the lobbies (they were probably removing  
9 flyers and slandering). There were other sketchy instances that were  
10 misrepresentative of the Australian population in Los Angeles not limited to  
11 encounters at nightclubs, specifically regarding Australians following the Plaintiff  
12 and trying to photograph while using a nightclub restroom. There have been shady  
13 things going on with people in the waiting rooms at the Dermatologists offices  
14 including a weird Australian on the first day at Dermatologist 4; prior was  
15 Australians in the waiting line at the pharmacy. Australian frauds have appeared to  
16 be trying to move in on the Plaintiff’s business since the night Plaintiff met said  
17 female before her attempted entrapment follow ups. Evidence connecting this to  
18 the pattern of RICO and domain name fraud exists on an as needed under seal  
19 basis. “AU” has been showing up in the name/word hacks obviously about what is  
20 going on here. Plaintiff has no problem with Australians, has distant Australian  
21 cousins who used to visit for family trips to Disneyland, these or any statements  
22 are not to be interpreted as an attack or discrimination against any country, state,  
23 race, or religion, but rather defense against groups alleged to be conspiring with  
24 Bad Karma Enterprise. Females from Sweden replaced Australians for a little  
25 while, initially tried to connect with Plaintiff on a good level, but they have also  
26 played into and conspired with Bad Karma Enterprise.

1 118. Several places the Plaintiff used to visit frequently added highly suspect  
2 cameras at face level where it is very difficult to impossible to avoid an invasion of  
3 privacy. They are trying to acquire bad images and it is suspected that frauds are  
4 either sharing those images to damage Plaintiff's relationships and business ,and/or  
5 they are creating a stockpile to use for retaliation when and if Plaintiff starts  
6 sharing more truth. This must be connected to the evil health care/dermatology  
7 fraud scheme, which was originally presumed to be the plan to keep Plaintiff on  
8 neither or at maximum one side of the camera. Anyone publicizing these types of  
9 defaming images, including strangers who have also been camera phone stalking  
10 the Plaintiff where he should have been anonymous, are alleged and should be  
11 assumed to be guilty of RICO conspiracy worthy of legal action if bad images ever  
12 surface.

13  
14 119. Defendants and suspects are trying to move in on all of Plaintiff's original  
15 business ventures. Plaintiff has multiple ventures mostly because frauds keeps  
16 sabotaging anything that can generate income, so Plaintiff starts something new  
17 while simultaneously moving forward with the old. The ventures are all connected  
18 to the original mission being to make a living doing what the Plaintiff loves where  
19 Defendants actions seem to be based on greed and control. The Australians started  
20 going after one business, then others, like targets for attacks are being traded by  
21 John does trying to evade detection and play human resources warfare with use  
22 human drones/shells in effort takeover each separate but connected original  
23 business venture. Florida has been mostly consistent with foreseen conflict of  
24 business interest under the influence of John Does in Florida's attempt of moving  
25 in on nightlife etc. business and things said and done by people in person and on  
26 social media, messages in license plate hacks, etc.

1 120. John Does include members of Plaintiff's family with siblings recently  
2 launching new and incomplete businesses to create the illusion of being serial  
3 entrepreneurs worthy of multi-million/billion-dollar investment deals like what  
4 Plaintiff has been pitching to venture capitalists and firms around the world for  
5 years. They do not like to admit it, and pretend to ignore things, but these frauds  
6 are obviously following and influenced by much of Plaintiff's intellectual property,  
7 some of which no one should have yet accessed. The frauds are merely unoriginal  
8 imitators trying to position themselves to build their careers on a weak foundation  
9 of defrauding and exploiting the original genius of a self-made Plaintiff who can  
10 directly attribute all aspects of his work to unique life experiences.

11  
12 121. People keep trying to set themselves up to exploit their connection to the  
13 Plaintiff most specifically and recently regarding females and family playing into  
14 frame work attempting to subordinate Plaintiff to a less educated and less talented  
15 older sibling who is trying to steal original business of the Plaintiff. In the  
16 alternative and still being falsely justified by disagreeable religious beliefs, the  
17 older sibling has veered away from religion in taking a wife from another faith  
18 where the younger sibling is being built up to Defendants as a FRAUDpreneur.  
19 Defendants are enabling this in their sabotage of social networking, online dating,  
20 and mobile communications. Plaintiff alleges that Defendants probably went bad  
21 in their trigger pulling/playing into false justification of haters, but since then have  
22 been turning the people who should be supporting Plaintiff into enemies through  
23 bribery because it is more cost effective for Defendants to buy into knockoffs who  
24 should be subordinate to Plaintiff in business.

25  
26 122. Prior to shrink younger brother and shrink sister-in-law slandering Plaintiff, a  
27 shrink trap hoe was defaming Plaintiff with slander and libel in conspiracy with but  
28 not limited to a promoter who also worked with Bad Karma Enterprise and is now

1 trying to compete in media business. That unrelated shrink female was playing  
2 into the hacks; one of which was prison themed party with social media  
3 posts/references poking at Plaintiff as if he was in prison. Prisons can take on  
4 several forms and Plaintiff has been falsely imprisoned to all the illegal actions  
5 stated in this complaint for hard time. All the stalkers are suspected to be  
6 connected through the associations described in the evidence of Bad Karma  
7 Enterprise described supra at paragraph 30.

#### 10 **4. CAR ATTACKS**

11  
12 123. Plaintiff is a very good driver. Several car accidents over the years seem  
13 connected to the RICO fraud and were reported to insurance with two incidents  
14 still being processed years after the incidents. There have definitively been  
15 additional attacks on the Plaintiff's car, which seems to be a tactic for the  
16 Defendants to try and drain the Plaintiff's bank account. These attacks range from  
17 broken windows/regulators, to hacking of the car computer to display a dashboard  
18 error indicator, which required visits to the shop, and at least two attacks on the  
19 battery.

20  
21 124. Suspected Car Accident Setup @ Sunset Blvd. - Plaintiff was cut off by and  
22 barely clipped another driver who was found at fault. After making contact, the  
23 other driver drove straight for some distance, appeared to have regained control,  
24 then abruptly turned right, drove over the sidewalk and into a wall. They are  
25 saying the wall costs a ridiculous \$17,000 to fix and the entire situation seems  
26 shady to the point where they did not fix the wall but rather patched it up with  
27 boards covered in advertisements that have changed several times since the  
28 incident. The other driver was alone, but Plaintiff thought that driver was drunk

1 and possibly switched places with someone who looked similar and was wearing  
2 what appeared the same uniform; after exchanging information, before Plaintiff left  
3 between when a fire truck showed up and before and police pulled as Plaintiff was  
4 driving off after having been cleared to leave by the fire department.

5  
6 125. Suspected Car Accident Setup @ Highland Blvd. - Plaintiff was rear ended  
7 slash side swiped by a driver who may have been stalking the Plaintiff. The other  
8 driver was clearly at fault and it is taking insurance too long to both investigate and  
9 settle the claim. The other driver was the one who hit the Plaintiff, but in a false  
10 claim about who was driving bad, the other driver admitted to following the  
11 Plaintiff for several blocks, which would have required multiple turns and probably  
12 aggressive driving. This almost cost Plaintiff a meeting with an attorney he was on  
13 the way to visit, but that attorney was sketch and it could have been an intentional  
14 obstruction.

15  
16 126. Prior to first entrapment, Plaintiff witnessed former temporary business  
17 partner also known as number "9" break one of Plaintiff's cars windows while the  
18 car was parked in Plaintiff's driveway. This was either in attempt to steal the  
19 360/VR video camera lens that was inside, and/or possibly to lure Plaintiff into a  
20 trap where Plaintiff would either get in trouble for chasing and speeding after the  
21 suspect, or where Plaintiff would file a police report naming the suspect thereby  
22 creating a connection of public record for purpose of exploiting connection to the  
23 Plaintiff. The CORRUPT Lost Hills Sheriff station not only responded so quick  
24 that they were probably camping out down the street waiting, but they also issued a  
25 corresponding report number(hack) "913-01829-2227-341" which was verified not  
26 to be a randomly selected number and only demonstrates that Sheriffs were playing  
27 into the RICO conspiracy; also consider their intentionally not issuing a report  
28 number when Plaintiff needed it for protection from the predicate state

1 crimes/RICO violations. Plaintiff was applying for work with the premiere luxury  
2 sports car dealership in the area at the time and the next day happened to be their  
3 event for the number “9” series sports car. Not only is there undoubtedly a  
4 connection between the vandalism/attempted robbery and the automotive media  
5 marketing business that Plaintiff was engaging, but Plaintiff was also proposing  
6 another deal with a hospitality/nightclub group, which started using Plaintiff’s  
7 ideas for automotive marketing in their illegally shortcutting Plaintiff and giving  
8 business to John Does who were not worthy.

9  
10 127. Door men at two separate nightclubs/groups tried to lure Plaintiff into what  
11 should be considered a death trap and attempted murder. The first individual, not  
12 acting alone because it would have taken a group effort to put him in this irregular  
13 position, was banning Plaintiff from a nightclub where Plaintiff had been a  
14 working member for years. On several instances this person, a former LAPD  
15 officer, got in the Plaintiff’s face, was aggressively taunting, and for no reason  
16 verbally and slanderously abusive, so Plaintiff possibly spit and ran before getting  
17 tackled, detained, and assaulted by security on demand of the instigator who was  
18 probably trying to have Plaintiff taken in by corrupt cop friends etc., before  
19 Plaintiff yelled for help and someone got real LAPD to come fast and release  
20 Plaintiff. Incident #? (Hollywood LAPD). The door man at the other club, who  
21 also has the same name as the former cop scumbag, was trying to lure Plaintiff into  
22 a similar trap with knowledge that Plaintiff is already on informal probation from  
23 entrapment fraud. This guy went so far as to have two irregular security guards  
24 placed at the only exit in case Plaintiff tried to run like at the other club. One of  
25 the guards had a name tag hack “Oscar” like this hater was going to be the end of  
26 the biographical movie Plaintiff is working on. There have been several hacks not  
27 limited “Oscar” name tags on cashiers at several restaurants Plaintiff frequents like  
28 the frauds think they are going to exploit the connection for a scene in a movie

1 created by the Plaintiff or a violator of intellectual property. These repetitive name  
2 hacks can on be accomplished by the various actors being influenced by a mutual  
3 connection being a criminal John Doe/Defendant.

## 4 5 6 **5. HOUSING FRAUD**

7  
8 128. Housing is being controlled by Defendants through a combination of abuse of  
9 power over the Internet and communication technology, keeping funds low, and  
10 bank fraud messing up Plaintiffs credit made matters worse. Defendants kill  
11 options and then place an advertisement/post for something that cannot be turned  
12 down. This is the same tactic mentioned supra at paragraph 87 concerning bank  
13 and loan fraud. Defendants are also trying to do this with relationships, but it is  
14 easier to turn down something that is not vital. Instances of housing fraud at  
15 multiple residences are labeled by street names as follows:

16  
17 129. Argyle Fraud: This deal was almost too good to be true and the only one  
18 worked out of many requests on AirBnB, which is a member of the Founders  
19 Fund/“PayPal Mafia” portfolio along with Facebook and other hacks. Roommate  
20 participated in fashion hack wearing shirt with harassing words, quoted something  
21 from unpublished book, was basically bi-polar crazy like someone was pulling  
22 strings, made physical threats, etc. The roommate’s name alone was a word hack  
23 with a fantasy gaming world definition of: undead slave summoned by wizard.  
24 Plaintiff applied for an apartment directly above and was not only discriminated  
25 against in violation of housing rights, but they decided to upgrade and use a  
26 recurring tactic of irregular construction noise to harass Plaintiff. Defendants  
27 started interfering with the Internet connection towards the end of the stay.  
28 Suspects slash Defendants did the same thing with construction and Internet at



1 both the prior home and next house. That also evolved in to a worse version of  
2 similar harassment at the house after being released from false imprisonment.  
3 There are witnesses to housing fraud claims mostly consisting of roommates and  
4 LAPD. Reference Exhibit "52" for more information.

5  
6 130. Quebec Fraud: See Entrapment Fraud supra at paragraphs 78 to 83. Landlord  
7 trespassed into Plaintiff's private bedroom on at least one and probably more  
8 occasions, did some awful things, and is suspect to have worse than stolen  
9 intellectual property gained from or enabled third party unauthorized access to  
10 Plaintiff's computer. Refer to counter eviction case #16U03756, which is attached  
11 as Exhibit "49." Quebec entrapment defense originally tried to omit the crazy  
12 landlord's role because she lived in the house on and off and was using scare  
13 tactics to make indirect threats with evidence attached as Exhibit "47" Quebec  
14 Fraud actors and their roles in the racket are identified in Exhibit "52."

15  
16 131. Crescent Fraud: September through October of 2016; Plaintiff knew this  
17 house was a setup, but it was the only option. The sub-lease was from roommate  
18 allegedly renting the entire six story house and acting as landlord. A rental  
19 agreement was based partially on a perfect Internet connection. The  
20 roommate/landlord kept disconnecting the Internet, intentionally stomping around  
21 on the thin floor above Plaintiff's room for extended periods of time, barging into  
22 Plaintiff's private room, was sending ridiculously annoying calls and texts with  
23 number hacks, had someone with the last name Sheriff call with notifications  
24 appearing on the TV when Plaintiff was watching cable because the Internet was  
25 disconnected, etc. That roommate admitted to having a connection to the frauds  
26 living in the house on Quebec and based on a noticeably repetitive pattern of  
27 racketeering activity, is obviously connected to the overall RICO enterprise. The  
28 scumbag was allegedly trying to create a reason to get Plaintiff to make a threat

1 where self-defense of felonious activity would have been justified, but the  
2 roommate was so foolish that plans backfired, and he allegedly ended up getting  
3 evicted, which resulted in Plaintiff also having to move. Roommate was most  
4 probably mentally ill and very shady as witnessed and reported to LAPD by  
5 Plaintiff, house manager/real landlord, and another roommate. Similar as other  
6 roommate/landlords, much of the craziness seems to be rooted in someone who  
7 does not really know what they are doing pulling their strings, but all these puppet  
8 frauds seem to be incompetent with a few loose screws on their own accords. A  
9 massive amount of text messages demonstrates the craziness and documents the  
10 Internet conflict with at the Crescent house. Evidence from Crescent Fraud is  
11 attached hereto as Exhibit “36” and by this reference made a part hereof.

12  
13 132. Ongoing and continued obstruction of justice by LAPD: when trying to have  
14 Crescent fraud roommate arrested per multiple witnesses, in dealing with Quebec  
15 fraud landlord, and Plaintiff had not yet been able to go after the Argyle fraud, but  
16 police should have at the very least investigated based on the next resident’s  
17 complaints. LAPD can easily pinpoint the mutual RICO fraud connection, but  
18 they have chosen to protect corrupt officers and obstruct investigations. Justice is  
19 still being obstructed by LAPD in recent reports made concerning this case even  
20 when just focusing on a smaller and easier to deal with aspects being the  
21 computer/loan fraud (which was probably had something to do with messing up  
22 credit to and messing up ability to rent) with evidence attached hereto as Exhibit  
23 “64” and by this reference made a part hereof. Justice is also being obstructed at  
24 the FBI and with other authorities, in being unable to acquire any legal  
25 representation or help, and probably intentional timing of false imprisonment  
26 missed court dates. One LAPD officer interrupted a conversation with a corrupt  
27 detective at the Hollywood station and admitted to working private security for  
28 John Doe(s), which is a major conflict of interest and probably “a” if not “the”

1 reason justice is being obstructed. The detective stole evidence (an original draft  
2 of this already at that time copyrighted complaint), did not attach it to the report,  
3 then neglected the case. The same thing happened with the FBI and next LAPD  
4 detective all of whom are obstructing justice, were leading Plaintiff in circles, most  
5 probably with intent to generate behavior that would justify another false  
6 imprisonment. THIS COMPLAINT IS AN ALTERNATIVE TO VIOLENCE.  
7 RICO WAS ENACTED AS THE ALTERNATIVE TO MOB VIOLENCE. EVIL  
8 OBSTRUCTION OF JUSTICE ONLY SERVES TO DETER OTHERS FROM  
9 GOING TO THE AUTHORITIES WHEN THEY CAN PERSONALLY END  
10 THE HATERS WITH MORE AGGRESSIVE ACTION. Plaintiff is nonviolent,  
11 but knows his rights, and before Defendants even knew that Plaintiff figured them  
12 out, in self-defense could have easily and legally terminated lives of many  
13 felonious frauds. This case must set a precedence that LEGAL ACTION IS THE  
14 SOLUTION.

15  
16 133. On and around the date of January 15, 2017, additional housing fraud was  
17 more attempted including: breach of contract on signed lease, stolen application  
18 and background check money, attempted theft of down payment, number “3”  
19 fashion hack in the lobby during signing of papers, and puppet housing manager  
20 lies documented by text messages. All of this was carried out by a foolish housing  
21 manager(affiliate)/fraud who was cast like an actor by name hack and this was  
22 obviously being conducted by John Doe RICO fraud Defendant(s) abusing power  
23 over the Internet/communication technology.

24  
25 134. There are obvious patterns of racketeering activity connecting all the separate  
26 instances of housing fraud to the overall RICO violations. All the places have used  
27 construction/noise as a weapon, cutting the Internet off as a distraction etc., and all  
28 the people have played into name/word and number hacks. Noteworthy is the fact

1 that Plaintiff is a perfect tenant (with exception of being defrauded of the ability to  
2 pay rent at Quebec) and all these people had been attacking the Plaintiff for no  
3 good reason and when they should not have had any knowledge of the elements of  
4 this complaint.

## 5 6 7 **6. EMPLOYMENT FRAUD**

8  
9 135. Plaintiff has applied for thousands of relevantly select jobs over the years  
10 with no call backs for interviews. Defendants are interfering not only with the  
11 ability to acquire money by any means, but also with Plaintiff's equal employment  
12 opportunity rights. Plaintiff started to keep a log of all applications in May 2016.  
13 The log already contains hundreds of submissions. More if not all records dating  
14 back up to ten years can be recovered from email archives. Plaintiff has been  
15 applying for jobs at all the Defendant and most suspect companies over the past ten  
16 years. They are all additionally and mostly probably guilty of constitutional equal  
17 employment opportunity violations in conspiracy with the overall RICO fraud.  
18 "Jobs Log" is attached hereto as Exhibit "53" and by this reference made a part  
19 hereof.

20  
21 136. Defendants and suspect members Founders Funds/"PayPal Mafia" are also  
22 invested in the premier business and job network LinkedIn, who is suspected of  
23 both sabotaging the employment process and interfering with messaging. There  
24 appear to be regular name hacks, etc., in the new feed, similar to at Facebook.

25  
26 137. Plaintiff filed ten charges of employment discrimination at the Equal  
27 Employment Opportunity Commission (EEOC) office in the Edward Roybal  
28 Federal Building @ 255 E. Temple St. #4, Los Angeles, CA 90012. Not only did

1 the staff members appear to be cast to work there by name hack, but their behavior  
2 was despicably predictable not limited to their literally bullying the Plaintiff out  
3 the front door, intentionally stalling and dodging communications, then completely  
4 intentionally avoiding the intake interview and neglecting investigation before  
5 sending a letter to the Plaintiff claiming they did an investigation that failed for no  
6 reason, and that Plaintiff had the right to go to sue without their legally required  
7 intermediary communication and conflict resolution. Any citizen already has the  
8 right to sue for anything specifically fraud, but now the Plaintiff allegedly has to do  
9 it within 90 days, which is really irrelevant under RICO and misdirecting to  
10 anyone without knowledge. Office of the Inspector General also obstructed justice  
11 at the EEOC.

## 12 13 14 **D. COMPLAINT CONTINUED**

### 15 16 **1. DOMAIN NAME FRAUD CONTINUED**

17  
18 138. Domain name fraud has continued through the pattern of RICO fraud  
19 connected to Defendant corporations and people from the Plaintiff's personal  
20 network. The frauds are trying to cover up their tracks as/after Plaintiff gathers  
21 evidence and logs or reports it. The following facts require an understanding of  
22 Plaintiff's relationships described in new testimony described under seal in Exhibit  
23 "52."

24  
25 139. Before filing the original complaint, there was a nightclub/group who had  
26 used Plaintiff's older brother as DJ before allegedly employing older brother to do  
27 what appeared like posing as a stage manager instead of paying Plaintiff for video  
28 marketing. This was not coincidentally at the time of domain name fraud inclusive

1 to a night where “DomainNameInDispute” was obnoxiously repeated over the  
2 microphone for no reason other than to mess with Plaintiff’s head. They should  
3 not have known name. That same club was also letting promoters, Australians,  
4 Florida, etc. sneak in and out around the Plaintiff utilizing their six entrances/exits  
5 before banning Plaintiff for no good reason. At two points they had promoters  
6 assault/try to physically bully Plaintiff (pointed security cameras away and moved  
7 security guards). The frauds thought Plaintiff was oblivious the backdoor game,  
8 but Plaintiff always locates the entrances and exits, and they were not minding  
9 social media. More information about these violators is documented under seal in  
10 Exhibit “52.”

11  
12 140. Before filing the original complaint, younger brother was suspected of lying  
13 about not knowing the domain name at family dinner, then father/attorney admitted  
14 to trying to outbid Plaintiff without permission. Both parents gave their word that  
15 they told no one and that they had not and would not sabotage this or any business  
16 of the Plaintiff. They are all liars and Plaintiff’s parents most probably told  
17 siblings the domain name and colluded with Defendants. John Doe RICO frauds  
18 with espionage capabilities enabled and coming directly from Defendants are  
19 equally alleged to have leaked the domain name because they are working with  
20 Plaintiff’s family who seems to think they can steal intellectual property and  
21 enslave the Plaintiff who knows his rights.

22  
23 141. Before filing the original complaint nightclub promoters/suspected frauds  
24 connected to older brother and the Bad Karma Enterprise had been referencing  
25 “DomainNameInDispute” and trying to position themselves to move in on  
26 DomainNameInDispute.com, actions which are obviously being triggered by  
27 Plaintiff’s uneducated dumbass older brother and this is supported by clear and  
28 convincing evidence. Plaintiff knows most everyone deep in the Hollywood

1 nightlife scene and intentionally designed and developed the site to be  
2 “DomainNameInDispute.com” as a platform to give everyone not limited to all his  
3 people opportunity, so these people are all being very greedy. Preemptive  
4 identifying of suspects/John Does is sealed in Exhibit “52.”

5  
6 142. Failed/sabotaged ex-romantic interests have referenced  
7 “DomainNameInDispute” on social media, most relevantly in instances of before  
8 the first domain name case was filed, alleged to be controlled by fraud family and  
9 conspirator Defendants, and with the domain name probably being used as a bribe  
10 for these females as if they get half of what is the Plaintiff’s, like being married  
11 without prenuptial agreement/marital rights, and for purpose of silencing  
12 witnesses/suspects of RICO. The names of these females, plural with the addition  
13 of another female since said preliminary instances, have been showing up in name  
14 and number hacks some of which are also connected to John Doe(s) not limited to  
15 “Tom/Thomas.” More information under seal in Exhibit “52” and more new  
16 evidence can be provided on an as necessary basis.

17  
18 143. The RICO enterprise has been trying to cover their tracks by separating  
19 Plaintiff from parties attended by many of the RICO and DomainNameInDispute  
20 conspirators and suspects. They have gotten totally out of hand and taken things to  
21 the point where employees at separate hospitality groups, which Plaintiff  
22 frequently visited and basically worked at, intentionally tried to lure Plaintiff into  
23 traps that could have very possibly ended death/murder of Plaintiff as was  
24 probably the intent with motive being intellectual property theft. One specific  
25 group, which has been violating EEO rights of the Plaintiff for more than ten years,  
26 recently hired both the female from Florida, and a suspected rapist door man who  
27 used to let said female suspect racketeer from Florida into the club before she was  
28 of age. The group had already been hiring door men/haters with the same names

1 as John Does identified under seal. That hospitality group is connected to several  
2 serious elements of the racketeering activity and possibly obstruction of justice on  
3 the federal level being the Secret Service who has jurisdiction over most of this  
4 case based on computer fraud law. Plaintiff's allegations are not baseless.  
5 Plaintiff met a former Secret Service agent at the owner of this hospitality group's  
6 home years before that same individual tried to recently press phony charges  
7 against Plaintiff. The false report would have resulted in violation of informal  
8 probation of the entrapment and false imprisonment case. Hard evidence links that  
9 group to that case. Furthermore, the first nightlife group mentioned is also alleged  
10 to have conspired to connect and coerce females into relations with rapists of  
11 Plaintiff's claims prior to attempted death entrapments.

12  
13 144. Pre-Filing & Ongoing: John Doe(s) has been cybersquatting, allegedly  
14 transferring the name around, and under identity concealment. Mostly importantly,  
15 they are both camping on the name pending the outcome of this situation because  
16 moving forward with their plans would be incriminating, and to drive up the value  
17 based on whatever happens here. Keyword "camping" on a domain name in bad  
18 faith is not legal. RICO fraud relief should have more weight than but inclusive  
19 the domain name claim based on both cybersquatting and misrepresentative/invalid  
20 registration information.

21  
22 145. The corrupt public defender assigned to the entrapment case in 2015 was  
23 more interested in DomainNameInDispute.com than Plaintiff's defense. At the  
24 first meeting in the library at the public defenders' office, the PD wrote  
25 "DomainNameInDispute.com" in large letters, underlined, and with exclamation  
26 marks on a paper for no apparent reason, and then made sure the  
27 Plaintiff/defendant took notice to what PD was writing and without giving  
28 explanation, and where it took the PD months to get to review other vital defensive



1 information and evidence. The PD and other court actors were cast both by  
2 name(hack) and conflicting personal beliefs between the PD and  
3 Plaintiff/Defendant.  
4

5 146. After firing the corrupt PD, because the corrupt judge fraudulently denied a  
6 Marsden for a new PD, Plaintiff/Defendant in pro se was sent to corrupt Mental  
7 Health Court (MHC) for no just reason, but rather to gag the Plaintiff/pro se  
8 defense from proving false imprisonment etc., and on the day Plaintiff/Defendant  
9 was supposed to receive information from multiple subpoenas that should have  
10 given positive identification of responsible should be Defendants/trappers  
11 including a true history of hidden domain name registration since domain name  
12 related fraud began.  
13

14 147. After being denied information subpoenaed from court and while in the MHC  
15 process, Plaintiff was suddenly bombarded by frauds sent by Defendants/suspects  
16 claiming to be responding to the low-key domain name subpoena with most  
17 probably false and misdirecting information; in a similar pattern of name and  
18 number hack communications. Plaintiff had made several informal and legal  
19 requests for information about the domain name and received various calls and a  
20 few emails for weird and shady people claiming to have had unfounded connection  
21 to the name. One guy said he bought it for like \$10(Plaintiff's original offer/bid)  
22 and then was forced to return it.  
23

24 148. After being released from false imprisonment, Plaintiff found a computer file  
25 that probably came from GoDaddy on CD that was mailed and containing the  
26 protected identity currently illegally registered information. The required  
27 identifying name is missing, probably still being controlled by John Doe allegedly  
28 named Tom Tate, but the billing and email address were updated to another

1 domain name and business connected to a company called Articulate in New York,  
2 who has been unresponsive and has a board allegedly comprised of members who  
3 appear to be cast by name hack. There are other sketchy RICO fraud connections  
4 drawn from Articulate's web site. The domain name has not been used by these  
5 suspects for so long that the only sensible reason for sitting on it is their knowledge  
6 of the fraud and probable involvement in the racket who is most probably using  
7 Articulate as backup escape plan.

8  
9 149. To sum up the new domain name fraud, people have literally tried to kill the  
10 Plaintiff in attempt steal the intellectual property, there have been a lot more  
11 abnormal "DomainNameInDispute" references by specific suspected frauds, there  
12 have been continuous name hacks referencing "DomainNameInDispute" and  
13 people more than suspected of trying to defraud Plaintiff, news feed hacks appear  
14 to intentionally be making "DomainNameInDispute" stuff show up too often, and  
15 the Plaintiff still has not told people the name, has kept this mostly on the down  
16 low/back burner while he works in silence, the entire fraud is both obviously  
17 happening and only stands as evidence to a legitimate claim by the Plaintiff.

18  
19 150. Plaintiff is sitting on some significant evidence connecting suspects  
20 (mentioned in Exhibit "52") and Defendants to more than domain name RICO  
21 fraud; however, some recent evidence pertaining to general domain name fraud etc.  
22 is attached hereto as Exhibit "64" and by this reference made a part hereof.

## 23 24 **2. UNDENIABLE DEFENDANT ACCOUNTABILITY**

25  
26  
27 151. Facebook: Plaintiff has been on Facebook since the early days of it being a  
28 closed platform limited to few select universities. The evidence demonstrates a

1 pattern of criminal racketeering activity; all of which was first recognized and  
2 documented at the same time starting with fraud and hacks at Facebook who either  
3 created most severe damage causing problems. John Does at Facebook with  
4 administrative powers made a conscious and intentional decision to single the  
5 Plaintiff out with clearly customized and unprovoked attacks. Plaintiff has  
6 personal connections to high level employees going all the way up to the liable  
7 RICO fraud enablers being Facebook and the CEO. (See Exhibit "40")  
8

9 152. One of the first times if not the first time Facebook disabled Plaintiff's  
10 account had to do with sending Mark Zuckerberg a personal message with no  
11 reason for a problem; possibly with a question about developing an app. Mr.  
12 Zuckerberg is both CEO/Owner and original developer at Facebook and therefore  
13 has both admin access, authority over anyone else with access, which is unlikely to  
14 be many, and executive responsibility. Plaintiff both acquired a list of Facebook  
15 corporate emails, attempted to add friends and message execs, and used email  
16 support, feedback, contact, etc., channels through Facebook's website to both make  
17 sure this John Doe, possibly to be added as Defendant, knows what is going on and  
18 that he is liable. There is zero probability that Mr. Zuckerberg is not well aware, at  
19 least in some way involved, capable of identifying more John Does, and acting  
20 negligent should not excuse him from the pattern of racketeering that started at  
21 Facebook. Plaintiff is planning to add Mr. Zuckerberg as a Defendant after  
22 connecting with Facebook attorneys and if this goes to trial.  
23

24 153. Apple: Not only has Apple directly violated the Plaintiff, but responsibility  
25 falls upon Apple to prevent software, especially after a complaint, not only from  
26 existing, but also from being distributed through their network. Apple is not only a  
27 root of all evil in this case, but Apple is enabling Defendants by permitting release  
28

1 software running illegal code. Apple is undoubtedly involved and responsible  
2 based on scientific observation and testing.

3 154. Plaintiff made many attempts to communicate directly with Tim Cook who is  
4 the CEO of Apple. Plaintiff eventually received live communication from the  
5 alleged highest level of executive relations reporting directly to Mr. Cook. Jocelyn  
6 Lara was either lying or in denial; regardless, there is no way that Mr. Cook does  
7 not have full knowledge of complaints, but again responsibility falls on this his  
8 shoulders for intentionally not being part of the solution thereby making this more  
9 than suspected John Doe a major problem. Furthermore, Plaintiff is 99% sure that  
10 Mr. Cook stalked the Plaintiff at the pharmacy in similar fashion as other stalkers,  
11 which was followed up by a family member entering the building while Plaintiff  
12 was exiting; before Mr. Cook left.

13  
14 155. Google: Following the similar pattern of racketeering fraud, harassment,  
15 termination, name and number threats and hack attacks that started at Facebook,  
16 Alphabet formerly Google has sabotaged accounts worse than preventing views  
17 within the YouTube community. Google is also more than suspect of singling the  
18 Plaintiff out and even going as far as to rewrite code to reduce reach/page rank and  
19 programming their web browser "Chrome" to cause discrete JavaScript errors.  
20 However, the easiest thing to prove are the YouTube hacks and terminations and  
21 name/number hacks from when Google Plus was launched.

22  
23 156. Plaintiff has a fraud family connection who was the executive assistant to one  
24 of the CEO/Owners of Google, others who have ties to Hollywood agencies and  
25 YouTube, and Plaintiff has been contacts Google Ventures and executives for  
26 business and relief for as long as the RICO fraud has been going on, but only to be  
27 neglected and ignored. Sergey Brin and/or Larry Page could possibly be held  
28

1 responsible for Alphabet’s involvement, but Facebook and Apple probably caused  
2 more damage.

3  
4 157. Twitter is mostly annoying because of Plaintiff’s constantly hacked Twitter  
5 feed, but censorship and fake news is a big deal. They have been stunting growth  
6 by cutting reach. Plaintiff made several attempted to resolve this issue directly  
7 with Twitter and CEO Jack Dorsey, but the Defendants obviously support John  
8 Doe and suspects.

9  
10 158. All of the above have not only violated Equal Employment Opportunity  
11 rights for reasons of religious discrimination based on age and birth order, which is  
12 demonstrated by the evidence not limited to name and number hacks, but they are  
13 either responsible or know who is directly responsible for the fact that the  
14 Plaintiff’s right to employment has been violated for the past ten years.

15  
16 159. John Doe aka Tom Tate: The individual and/or group allegedly identified as  
17 “Tom Tate” by Network Solutions is accused of more than fraudulent  
18 misrepresentation, mail fraud, and cybersquatting, all in conspiracy with the  
19 recognizable pattern of RICO fraud and in violation of ICANN. More violations  
20 and probably more definitive Defendants pending new subpoenas to be connected  
21 to evidence attached hereto as Exhibit “58” and by this reference made a part  
22 hereof.

23  
24 160. An easy way to for law enforcement to detect would be starting with finding  
25 the common connection between all fraud landlords/roommates per  
26 communication records, but justice is clearly being obstructed.

1 161. There is clearly a common fraud or common frauds pulling strings of various  
2 groups if people. All of this can only be accomplished through communication  
3 technology that is logged by phone companies/Internet service providers and  
4 government agencies. It should be easy to validate the information in Exhibit 52,  
5 which undeniably identifies suspects, but the court can decide if any of the name  
6 criminals should go prison after Plaintiff receives relief as requested.

7  
8 162. Plaintiff is a True OG = Honest Original Genius.

9  
10  
11 **VI. CAUSES OF ACTION & COUNTS**

12  
13 \*Plaintiff can competently and verbally argue all the following counts, causes of  
14 action, and their elements where there may be any miscommunication in what is  
15 read or written.

16  
17 **COUNT ONE**

18 **Violations of RICO - 18 USC § 1962(a)(c)**

19 (Against All Defendants)

20  
21 163. Plaintiff re-alleges and restates paragraphs 1 through 162.

22  
23 **Federal Predicate Crime: Violations of RICO;**

24 164. Racketeer Influenced & Corrupt Organizations Act of 1970 (RICO)  
25 18 USC §§ 1961 et seq; 1962 - Prohibited Activities "(a) It shall be unlawful for  
26 any person who has received any income derived, directly or indirectly, from a  
27 pattern of racketeering activity... to use or invest, directly or indirectly, any part of  
28 such income, or the proceeds of such income, in acquisition of any interest in, or

1 the establishment or operation of, any enterprise which is engaged in, or the  
2 activities of which affect, interstate or foreign commerce. (b) It shall be unlawful  
3 for any person through a pattern of racketeering activity... to acquire or maintain,  
4 directly or indirectly, any interest in or control of any enterprise which is engaged  
5 in, or the activities of which affect, interstate or foreign commerce. (c) It shall be  
6 unlawful for any person employed by or associated with any enterprise engaged in,  
7 or the activities of which affect, interstate or foreign commerce, to conduct or  
8 participate, directly or indirectly, in the conduct of such enterprise's affairs through  
9 a pattern of racketeering activity or collection of unlawful debt. (d) It shall be  
10 unlawful for any person to conspire to violate any of the provisions of subsection  
11 (a), (b), or (c) of this section."  
12

13 **Civil Cause of Action; Violations of RICO:**

14 165. 18 USC § 1964 – Civil Remedies “(a) The district courts of the United States  
15 shall have jurisdiction to prevent and restrain violations of section 1962 of this  
16 chapter by issuing appropriate orders, including, but not limited to: ordering any  
17 person to divest himself of any interest, direct or indirect, in any enterprise;  
18 imposing reasonable restrictions on the future activities or investments of any  
19 person, including, but not limited to, prohibiting any person from engaging in the  
20 same type of endeavor as the enterprise engaged in, the activities of which affect  
21 interstate or foreign commerce; or ordering dissolution or reorganization of any  
22 enterprise, making due provision for the rights of innocent persons. (c) Any person  
23 injured in his business or property by reason of a violation of section 1962 of this  
24 chapter may sue therefor in any appropriate United States district court and shall  
25 recover threefold the damages he sustains and the cost of the suit, including a  
26 reasonable attorney's fee..."  
27  
28

1 166. "To **state a claim**, a plaintiff must allege (1) that the defendant received  
2 money from a pattern of racketeering activity, (2) invested that money in an  
3 enterprise, (3) the enterprise affected interstate commerce, and (4) an injury  
4 resulting from the investment of racketeering income distinct from an injury  
5 caused by the predicate acts themselves." Johnson v. GEICO Cas. Co., 516 F.  
6 Supp. 2d 351 (D. Del. 2007).

7  
8 **Statement of Claim; Violations of RICO:**

9 167. Plaintiff alleges that through an obvious pattern of racketeering activity,  
10 conspiring Defendants have been defrauding the Plaintiff of civil rights, life/time,  
11 money, relationships, and interstate to intergalactic business. Defendants received  
12 money from this pattern of racketeering activity, invested money into the  
13 enterprise, related business and crime affects interstate commerce, and injury not  
14 limited to market dilution resulting from the investment of racketeering income  
15 distinct from an injury caused by the predicate acts themselves have been causing  
16 major problems for the Plaintiff. Defendants, their criminal enterprise, and  
17 racketeering activity have directly and indirectly caused serious injury and  
18 irreparable damage to the Plaintiff.

19  
20 168. Defendants and suspects also known as Bad Karma Enterprise constituted an  
21 "enterprise," within the meaning of 18 USC §§ 1961(4) & 1962(c), in that they  
22 were "a group of individuals associated in fact" (hereinafter referred to as the  
23 "Defendants"). Defendants shared the common purpose of (among other things)  
24 defrauding Plaintiff of money and human/civil rights. Defendants members are  
25 related in that they are parties to a putative business and an obvious pattern of  
26 criminal activity that is only possible through insider knowledge. Defendants  
27 possessed sufficient longevity for the members to carry out their purpose(s) in that  
28 Bad Karma Enterprise existed from 2007 through 2017 (at a minimum).



1  
2 169. Defendants are each a “corporation” or “person,” within the meaning of 18  
3 USC §§ 1961(3)(4) & 1962 (c), who individually conducted, participated in,  
4 engaged in, and operated and managed at the affairs of the Plaintiff through a  
5 pattern of racketeering activity within the meaning of 18 USC §§ 1961(1)(2),  
6 1961(5) & 1962(a)(b)(c). Said pattern of racketeering activity consisted of, but  
7 was not limited to, the acts of mail and wire fraud, obstruction of justice, threats of  
8 murder, etc. (described in paragraphs 1-162, supra) and further stated in relevant  
9 counts and causes of action.

10  
11 170. At all relevant times, the enterprises alleged in paragraphs 1 through 169  
12 (supra) were related so as to establish a pattern of racketeering activity, within the  
13 meaning of 18 USC § 1962(c), in that their common purpose was to defraud  
14 Plaintiff of money and human/civil rights, their common result was defrauding  
15 Plaintiff of money and human/civil rights; Defendants, individually and through  
16 their agent, directly and indirectly, participated in all of the acts and employed the  
17 same or similar methods of fraud, Plaintiff was the victim of the acts of  
18 racketeering; and/or the acts of racketeering were otherwise interrelated by  
19 distinguishing characteristics and were not isolated events.

20  
21 171. All of the acts of racketeering described in paragraphs 1 through 170 (supra)  
22 were continuous so as to form a pattern of racketeering activity in that Defendants  
23 engaged in the predicate acts over a substrata period of time or in that Defendants’  
24 acts of racketeering were an extension of original efforts to wrongfully defraud  
25 Plaintiff and steal or control Plaintiff’s intellectual property, and Defendants’ acts  
26 of racketeering threaten to continue indefinitely if not for requested intervention  
27 from the Department of Justice.

1 172. As a direct and proximate result of, and by reason of, the activities of  
2 Defendants, and their conduct in violation of 18 USC § 1962(c), Plaintiff was  
3 injured in more than his business or property, within the meaning of 18 USC §  
4 1962(c). Among other things, Plaintiff suffered damages to the extent his money  
5 or property was stolen, income cut off; legal fees have been incurred and time has  
6 been lost; to the extent that Plaintiff paid for services that provided no benefit to  
7 Plaintiff and only inflicted harm upon him (e.g., fraudulent housing payments and  
8 application fees, printing and travel expenses, fake loan scam, etc.). Plaintiff is,  
9 therefore, entitled to recover threefold the damages he sustained together with the  
10 cost of the suit, including costs, reasonable attorneys' fees, and reasonable experts'  
11 fees plus punitive damages and other reasonably requested relief.

12  
13  
14 **COUNT TWO**

15 **RICO/Civil Conspiracy - 18 USC §§ 1962(d) & 1349**

16 (Against All Defendants)

17  
18 173. Plaintiff re-alleges and restates paragraphs 1 through 172.

19  
20 **Predicate Federal Crime; RICO Conspiracy:**

21 174. 18 U.S. Code § 1962 - Prohibited Activities “(d) It shall be unlawful for any  
22 person to conspire to violate any of the provisions of subsection (a), (b), or (c) of  
23 this section.”

24  
25 **Legal Doctrine; Civil Conspiracy:**

26 175. "The elements of an action for civil conspiracy are the formation and  
27 operation of the conspiracy and damage resulting to plaintiff from an act or acts  
28 done in furtherance of the common design... In such an action the major

1 significance of the conspiracy lies in the fact that it renders each participant in the  
2 wrongful act responsible as a joint tortfeasor for all damages ensuing from the  
3 wrong, irrespective of whether or not he was a direct actor and regardless of the  
4 degree of his activity." (Doctors' Co. v. Superior Court (1989) 49 Cal.3d 44, citing  
5 Mox Incorporated v. Woods (1927) 202 Cal. 675, 677-78.)' (Id. at 511.)

6  
7 176. "Conspiracy is not a cause of action, but a legal doctrine that imposes  
8 liability on persons who, although not actually committing a tort themselves, share  
9 with the immediate tortfeasors a common plan or design in its perpetration. By  
10 participation in a civil conspiracy, a coconspirator effectively adopts as his or her  
11 own the torts of other coconspirators within the ambit of the conspiracy. In this  
12 way, a coconspirator incurs tort liability co-equal with the immediate tortfeasors.  
13 Standing alone, a conspiracy does no harm and engenders no tort liability. It must  
14 be activated by the commission of an actual tort. 'A civil conspiracy, however  
15 atrocious, does not per se give rise to a cause of action unless a civil wrong has  
16 been committed resulting in damage...' (Allied Equipment Corp. v. Litton Saudi  
17 Arabia Ltd., supra, 7 Cal.4th at 510-11.)

18  
19 **Statement of Claim; RICO Conspiracy;**

20 177. Defendants conspired to conduct or participate, directly, or indirectly, in the  
21 conduct of the affairs of the enterprises (see supra paragraphs 1-176) through a  
22 pattern of racketeering activity (see supra paragraphs 1-176) in violation of 18  
23 USC § 1962(d). In particular, Defendants intended to further an endeavor of the  
24 enterprise which satisfies all the elements of substantive RICO criminal offenses  
25 (18 USC § 1962(a)(b)(c)) and adopted the goal of furthering or facilitating the  
26 criminal endeavor.

27  
28 178. 18 USC § 1349 - Attempt & Conspiracy "Any person who attempts or

1 conspires to commit any offense under this chapter [(mail/wire fraud etc.)] shall be  
2 subject to the same penalties as those prescribed for the offense, the commission of  
3 which was the object of the attempt or conspiracy."

4 179. Plaintiff was injured by Defendants' overt acts of racketeering activity and  
5 otherwise unlawful under the RICO statute, which among other predicate criminal  
6 acts, include mail and wired fraud, obstruction of justice, threats of murder, etc.  
7 (described in paragraphs 1-178, supra) and further stated in relevant counts and  
8 causes of action.

9  
10 180. As a direct and proximate result of, and by reason of, the activities of  
11 Defendants, and their conduct in violation of 18 USC § 1962(d), Plaintiff was  
12 injured in more than his business and property, within the meaning of 18 USC §  
13 1962(a)(b)(c). Among other loss, Plaintiff suffered damages to the extent his  
14 money or property was stolen, income cut off, legal fees have been incurred and  
15 time has been lost; to the extent that Plaintiff paid for services that provided no  
16 benefit to Plaintiff and only inflicted harm upon him (e.g., fraudulent housing  
17 payments and application fees, printing and travel expenses, fake loan scam, etc.).  
18 Plaintiff its, therefore, entitled to recover threefold the damages he sustained  
19 together with the cost of the suit, including costs, reasonable attorneys' fees, and  
20 reasonable experts' fees plus punitive damages and other reasonably requested  
21 relief.

22  
23 **COUNT THREE**

24 **FRAUD - PEN § 470, 18 USC § 1001, CIV § 1710, CIV § 3294**

25 (Against All Defendants)  
26

27 181. Plaintiff re-alleges and restates paragraphs 1 through 180.  
28

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**Predicate Federal Crime; Fraud:**

182. 18 USC § 1001 "(a) Except as otherwise provided in this section, whoever, in any matter within the jurisdiction of the executive, legislative, or judicial branch of the Government of the United States, knowingly and willfully— (1) falsifies, conceals, or covers up by any trick, scheme, or device a material fact; (2) makes any materially false, fictitious, or fraudulent statement or representation; or (3) makes or uses any false writing or document knowing the same to contain any materially false, fictitious, or fraudulent statement or entry; shall be fined under this title, imprisoned not more than 5 years"

**Predicate State Crime; Fraud:**

183. (c.) California Penal Code Section 470, which makes it unlawful, with intent to defraud, to alter anything real or personal.

**Civil Causes of Action; Fraud:**

184. CIV § 3294 – Civil Remedies “(a) In an action for the breach of an obligation not arising from contract, where it is proven by clear and convincing evidence that the defendant has been guilty of oppression, fraud, or malice, the plaintiff, in addition to the actual damages, may recover damages for the sake of example and by way of punishing the defendant.”

**Statement of Claim; Fraud:**

185. Defendants made false representations to Plaintiff, as set forth with specificity in paragraphs 1 through 184, supra. Defendants knew the statements were false at the time the statements were made to Plaintiff. Defendants intended

1 to defraud Plaintiff and intended that Plaintiff would rely upon their false  
2 representations. Plaintiff justifiably and detrimentally relied upon Defendants'  
3 false statements. Plaintiff was directly injured by reason of Defendants'  
4 statements.

5  
6 186. Plaintiff is accusing defendants of thousands of counts of fraud etc. over ten  
7 plus years if you consider every instance requiring capturing a screen shot only  
8 accounts for a fraction of instances of violations.

9  
10 187. Plaintiff is informed and believes, and thereupon alleges, that each of the  
11 Defendants were the agents, representatives, servants, employees, principals, joint-  
12 ventures, co-conspirators, and/or representatives of each of the remaining  
13 codefendants and, in doing the acts hereinafter alleged, were acting within the  
14 course and scope of said agency, employments, joint-venture, conspiracy, and/or  
15 service with the approval, knowledge, authority, acquiescence, and/or ratification  
16 of each of the remaining Defendants and, therefore, the Defendants who did not  
17 directly engage in the actions upon which this count is based are as liable for the  
18 resulting damages as the Defendants who did engage in said actions.

19  
20 188. Plaintiff is entitled to monetary damages in excess of \$100,000,000,000.00  
21 from Defendants to fairly and adequately compensate him for the injuries and  
22 damages he sustained by reason of Defendants' (various) criminal acts not limited  
23 to fraud.

24  
25 189. In doing the acts alleged above, which are incorporated herein by this  
26 reference as if repeated in full, Defendants acted intentionally, outrageously,  
27 oppressively, despicably, fraudulently, and maliciously in conscious disregard for  
28 Plaintiff's rights and welfare, and in contravention of California law and public

1 policy. As result thereof, Plaintiff is entitled to exemplary punitive damages in an  
2 amount sufficient to properly punish and deter Defendants.

3 190. Fraudulent misrepresentation of registration/contact information, which the  
4 plaintiff and public are reliant upon, which was a violation of terms of service with  
5 the registrar, can be viewed as the underlying cause of all mentioned damages to  
6 the plaintiff. Defendants are accused and suspected of both negligent and  
7 intentional misrepresentation, deceit, and concealment of domain name registration  
8 information, which Plaintiff had reliance upon and suffered serious damages not  
9 limited to pecuniary loss.

## 10 11 12 **COUNT FOUR**

### 13 **Computer Fraud - 18 USC § 1030**

14 (Against All Defendants)

15  
16 191. Plaintiff re-alleges and restates paragraphs 1 through 190.

### 17 18 **Predicate Federal Crimes; Computer Fraud:**

19 192. Fraud and Related Activity in Connection with Computers

20 18 USC § 1030 (a)(2)(c) & (a)(4) “(a) Whoever— (2) intentionally accesses a  
21 computer without authorization or exceeds authorized access, and thereby  
22 obtains— (C) information from any protected computer;” & (a) Whoever— (4)  
23 knowingly and with intent to defraud, accesses a protected computer without  
24 authorization, or exceeds authorized access, and by means of such conduct furthers  
25 the intended fraud and obtains anything of value... [can] be punished as provided  
26 in subsection (c) of this section.”

1 193. Phishing “attempts” per 18 USC § 1030(b) to gain access to protected  
2 computers used for banking and data management are easily proven, but more  
3 important is the Plaintiff’s professional expert witness testimony of unauthorized  
4 access to private data, screen watching and/or keystroke recording. Ongoing  
5 computer fraud mentioned above is supported by evidence labeled Exhibit “35.”  
6

7 **Civil Cause of Action; Computer Fraud:**

8 194. 18 USC § 1030(g) “Any person who suffers damage or loss by reason of a  
9 violation of this section may maintain a civil action against the violator to obtain  
10 compensatory damages and injunctive relief or other equitable relief.”  
11

12 195. To state a civil claim for violation of the Computer Fraud & Abuse Act  
13 (CFAA), a Plaintiff must allege damage or loss; caused by; a violation of one of  
14 the substantive provisions set forth in § 1030(a); and conduct involving one of the  
15 factors in § 1030(c)(4)(A)(i)(I)-(V).  
16

17 **Statement of Claim; Computer Fraud:**

18 196. Plaintiff alleges that Defendants accessed several of the Plaintiff’s protected  
19 computers; without authorization; knowingly and with intent to defraud; and as a  
20 result, furthered the intended fraud and obtained both information and intellectual  
21 property of value. Damages to Plaintiff exceed \$5,000 in value; include impaired  
22 medical care of Plaintiff; caused physical injury to Plaintiff; and are a threat to  
23 both public health and safety.  
24

25 197. This predicate crime of computer fraud is identified as an act of “racketeering  
26 activity” in 18 USC §1961 Definitions (1)(B), which establish the predicative  
27 elements of the Defendants’ RICO violations. Furthermore, (5) “pattern of  
28 racketeering activity” [only] requires at least two acts of racketeering activity...



1 within ten years... after the commission of a prior act of racketeering activity,” and  
2 this section of the complaint covers an excessive amount of RICO violations.  
3 198. Plaintiff has suffered serious and irreparable damages pursuant to these  
4 violations further detailed in the “Damages” section of this complaint. Loss  
5 includes, but is not limited to: response costs, damage assessments, restoration of  
6 data or programs, lost sales from website, lost advertising revenue from website,  
7 harm to reputation and goodwill, loss of relationships, wasted time, and other  
8 reasonable costs.

9  
10  
11 **COUNT FIVE**

12 **Wire Fraud - 18 USC § 1343**

13 (Against All Defendants)

14  
15 199. Plaintiff re-alleges and restates paragraphs 1 through 198.

16  
17 **Predicate Federal Crime; Wire Fraud:**

18 200. 18 USC § 1343 - Fraud by Wire, Radio, or Television “Whoever, having  
19 devised or intending to devise any scheme or artifice to defraud, or for obtaining  
20 money or property by means of false or fraudulent pretenses, representations, or  
21 promises, transmits or causes to be transmitted by means of wire, radio, or  
22 television communication in interstate or foreign commerce, any writings, signs,  
23 signals, pictures, or sounds for the purpose of executing such scheme or artifice,  
24 shall be fined under this title or imprisoned not more than 20 years, or both...”

25  
26 201. “The four essential elements of the crime of wire fraud are: (1) that the  
27 defendant voluntarily and intentionally devised or participated in a scheme to  
28 defraud another out of money; (2) that the defendant did so with the intent to

1 defraud; (3) that it was reasonably foreseeable that interstate wire communications  
2 would be used; and (4) that interstate wire communications were in fact used.”  
3 (Manual of Model Criminal Jury Instructions for the District Courts of the 8th  
4 Circuit 6.18.1341 (West 1994)

5  
6 **Statement of Claim; Wire Fraud:**

7 202. Plaintiff alleges that Defendants intentionally devised and carried out a  
8 scheme to defraud Plaintiff through both interstate wire and as recently as of the  
9 end of 2017 to early 2018 now includes television communications. Given the  
10 facts that Internet communications get bounced all around the globe, that  
11 Plaintiff’s communications not limited to through Defendant networks have an  
12 obvious reach spanning from national to an international audience, and that  
13 television shows are suspected to have broadcast Plaintiff’s criminally framed  
14 image to their national audiences, it was reasonably foreseeable that interstate wire  
15 communications would be and were used.

16  
17 203. This predicate crime of wire fraud is identified as an act of “racketeering  
18 activity” in 18 USC §1961 Definitions (1)(B), which establish the predicative  
19 elements of the Defendants’ RICO violations. Furthermore, (5) “pattern of  
20 racketeering activity” [only] requires at least two acts of racketeering activity...  
21 within ten years... after the commission of a prior act of racketeering activity,” and  
22 this section of the complaint covers an excessive amount of RICO violations.

23 204. Plaintiff has suffered serious and irreparable damages pursuant to these  
24 violations further detailed in the “Damages” section of this complaint. Loss  
25 includes, but is not limited to: response costs, damage assessments, restoration of  
26 data or programs, lost sales from website, lost advertising revenue from website,  
27 harm to reputation and goodwill, loss of relationships, wasted time, and other  
28 reasonable costs.

1  
2  
3 **COUNT SIX**

4 **Mail Fraud – 18 USC § 1341**

5 (Against All Defendants)

6  
7 205. Plaintiff re-alleges and restates paragraphs 1 through 204.

8  
9 **Predicate Federal Crime; Mail Fraud:**

10 206. 18 USC Ch. 63 - Mail Fraud & Other Fraud Offenses § 1341 – Frauds &  
11 Swindles “Whoever, having devised or intending to devise any scheme or artifice  
12 to defraud, or for obtaining money or property by means of false or fraudulent  
13 pretenses, representations, or promises... for the purpose of executing such scheme  
14 or artifice or attempting so to do... takes or receives therefrom, any such matter or  
15 thing... delivered by mail or such carrier according to the direction thereon... shall  
16 be fined under this title or imprisoned not more than 20 years, or both.”

17  
18 **Statement of Claim; Mail Fraud:**

19 207. Plaintiff alleges that Defendants committed mail fraud during the domain  
20 name fraud/conspiracy and in correspondence with wire fraud involving a federal  
21 agency being the USPS. Defendants devised a scheme to defraud Plaintiff, and in  
22 order to execute, Defendants made false representations in receipt of certified mail  
23 and through use of the Internet.

24 208. Plaintiff brings this cause of action pursuant to the following: (a.) 18 USC  
25 §1341, which makes it unlawful to use the mail for the purpose attempting to  
26 execute fraudulent acts., inclusive to (b.) 18 USC §1343, which makes it unlawful  
27 use the Internet for the purpose attempting to execute fraudulent acts. (also see  
28 Count Five; Wire Fraud)

1  
2 209. Plaintiff is suffered from ongoing violations and irreparable damages  
3 pursuant to domain name fraud violations not limited to cybersquatting as detailed  
4 in the “Damages” section of this complaint. Loss includes, but is not limited to:  
5 response costs, lost sales from websites, lost advertising revenue from websites,  
6 harm to reputation and goodwill, loss of relationships, wasted time, and other  
7 reasonable costs.

8  
9  
10 **COUNT SEVEN**

11 **Criminal Threats - PEN § 422**

12 (Against All Defendants)

13  
14 210. Plaintiff re-alleges and restates paragraphs 1 through 209.

15  
16 **Predicate State Crime; Criminal Threats:**

17 211. California Penal Code 422 PC defines the crime of "criminal threats"  
18 (formerly known as terrorist threats). “(a) Any person who willfully threatens to  
19 commit a crime which will result in death or great bodily injury to another person,  
20 with the specific intent that the statement, made verbally, in writing, or by means  
21 of an electronic communication device, is to be taken as a threat, even if there is no  
22 intent of actually carrying it out, which, on its face and under the circumstances in  
23 which it is made, is so unequivocal, unconditional, immediate, and specific as to  
24 convey to the person threatened, a gravity of purpose and an immediate prospect of  
25 execution of the threat, and thereby causes that person reasonably to be in  
26 sustained fear for his or her own safety or for his or her immediate family’s safety,  
27 [can] be punished by imprisonment in the county jail not to exceed one year, or by  
28 imprisonment in the state prison.”

1  
2 **Statement of Claim; Criminal Threats:**

3 212. Plaintiff alleges that Defendants have been making "criminal threats" to kill  
4 or physically harm his person and thereby placed Plaintiff in a state of reasonably  
5 sustained fear for his safety, the threat is specific and unequivocal, and Defendants  
6 communicated the threat verbally and via an electronically transmitted device.

7 These threats have not only caused Plaintiff to reasonably be in a sustained and  
8 concerned mindset over his safety, but to the point where it was necessary to report  
9 to several authorities, file lawsuits, and purchase a small firearm for protection.  
10

11 213. Defendants have made repetitive death threats on the Plaintiff's life through  
12 actions not limited to name and number hacks and conspiring to physically assault  
13 and verbally threaten Plaintiff. The computer crime related death threats started  
14 out as exorbitant, intentional, and misrepresentative display of the number "187,"  
15 which literally means "Murder, Death, Kill," in places where a number can be  
16 injected on Plaintiff's social media. This evolved into stalkers with the number  
17 187 etc. on suspected vanity license plates and apparel. This is an ongoing threat  
18 with violations as recent as 2018. "187" Number Hacks mentioned supra at  
19 paragraph 54 etc. are supported by evidence labeled Exhibit "7."  
20

21 214. These threats are predicate crimes identified as an act of "racketeering  
22 activity" in 18 USC §1961 Definitions (1)(A), which establish the predicative  
23 elements of the Defendants' RICO violations. Furthermore, (5) "pattern of  
24 racketeering activity" [only] requires at least two acts of racketeering activity...  
25 within ten years... after the commission of a prior act of racketeering activity," and  
26 this section of the complaint covers an excessive amount of RICO violations.  
27  
28

1 215. Plaintiff has suffered damages pursuant to these violations further detailed in  
2 the “Damages” section of this complaint. Loss includes, but is not limited to:  
3 response costs, harm to reputation and goodwill, wasted time, and other reasonable  
4 costs.

5  
6 **COUNT EIGHT**

7 **Obscene, Threatening, & Annoying Communications - PEN § 653m**

8 (Against All Defendants)

9  
10 216. Plaintiff re-alleges and restates paragraphs 1 through 216.

11  
12 **Predicate State Crime; Obscene, Threatening & Annoying Communications:**

13 217. PEN § 653m “(a) Every person who, with intent to annoy, telephones or  
14 makes contact by means of an electronic communication device with another and  
15 addresses to or about the other person any obscene language or addresses to the  
16 other person any threat to inflict injury to the person or property of the person  
17 addressed or any member of his or her family, is guilty...”

18  
19 **Statement of Claim: Obscene, Threatening, & Annoying Communications:**

20 218. Plaintiff alleges that, for around the past ten years to present day, Defendants  
21 have been intentionally and repetitively bombarding Plaintiff with worse than  
22 spam and hack communications, obviously with intent not only to annoy and  
23 harass, but apparently in attempt to create the illusion of or to cause psychological  
24 damage, which is a failed disturbance on mind over matter with exception of  
25 wasted time spent logging nuisances and filing legal actions.

26  
27 219. The excessive amount of the daily name and number hacks, etc. mentioned  
28 through the entire complaint, supported by clear and convincing evidence, and

1 serving as a distinguishably recognizable piece of obvious pattern of racketeering  
2 activity, has become so ridiculous that Plaintiff can hardly check his email or open  
3 an application developed by one of the Defendants without encountering  
4 something that is a violation of RICO law.

5  
6 220. The threatening aspects of these communications are predicate crimes  
7 identified as acts of “racketeering activity” in 18 USC §1961 Definitions (1)(A),  
8 which establish the predicative elements of the Defendants’ RICO violations.  
9 Furthermore, (5) “pattern of racketeering activity” [only] requires at least two acts  
10 of racketeering activity... within ten years... after the commission of a prior act of  
11 racketeering activity,” and this section of the complaint covers an excessive  
12 amount of RICO violations.

13  
14 221. Plaintiff has suffered damages pursuant to these violations further detailed in  
15 the “Damages” section of this complaint. Loss includes, but is not limited to:  
16 response costs, harm to reputation and goodwill, wasted time, and other reasonable  
17 costs.

18  
19  
20 **COUNT NINE**

21 **Stalking - PEN § 649(.9)**

22 (Against All Defendants)

23  
24 222. Plaintiff re-alleges and restates paragraphs 1 through 221.

25  
26 **Predicate State Crime; Stalking:**

27 223. PEN § 646(.9) “Any person who willfully, maliciously, and repeatedly  
28 follows or willfully and maliciously harasses another person and who makes a

1 credible threat with the intent to place that person in reasonable fear for his or her  
2 safety, or the safety of his or her immediate family is guilty of the crime of  
3 stalking, punishable by imprisonment.”  
4

5 **Statement of Claim; Stalking:**

6 224. Plaintiff alleges that Defendants are willfully, maliciously, and repeatedly  
7 following and harassing the Plaintiff, that Defendants have made many credible  
8 threats against Plaintiff not limited to in their stalking activities, and that  
9 Defendants are doing so with the specific intent not only to place Plaintiff in  
10 reasonable fear for his safety, but also with intent to damage Plaintiff by either  
11 fulfilling threats of violence or by creating the illusion of mental illness in attempt  
12 to justify false imprisonment etc.  
13

14 225. License Plate Stalkers, Camera Stalkers, Fashion Stalkers, and Trap Ho  
15 Stalkers mostly documented by clear and convincing evidence is consistent with  
16 the recurring pattern of racketeering activity, are obviously intentional acts ranging  
17 from almost harmless to illegal threats followed up by attacks being the problem.  
18 At least one person/Defendant is using others like drones to receptively and  
19 criminally stalk, harass, and threaten Plaintiff, thereby making all of them  
20 accountable for all aspects of the stalking, harassing and threats through conspiracy  
21 to engage in a pattern of racketeering activity.  
22

23 226. The threatening aspects of daily instances of stalking as recent as February  
24 2018 are predicate crimes identified as acts of “racketeering activity” in 18 USC  
25 §1961 Definitions (1)(A), which establish the predicative elements of the  
26 Defendants’ RICO violations. Furthermore, (5) “pattern of racketeering activity”  
27 [only] requires at least two acts of racketeering activity... within ten years... after  
28



1 the commission of a prior act of racketeering activity,” and this section of the  
2 complaint covers an excessive amount of RICO violations.

3 227. Plaintiff has suffered damages pursuant to these violations further detailed in  
4 the “Damages” section of this complaint. Loss includes, but is not limited to:  
5 response costs, harm to reputation and goodwill, wasted time, and other reasonable  
6 costs.

7  
8  
9 **COUNT TEN**

10 **Assault & Battery - PEN §§ 240 & 242**

11 (Against All Defendants)

12  
13 228. Plaintiff re-alleges and restates paragraphs 1 through 227.

14  
15 **Predicate State Crimes; Assault & Battery:**

16 229. PEN § 240 – Assault “is an unlawful attempt, coupled with a present ability,  
17 to commit a violent injury on the person of another.”

18  
19 230. PEN § 242 – Battery “is any willful and unlawful use of force or violence  
20 upon the person of another.”

21  
22  
23 **Statement of Claims; Assault & Battery:**

24 231. Plaintiff alleges that Defendants willfully, physically, and violently attacked  
25 Plaintiff who was sucker-punched on Hollywood Blvd., and on two separate  
26 occasions, was both strangled and verbally threatened inside of a Hollywood  
27 nightclub. There was at least one other incident involving security at a different  
28 club being coerced, by conspiring frauds, into dragging the plaintiff outside in a

1 chokehold. This was all viewed by known witnesses and is definitely in relation to  
2 conspiracy. Plaintiff currently takes the fifth on identifying suspects who are  
3 puppets in the conspiracy. Also assaulted by suspected security trap and further  
4 instigated by security/entraper who directed security to “rough him up” outside  
5 club mentioned in Exhibit 52.

6  
7 232. Plaintiff incurred damages to business, personal relations, and physically as  
8 witnessed by more than LAPD Hollywood.

9  
10 233. “Generally speaking, an assault is a demonstration of an unlawful intent by  
11 one person to inflict immediate injury on the person of another then present.’ A  
12 civil action for assault is based upon an invasion of the right of a person to live  
13 without being put in fear of personal harm.” (Lowry v. Standard Oil Co. of  
14 California (1944) 63 Cal.App.2d 1, 6—7 [146 P.2d 57])

15  
16 234. The threatening aspects of the assault and battery claim(s) is a/are predicate  
17 crime(s) identified as an act of “racketeering activity” in 18 USC §1961  
18 Definitions (1)(A), which establish the predicative elements of the Defendants’  
19 RICO violations. Furthermore, (5) “pattern of racketeering activity” [only]  
20 requires at least two acts of racketeering activity... within ten years... after the  
21 commission of a prior act of racketeering activity,” and this section of the  
22 complaint covers an excessive amount of RICO violations.

23  
24 235. Plaintiff has suffered damages pursuant to these violations further detailed in  
25 the “Damages” section of this complaint. Loss includes, but is not limited to:  
26 response costs, harm to reputation and goodwill, and other reasonable costs.

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**COUNT ELEVEN**

**Espionage - Economic & Personal - 18 USC § 1831**

(Against All Defendants)

236. Plaintiff re-alleges and restates paragraphs 1 through 235.

**Predicate Federal Crime; Espionage:**

237. Economic Espionage Act of 1996: 18 USC § 1831 “(a)In General.—  
Whoever, intending or knowing that the offense will benefit any foreign  
government, foreign instrumentality, or foreign agent, knowingly— (1) steals, or  
without authorization appropriates, takes, carries away, or conceals, or by fraud,  
artifice, or deception obtains such information; (2) without authorization copies,  
duplicates, sketches, draws, photographs, downloads, uploads, alters, destroys,  
photocopies, replicates, transmits, delivers, sends, mails, communicates, or  
conveys such information; (3) receives, buys, or possesses such information,  
knowing the same to have been stolen or appropriated, obtained, or converted  
without authorization; (4) attempts to commit any offense described in paragraphs  
(1) through (3); or (5) conspires with one or more other persons to commit any  
offense described in paragraphs (1) through (3), and one or more of such persons  
do any act to effect the object of the conspiracy, [can], except as provided in  
subsection (b), be fined under this title or imprisoned not more than 10 years, or  
both. (b) Any organization that commits any offense described in subsection (a)  
shall be fined...”

**Statement of Claim; Espionage:**

238. Plaintiff alleges that through GPS stalking, screen watching, book leaking,

1 domain name fraud, etc., Defendants are not just intentionally spying on Plaintiff,  
2 but they are also using espionage to steal trade secrets and cause damage to  
3 Plaintiff. Plaintiff's unreleased book contains trade secrets that were meant to be  
4 kept confidential until publication. Screen watching, suspected unauthorized  
5 access to computer, sharing and use of said trade secrets through conspiracy have  
6 violated the Plaintiff's rights and caused a domino effect of damages. Conspirators  
7 include local parties consisting of both citizens and aliens with foreign associations  
8 who are knowingly gaining from Defendant violations, specifically foreign  
9 Defendants mentioned in the Exhibit 52.

10  
11 239. Acts of the espionage claim involving both stalking with threats of murder  
12 and robbery are predicate crimes identified as acts of "racketeering activity" in 18  
13 USC §1961 Definitions (1)(A), which establish the predicative elements of the  
14 Defendants' RICO violations. Furthermore, (5) "pattern of racketeering activity"  
15 [only] requires at least two acts of racketeering activity... within ten years... after  
16 the commission of a prior act of racketeering activity," and this section of the  
17 complaint covers an excessive amount of RICO violations.

18  
19 240. Plaintiff has suffered serious and irreparable damages pursuant to these  
20 violations further detailed in the "Damages" section of this complaint. Loss  
21 includes, but is not limited to: response costs, damage assessments, restoration of  
22 data or programs, lost sales from website, lost advertising revenue from website,  
23 harm to reputation and goodwill, and other reasonable costs.

24  
25 **COUNT TWELVE**

26 **Theft of Trade Secrets - 18 USC §§ 1832 & 1836**

27 (Against All Defendants)  
28

1  
2 241. Plaintiff re-alleges and restates paragraphs 1 through 240.

3 **Predicate Federal Crime; Theft of Trade Secrets:**

4 242. 18 USC § 1832 “(a) Whoever, with intent to convert a trade secret, that is  
5 related to or included in a product that is produced for or placed in interstate or  
6 foreign commerce, to the economic benefit of anyone other than the owner thereof,  
7 and intending or knowing that the offense will, injure any owner of that trade  
8 secret.

9  
10 **Civil Cause of Action; Theft of Trade Secrets:**

11 243. 18 USC § 1836 - Civil Proceedings: “(b) **Private Civil Actions.**— (1)In  
12 general.— An owner of a trade secret that is misappropriated may bring a civil  
13 action under this subsection if the trade secret is related to a product or service  
14 used in, or intended for use in, interstate or foreign commerce. **(2) Civil**  
15 **seizure.**— (A) In general.— (i)Application.— Based on an affidavit or verified  
16 complaint satisfying the requirements of this paragraph, the court may, upon ex  
17 parte application but only in extraordinary circumstances, issue an order providing  
18 for the seizure of property necessary to prevent the propagation or dissemination of  
19 the trade secret that is the subject of the action... (3)**Remedies.**—In a civil action  
20 brought under this subsection with respect to the misappropriation of a trade secret,  
21 a court may— (A) grant an injunction— (i) to prevent any actual or threatened  
22 misappropriation described in paragraph (1) on such terms as the court deems  
23 reasonable... (B) **award**— (i) (I) damages for actual loss caused by the  
24 misappropriation of the trade secret; and (II) damages for any unjust enrichment  
25 caused by the misappropriation of the trade secret that is not addressed in  
26 computing damages for actual loss... (C) if the trade secret is willfully and  
27 maliciously misappropriated, award exemplary damages in an amount not more  
28 than 2 times the amount of the damages awarded under subparagraph (B); and (D)

1 if a claim of the misappropriation is made in bad faith, which may be established  
2 by circumstantial evidence, a motion to terminate an injunction is made or opposed  
3 in bad faith, or the trade secret was willfully and maliciously misappropriated,  
4 award reasonable attorney’s fees to the prevailing party. **(c)Jurisdiction.**— The  
5 district courts of the United States shall have original jurisdiction of civil actions  
6 brought under this section.”  
7

8 **Statement of Claim; Theft of Trade Secrets:**

9 244. Plaintiff alleges that Defendants stole and distributed intellectual property  
10 belonging to the Plaintiff, which contained trade secrets: leaked book, suspected  
11 screen watching, coerced publication. Trade secrets in the stolen book have been  
12 used to steal business.  
13

14 245. Theft of Trade Secrets involving acts not limited to domain name fraud and  
15 stolen and leaked information from screen watching and leaked book are predicate  
16 crimes identified as acts of “racketeering activity” in 18 USC §1961 Definitions  
17 (1)(A), which establish the predicative elements of the Defendants’ RICO  
18 violations. Furthermore, (5) “pattern of racketeering activity” [only] requires at  
19 least two acts of racketeering activity... within ten years... after the commission of  
20 a prior act of racketeering activity,” and this section of the complaint covers an  
21 excessive amount of RICO violations.  
22

23 246. Plaintiff has suffered serious and irreparable damages pursuant to these  
24 violations further detailed in the “Damages” section of this complaint. Loss  
25 includes, but is not limited to: response costs, lost sales from websites, lost  
26 advertising revenue from websites, harm to reputation and goodwill, loss of  
27 relationships, wasted time, and other reasonable costs.  
28

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2  
3 **COUNT THIRTEEN**

4 **Obstruction of Justice - 18 USC §§ 1510, 1513, & 1985**

5 (Against All Defendants)

6  
7 **Predicate Federal Crimes; Obstruction of Justice:**

8 247. 18 USC § 1510 - Obstruction of Criminal Investigations “(a) Whoever  
9 willfully endeavors by means of bribery to obstruct, delay, or prevent the  
10 communication of information relating to a violation of any criminal statute of the  
11 United States by any person to a criminal investigator shall be fined under this title,  
12 or imprisoned not more than five years, or both.”

13  
14 248. 18 USC § 1513 - Retaliating Against a Witness, Victim, or an Informant  
15 “(a)(1) Whoever kills or attempts to kill another person with intent to retaliate  
16 against any person for— (A) the attendance of a witness or party at an official  
17 proceeding, or any testimony given or any record, document, or other object  
18 produced by a witness in an official proceeding; or (B) providing to a law  
19 enforcement officer any information relating to the commission or possible  
20 commission of a Federal offense or a violation of conditions of probation,  
21 supervised release, parole, or release pending judicial proceedings, [can] be  
22 punished as provided in paragraph (2) The punishment for an offense under this  
23 subsection is— (B) in the case of an attempt, imprisonment for not more than 30  
24 years. (b) Whoever knowingly engages in any conduct and thereby causes bodily  
25 injury to another person or damages the tangible property of another person, or  
26 threatens to do so, with intent to retaliate against any person for— (1) ...any  
27 testimony given or any record, document, or other object produced by a witness in  
28 an official proceeding; or ...[can] be fined under this title or imprisoned not more

1 than 20 years, or both. (c) If the retaliation occurred because of attendance at or  
2 testimony in a criminal case, the maximum term of imprisonment which may be  
3 imposed for the offense under this section shall be the higher of that otherwise  
4 provided by law or the maximum term that could have been imposed for any  
5 offense charged in such case. (d) There is extraterritorial Federal jurisdiction over  
6 an offense under this section. (e) Whoever knowingly, with the intent to retaliate,  
7 takes any action harmful to any person, including interference with the lawful  
8 employment or livelihood of any person, for providing to a law enforcement  
9 officer any truthful information relating to the commission or possible commission  
10 of any Federal offense, shall be fined under this title or imprisoned not more than  
11 10 years, or both. (f) Whoever conspires to commit any offense under this section  
12 shall be subject to the same penalties as those prescribed for the offense the  
13 commission of which was the object of the conspiracy. (g) A prosecution under  
14 this section may be brought in the district in which the official proceeding (whether  
15 pending, about to be instituted, or completed) was intended to be affected, or in  
16 which the conduct constituting the alleged offense occurred.”

17  
18 249. 42 USC § 1985 - Conspiracy to Interfere with Civil Rights "(1) Preventing  
19 officer from performing duties... (2) **Obstructing justice**; intimidating party,  
20 witness... if two or more persons conspire for the purpose of impeding, hindering,  
21 obstructing, or defeating, in any manner, the due course of justice in any State or  
22 Territory, with intent to deny to any citizen the equal protection of the laws, or to  
23 injure him or his property for lawfully enforcing, or attempting to enforce, the right  
24 of any person, or class of persons, to the equal protection of the laws; (3)  
25 Depriving persons of rights or privileges...in any case of conspiracy set forth in this  
26 section, if one or more persons engaged therein do, or cause to be done, any act in  
27 furtherance of the object of such conspiracy, whereby another is injured in his  
28 person or property, or deprived of having and exercising any right or privilege of a



1 citizen of the United States, the party so injured or deprived may have an action for  
2 the recovery of damages occasioned by such injury or deprivation, against any one  
3 or more of the conspirators."  
4

5 **Statement of Claim; Obstruction of Justice:**

6 250. Plaintiff alleges that Defendants are using bribery and acts not limited to  
7 fraudulent misrepresentation of Plaintiff's character to obstruct justice in their  
8 impeding criminal investigations at multiple agencies and authorities not limited to  
9 LASD, LAPD, USSS, and FBI. Plaintiff alleges to a point that can be considered  
10 attempted murder, Defendants have retaliated against the Plaintiff who is also a  
11 witness, victim and informant.  
12

13 251. Acts of the obstruction of justice claims are predicate crimes identified as  
14 acts of "racketeering activity" in 18 USC §1961 Definitions (1)(A), which  
15 establish the predicative elements of the Defendants' RICO violations.

16 Furthermore, (5) "pattern of racketeering activity" [only] requires at least two acts  
17 of racketeering activity... within ten years... after the commission of a prior act of  
18 racketeering activity," and this section of the complaint covers an excessive  
19 amount of RICO violations.  
20

21 252. Plaintiff has suffered serious and irreparable damages pursuant to these  
22 violations further detailed in the "Damages" section of this complaint. Loss  
23 includes, but is not limited to: response costs, lost sales from websites, lost  
24 advertising revenue from websites, harm to reputation and goodwill, loss of  
25 relationships, wasted time, and other reasonable costs.  
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2 **COUNT FOURTEEN**

3 **False Imprisonment - 1240-1: PEN §§ 210.5, 236; 42 USC § 1983**

4 (Against All Defendants)  
5

6 253. Plaintiff re-alleges and restates paragraphs 1 through 252.  
7

8 **Predicate State Crimes; False Imprisonment:**

9 254. PEN § 210.5 – False Imprisonment “Every person who commits the offense  
10 of false imprisonment, as defined in Section 236, against a person for purposes of  
11 protection from arrest, which substantially increases the risk of harm to the victim,  
12 or for purposes of using the person as a shield is punishable by imprisonment  
13 pursuant to subdivision (h) of Section 1170 for three, five, or eight years.”  
14

15 255. PEN § 236 – False Imprisonment “is the unlawful violation of the personal  
16 liberty of another.”  
17

18 **Statement of Claim; False Imprisonment:**

19 256. Plaintiff alleges that Defendants unlawfully engaged in multiple acts of  
20 violating the personal liberty of Plaintiff through false imprisonment. Fraud 5150,  
21 Fraud Arrest, Fraud MHC, and every corrupt court date are all instances of attacks  
22 on the personal freedom of the Plaintiff and clearly acts of retaliation by  
23 Defendants following the exercising of legal rights in pro per by the Plaintiff.  
24

25 257. It can be argued that the kidnapping mental hospital/court psychological  
26 attacks on the perfectly healthy genius mind of the Plaintiff are being used to  
27 shield Defendants from the justice system.  
28

1  
2 **Civil Cause of Action; False Imprisonment:**

3 258. 42 USC § 1983 - Civil Action for Deprivation of Rights "Every person who,  
4 under color of any statute, ordinance, regulation, custom, or usage, of any State or  
5 Territory or the District of Columbia, subjects, or causes to be subjected, any  
6 citizen of the United States or other person within the jurisdiction thereof to the  
7 deprivation of any rights, privileges, or immunities secured by the Constitution and  
8 laws, shall be liable to the party injured in an action at law, suit in equity, or other  
9 proper proceeding for redress..."

10  
11 259. Plaintiff has suffered serious and irreparable damages pursuant to these  
12 violations further detailed in the "Damages" section of this complaint. Loss  
13 includes, but is not limited to: response costs, lost sales from websites, lost  
14 advertising revenue from websites, harm to reputation and goodwill, loss of  
15 relationships, wasted time, and other reasonable costs.

16  
17  
18 **COUNT FIFTEEN**

19 **Perjury –18 USC § 1621; CPC § 118(a)**

20 (Against All Defendants)

21  
22 260. Plaintiff re-alleges and restates paragraphs 1 through 259.

23  
24 **Predicate Federal Crime; Perjury:**

25 261. 18 USC § 1621 - Perjury Generally "Whoever— (1) having taken an oath  
26 before a competent tribunal, officer, or person, in any case in which a law of the  
27 United States authorizes an oath to be administered, that he will testify, declare,  
28 depose, or certify truly, or that any written testimony, declaration, deposition, or

1 certificate by him subscribed, is true, willfully and contrary to such oath states or  
2 subscribes any material matter which he does not believe to be true; or (2) in any  
3 declaration, certificate, verification, or statement under penalty of perjury as  
4 permitted under section 1746 of title 28, United States Code, willfully subscribes  
5 as true any material matter which he does not believe to be true; is guilty of perjury  
6 and shall, except as otherwise expressly provided by law, be fined under this title  
7 or imprisoned not more than five years, or both. This section is applicable whether  
8 the statement or subscription is made within or without the United States.”

9  
10 **Predicate State Crime; Perjury:**

11 262. CPC § 118(a) “Every person who, having taken an oath that he or she will  
12 testify, declare, depose, or certify truly before any competent tribunal, officer, or  
13 person, in any of the cases in which the oath may by law of the State of California  
14 be administered, willfully and contrary to the oath, states as true any material  
15 matter which he or she knows to be false, and every person who testifies, declares,  
16 deposes, or certifies under penalty of perjury in any of the cases in which the  
17 testimony, declarations, depositions, or certification is permitted by law of the  
18 State of California under penalty of perjury and willfully states as true any material  
19 matter which he or she knows to be false, is guilty of perjury. This subdivision is  
20 applicable whether the statement, or the testimony, declaration, deposition, or  
21 certification is made or subscribed within or without the State of California.

22 (b) No person shall be convicted of perjury where proof of falsity rests solely upon  
23 contradiction by testimony of a single person other than the defendant. Proof of  
24 falsity may be established by direct or indirect evidence.”

25  
26 **Statement of Claim; Perjury:**

27 263. Plaintiff alleges that Defendants have committed several acts of perjury not  
28 limited to the alleged victim of case BA437792 clearly lying under oath when she

1 said Plaintiff/Defendant was not taking photographs and that his hands were on her  
2 car for five whole minutes. The alleged victim willfully and knowingly gave false  
3 testimony that Plaintiff acted in a way which is unbelievable. Plaintiff/Defendant  
4 lodged evidence before the fake preliminary trial proving that in reality his hands  
5 were holding his camera phone. Plaintiff/Defendant lodged time-stamped  
6 photographs from both his camera and one belonging to a witness proving he was  
7 only on the scene and taking photographs of the rule breaking RICO trapping  
8 LADOT officer for about thirty seconds.

9  
10 264. Civil Remedies & Damages: See Fraud & Obstruction of Justice COAs  
11  
12

### 13 **COUNT SIXTEEN**

#### 14 **Robbery & Theft/Burglary - 18 USC § 2113; PEN §§ 211, 484, & 458**

15 (Against All Defendants)  
16

17 265. Plaintiff re-alleges and restates paragraphs 1 through 264.  
18

#### 19 **Predicate Federal Crimes; Robbery:**

20 266. 18 USC § 2113 - Bank Robbery and Incidental Crimes “(a) Whoever, by  
21 force and violence, or by intimidation, takes, or attempts to take, from the person  
22 or presence of another, or obtains or attempts to obtain by extortion any property or  
23 money or any other thing of value belonging to, or in the care, custody, control,  
24 management, or possession of, any bank, credit union, or any savings and loan  
25 association; Shall be fined under this title or imprisoned not more than twenty  
26 years, or both. (b) Whoever takes and carries away, with intent to steal or purloin,  
27 any property or money or any other thing of value exceeding \$1,000 belonging to,  
28 or in the care, custody, control, management, or possession of any bank, credit

1 union, or any savings and loan association, shall be fined under this title or  
2 imprisoned not more than ten years, or both; or (c) Whoever receives, possesses,  
3 conceals, stores, barter, sells, or disposes of, any property or money or other thing  
4 of value which has been taken or stolen from a bank, credit union, or savings and  
5 loan association in violation of subsection (b), knowing the same to be property  
6 which has been stolen shall be subject to the punishment provided in subsection (b)  
7 for the taker.”

8  
9 **Predicate State Crimes; Robbery, Grand Theft, & Burglary:**

10 267. PEN § 211-215 – Robbery “is the felonious taking of personal property in the  
11 possession of another, from his person or immediate presence, and against his will,  
12 accomplished by means of force or fear...”

13  
14 268. PEN § 484-502.9 - Theft and Fraud “484. (a) Every person who shall  
15 feloniously steal, take, carry, lead, or drive away the personal property of another,  
16 or who shall fraudulently appropriate property which has been entrusted to him or  
17 her, or who shall knowingly and designedly, by any false or fraudulent  
18 representation or pretense, defraud any other person of money, labor or real or  
19 personal property...”

20  
21 269. PEN § 458-464 – Burglary is what Plaintiff thinks Sheriff’s wrote in report  
22 #913-01829-2227-341, but Plaintiff is not sure if that is the correct offense because  
23 nothing was able to be stolen before witness/plaintiff saw the known defendant flee  
24 the scene into an unknown defendant’s getaway car. This incident is more  
25 describable vandalism and attempted burglary related to conspiracy.

26  
27 **Statement of Claim; Robbery & Theft/Burglary:**

1 270. Plaintiff alleges that by force and fear, Defendants feloniously took property  
2 belonging to Plaintiff including but not limited to money stolen during loan fraud,  
3 said theft of trade secrets, and the attempted robbery of car/video equipment per  
4 LASD report, and all schemes to defraud Plaintiff of money, etc.

5  
6 271. The robbery claim is a predicate crime identified as an act of “racketeering  
7 activity” in 18 USC §1961 Definitions (1)(A), which establish the predicative  
8 elements of the Defendants’ RICO violations. Furthermore, (5) “pattern of  
9 racketeering activity” [only] requires at least two acts of racketeering activity...  
10 within ten years... after the commission of a prior act of racketeering activity,” and  
11 this section of the complaint covers an excessive amount of RICO violations.

12  
13 272. Plaintiff has suffered serious and irreparable damages pursuant to these  
14 violations further detailed in the “Damages” section of this complaint. Loss  
15 includes, but is not limited to: response costs, lost sales from websites, lost  
16 advertising revenue from websites, harm to reputation and goodwill, loss of  
17 relationships, wasted time, and other reasonable costs.

18  
19  
20 **COUNT SEVENTEEN**

21 **Attempted Murder (Assault & Battery) - 18 USC §§ 1113 & 113;**

22 (Against All Defendants)

23  
24 273. Plaintiff re-alleges and restates paragraphs 1 through 272.

25  
26 **Federal Predicate Crime; Attempted Murder & Assault:**

27 274. 18 USC § 1113 - Attempt to Commit Murder or Manslaughter "Except as  
28 provided in section 113 of this title, whoever, within the special maritime and

1 territorial jurisdiction of the United States, attempts to commit murder or  
2 manslaughter, shall, for an attempt to commit murder be imprisoned not more than  
3 twenty years or fined under this title, or both, and for an attempt to commit  
4 manslaughter be imprisoned not more than seven years or fined under this title, or  
5 both."

6  
7 275. 18 USC § 113 - Assaults Within Maritime and Territorial Jurisdiction "(a)  
8 Whoever, within the special maritime and territorial jurisdiction of the United  
9 States, is guilty of an assault shall be punished as follows: (1) Assault with intent  
10 to commit murder or a violation of section 2241 or 2242, by a fine under this title,  
11 imprisonment for not more than 20 years, or both. (2) Assault with intent to  
12 commit any felony, except murder or a violation of section 2241 or 2242, by a fine  
13 under this title or imprisonment for not more than ten years, or both. (6) Assault  
14 resulting in serious bodily injury, by a fine under this title or imprisonment for not  
15 more than ten years, or both. (b)Definitions.—In this section— (1) the term  
16 “substantial bodily injury” means bodily injury which involves— (A) a temporary  
17 but substantial disfigurement.

18  
19 **Statement of Claim; Attempted Murder (Assault & Battery):**

20 276. Plaintiff alleges that Defendants physically assaulted Plaintiff, with intent to  
21 murder and/or at least to feloniously defraud Plaintiff. Multiple aggravated  
22 attempts previously mentioned including, but not limited to being sucker punched  
23 in attempt to lure Plaintiff into an unfair fight and health care fraud, have caused  
24 bodily injury to Plaintiff with intent to do even more damage.

25  
26 277. The “187” number hacks are a very specific reference that should be  
27 translated as more than a threat, but actual intent of “Murder Death Kill” and there  
28 have been several displays of those worse than threatening intentions between



1 previous filings and this new complaint where each instance is a new, connected,  
2 and evolving nucleus of transactional facts, all supported by new clear and  
3 convincing evidence and with new evidence linking all Defendants to all crimes  
4 through conspiracy and to a pattern of racketeering activity.

5  
6 278. Furthermore, Plaintiff alleges that the combination of all these connected  
7 attacks by conspiring Defendants is an intentional attempt to drive Plaintiff  
8 towards suicide, which would be murder, and therefore is attempted murder.

9  
10 279. This predicate crime of attempted murder is identified as an act of  
11 “racketeering activity” in 18 USC §1961 Definitions (1)(B), which establish the  
12 predicative elements of the Defendants’ RICO violations. Furthermore, (5)  
13 “pattern of racketeering activity” [only] requires at least two acts of racketeering  
14 activity... within ten years... after the commission of a prior act of racketeering  
15 activity,” and this section of the complaint covers an excessive amount of RICO  
16 violations.

17  
18 280. Plaintiff has suffered serious and irreparable damages pursuant to these  
19 violations further detailed in the “Damages” section of this complaint. Loss  
20 includes, but is not limited to: response costs, lost sales from websites, lost  
21 advertising revenue from websites, harm to reputation and goodwill, loss of  
22 relationships, wasted time, and other reasonable costs.

23  
24 **CAUSE OF ACTION EIGHTEEN**  
25 **Defamation - CIV §§ 44(a)(b); 45-46**  
26 **(Against All Defendants)**  
27

1 281. Plaintiff re-alleges and restates paragraphs 1 through 280.

2  
3 **Civil Tort; Defamation:**

4 282. CIV §§ 44 - Defamation "is effected by either of the following: (a) Libel. (b)  
5 Slander." CIV §§ 45 - Libel "is a false and unprivileged publication by writing,  
6 printing, picture, effigy, or other fixed representation to the eye, which exposes any  
7 person to hatred, contempt, ridicule, or obloquy, or which causes him to be  
8 shunned or avoided, or which has a tendency to injure him in his occupation." CIV  
9 §§ 46 - Slander "is a false and unprivileged publication, orally uttered, and also  
10 communications by radio or any mechanical or other means which: 5. Which, by  
11 natural consequence, causes actual damage."

12  
13 283. "Defamation is an invasion of the interest in reputation. The tort involves the  
14 intentional publication of a statement of fact that is false, unprivileged, and has a  
15 natural tendency to injure or which causes special damage." (Smith v. Maldonado  
16 (1999) 72 Cal.App.4th 637, 645 [85 Cal. Rptr. 2d 397].)

17  
18 284. The elements of a defamation claim are: publication of a statement of fact;  
19 that is false, unprivileged, has a natural tendency to injure or which causes "special  
20 damage," and the defendant's fault in publishing the statement amounted to at least  
21 negligence.

22  
23 **Statement of Claim; Defamation:**

24 285. Plaintiff alleges that Defendants defamed Plaintiff through libel and slander  
25 in their intentionally orally utter and unprivileged publication of misrepresentative  
26 and damaging information regarding the Plaintiff's character not limited to fraud  
27 competitor/RICO fraud admission to slander in libel email, all fraud doctor reports.  
28 Secret Service agent at DTLA office interestingly tried to blame everything on

1 slander in brief conversation without their sharing a supporting argument.  
2 Repetitive pattern of groups of RICO suspects trying to frame Plaintiff's character  
3 in the same ways with obvious motives.  
4

5 286. Plaintiff has suffered serious and irreparable damages pursuant to these  
6 violations further detailed in the "Damages" section of this complaint. Loss  
7 includes, but is not limited to: response costs, lost sales from websites, lost  
8 advertising revenue from websites, harm to reputation and goodwill, loss of  
9 relationships, wasted time, and other reasonable costs.  
10

## 11 **CAUSE OF ACTION NINETEEN**

### 12 **Unfair Competition - CBPC § 17200-17210**

#### 13 **Intentional Interference with Economic Relations**

14 (Against All Defendants)  
15  
16

17 287. Plaintiff re-alleges and restates paragraphs 1 through 286.  
18

#### 19 **Violation of Unfair Competition Law (UCL)**

20 288. CBPC § 17200 et seq. Unfair Competition "In order to state a claim for a  
21 violation of the unfair competition law (UCL) (Bus. & Prof. Code, § 17200), a  
22 plaintiff must allege that the defendant committed a business act that is either  
23 fraudulent, unlawful, or unfair." *Levine v. Blue Shield of California*, 189 Cal. App.  
24 4th 1117, 1136 (2010). In 2004 "UCL was amended to confine standing to those  
25 actually injured by a defendant's business practices." *Schwartz v. Provident Life &*  
26 *Accident Ins. Co.*, 216 Cal. App. 4th 607, 611 (2013)."  
27

28 289. CBPC § 17200-17210 - Unfair Competition - "As used in this chapter, unfair

1 competition shall mean and include any unlawful, unfair or fraudulent business  
2 act”

3  
4 **Statement of Claim; Unfair Competition:**

5 290. Plaintiff alleges that Defendants committed multiple illegal and unfair  
6 competition business acts that caused injury to Plaintiff. This can be applied to  
7 every count and cause of action in the entire complaint.

8  
9 291. Plaintiff has suffered damages pursuant to unfair competition violations  
10 further detailed in the “Damages” section of this complaint. Loss includes, but is  
11 not limited to: response costs, damage assessments, restoration of data or  
12 programs, lost sales from website, lost advertising revenue from website, harm to  
13 reputation and goodwill, and other reasonable costs.

14  
15  
16 **CAUSE OF ACTION TWENTY**

17 **Intentional Infliction of Emotional Distress -**

18 (Against All Defendants)

19  
20 292. Plaintiff re-alleges and restates paragraphs 1 through 291.

21  
22 **Civil Tort: Intentional Infliction of Emotional Distress:**

23 293. INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS: “A cause of  
24 action for intentional infliction of emotional distress exists when there is ‘(1)  
25 extreme and outrageous conduct by the defendant with the intention of causing, or  
26 reckless disregard of the probability of causing, emotional distress; (2) the  
27 plaintiff’s suffering severe or extreme emotional distress; and (3) actual and  
28 proximate causation of the emotional distress by the defendant’s outrageous

1 conduct.’ A defendant’s conduct is ‘outrageous’ when it is so ‘extreme as to  
2 exceed all bounds of that usually tolerated in a civilized community.’ And the  
3 defendant’s conduct must be ‘intended to inflict injury or engaged in with the  
4 realization that injury will result.’ ” (Hughes v. Pair (2009) 46 Cal.4th 1035,  
5 1050—1051 [95 Cal.Rptr.3d 636, 209 P.3d 963])

6  
7 294. Intentional Infliction of Emotional Distress — “Outrageous Conduct” is  
8 conduct so extreme that it goes beyond all possible bounds of decency. Conduct is  
9 outrageous if a reasonable person would regard the conduct as intolerable in a  
10 civilized community. Outrageous conduct does not include trivialities such as  
11 indignities, annoyances, hurt feelings, or bad manners that a reasonable person is  
12 expected to endure. In deciding whether Defendant conduct was outrageous, you  
13 may consider, among other factors, the following: (a) Whether Defendants abused  
14 a position of authority or a relationship that gave Defendants real or apparent  
15 power to affect Plaintiff’s interests; (b) Whether Defendants knew that Plaintiff  
16 was particularly vulnerable to emotional distress; and (c) Whether Defendants  
17 knew that Defendant conduct would likely result in harm due to mental distress.

18  
19 **Statement of Claim; Intentional Infliction of Emotional Distress:**

20 295. Plaintiff alleges that Defendants have engaged in outrageous conduct in their  
21 abuse of power of Plaintiff, that they knew Plaintiff was vulnerable, and that their  
22 actions would harm the Plaintiff. Defendants are intentionally using fear tactics,  
23 have gone out of their way to create daily nuisances, and are customizing hack  
24 attacks based on personal information. Defendants are not just trying to inflict  
25 emotional distress, but they are attempted to cause mental illness, or in the  
26 alternative to frame the Plaintiff to appear mentally ill for the root purposes of both  
27 control and financial gain.

1 296. Defendants were verifiably made aware of the problems they are causing.  
2 Defendants refuse to communicate with plaintiff, therefore forcing this extreme  
3 action, which is outrageous. Defendants were informed of how important their  
4 actions (or lack thereof) are to Plaintiff, and they are displaying intentionally  
5 reckless disregard for the probability of causing emotional distress. Defendants  
6 have caused, whether indirectly or by coercion, information to be publicized by  
7 plaintiff, in regard to both timing of a publicly advertised launch, which has been  
8 expected by a large audience and delayed for years, to become false, thus causing  
9 defamation, humiliation, and indignity of the plaintiff, and also in regard to  
10 information about this case, which must be recognized, or the plaintiff will most  
11 definitely face further irreparable damages. The coerced self-publishing, which  
12 plaintiff has kept as low key as possible, has already resulted in further harassment  
13 of the plaintiff by conspiring defendants. Plaintiff has incurred and will continue  
14 to incur damages as a result. It should not take a shrink to prove that any person,  
15 especially one with an exceptionally high emotional IQ, is bound to be affected by  
16 the repetitive and malicious attacks reported by the plaintiff. The plaintiff is stable  
17 and this legal plead should demonstrate that a rational and head strong man knows  
18 how to deal with his problems, but that does not mean they do not exist, and the  
19 only support necessary is the relief, which has been requested herein.

20  
21 297. Defendants were made aware of their misrepresentation and problem it is  
22 causing, which is verifiable. Defendant is refusing to communicate with plaintiff,  
23 therefore forcing this extreme action, which is outrageous. Defendant was  
24 informed of how important their actions (or lack thereof) are to Plaintiff, and  
25 Defendant is displaying reckless disregard of the probability of causing more  
26 distress. Defendant has caused, whether directly or by coercion, information to be  
27 publicly self-published by the plaintiff, in regards product plans and timing of  
28 advertised launch, which has been expected by a large audience and delayed for

1 years, to become false, thus causing defamation, humiliation, and indignity of the  
2 plaintiff. This has resulted in further harassment of the plaintiff and attempted IP  
3 theft by conspiring defendants. Plaintiff has incurred and will continue to incur  
4 damages.

5  
6 298. Ongoing violations and of intentional infliction to of emotion distress have  
7 caused serious damage, but only as direct result of temporary emotional distresses  
8 that come and go as a natural result of other intentional and criminal violations.  
9 The real damage here is loss of relationships and the threat of what could happen if  
10 justice continues to be obstructed. Additional loss includes, but is not limited to:  
11 response costs, lost sales from websites, lost advertising revenue from websites,  
12 harm to reputation and goodwill, loss of relationships, wasted time, and other  
13 reasonable costs.

14  
15  
16 **CAUSE OF ACTION TWENTY-ONE**

17 **Cybersquatting - ACPA @ USC 15 § 1125(d)**

18 (Against All Defendants)

19  
20 299. Plaintiff re-alleges and restates paragraphs 1 through 298.

21  
22 **Civil Cause of Action; Cybersquatting/Fraud:**

23 300. Anticybersquatting Consumer Protection Act: 15 USC § 1125(D) Sec. 1125.

24 - False Designations of Origin, False Descriptions, and Dilution Forbidden

25 [Fraudulent Misrepresentation] "(a) Civil action (1) Any person who, on or in  
26 connection with any goods or services, or any container for goods, uses in  
27 commerce any word, term, name, symbol, or device, or any combination thereof,  
28 or any false designation of origin, false or misleading description of fact, or false

1 or misleading representation of fact, which - (A) is likely to cause confusion, or to  
2 cause mistake, or to deceive as to the affiliation, connection, or association of such  
3 person with another person, or as to the origin, sponsorship, or approval of his or  
4 her goods, services, or commercial activities by another person... shall be liable in  
5 a civil action by any person who believes that he or she is or is likely to be  
6 damaged by such act."  
7

8 **Statement of Claim; Cybersquatting/Fraud:**

9 301. Plaintiff alleges that Defendants are both cybersquatting and committing  
10 criminal acts no limited to various types of fraud in their abuse of the domain name  
11 and with intent to exploit and damage the Plaintiff. After multiple violations of  
12 various fraud laws, Defendant(s) were hosting camping/landing page parked at the  
13 DomainNameInDispute.com, where there was an option to bid on the name,  
14 thereby publicly and in commerce using the domain name, which is not only a  
15 word/name/term but also falls under the category of "goods." In their  
16 misrepresentation of material facts contained within the registration, Defendants  
17 were/are making a false designation of origin, false and misleading description of  
18 fact, which as of 2018 are still deceiving as to the affiliations, connections, and  
19 associations. Plaintiff had a reliance upon the facts that Defendants misrepresented  
20 online and through mail fraud. Not only did this cause confusion, but more so  
21 caused serious and irreparable damages to Plaintiff for which Defendants are  
22 liable.  
23

24 302. Defendants are camping on/using the domain name with bad faith intent to  
25 profit from the good will of not only an online namespace. Plaintiff alleges both  
26 obvious Defendant intent to use coerced publication by Plaintiff to drive up value  
27 of the domain name and that Defendants had already made a backroom deal about  
28



1 the fate of the domain name way before Plaintiff filed anything; a deal which is  
2 apparently pending the outcome of this case based on the new landing page.

3  
4 303. Plaintiff has an intellectual property claim to the name based upon an  
5 independent discovery through a scientific method, a product for the name space,  
6 and an incredible amount of time, energy, and some money put into pursuing it.  
7 Had it not been for the original fraud and/or obstruction of justice, Plaintiff would  
8 either already be in possession of or at least would have had an opportunity to bid  
9 on the domain name at fair auction, which is no longer possible. Plaintiff self-  
10 copyrighted UI & docs.

11  
12 304. Plaintiff brings legal action for the domain name not limited to this cause of  
13 action being the Anticybersquatting Consumer Protection Act (ACPA), 15 USC  
14 Section 1125(d) Cyber Piracy Prevention, intellectual property claim to the name,  
15 and Defendants' fraudulent/bad faith use, but also pursuant to all counts and causes  
16 of action in this complaint including RICO and multiple predicate crimes with civil  
17 remedies granting this court jurisdiction to order transfer of the domain name from  
18 any party/John Does to the Plaintiff.

19  
20 305. Plaintiff is suffered from ongoing violations and irreparable damages  
21 pursuant to domain name fraud violations not limited to cybersquatting as detailed  
22 in the "Damages" section of this complaint. Loss includes, but is not limited to:  
23 response costs, lost sales from websites, lost advertising revenue from websites,  
24 harm to reputation and goodwill, loss of relationships, wasted time, and other  
25 reasonable costs.

26  
27 **CAUSE OF ACTION TWENTY-TWO**

1 **EEO Violations - 42 USC § 2000e-2(a)**

2 (Against All Defendants)

3  
4 306. Plaintiff re-alleges and restates paragraphs 1 through 305.

5  
6 **Violations of Title VII of Civil Rights Act of 1964:**

7 307. 42 USC § 2000e-2(a) “Employer practices: It shall be an unlawful  
8 employment practice for an employer - (1) to fail or refuse to hire or to discharge  
9 any individual, or otherwise to discriminate against any individual with respect to  
10 his compensation, terms, conditions, or privileges of employment, because of such  
11 individual’s race, color, religion, sex, or national origin;”

12  
13 **Statement of Claim; Employment Discrimination:**

14 308. Plaintiff alleges employment discrimination based on religion (that Plaintiff  
15 does not subscribe to), sex and marital/relationship status, and retaliation  
16 connected to RICO conspiracy based on repetitive patterns, specifically stalking  
17 and fashion hacks where stalkers have been wearing company clothing leading  
18 Plaintiff to believe many of the other uninformed stalkers have been connected to  
19 EEO frauds.

20  
21 309. Plaintiff is suffering from ongoing violations of employment discrimination  
22 both wasting a tremendous amount of time and causing the financial burden of not  
23 having a safety net or steady income. More loss is detailed in the “Damages”  
24 section of this complaint. Loss includes, but is not limited to: response costs,  
25 damage assessments, restoration of data or programs, lost sales from website, lost  
26 advertising revenue from website, harm to reputation and goodwill, and other  
27 reasonable costs.

1  
2  
3 **VII. EVIDENCE**  
4

5 **A. ORIGINAL EVIDENCE**  
6

7 Exhibit 1: List of Suspected John Does 1 to 10

8 Exhibit 2: List of Suspected Bad Karma Enterprise Conspirators

9 Exhibit 3: Proof that Facebook Disabled Accounts / Denial of Service Hacks

10 Exhibit 4: Screen Shots of Original Number Hacks @ Facebook

11 Exhibit 5: Screen Shots of Instagram Name, Number, & Denial of Service Hacks

12 Exhibit 6: Screen Shots of Twitter Name, Number, & Denial of Service Hacks

13 Exhibit 7: Screen Shots of Google / YouTube / AdSense Number, & DoS Hacks

14 Exhibit 8: Screen Shots of Apple Sabotage & Denial of Service Hacks

15 Exhibit 9: Screen Shots of Number Hack Progression from Threat to Psych

16 Exhibit 10: Screen Shots of Folders & Files w/Original Evidence

17 Exhibit 11: Screen Shots of Superb Internet Denial of Service & etc. Hacks

18 Exhibit 12: Screen Shots of Desktop, Organized Folders w/Original Evidence

19 Exhibit 13: Screen Shots of Desktop, Organized Folders w/Original Evidence

20 Exhibit 14: Pie Chart of Defendant Levels of Responsibility  
21

22 **B. ORIGINAL DOMAIN NAME EVIDENCE**  
23

24 Exhibit 15: Screen Shots of Fully Functional Prototype

25 Exhibit 16: Domain Name Brainstorming Notes

26 Exhibit 17: Screen Shot of No Site @ DomainNameInDispute.com

27 Exhibit 18: Screen Shot of Misrepresentative Whois Information

28 Exhibit 19: Screen Shot of Suspended Business License

- 1 Exhibit 20: Screen Shot of Wikipedia Out of Business Statement
- 2 Exhibit 21: Screen Shot of UPS(dot com) Mail & Wire Fraud
- 3 Exhibit 22: Photograph of First Certified Mail Receipt
- 4 Exhibit 23: Photograph of Second Certified Mail Receipt
- 5 Exhibit 24: Screen Shot of No Site after iCANN & NS Contact
- 6 Exhibit 25: Screen Shot of Domain Name Used in Bad Faith
- 7 Exhibit 26: Screen Shot of (Camping Sale) Connection
- 8 Exhibit 27: Screen Shot of Receipt of Message Delivery
- 9 Exhibit 28: Screen Shot of First Email (Sent Twice) No Mail Server
- 10 Exhibit 29: Screen Shot of Second Email (To Tom Tate)
- 11 Exhibit 30: Screen Shot of Communication with Tom

12  
13 **C. NEW EVIDENCE**

- 14
- 15 Exhibit 31: Screen Shots of Continued Number Hacks
- 16 Exhibit 32: Screen Shots of Continued Name Hacks
- 17 Exhibit 33: Screen Shots of YouTube Termination
- 18 Exhibit 34: Screen Shots of Fraud Loan Company
- 19 Exhibit 35: Screen Shots of Phishing Attempts
- 20 Exhibit 36: Evidence of Crescent Fraud (Photos, Text Messages / Witness)
- 21 Exhibit 37: Key Code from Book. & Quotes? Human “Shells”
- 22 Exhibit 38: Screen Shots of Credit Score Fraud (Before & After)
- 23 Exhibit 39: Timeline

24  
25 **D. NEW EVIDENCE LODGED ON CD**

- 26
- 27 Exhibit 40: Facebook/Blog Videos
- 28 Exhibit 41: LA-CV14-04900

1 Exhibit 42: LA-CV14-04232

2 Exhibit 43: LA-CV14-04002

3 Exhibit 45: BC608501 vs. JPMC & BC607769

4 Exhibit 46: Copy of Indemnity Agreement Fraud

5 Exhibit 47: BA437791 - Defense: Motions for Criminal Trial

6 Exhibit 48: ZM029514 - Defense: Motions for MHC

7 Exhibit 49: 16U03746 Counter Complaint & Evidence

8 Exhibit 50: Complaints Against Corrupt Authority

9  
10 **E. NEW EVIDENCE LODGED UNDER SEAL**

11  
12 Exhibit 44: 5150 Defense/Evidence ZM025125

13 Exhibit 51: Original Sheriff Report about FB++

14 Exhibit 52: Background Story + Individual Suspects Named & Connections

15 Exhibit 53: Jobs Log

16 Exhibit 54: Defense Log

17  
18 **F. MISSING EVIDENCE / NEW SUBPOENAS**

19  
20 Exhibit 55: LAPD Subpoena

21 Exhibit 56: LADOT Subpoena

22 Exhibit 57: MHC Subpoena

23 Exhibit 58: DomainNameInDispute Subpoena

24 Exhibit 59: Phone Record Subpoenas

25  
26 **G. CASE EXAMPLES**

27 Exhibit 60: Unaffiliated RICO Complaints

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**H. MORE NEW EVIDENCE**

- Exhibit 61: License Plate Hacks/Stalkers
- Exhibit 62: Apple Fraud (lodged on cd)
- Exhibit 63: Website Hacks
- Exhibit 64: Recent Domain Name Fraud
- Exhibit 65: Business Files (lodged under seal)
- Exhibit 66: CalVCB Application (lodged under seal)
- Exhibit 67: Evidence of Reason to Question Impartiality
- Exhibit 68: Evidence of Research on Judges
- Exhibit 69: Transfer Order Denial

**VIII. DAMAGES**

310. Ten plus years of RICO fraud has caused a tremendous amount of irreparable damage. In particular, Plaintiff’s money or property, which was the target of Defendant’s conspiracy, consisted of: a) Money, b) Business, c) Intellectual Property, d) Domain Name, e) Relationships

311. The original cases were supposed to be filed under seal; nevertheless, Plaintiff copyrighted this true story prior to filing and retains all intellectual property rights. However, all these problems forced free publication of what has significant value to the Plaintiff and his business. Furthermore, it is highly suspected that the Plaintiff’s unfinished and unpublished book and story for a movie, possibly a trilogy, was leaked by these frauds who are trying to write the

1 ending, through more than daily harassment, which is damage that no amount of  
2 money could compensate for.

3 312. The domain name fraud has stunted the growth of business causing major  
4 damage not limited to the loss of years of prospective revenue, but also harming  
5 relationships and social status, and leading to related harassment endured.

6  
7 313. Plaintiff could have been working a job with a salary while conducting  
8 entrepreneurial business. Equal Employment Opportunity violations caused a loss  
9 of \$1-2,000,000 plus time spent applying to thousands of jobs over the past decade.  
10 A lot of that money would have been reinvested in business. The frauds also cut  
11 off access to venture capital, loans and basically any resource for growth that was  
12 naturally exponential before the sabotage.

13  
14 314. Personal Income Loss - est. \$1,000,000.00++ (salary value @  
15 \$75,000.00++/yr. prior to fraud; add bonuses and raises multiplied by 10+ years)  
16 2006-Present, Multiple EEOC Charges Filed 5-5-2017

17  
18 315. Single Member LLC/Business Loss - est. \$1,000,000,000.00++ (CA business  
19 entity #200703210196 legally established years before copycat competition “Weed  
20 Maps” and affiliates reported \$100,000,000.00 annual revenue; multiply that by  
21 10+ years of RICO fraud/damages) 2006-Present

22  
23 316. Vandalism / Robbery - est. \$1,000.00++ (multiple instances of broken car  
24 windows, regulators, batteries, etc. reported to Sheriffs/insurance) 4-2013 LHSD  
25 Robbery #913-01829-2227-340, 11-2014 RICO/Fraud?(Possibly 5150 BS) #014-  
26 06049-2241-461

1 317. Physical/Medical Fraud - \$2,000.00++ (minimum amount quoted by MD. to  
2 fix damage to face caused by RICO health fraud & malpractice) 2006-Present

3  
4 318. Personal Property Theft - \$1000.00 (stolen smart phone; separately stolen  
5 clothes and broken GPS blocking device during false imprisonment for case  
6 #ZM029514) 2016-2017

7  
8 319. Fraudulent 5150 case # ZM025125 and corrupt judge not only stole firearm,  
9 but also the constitutional right to bear arms. This also damaged Plaintiff's  
10 reputation, was undoubtedly used in character framing that illegally continued to  
11 the next round of false imprisonment, and cost Plaintiff a lot of time.

12  
13 320. Internet Loan/Theft/Computer Fraud - \$400.00++ (stolen money by fraud  
14 loan company "Smart Asset Management" connected to RICO and influenced  
15 chain of events causing much more costly credit and banking damages.  
16 Additionally, recent target phishing attempts were also used as basis for new  
17 report(s) with 46-page draft of new RICO/fraud case attached) Fraud 3-3-2016;  
18 Reported Online Prior & in Person @ LAPD & FBI 5-26-2017

19  
20 321. Bank Fraud - \$2,079.03 (vital business account money stolen by JPMorgan  
21 Chase & Co.; missed court dates for slam dunk case #BC608501 due to retaliation  
22 for pursuing justice entrapment/false imprisonment) 12-10-2015-Present

23  
24 322. Current Credit Card Debt - est. \$5-10,000.00 (from paying rent and life  
25 expenses as result of RICO/fraud) 2015-Present

26  
27 323. Life Insurance Loan - \$20,183.54 (forced debt to Mass Mutual account  
28 #8996254 broker for purpose of paying rent and life expenses as result of



1 RICO/fraud) 2014-Present

2  
3 324. Housing Fraud - \$26,000.00 (missed court dates for slam dunk case  
4 #16U03746 against fraud landlord due to false imprisonment based on entrapment  
5 by fraud landlord conspiring with false reporting LADOT entrapper/proven  
6 perjury) 2014-Present

7  
8 325. Fraudulent parking officer's false report and entrapment caused a lot of  
9 serious problems not limited to cost of time and money, but also damaged both  
10 reputation and physical health. Between bail, connected theft, transportation, and  
11 printing of legal documents alone, this fraud cost Plaintiff at least \$5,000 and  
12 ability to make regular scheduled payments, which resulted in more damages.

13  
14 326. Bail Bond Fraud - \$4,000.00 (cash stolen through false imprisonment and  
15 fraud preventing release on own recognizance for case #BA437791) 6-11-2015-  
16 Present

17  
18 327. Legal & Transportation - est. \$1,000.00++ (printing, gas, and Uber for case  
19 #LA-CV14-04900++, #BA437791, and #ZM029514) 2014-Present

20  
21 328. Car Impound Fraud - \$2,058.00 + est. \$250.00 = \$2,308.00 (fraudulently  
22 impounded LP #5HYD491 & VIN #1J4GK48K34W264753 by VTS of Norwalk  
23 while falsely imprisoned for case #ZM029514, plus expenses from having to stay  
24 in cheap hotel for the weekend/until property could be recovered) Impounded 4-  
25 23-2017, Released 6-19-2016

26  
27 329. Car Title Loan Fraud - \$2,700.00 (loan #3026428 from WCC = forced debt to  
28 pay rent and life expenses as result of RICO/fraud) 5-30-2017

1  
2 330. A pie chart from the original filing displaying the plaintiff's perception of  
3 defendant levels of responsibility is attached hereto as Exhibit "14" and by this  
4 reference made a part hereof.

5  
6 331. Plaintiff is arguably more intelligent and talented than all defendants and  
7 suspects combined. In addition to moving forward with productions as planned,  
8 Plaintiff will become a dedicated 'philanthropreneur' funding and employing  
9 others while making charitable donations of up to 90% of monetary relief awarded  
10 should he win in full.

11  
12 332. Plaintiff declares that all statements in this complaint are real and true.  
13 Plaintiff hopes legal action will result in peace and relief as requested. Plaintiff  
14 respectfully and humbly demands justice. Please and thanks.

15  
16 \*All the fraud and damages are connected, following the same pattern and  
17 evolution of linear crime and events as indicated by evidence.

18  
19  
20 **IX. REQUEST FOR RELIEF**

21  
22 333. Wherefore, Plaintiff Requests:

23  
24 334. Judgement be entered in favor of Plaintiff and against Defendants jointly and  
25 severally, in the amount of \$100,000,000,000.00 or more;

26  
27 335. Plaintiff be awarded prejudgment interest on the amount of damages and/or  
28 losses Plaintiff has sustained;

1  
2 336. Plaintiff be awarded treble damages pursuant to 18 USC § 1964(c);

3 337. Plaintiff be awarded punitive damages pursuant to CIV § 3294;

4  
5 338. Plaintiff be awarded reasonable costs and attorneys' fees pursuant to 18 USC  
6 § 1964(c) and/or the California Welfare and Institutions Code § 15657.5(a); and

7  
8 339. Plaintiff be awarded such other and further relief as the Court deems just and  
9 equitable.

10  
11 340. Order for Defendants to compensate Plaintiff via direct deposit into Plaintiff  
12 bank account(s). Funds to be divided by Defendants about Exhibit 14.

13  
14 341. Order for transfer of domain name registration for  
15 "DomainNameInDispute.com" (from any party) to Plaintiff.

16  
17 342. Order for Defendants to reset or remove block and follow settings preventing  
18 friends and followers from seeing Plaintiff posts.

19  
20 343. Order for Defendants to stop all sabotage, hacks, censorship, interference  
21 with connections, communications, business, and personal life.

22  
23 344. Injunctive order preventing Defendants from doing business with or  
24 providing service to suspects named in Exhibit "52" (exception for known CEOs  
25 and founding members of Defendant companies engaging in regular business  
26 within their own Defendant companies, and JPMorgan Chase & Co. can keep bank  
27 accounts open). All social media personal, business, and affiliate accounts deemed  
28 to be conflict of interest of Plaintiff and by the Plaintiff to be "disabled" pending

1 the outcome of this case. Violation of injunction to result in addition of CEO of  
2 Defendant company to Defendant list and for issue of arrest warrant and  
3 indictment of CEO.

4  
5 345. Order for Defendants to provide access to Defendant system administrators  
6 for purpose of stopping other violations, and for disabling, suspension, or  
7 termination of conspirator accounts.

8 346. Order for JPMorgan Chase & Co. to return funds, freeze accounts and  
9 remove any negative credit reports; dated back to 5-30-2015 and pending outcome  
10 of this case.

11  
12 347. Order for investigation and direct communication between FBI Director  
13 Andrew McCabe (or replacement) and Plaintiff.

14  
15 348. Order for arrest warrants to be discussed in the courtroom or motioned for at  
16 a later point in time.

17  
18 349. Termination of 5150 case #ZM025125 and restoration of right to bear arms.

19  
20 350. Order for return of firearm(s) confiscated by the Lost Hills Sheriffs.

21  
22 351. Order for federal CCW license (security clearance) or order for LA County  
23 Sheriff to issue CCW license.

24  
25 352. Order for dismissal and termination of case #BA437791, also to expunge  
26 record(s).

1 353. Order for case # ZM029514 court, hospital, doctor, and jail records to be  
2 destroyed.

3 354. Expunge/destroy all criminal (felony, misdemeanor, infraction) related  
4 records from Superior Courts, LAPD, and LA County Sheriff.

5  
6 355. Order for international security and investigation support from Secret Service  
7 in communication with Plaintiff under jurisdiction of 18 USC §§ 3056 & 1030.

8  
9 356. Order or request from judge to attorney general for award and victim  
10 compensation. 18 USC §§ 3056 & 1030, GOV § 13952.5, GOV § 13957-8, 42  
11 USC Chapter 112

12  
13 357. Order for immediate compliance with any demand to remove defamation of  
14 Plaintiff from the Internet or other medium, specifically with regards to audio or  
15 visual captured by stalkers, or communication logs between Plaintiff and suspects  
16 who were conspiring by other suspects and defendants, with option for search and  
17 seizure and arrest of any suspects or their property.

18  
19 358. Seal this entire case and destroy or seal cases # LA-CV14-04900, LA-CV14-  
20 04232, and LA-CV14-04002.

21  
22 359. Plaintiff respectfully and humbly demands this justice.

23  
24 360. Please & Thanks

25  
26 **X. REQUEST FOR TRIAL & (EX PARTE) RELIEF**  
27

1 361. In conclusion, Defendant corporations not only intentionally conspired to  
2 abuse power in violation of the law for purpose of defrauding the Plaintiff, but they  
3 willfully and unlawfully acted and caused irreparable damages and then attempted  
4 murder and falsely imprison Plaintiff in their justice obstructing effort to cover  
5 their tracks. Justice should be proportional relief, not only to deter the Defendants  
6 from engaging in this illegal behavior, but also to prove that what goes around  
7 comes around, so people should mind their own business and treat others how they  
8 want to be treated. Defendants and suspects think they are above the law and  
9 Plaintiff cannot accept that. Defendants who tried to take everything including  
10 freedom from Plaintiff are collectively worth trillions of dollars, so nothing less  
11 than most requests granted, specifically transfer of domain name and multibillion  
12 dollar settlement or judgement, will required by a most determined Plaintiff who is  
13 to become a philanthropreneur.

14  
15 362. Plaintiff requests a new and honorable judge to grant proposed orders without  
16 further discussion.

17  
18 363. Then ADR or a trial by that judge who would be proven not to be corrupt and  
19 willing to rule in favor of the Plaintiff is justice,

20  
21 364. If that does not work, this will be resentfully followed up with another  
22 amendment, or appeals/motions, and addition of more Defendants.

23  
24 365. "Greatest glory comes from falling, failing, and getting back up until rising to  
25 success. Time is precious." @RussellRope

26  
27 *Russell Rope*

28 Dated this 19<sup>th</sup> of February, 2018.

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Russell Rope