

Russell Rope vs. The Interweb

1 Name: Russell Rope #1607
2 Address: PO Box 1198
3 Sacramento, CA 95812
4 Phone: (818) 400-5592
5 Plaintiff In Pro Per

7 UNITED STATES DISTRICT COURT
8 CENTRAL DISTRICT OF CALIFORNIA

9 LA CV14 04900—

(VBK)

10 Russell Rope,

Case No.: _____

11 PLAINTIFF,

12 vs.

Civil Rights Complaint Pursuant To

13 Facebook, Inc.

42 U.S.C. § 1983

14 Google, Inc.,

15 Apple, Inc.,

16 Twitter, Inc.,

17 and John Does 1 to 10

18 DEFENDANT(S).

20 I. JURISDICTION

21
22 1. This Court has jurisdiction under 28 U.S.C. § 1331 & 28 U.S.C. § 1343.
23 Federal question jurisdiction arises pursuant to 42 U.S.C. § 1983.

2014 JUN 24 PM 1:02
U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
LOS ANGELES

LODGED

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Introduction

DISCLAIMER & LEGAL AGREEMENT

By continuing to read the documents contained in this book, you agree to respect and honor the intellectual property of Russell Rope. Additionally, this information is more than copyright and fraud protected for all forms of media (with the exception of authorized publicity). Please help set a good example for society by showing support for this peaceful pursuit of justice is a most civil reaction to serious and long endured injustice.

This work in progress is being published at present for public record, because the information has been stolen and leaked, and the judge publicized this case in the court system despite a request to file under seal. The cases disappeared from the system right before some corrupt pigs who neglected Russell's legitimate plead for justice failed at trying to make him and his work disappear.

Prior to filing in pro per, Russell Rope did not receive proper guidance from the Pro Se Clinic in the courthouse, which said the judge would be lenient towards pro per filing. Russell went back to the clinic for reconsideration and refiling information, understands his first time filing errors, but is still seeking qualified legal assistance for both refiling and whatever may arise; however, it is still of preference to settle without spending anymore time wasting time that should be used for development etc. Consider this a final opportunity for opposition to take responsibility and surrender before feeling the full force of a legitimate legal wrath including both possible prosecution and civil war.

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II. VENUE

2. Venue is proper pursuant to 28 U.S.C. § 1391 and locations of the defendants are possibly in multiple states and unknown locations, which fall under jurisdiction of this court; and because this is the district where the plaintiff both lives and was located during the violations of the plaintiff's rights.

III. PARTIES

3. Plaintiff's name is Russell Rope. Plaintiff resides at: address protected by Safe at Home program (C.G.C. 6205-6210) within the county of Los Angeles

4. Defendant Facebook, Inc. is located in Menlo Park, CA

5. Defendant Apple, Inc. is located in Cupertino, CA

6. Defendant Google, Inc. is located in Mountain View, CA

7. Defendant Twitter, Inc. is located in San Francisco, CA

8. Defendant John Does 1 to 10 locations range from local to plaintiff to scattered across the United States of America and possibly international.

9. Defendant John Does plus additional suspected conspirators are listed in attached exhibits and located in proximity to plaintiff and beyond.

IV. STATEMENT OF FACTS

10. Plaintiff is a brilliant and innovative entrepreneur with traditional credentials plus nearly twenty years of professional experience in the fields of technology, arts, and media. Plaintiff grew up an elite ethical hacker investing most of his time and all of his money into electronics, computers, information technology, and media arts. The following honest statements come directly from a professional expert of a witness slash victim in pro per:

11. Defendants are primarily known hackers accused of much more than maliciously hacking the plaintiff for at least seven years.

12. Defendants are literally terrorizing the plaintiff in their conspiracy to sabotage and control both business and personal life through incessant and illegal actions not limited to espionage, fraud, defamation, theft, harassment, stalking, threats, physical assault, and obstruction of justice.

13. Defendants are causing irreparable damages to the plaintiff in their killing of business, relationships, income, communications, time, and liberty. Plaintiff has personally suffered much stress and anxiety as a direct result of defendants, which have lead to new health issues and exacerbation of preexisting conditions. Defendants are intentionally bleeding the plaintiff to death by a thousand cuts in the back while forcing him to watch as others abduct and rape his pioneering claims. Defendants' unwarranted actions are like a customized form of terroristic torture, which have been preventing the plaintiff from achieving what he has devoted a lifetime of both education and hard work.

1 14. John Doe 1 and John Doe 2 are most probably responsible for and/or
2 enabled additional John Does and additional suspects.

3
4 15. A list of suspected John Does is attached hereto as Exhibit "1" and by this
5 reference made a part hereof.

6
7 16. Bad Karma Foundation (not an actual organization) accounts for several
8 groups of suspected conspirators who have violated the plaintiff not only in
9 attempts to steal, sabotage, and control business, but they have also gone so low
10 as to interfere with personal relations. Listed as suspects rather than defendants
11 or John Does for reasons of safety, security, and not to give underserved credits,
12 but referenced so the court is prepared for additional foreseen problems and
13 requests for relief.

14
15 17. A list of suspected Bad Karma Foundation conspirators as indicated by
16 instinct, supported by evidence, and mostly deserving of no less than injunctions
17 is attached hereto as Exhibit "2" and by this reference made a part hereof.

18
19 18. All defendants can legally be held accountable for all crimes, torts, and
20 causes of actions based on conspiracy. Plaintiff seeks retribution based on
21 defendants' levels of responsibility.

22
23 19. This is the third of three individual cases, all suspected of similar
24 conspiracy, which are undoubtably connected at some level, yet distinct enough to
25 require separate filing, cases, and judgements. Cases filed in reverse order for
26 security and pro se experience.

1 20. Government is accused of having fallen victim to playing part in this
2 conspiracy, but level of involvement is not responsible for these complaints, less
3 damaging, and worthy of plaintiff seeking relief from the first separately filed
4 case. (#CV14-04002)

5
6 21. Domain Name in Dispute is accused of having fallen victim to playing
7 part in this conspiracy, but level of involvement is not responsible for most of
8 these complaints, less damaging, and worthy of plaintiff seeking relief from the
9 second separately filed case. (#CV14-04232)

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

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

1 24. Plaintiff is the true original genius responsible for this testimony in pro
2 per offensive defense. Plaintiff has clear and convincing evidence, which
3 supports all claims against both the defendants and most suspects, including
4 evidence of both authenticity of evidence and damages endured as a result of
5 defendants.

6
7 25. 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
10 known and unknown John Does and copycats.

11
12 26. Defendants are accused of more than attempting to defame and frame the
13 plaintiff's character as a method of immoral justification.

14
15 27. Not only have defendants obstructed justice in terms of seeking legal
16 representation and proper assistance from the authorities, but defendants have also
17 interfered with the health care process, thus exacerbating health issues, which this
18 conspiracy may have played part in creating.

19
20 28. Defendants have attacked the plaintiff in almost every way possible and in
21 more ways than one person could have imagined or executed on their own.
22 Defendants and suspects have broken almost every rule in the written and
23 unwritten books with complete disregard for the law.

24
25 29. Plaintiff was and still is being violated and victimized by the following
26 specific actions conducted by defendants and conspirators:

1 30. First defendant, Facebook, Inc., from plaintiff perspective, is the root of
2 all evil when it comes to this case.

3
4 31. Indisputable Actions by Facebook: (1) Disabling of personal account
5 multiple times and termination of business/fan page, (2) Disabling of advertising
6 and suggest/invite fan page features, (3) Threatening, harassing, insulting number,
7 name, and word hacks, (4) Interference with private messages, instant messaging,
8 and friend requests, (5) Interference with smart phone connectivity, news feed,
9 and likes, (6) Sabotaging of events (invites), (7) Advertising former clients and
10 enabling competitors via above stated actions (8) This partial list is limited to
11 what is indisputable based on supporting evidence.

12
13 32. Evidence of defendant Facebook disabling personal account, fan/business
14 pages, and advertising interference is attached hereto as Exhibit "3" and by this
15 reference made a part hereof.

16
17 33. Facebook allegedly disabled the plaintiff's account multiple times because
18 he was "adding friends," which he was doing selectively and mostly for
19 networking purposes; well within Facebook's original terms of service. Plaintiff
20 alleges that he was singled out by haters who put social pressure on an immature
21 company that inevitably followed the plaintiff's suggestions for upgrading.

22
23 34. Evidence of defendant Facebook repetitively harassing/threatening the
24 plaintiff with number hacks is attached hereto as Exhibit "4" and by this reference
25 made a part hereof.

26
27 35. Defendant Instagram, owned by Facebook, and other social web apps
28 followed the leader off the bridge and are doing the same stuff within capabilities.

1 36. Indisputable Actions by Instagram: (1) Disabling of hash tags,
2 (2) Interference with likes, (3) Interference with followers, (4) Name and number
3 hacks, (5) Feed hacks, (6) Service attacks and app shutdown hacks during use,
4 (7) Conspiracy to enable both fraudulent and unfair competition.

5
6 37. Evidence of defendant Instagram maliciously hacking and harassing the
7 plaintiff is attached hereto as Exhibit "5" and by this reference made a part hereof.

8
9 38. Defendant Google Inc., including but not limited to YouTube, Google Plus,
10 and AdSense also joined in with both similar and different attacks that took a
11 while to become recognizable as an obvious conspiracy.

12
13 39. Google/YouTube is also accused of actions including: (1) Termination of
14 YouTube Business Account, (2) Sabotaging Personal YouTube Account and
15 AdSense, (3) YouTube Interfering with Tags, Search, and View Counts,
16 (4) Suspected Google Search Interference, (5) Google Plus Sabotage (Name and
17 Number Hacks), etc.

18
19 40. Evidence of defendant Google maliciously hacking and harassing the
20 plaintiff is attached hereto as Exhibit "6" and by this reference made a part hereof.

21
22 41. Defendant Twitter Inc., and all other defendants are accused of name and
23 number hacks including cryptic message harassment such as modifying
24 modifying URLs or hyper links in tweets to form harassing messages like
25 <http://twit.us/iAMguna187u>. Additionally, Twitter and other social platform
26 operating defendants are accused of interfering with plaintiff's ability to connect
27 with other users.

1 42. Evidence of defendant Twitter maliciously hacking and harassing the
2 plaintiff is attached hereto as Exhibit "7" and by this reference made a part hereof.

3
4 43. Defendant Apple, Inc. could have been involved as long as Facebook.
5 Apple is both directly causing problems and is as guilty as every social web
6 app/hack on iTunes. Apple, their API, and iTunes gatekeepers are undoubtably
7 enabling some of the defendants and their corresponding criminal actions.

8
9 44. Apple is also accused of: (1) Interfering with smart phone service and
10 connectivity, (2) Blocking use of apps and shutting apps down during use,
11 (3) Apps: notification and message hacks, (4) Blue tooth mouse and keyboard
12 hacks (5) Remote access screen watching or enabling screen watchers on all
13 devices, (6) Somehow responsible for smart phone GPS being used to stalk
14 plaintiff in person, (7) Fraudulently misrepresenting facts in their lying and trying
15 to cover it up.

16
17 45. Evidence of defendant Apple maliciously hacking and harassing the
18 plaintiff is attached hereto as Exhibit "8" and by this reference made a part hereof.

19
20 46. It is obvious that defendants and John Does are conspiring based on
21 similarities mostly in use of plaintiff's personal and private information in the
22 name, number, and harass hacks, both on the social web and in person.

23
24 47. Evidence of malicious and harassing number hacks related to people is
25 attached hereto as Exhibit "9" and by this reference made a part hereof.

26
27 48. Evidence of malicious and harassing name hacks related to people is
28 attached hereto as Exhibit "10" and by this reference made a part hereof.

1 49. Defendants and John Does are more than sexually harassing plaintiff by
2 interfering with all online dating activity and trying to cast and control the people
3 in plaintiff's life through control of events. Defendants are also using GPS and
4 interference with messaging and/or phone communications to control people and
5 relationships. Additionally, defendants are suspected of collecting video
6 surveillance footage and private messages because they are sick people who think
7 they can capitalize on relation to the plaintiff in the event of error and/or tragedy,
8 which they have certainly at least tried to cause or lure the plaintiff into on several
9 occasions.

10
11 50. Defendants are also using the aforementioned tactics to interfere with
12 business and relationships not only with prospective attorneys and law
13 enforcement, which has been a major contribution to the obstruction of justice
14 complaint, but also with both prospective and former clients, inventors, family,
15 friends, fans, etc.

16
17 51. Defendants and John Does are using slander, libel, complete
18 exaggerations, and suspected bribes to frame plaintiff's character in their
19 corruption of relationships including turning law enforcement and other
20 authorities against the plaintiff in attempt at rendering the plaintiff defenseless.

21
22 52. John Does most probably include law enforcement who have attempted to
23 entrap an innocent plaintiff as well as others who simply did not do their job or
24 interfered with others doing their jobs. Evidence exists, which links John Does,
25 law enforcement, other government, and defendants based on indisputable
26 similarities between violations and reported conspiracy.

1 53. John Does, MySpace, and Superb Internet are suspected of conspiring to
2 trade advertising and possibly more for access to plaintiff's personal and business
3 web and email hosting.

4
5 54. Evidence of suspect Superb maliciously hacking and harassing the
6 plaintiff is attached hereto as Exhibit "11" and by this reference made a part
7 hereof. Further evidence suggests conspiracy related name and number hacks in
8 communications with technical support.

9
10 55. Defendants and John Does are enabling each other while disabling and
11 damaging the plaintiff, and in so doing have made the plaintiff a target for cheap
12 shots designed to further empower inferiority.

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

1 57. Defendant Facebook started these problems. Defendant Apple has
2 probably caused as many problems as Facebook and for the same amount of time.
3 John Does are probably responsible for putting pressure on defendants to start and
4 perpetuate these violations, but defendants had and abused the power to process
5 actions responsible for causing the problems for the plaintiff. Mark Zuckerberg
6 and Tim Cook must have played some part in this conspiracy based on their
7 positions and a every attempt possible made in connecting with defendants in
8 effort of resolving these issues.

9
10 58. Plaintiff believes true databases queries and phone records can provide
11 access to any missing evidence or connections, which can be useful for
12 incrimination of all defendants and John Does. Plaintiff plans to subpoena data.

13
14 59. Some attached evidence has been slightly modified with originals in tact.
15 Edits are mostly limited to cropping and highlighting of violations. Much more
16 evidence including photos, videos, emails, and possible testimonies. Plaintiff
17 literally has 4,000+ more pieces/files of evidence, each accounting for separate,
18 but related instances, counts and infractions. Few screen shots used as examples
19 in exhibits may have been natural errors, but help prove a point, which may be
20 hard to see. Some sequential screen shots exist for purpose of clearly
21 demonstrating actions and violations of defendants. Many sequential and time
22 stamped screen shots also show how seemingly common appearing errors are
23 misdirections.

24
25 60. Evidence of more and well organized evidence in form of original
26 image/video files and screen shots/video (not including trail of emails, audio
27 recordings and written docs) is attached hereto as both Exhibit "12" and Exhibit
28 "13" and by this reference made a part hereof.

1 61. Evidence of Damages Includes: (1) Visible scarring to more than the
2 plaintiff's face, (2) Physician, witness, and professional testimony, (3) Bank
3 account records easily verified via smart phone, (4) Resume/portfolio and obvious
4 arrested development, (5) Analysis of messages, emails, web stats, and docs,
5 (6) Analysis of competition success and suspect activity, (7) General social
6 analysis, (8) Witnesses to multiple physical assaults, (9) Telephone record proof
7 of declining to toxic and tainted relationships (10) Time is irreplaceable

8
9 62. This document is filed under seal and copyrighted. Plaintiff retains all
10 intellectual property rights.

11
12 63. A pie chart displaying the plaintiff's perception of defendant levels of
13 responsibility is attached hereto as Exhibit "14" and by this reference made a part
14 hereof.

15
16 64. Plaintiff is arguably more intelligent and talented than all defendants and
17 suspects combined.

18
19 65. In addition to moving forward with productions as planned, Plaintiff will
20 become a dedicated 'philanthropreneur' funding and employing others while
21 making charitable donations of up to 90% of monetary relief awarded should he
22 win in full.

23
24 66. Plaintiff declares that all statements in this complaint are real and true.

25
26 67. Plaintiff hopes legal action will result in peace and relief as requested.

27
28 68. Plaintiff respectfully and humbly demands justice. Please and thanks.

V. CAUSES OF ACTION

FIRST CAUSE OF ACTION

Fraud: In Connection with Computers, By Wire, Theft

(As against Defendant(s): Facebook, Inc., Apple, Inc., Google, Inc.,
Twitter, Inc., and John Does 1 to 10)

69. Plaintiff refers to and incorporates paragraphs 1 through 68, inclusive,
as though fully set forth herein, hereat, verbatim.

70. Defendants are using more than unauthorized computer access in
conspiracy to defraud the plaintiff.

71. 18 U.S.C. § 1030, also known as the National Information
Infrastructure Protection Act of 1996, makes it illegal to commit fraud and related
activity in connection with computers.

72. Defendants are using several forms communications fraud to violate
the plaintiff's rights.

73. 18 USC § 1343 makes it illegal to commit fraud by wire, radio, or
television.

SECOND CAUSE OF ACTION

(Fraud: Intentional/Negligent Misrepresentation, Deceit, Concealment)

(As against Defendant(s): Facebook, Inc., Apple, Inc., Google, Inc.,
Twitter, Inc., and John Does 1 to 10)

74. Plaintiff refers to and incorporates paragraphs 1 through 73,
inclusive, as though fully set forth herein, hereat, verbatim.

75. Defendants have made many misrepresentations in their falsifying of
various numbers and stats used in fraudulent, harassing, and threatening hacks.
They have also concealed and suppressed other relevant information including
anything related to seeking help in ending the hacks. This must also be
deceitfully related to additional interference with important statistics, which the
plaintiff must keep up and constantly analyze for vital business functions.

76. 18 U.S.C. § 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”

77. California Civil Code Section 1710 - Deceit “(3) The suppression of
a fact, by one who is bound to disclose it, or who gives information of other facts
which are likely to mislead for want of communication of that fact;”

1 78. Plaintiff also brings this cause of action pursuant to the following: (a.)
2 CAL. CIV. CODE Section 3294, which makes it unlawful to misrepresent, deceit,
3 or conceal material fact known to the defendant with the intention on the part of
4 the defendant of thereby depriving a person of property or legal rights or
5 otherwise causing injury. (b.) CAL. CIV. CODE Section 3294, which also says
6 that an action for the breach of an obligation not arising from contract, where it is
7 proven by clear and convincing evidence that the defendant has been guilty of
8 fraud, the plaintiff, in addition to the actual damages, may recover damages for
9 the sake of example and by way of punishing the defendant.

10
11 79. FRAUD and DECEIT - INTENTIONAL MISREPRESENTATION:
12 "Fraud" and "deceit" are defined in Civil Code sections 1572, 1709, and 1710.
13 Courts appear to refer to the terms interchangeably, though technically "fraud"
14 applies to only contract actions.

15
16 80. FRAUD and DECEIT - INTENTIONAL MISREPRESENTATION: Civil
17 Code section 1709 defines "deceit" generally: "One who willfully deceives
18 another with intent to induce him to alter his position to his injury or risk, is liable
19 for any damage which he thereby suffers."

20
21 81. FRAUD and DECEIT - INTENTIONAL MISREPRESENTATION: Civil
22 Code section 1572, dealing specifically with fraud in the making of contracts,
23 restates these definitions in slightly differing language, with the addition of a fifth
24 kind of deceit, described generally as "[a]ny other act fitted to deceive." Fraud in
25 the context of contract formation is covered by other instructions.
26
27
28

1 82. FRAUD and DECEIT - INTENTIONAL MISREPRESENTATION: The
2 tort of deceit or fraud requires: “ ‘(a) misrepresentation (false representation,
3 concealment, or nondisclosure); (b) knowledge of falsity (or ‘scienter’); (c) intent
4 to defraud, i.e., to induce reliance; (d) justifiable reliance; and (e) resulting
5 damage.’ ” (Engalla v. Permanente Medical Group, Inc. (1997) 15 Cal.4th 951,
6 974 [64 Cal.Rptr.2d 843, 938 P.2d 903], internal quotation marks omitted; see also
7 Molko v. Holy Spirit Ass’n (1988) 46 Cal.3d 1092, 1108 [252 Cal.Rptr. 122, 762
8 P.2d 46].)

9
10 83. FRAUD and DECEIT - INTENTIONAL MISREPRESENTATION:
11 Sometimes this tort is stated with four elements instead of five: “(1) a knowingly
12 false representation by the defendant; (2) an intent to deceive or induce reliance;
13 (3) justifiable reliance by the plaintiff; and (4) resulting damages.” (Service by
14 Medallion, Inc. v. Clorox Co. (1996) 44 Cal.App.4th 1807, 1816 [52 Cal.Rptr.2d
15 650].)

16
17 84. FRAUD and DECEIT - INTENTIONAL MISREPRESENTATION: The
18 representation must ordinarily be an affirmation of fact, as opposed to an opinion.
19 Under the Restatement Second of Torts section 538A, a representation is an
20 opinion “if it expresses only (a) the belief of the maker, without certainty, as to the
21 existence of a fact; or (b) his judgment as to quality, value, authenticity, or other
22 matters of judgment.” Opinions are addressed in CACI No. 1904, Opinions as
23 Statements of Fact.

1 85. FRAUD and DECEIT - INTENTIONAL MISREPRESENTATION:

2 “Fraud is an intentional tort; it is the element of fraudulent intent, or intent to
3 deceive, that distinguishes it from actionable negligent misrepresentation and
4 from nonactionable innocent misrepresentation. It is the element of intent which
5 makes fraud actionable, irrespective of any contractual or fiduciary duty one party
6 might owe to the other.” (City of Atascadero v. Merrill Lynch, Pierce, Fenner and
7 Smith (1998) 68 Cal.App.4th 445, 482 [80 Cal.Rptr.2d 329], internal citations
8 omitted.)

9
10 86. FRAUD and DECEIT - INTENTIONAL MISREPRESENTATION: “A
11 misrepresentation need not be oral; it may be implied by conduct.” (Thrifty-Tel,
12 Inc. v. Bezenek (1996) 46 Cal.App.4th 1559, 1567 [54 Cal.Rptr.2d 468], internal
13 citations omitted.)

14
15 87. FRAUD and DECEIT - INTENTIONAL MISREPRESENTATION:
16 “[F]alse representations made recklessly and without regard for their truth in
17 order to induce action by another are the equivalent of misrepresentations
18 knowingly and intentionally uttered.’” (Engalla, supra, 15 Cal.4th at p. 974,
19 quoting Yellow Creek Logging Corp. v. Dare (1963) 216 Cal.App.2d 50, 55 [30
20 Cal.Rptr. 629].)

21
22 88. FRAUD and DECEIT - INTENTIONAL MISREPRESENTATION:
23 “Justifiable reliance is an essential element of a claim for fraudulent
24 misrepresentation, and the reasonableness of the reliance is ordinarily a question
25 of fact.” (Guido v. Koopman (1991) 1 Cal.App.4th 837, 843 [2 Cal.Rptr.2d 437]
26 internal citations omitted.)

1 89. FRAUD and DECEIT - INTENTIONAL MISREPRESENTATION:

2 “Actual reliance occurs when a misrepresentation is “ ‘an immediate cause of [a
3 plaintiff’s] conduct, which alters his legal relations,’ ” and when, absent such
4 representation, “ ‘he would not, in all reasonable probability, have entered into the
5 contract or other transaction.’ ” ‘It is not . . . necessary that [a plaintiff’s] reliance
6 upon the truth of the fraudulent misrepresentation be the sole or even the
7 predominant or decisive factor in influencing his conduct... It is enough that the
8 representation has played a substantial part, and so has been a substantial factor, in
9 influencing his decision.’ ” (Engalla, supra, 15 Cal.4th at pp. 976—977, internal
10 citations omitted.)

11
12 90. FRAUD and DECEIT - INTENTIONAL MISREPRESENTATION: “A

13 ‘complete causal relationship’ between the fraud or deceit and the plaintiff’s
14 damages is required... Causation requires proof that the defendant’s conduct was
15 a “ ‘substantial factor’ ” in bringing about the harm to the plaintiff.” (Williams v.
16 Wraxall (1995) 33 Cal.App.4th 120, 132 [39 Cal.Rptr.2d 658], internal citations
17 omitted.)

18
19 91. FRAUD and DECEIT - INTENTIONAL MISREPRESENTATION: “In

20 order to recover for fraud, as in any other tort, the plaintiff must plead and prove
21 the ‘detriment proximately caused’ by the defendant’s tortious conduct. Deception
22 without resulting loss is not actionable fraud.” (Service by Medallion, Inc., supra,
23 44 Cal.App.4th at p. 1818, internal citations omitted.)

1 92. FRAUD and DECEIT - NEGLIGENT MISREPRESENTATION:

2 “Negligent misrepresentation is a separate and distinct tort, a species of the tort of
3 deceit. ‘Where the defendant makes false statements, honestly believing that they
4 are true, but without reasonable ground for such belief, he may be liable for
5 negligent misrepresentation, a form of deceit.’ ” (Bily, supra, 3 Cal.4th at pp. 407,
6 internal citations omitted.)

8 93. FRAUD and DECEIT - NEGLIGENT MISREPRESENTATION:

9 “Negligent misrepresentation is a form of deceit, the elements of which consist of
10 (1) a misrepresentation of a past or existing material fact, (2) without reasonable
11 grounds for believing it to be true, (3) with intent to induce another’s reliance on
12 the fact misrepresented, (4) ignorance of the truth and justifiable reliance thereon
13 by the party to whom the misrepresentation was directed, and (5) damages.” (Fox
14 v. Pollack (1986) 181 Cal.App.3d 954, 962 [226 Cal.Rptr. 532], internal citation
15 omitted.)

17 94. FRAUD and DECEIT - NEGLIGENT MISREPRESENTATION: “This is
18 not merely a case where the defendants made false representations of matters
19 within their personal knowledge which they had no reasonable grounds for
20 believing to be true. Such acts clearly would constitute actual fraud under CA law.
21 In such situations the defendant believes the representations to be true but is
22 without reasonable grounds for such belief. His liability is based on negligent
23 misrepresentation which has been made a form of actionable deceit. On the
24 contrary, in the instant case, the court found that the defendants did not believe in
25 the truth of the statements. Where a person makes statements which he does not
26 believe to be true, in a reckless manner without knowing whether they are true or
27 false, the element of scienter is satisfied and he is liable for int. misrep..”
28 (YLC Corp. v. Dare (1963) 216 Cal.App.2d 50, 57 [30 Cal.Rptr. 629])

95. FRAUD and DECEIT - NEGLIGENT MISREPRESENTATION: ““To be actionable deceit, the representation need not be made with knowledge of actual falsity, but need only be an “assertion, as a fact, of that which is not true, by one who has no reasonable ground for believing it to be true” and made “with intent to induce [the recipient] to alter his position to his injury or his risk...’ ” The elements of negligent misrepresentation also include justifiable reliance on the representation, and resulting damage.” (B.L.M. v. Sabo and Deitsch (1997) 55 Cal.App.4th 823, 834 [64 Cal.Rptr.2d 335], internal citations omitted.)

96. FRAUD and DECEIT - NEGLIGENT MISREPRESENTATION: “As is true of negligence, responsibility for negligent misrepresentation rests upon the existence of a legal duty, imposed by contract, statute or otherwise, owed by a defendant to the injured person. The determination of whether a duty exists is primarily a question of law.” (Eddy v. Sharp (1988) internal citations omitted.)

97. FRAUD and DECEIT - NEGLIGENT MISREPRESENTATION: “““Where the defendant makes false statements, honestly believing that they are true, but without reasonable ground for such belief, he may be liable for negligent misrepresentation, a form of deceit.” ’ If defendant’s belief ‘is both honest and reasonable, the misrepresentation is innocent and there is no tort liability.’ ” (Diediker v. Peelle Financial Corp. (1997) 60 Cal.App.4th 288, 297 [70 Cal.Rptr. 2d 442], internal citations omitted.)

98. FRAUD and DECEIT - NEGLIGENT MISREPRESENTATION: “Parties cannot read something into a neutral statement in order to justify a claim for negligent misrepresentation. The tort requires a ‘positive assertion.’ ‘An “implied” assertion or representation is not enough.’ ” (Diediker, supra, 60 Cal.App.4th at pp. 297—298, internal citations omitted.)

1 99. FRAUD and DECEIT - NEGLIGENT MISREPRESENTATION:

2 “Whether a defendant had reasonable ground for believing his or her false
3 statement to be true is ordinarily a question of fact.” (Quality Wash Group V, Ltd.
4 v. Hallak (1996) 50 Cal.App.4th 1687, 1696 [58 Cal.Rptr.2d 592], internal
5 citations omitted.)

6
7 100. CONCEALMENT: “[T]he elements of an action for fraud and deceit
8 based on a concealment are: (1) defendant must have concealed or suppressed a
9 material fact, (2) defendant must have been under a duty to disclose the fact to the
10 plaintiff, (3) defendant must have intentionally concealed or suppressed the fact
11 with the intent to defraud the plaintiff, (4) plaintiff must have been unaware of the
12 fact and would not have acted as he did if he had known of the concealed or
13 suppressed fact, and (5) as a result of the concealment or suppression of the fact,
14 the plaintiff must have sustained damage.” (Boschma v. HLC, Inc. (2011))

15
16 101. CONCEALMENT: “There are ‘four circumstances in which
17 nondisclosure or concealment may constitute actionable fraud: (1) when the
18 defendant is in a fiduciary relationship with the plaintiff; (2) when the defendant
19 had exclusive knowledge of material facts not known to the plaintiff; (3) when the
20 defendant actively conceals a material fact from the plaintiff; and (4) when the
21 defendant makes partial representations but also suppresses some material facts...
22 Each of the [three nonfiduciary] circumstances in which nondisclosure may be
23 actionable presupposes the existence of some other relationship between the
24 plaintiff and defendant in which a duty to disclose can arise... [¶] . . . [S]uch a
25 relationship can only come into being as a result of some sort of transaction
26 between the parties... Thus, a duty to disclose may arise from the relationship
27 between seller and buyer, employer and prospective employee, doctor and patient,
28 or parties entering into any kind of contractual agreement.’ All of these

relationships are created by transactions between parties from which a duty to disclose facts material to the transaction arises under certain circumstances.” (Limandri v. Judkins (1997) 52 Cal.App.4th 326, 336—337 [60 Cal.Rptr.2d 539], internal citations, italics, and footnote omitted.)

102. CONCEALMENT: “Ordinarily, failure to disclose material facts is not actionable fraud unless there is some fiduciary relationship giving rise to a duty to disclose . . . [however,] ‘[t]he duty to disclose may arise without any confidential relationship where the defendant alone has knowledge of material facts which are not accessible to the plaintiff.’ ” (Magpali v. Farmers Group, Inc. (1996) 48 Cal. App.4th 471, 482 [55 Cal.Rptr.2d 225], internal citations omitted.)

103. CONCEALMENT: “In transactions which do not involve fiduciary or confidential relations, a cause of action for non-disclosure of material facts may arise in at least three instances: (1) the defendant makes representations but does not disclose facts which materially qualify the facts disclosed, or which render his disclosure likely to mislead; (2) the facts are known or accessible only to defendant, and defendant knows they are not known to or reasonably discoverable by the plaintiff; (3) the defendant actively conceals discovery from the plaintiff.” (Warner Construction Corp. v. City of Los Angeles (1970) 2 Cal.3d 285, 294 [85 Cal.Rptr. 444, 466 P.2d 996], footnotes omitted.)

104. CONCEALMENT: “[A]ctive concealment of facts and mere nondisclosure of facts may under certain circumstances be actionable without [a fiduciary or confidential] relationship. For example, a duty to disclose may arise without a confidential or fiduciary relationship where the defendant, a real estate agent or broker, alone has knowledge of material facts which are not accessible to the plaintiff, a buyer of real property.” (LJVHA. v. Superior Court (1989))

105. CONCEALMENT: “Even if a fiduciary relationship is not involved, a non-disclosure claim arises when the defendant makes representations but fails to disclose additional facts which materially qualify the facts disclosed, or which render the disclosure likely to mislead.” (Roddenberry v. Roddenberry (1996) 44 Cal.App.4th 634, 666 [51 Cal.Rptr.2d 907], internal citations omitted.)

106. CONCEALMENT: “[T]he rule has long been settled in this state that although one may be under no duty to speak as to a matter, ‘if he undertakes to do so, either voluntarily or in response to inquiries, he is bound not only to state truly what he tells but also not to suppress or conceal any facts within his knowledge which materially qualify those stated. If he speaks at all he must make a full and fair disclosure.’” (Marketing West, Inc. v. Sanyo Fisher (USA) Corp. (1992) 6 Cal.App.4th 603, 613 [7 Cal.Rptr.2d 859].)

107. CONCEALMENT: “Contrary to plaintiffs’ assertion, it is not logically impossible to prove reliance on an omission. One need only prove that, had the omitted information been disclosed, one would have been aware of it and behaved differently.” (Mirkin v. Wasserman (1993) 5 Cal.4th 1082, 1093 [23 Cal.Rptr.2d 101, 858 P.2d 568].)

108. CONCEALMENT: “The fact that a false statement may be obviously false to those who are trained and experienced does not change its character, nor take away its power to deceive others less experienced. There is no duty resting upon a citizen to suspect the honesty of those with whom he [or she] transacts business. Laws are made to protect the trusting as well as the suspicious. [T]he rule of caveat emptor should not be relied upon to reward fraud and deception.” (Boschma, supra, 198 Cal.App.4th at p. 249, original italics.)

1 109. RELIANCE: “It is settled that a plaintiff, to state a cause of action for
2 deceit based on a misrepresentation, must plead that he or she actually relied on
3 the misrepresentation.” (Mirkin v. Wasserman (1993) 5 Cal.4th 1082, 1088 [23
4 Cal.Rptr.2d 101, 858 P.2d 568], internal citations omitted.) “Reliance exists when
5 the misrepresentation or nondisclosure was an immediate cause of the plaintiff’s
6 conduct which altered his or her legal relations, and when without such msirep. or
7 nondisclosure he or she would not, in all reasonable probability, have entered into
8 the contract or other transaction. ‘Except in the rare case where the undisputed
9 facts leave no room for a reasonable difference of opinion, the question of whether
10 the plaintiff’s reliance is reasonable is a question of fact.’ ” (Alliance Mortgage
11 Co. v. Rothwell (1995) 10 Cal.4th 1226, 1239 [44 Cal.Rptr.2d 352, 900 P.2d 601])

12
13 110. RELIANCE: “In establishing the reliance element of a cause of action
14 for fraud, it is settled that the alleged fraud need not be the sole cause of a party’s
15 reliance. Instead, reliance may be established on the basis of circumstantial
16 evidence showing the alleged fraudulent misrepresentation or concealment
17 substantially influenced the party’s choice, even though other influences may
18 have operated as well.” (Sangster v. Paetkau (1998) 68 Cal.App.4th 151, 170 [80
19 Cal.Rptr.2d 66], internal citations omitted.)

20
21 111. RELIANCE: “[A] presumption, or at least an inference, of reliance
22 arises wherever there is a showing that a misrepresentation was material. A
23 misrepresentation is judged to be ‘material’ if ‘a reasonable man would attach
24 importance to its existence or nonexistence in determining his choice of action in
25 the transaction in question’ and as such, materiality is generally a question of fact
26 unless the ‘fact misrepresented is so obviously unimportant that the jury could not
27 reasonably find that a reasonable man would have been influenced by it.’ ”
28 (Engalla v. Permanente Medical Group, Inc. (1997))

112. FALSE PROMISE: ““Promissory fraud” is a subspecies of fraud and deceit. A promise to do something necessarily implies the intention to perform; hence, where a promise is made without such intention, there is an implied misrepresentation of fact that may be actionable fraud. [¶] An action for promissory fraud may lie where a defendant fraudulently induces the plaintiff to enter into a contract.’” (Engalla v. PMG, Inc. (1997) 15 Cal.4th 951, 973—974 [64 Cal.Rptr.2d 843, 938 P.2d 903], internal citations omitted.)

113. FALSE PROMISE: “A promise of future conduct is actionable as fraud only if made without a present intent to perform. ‘A declaration of intention, although in the nature of a promise, made in good faith, without intention to deceive, and in the honest expectation that it will be fulfilled, even though it is not carried out, does not constitute a fraud.’ Moreover, ‘“something more than nonperformance is required to prove the defendant’s intent not to perform his promise.” . . . [I]f plaintiff adduces no further evidence of fraudulent intent than proof of nonperformance of an oral promise, he will never reach a jury.’” (Magpali v. Farmers Group, Inc. (1996) 48 Cal.App.4th 471, 481 [55 Cal.Rptr.2d 225], internal citations omitted.)

114. FALSE PROMISE: “[I]n order to support a claim of fraud based upon the alleged failure to perform a promise, it must be shown that the promisor did not intend to perform at the time the promise was made.” (Conrad v. Bank of America (1996) 45 Cal.App.4th 133, 157 [53 Cal.Rptr.2d 336], citing Tenzer v. Superscope, Inc. (1985) 39 Cal.3d 18, 30 [216 Cal.Rptr. 130, 702 P.2d 212].)

THIRD CAUSE OF ACTION

(Terrorism/Harassment, Threats, Stalking, Assault)

(As against Defendant(s): Facebook, Inc., Apple, Inc., Google, Inc.,
Twitter, Inc., and John Does 1 to 10)

115. Plaintiff refers to and incorporates paragraphs 1 through 114,
inclusive, as though fully set forth herein, hereat, verbatim.

116. Defendants have put the plaintiff's life in danger on multiple
occasions and are suspected of coercing the civil population that is the plaintiff's
personal and professional network in attempt to control authority.

117. 18 U.S.C. § 2331 - Terrorism - (5) the term "domestic terrorism"
means activities that (A) involve acts dangerous to human life that are a violation
of the criminal laws of the United States or of any State; (B) appear to be intended
— (i) to intimidate or coerce a civilian population; (ii) to influence the policy of a
government by intimidation or coercion; or (iii) to affect the conduct of a
government by mass destruction, assassination, or kidnapping; and (C) occur
primarily within the territorial jurisdiction of the United States.

118. C.P.C. § 653 - Obscene, Threatening or Annoying Communications -
It is illegal to use electronic/phone communications to harass and convey threats.

1 119. C.P.C. § 646(.9) - Stalking - "Any person who willfully, maliciously, and
2 repeatedly follows or willfully and maliciously harasses another person and who
3 makes a credible threat with the intent to place that person in reasonable fear for
4 his or her safety, or the safety of his or her immediate family is guilty of the crime
5 of stalking, punishable by imprisonment."

6
7 120. Plaintiff was sucker punched on Hollywood Blvd., and on two separate
8 occasions, was both strangled and verbally threatened inside of a Hollywood
9 nightclub. There was at least one other incident involving security at a different
10 club being coerced, by conspiring haters, into dragging the plaintiff outside in a
11 chokehold. This was all viewed by known witnesses and is definitely in relation
12 to conspiracy.

13
14 121. ASSAULT "Generally speaking, an assault is a demonstration of an
15 unlawful intent by one person to inflict immediate injury on the person of another
16 then present.' A civil action for assault is based upon an invasion of the right of a
17 person to live without being put in fear of personal harm." (Lowry v. Standard Oil
18 Co. of California (1944) 63 Cal.App.2d 1, 6—7 [146 P.2d 57], internal citation
19 omitted.)

FOURTH CAUSE OF ACTION

(Espionage: Economic and Personal)

(As against Defendant(s): Facebook, Inc., Apple, Inc., Google, Inc.,
Twitter, Inc., and John Does 1 to 10)

122. Plaintiff refers to and incorporates paragraphs 1 through 121,
inclusive, as though fully set forth herein, hereat, verbatim.

123. Defendants are not just spying on the plaintiff, but they are also using
espionage to damage the plaintiff. Conspirators include parties with foreign
relations that would gain from defendants getting away with these violations.

124. 18 U.S.C. § 1831 - Economic Espionage Act of 1996 - "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 a trade secret: (2) without authorization copies,
duplicates, sketches, draws, photographs, downloads, uploads, alters, destroys,
photocopies, replicates, transmits, delivers, sends, mails, communicates, or
conveys a trade secret: (3) receives, buys, or possesses a trade secret, knowing the
same to have been stolen or appropriated, obtained, or converted without
authorization: (4) attempts to commit any offense described in any of paragraphs
(1) through (3); or (5) conspires with one or more other persons to commit any
offense described in any of paragraphs (1) through (4), and one or more of such
persons do any act to effect the object of conspiracy...."

1 125. Defendants are suspected of stealing and sharing copyrighted intellectual
2 property belonging to the plaintiff.

3
4 126. 18 U.S.C. § 1832 - Theft of Trade Secrets - "(a) Whoever, with intent to
5 convert a trade secret, that is related to or included in a product that is produced
6 for or placed in interstate or foreign commerce, to the economic benefit of anyone
7 other than the owner thereof, and intending or knowing that the offense will ,
8 injure any owner of that trade secret, knowingly-- (1) steals, or without
9 authorization appropriates, takes, carries away, or conceals, or by fraud, artifice,
10 or deception obtains such information; (2) without authorization copies,
11 duplicates, sketches, draws, photographs, downloads, uploads, alters, destroys,
12 photocopies, replicates, transmits, delivers, sends, mails, communicates, or
13 conveys such information; (3) receives, buys, or possesses such information,
14 knowing the same to have been stolen or appropriated, obtained, or converted
15 without authorization; (4) attempts to commit any offense described in paragraphs
16 (1) through (3); or (5) conspires with one or more other persons to commit any
17 offense described in paragraphs (1) through (3), and one or more of such persons
18 do any act to effect the object of the conspiracy, shall, except as provided in
19 subsection (b), be fined under this title or imprisoned not more than 10 years, or
20 both. (b) Any organization that commits any offense described in subsection (a)
21 shall be fined..."

FIFTH CAUSE OF ACTION

(Defamation: Slander and Liberal)

(As against Defendant(s): Facebook, Inc., Apple, Inc., Google, Inc.,
Twitter, Inc., and John Does 1 to 10)

127. Plaintiff refers to and incorporates paragraphs 1 through 126,
inclusive, as though fully set forth herein, hereat, verbatim.

128. Plaintiff had long suspected conspirators of slander and libel.
Conspirators eventually slipped up in their providing email documented evidence
of their fraudulent defamation and interference with perspective business relations.

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

130. Sources: (1) 5 Witkin, Summary of California Law (10th ed. 2005)
Torts, §§ 529—555, 615, (2) 4 Levy et al., California Torts, Ch. 45, Defamation,
§§ 45.04, 45.13 (Matthew Bender), (3) 30 California Forms of Pleading and
Practice, Ch. 340, Libel and Slander, §§ 340.12—340.13 (Matthew Bender), (4)
14 California Points and Authorities, Ch. 142, Libel and Slander (Defamation),
§§ 142.20—142.32 (Matthew Bender)

SIXTH CAUSE OF ACTION

(Interference with Prospective Economic Relations: Unfair Competition)

(As against Defendant(s): Facebook, Inc., Apple, Inc., Google, Inc.,
Twitter, Inc., and John Does 1 to 10)

131. Plaintiff refers to and incorporates paragraphs 1 through 130,
inclusive, as though fully set forth herein, hereat, verbatim.

132. Plaintiff claims that defendants are interfering with economic
relationships between plaintiff, prospective clients, plaintiff's audience, which
probably would have resulted in an economic benefit to plaintiff.

133. C.B.P.C. § 17200-17210 - Unfair Competition - "As used in this
chapter, unfair competition shall mean and include any unlawful, unfair or
fraudulent business act"

134. Plaintiff brings this cause of action pursuant to the following CAL.
BPC. CODE Section 17200 : California Code - Section 17200, in which "Unfair
competition" is defined as encompassing any one of the following five types of
business "wrongs": (1) an "unlawful" business act or practice; (2) an "unfair"
business act or practice; (3) a "fraudulent" business act or practice; (4) "unfair,
deceptive, untrue or misleading advertising"; and (5) any act prohibited by
Sections 17500-17577.5.

1 135. INTENTIONAL INTERFERENCE WITH PROSPECTIVE ECONOMIC
2 RELATIONS: “The tort of intentional or negligent interference with prospective
3 economic advantage imposes liability for improper methods of disrupting or
4 diverting the business relationship of another which fall outside the boundaries of
5 fair competition.” (Settimo Associates v. Environ Systems, Inc. (1993) 14 Cal.
6 App.4th 842, 845 [17 Cal.Rptr.2d 757], internal citation omitted.)

7
8 136. INTENTIONAL INTERFERENCE WITH PROSPECTIVE ECONOMIC
9 RELATIONS: “The tort of interference with prospective economic advantage
10 protects the same interest in stable economic relationships as does the tort of
11 interference with contract, though interference with prospective advantage does
12 not require proof of a legally binding contract. The chief practical distinction
13 between interference with contract and interference with prospective economic
14 advantage is that a broader range of privilege to interfere is recognized when the
15 relationship or economic advantage interfered with is only prospective.” (Pacific
16 Gas and Electric Co. v. Bear Stearns and Co. (1990) 50 Cal.3d 1118, 1126 [270
17 Cal.Rptr. 1, 791 P.2d 587], internal citations omitted.)

18
19 137. INTENTIONAL INTERFERENCE WITH PROSPECTIVE ECONOMIC
20 RELATIONS: “The five elements for intentional interference with prospective
21 economic advantage are: (1) [a]n economic relationship between the plaintiff and
22 some third party, with the probability of future economic benefit to the plaintiff;
23 (2) the defendant’s knowledge of the relationship; (3) intentional acts on the part
24 of the defendant designed to disrupt the relationship; (4) actual disruption of the
25 relationship; and (5) economic harm to the plaintiff proximately caused by the
26 acts of the defendant.” (Youst v. Longo (1987) 43 Cal.3d 64, 71, fn. 6 [233 Cal.
27 Rptr. 294, 729 P.2d 728].)

1 138. INTENTIONAL INTERFERENCE WITH PROSPECTIVE ECONOMIC
2 RELATIONS: “With respect to the third element, a plaintiff must show that the
3 defendant engaged in an independently wrongful act. It is not necessary to prove
4 that the defendant acted with the specific intent, or purpose, of disrupting the
5 plaintiff’s prospective economic advantage. Instead, ‘it is sufficient for the
6 plaintiff to plead that the defendant “[knew] that the interference is certain or
7 substantially certain to occur as a result of his action.” ’ “[A]n act is independently
8 wrongful if it is unlawful, that is, if it is proscribed by some constitutional,
9 statutory, regulatory, common law, or other determinable legal standard.’ “[A]n act
10 must be wrongful by some legal measure, rather than merely a product of an
11 improper, but lawful, purpose or motive.’ ” (San Jose Construction, Inc. v.
12 S.B.C.C., Inc. (2007) 155 Cal.App.4th 1528, 1544—1545 [67 Cal.Rptr.3d 54],
13 internal citations omitted.)

15 139. INTENTIONAL INTERFERENCE WITH PROSPECTIVE ECONOMIC
16 RELATIONS: “[A]n essential element of the tort of intentional interference with
17 prospective business advantage is the existence of a business relationship with
18 which the tortfeasor interfered. Although this need not be a contractual
19 relationship, an existing relationship is required.” (Roth v. Rhodes (1994) 25 Cal.
20 App.4th 530, 546 [30 Cal.Rptr.2d 706], internal citations omitted.)

22 140. INTENTIONAL INTERFERENCE WITH PROSPECTIVE ECONOMIC
23 RELATIONS: “Although varying language has been used to express this
24 threshold requirement, the cases generally agree it must be reasonably probable
25 that the prospective economic advantage would have been realized but for
26 defendant’s interference.” (Youst, supra, 43 Cal.3d at p. 71, internal citations
27 omitted.)

1 141. INTENTIONAL INTERFERENCE WITH PROSPECTIVE ECONOMIC
2 RELATIONS: “[A] plaintiff seeking to recover for an alleged interference with
3 prospective contractual or economic relations must plead and prove as part of its
4 case-in-chief that the defendant not only knowingly interfered with the plaintiff’s
5 expectancy, but engaged in conduct that was wrongful by some legal measure
6 other than the fact of interference itself.” (Della Penna, *supra*, 11 Cal.4th at p. 393)

8 142. INTENTIONAL INTERFERENCE WITH PROSPECTIVE ECONOMIC
9 RELATIONS: “Commonly included among improper means are actions which are
10 independently actionable, violations of federal or state law or unethical business
11 practices, e.g., violence, misrepresentation, unfounded litigation, defamation, trade
12 libel or trade mark infringement.” (PMC, Inc., *supra*, 45 Cal.App.4th at p. 603)

14 143. INTENTIONAL INTERFERENCE WITH PROSPECTIVE ECONOMIC
15 RELATIONS: “[O]ur focus for determining the wrongfulness of those intentional
16 acts should be on the defendant’s objective conduct, and evidence of motive or
17 other subjective states of mind is relevant only to illuminating the nature of that
18 conduct.” (Arntz Contracting Co., *supra*, 47 Cal.App.4th at p. 477.)

20 144. INTENTIONAL INTERFERENCE WITH PROSPECTIVE ECONOMIC
21 RELATIONS: “[I]n the absence of other evidence, timing alone may be sufficient
22 to prove causation . . . Thus, . . . the real issue is whether, in the circumstances of
23 the case, the proximity of the alleged cause and effect tends to demonstrate some
24 relevant connection. If it does, then the issue is one for the fact finder to decide.”
25 (Overhill Farms, Inc. v. Lopez (2010) 190 Cal.App.4th 1248, 1267 [119 Cal.Rptr.
26 3d 127], original italics.) There are other privileges that a defendant could assert
27 in appropriate cases, such as the “manager’s privilege”. (Halvorsen v. AUSces, Inc.
28 (1998) 65 Cal.App.4th 1383, 1391—1392 [77 Cal.Rptr.2d 383].)

SEVENTH CAUSE OF ACTION

(Intentional Infliction fo Emotional Distress)

(As against Defendant(s): Facebook, Inc., Apple, Inc., Google, Inc.,
Twitter, Inc., and John Does 1 to 10)

145. Plaintiff refers to and incorporates paragraphs 1 through 144,
inclusive, as though fully set forth herein, hereat, verbatim.

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

1 147. INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS: “A cause
2 of action for intentional infliction of emotional distress exists when there is ‘(1)
3 extreme and outrageous conduct by the defendant with the intention of causing, or
4 reckless disregard of the probability of causing, emotional distress; (2) the
5 plaintiff’s suffering severe or extreme emotional distress; and (3) actual and
6 proximate causation of the emotional distress by the defendant’s outrageous
7 conduct.’ A defendant’s conduct is ‘outrageous’ when it is so ‘extreme as to
8 exceed all bounds of that usually tolerated in a civilized community.’ And the
9 defendant’s conduct must be ‘intended to inflict injury or engaged in with the
10 realization that injury will result.’” (Hughes v. Pair (2009) 46 Cal.4th 1035, 1050
11 —1051 [95 Cal.Rptr.3d 636, 209 P.3d 963])

12
13 148. INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS: “ ‘[I]t is
14 generally held that there can be no recovery for mere profanity, obscenity, or
15 abuse, without circumstances of aggravation, or for insults, indignities or threats
16 which are considered to amount to nothing more than mere annoyances.’ ”
17 (Yurick v. Superior Court (1989) 209 Cal.App.3d 1116, 1128 [257 Cal.Rptr. 665],
18 internal citations omitted.)

19
20 149. INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS: “It is not
21 enough that the conduct be intentional and outrageous. It must be conduct
22 directed at the plaintiff, or occur in the presence of a plaintiff of whom the
23 defendant is aware.” (Christensen v. Superior Court (1991) 54 Cal.3d 868, 903—
24 904 [2 Cal.Rptr.2d 79, 820 P.2d 181].)

1 150. INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS: “Severe
2 emotional distress [is] emotional distress of such substantial quantity or enduring
3 quality that no reasonable man in a civilized society should be expected to endure
4 it.” (Fletcher v. Western Life Insurance Co. (1970) 10 Cal.App.3d 376, 397 [89
5 Cal.Rptr. 78].)

6
7 151. INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS: “ ‘It is
8 for the court to determine whether on the evidence severe emotional distress can
9 be found; it is for the jury to determine whether, on the evidence, it has in fact
10 existed.’ ” (Fletcher, supra, 10 Cal.App.3d at p. 397, internal citation omitted.)

11
12 152. INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS: “ ‘The
13 law limits claims of intentional infliction of emotional distress to egregious
14 conduct toward plaintiff proximately caused by defendant.’ The only exception to
15 this rule is that recognized when the defendant is aware, but acts with reckless
16 disregard of, the plaintiff and the probability that his or her conduct will cause
17 severe emotional distress to that plaintiff. Where reckless disregard of the
18 plaintiff’s interests is the theory of recovery, the presence of the plaintiff at the
19 time the outrageous conduct occurs is recognized as the element establishing a
20 higher degree of culpability which, in turn, justifies recovery of greater damages
21 by a broader group of plaintiffs than allowed on a negligent infliction of
22 emotional distress theory.” (Christensen, supra, 54 Cal.3d at pp. 905—906,
23 internal citations omitted.)
24
25
26
27
28

EIGHTH CAUSE OF ACTION

(Obstruction of Justice)

(As against Defendant(s): Facebook, Inc., Apple, Inc., Google, Inc.,
Twitter, Inc., and John Does 1 to 10)

153. Plaintiff refers to and incorporates paragraphs 1 through 152,
inclusive, as though fully set forth herein, hereat, verbatim.

154. Defendants have been obstructing the due course of justice in
conjunctions with the aforementioned violations.

155. 42 U.S.C. § 1985 - Conspiracy To Interfere With Civil Rights - "(2)
Obstructing justice; intimidating party, witness, or juror; If two or more persons in
any State or Territory conspire to deter, by force, intimidation, or threat, any party
or witness in any court of the United States from attending such court, or from
testifying to any matter pending therein, freely, fully, and truthfully...or if two or
more persons conspire for the purpose of impeding, hindering, obstructing, or
defeating, in any manner, the due course of justice in any State or Territory, with
intent to deny to any citizen the equal protection of the laws, or to injure him or
his property for lawfully enforcing, or attempting to enforce, the right of any
person, or class of persons, to the equal protection of the laws;"

NINTH CAUSE OF ACTION

(Civil Conspiracy to Commit Crimes Against Plaintiff, Ongoing)

(As against Defendant(s): Facebook, Inc., Apple, Inc., Google, Inc.,
Twitter, Inc., and John Does 1 to 10)

156. Plaintiff refers to and incorporates paragraphs 1 through 155,
inclusive, as though fully set forth herein, hereat, verbatim.

157. Plaintiff accuses defendants of conspiring, at least on some level, to
commit all crimes mentioned in paragraphs 1 through 156, which have resulted in
damages to the plaintiff.

158. CIVIL CONSPIRACY: Conspiracy is not a cause of action, but a
legal doctrine that imposes liability on persons who, although not actually
committing a tort themselves, share with the immediate tortfeasors a common plan
or design in its perpetration. By participation in a civil conspiracy, a coconspirator
effectively adopts as his or her own the torts of other coconspirators within the
ambit of the conspiracy. In this way, a coconspirator incurs tort liability co-equal
with the immediate tortfeasors." (Applied Equipment Corp. v. Litton Saudi Arabia
Ltd. (1994) 7 Cal.4th 503, 510-511 [28 Cal.Rptr.2d 475, 869 P.2d 454])

159. CIVIL CONSPIRACY: "While criminal conspiracies involve
distinct substantive wrongs, civil conspiracies do not involve separate torts. The
doctrine provides a remedial measure for affixing liability to all persons who
have 'agreed to a common design to commit a wrong.' " (Choate v. County of
Orange (2000) 86 Cal.App.4th 312, 333 [103 Cal.Rptr.2d 339])

1 160. CIVIL CONSPIRACY: "As long as two or more persons agree to
2 perform a wrongful act, the law places civil liability for the resulting damages on
3 all of them, regardless of whether they actually commit the tort themselves. 'The
4 effect of charging . . . conspiratorial conduct is to implicate all . . . who agree to
5 the plan to commit the wrong as well as those who actually carry it out.' " (Wyatt
6 v. Union Mortgage Co. (1979) 24 Cal.3d 773, 784 [157 Cal.Rptr. 392, 598 P.2d
7 45], internal citations omitted.)

8
9 161. CIVIL CONSPIRACY: "The elements of a civil conspiracy are '(1) the
10 formation and operation of the conspiracy; (2) the wrongful act or acts done
11 pursuant thereto; and (3) the damage resulting.' " (Mosier v. Southern California
12 Physicians Insurance Exchange (1998) 63 Cal.App.4th 1022, 1048 [74 Cal.Rptr.
13 2d 550], internal citations omitted.)

14
15 162. CIVIL CONSPIRACY: " '[T]he major significance of the conspiracy lies
16 in the fact that it renders each participant in the wrongful act responsible as a joint
17 tortfeasor for all damages ensuing from the wrong, irrespective of whether or not
18 he was a direct actor and regardless of the degree of his activity.' " (Applied
19 Equipment Corp., supra, 7 Cal.4th at p. 511, internal citations omitted.)

20
21 163. CIVIL CONSPIRACY: "A complaint for civil conspiracy states a cause
22 of action only when it alleges the commission of a civil wrong that causes damage.
23 Though conspiracy may render additional parties liable for the wrong, the
24 conspiracy itself is not actionable without a wrong." (Okun v. Superior Court
25 (1981) 29 Cal.3d 442, 454 [175 Cal.Rptr. 157, 629 P.2d 1369].)

1 164. CIVIL CONSPIRACY: "Conspiracy is not an independent tort; it cannot
2 create a duty or abrogate an immunity. It allows tort recovery only against a party
3 who already owes the duty and is not immune from liability based on applicable
4 substantive tort law principles." (Applied Equipment Corp., supra, 7 Cal.4th at p.
5 514, internal citations omitted.)

6
7 165. CIVIL CONSPIRACY: "A conspiracy cannot be alleged as a tort separate
8 from the underlying wrong it is organized to achieve. As long as the underlying
9 wrongs are subject to privilege, defendants cannot be held liable for a conspiracy
10 to commit those wrongs. Acting in concert with others does not destroy the
11 immunity of defendants." (McMartin v. Children's Institute International (1989)
12 212 Cal.App.3d 1393, 1406 [261 Cal.Rptr. 437], internal citations omitted.)

13
14 166. CIVIL CONSPIRACY: "We agree . . . that the general rule is that a party
15 who is not personally bound by the duty violated may not be held liable for civil
16 conspiracy even though it may have participated in the agreement underlying the
17 injury. However, an exception to this rule exists when the participant acts in
18 furtherance of its own financial gain." (Mosier, supra, 63 Cal.App.4th at p. 1048,
19 internal citations omitted.)

20
21 167. CIVIL CONSPIRACY: "Conspiracy liability may properly be imposed
22 on nonfiduciary agents or attorneys for conduct which they carry out not simply
23 as agents or employees of fiduciary defendants, but in furtherance of their own
24 financial gain." (Skarbrevik v. Cohen, England and Whitfield (1991) 231
25 Cal.App.3d 692, 709 [282 Cal.Rptr. 627], internal citations omitted.)

1 168. CIVIL CONSPIRACY: " 'The basis of a civil conspiracy is the formation
2 of a group of two or more persons who have agreed to a common plan or design
3 to commit a tortious act.' The conspiring defendants must also have actual
4 knowledge that a tort is planned and concur in the tortious scheme with
5 knowledge of its unlawful purpose." (Kidron v. Movie Acquisition Corp. (1995)
6 40 Cal.App.4th 1571, 1582 [47 Cal.Rptr.2d 752], internal citations omitted.)
7

8 169. CIVIL CONSPIRACY: "Liability as a co-conspirator depends upon
9 projected joint action. 'The mere knowledge, acquiescence, or approval of the act,
10 without cooperation or agreement to cooperate is not enough .' But once the plan
11 for joint action is shown, 'a defendant may be held liable who in fact committed
12 no overt act and gained no benefit therefrom.' " (Wetherton v. Growers Farm L
13 abor Assn. (1969) 275 Cal.App.2d 168, 176 [79 Cal.Rptr. 543], internal citations
14 omitted, disapproved on another ground in Applied Equipment Corp., supra, 7
15 Cal.4th at p. 521, fn. 10.)
16

17 170. CIVIL CONSPIRACY: "Furthermore, the requisite concurrence and
18 knowledge 'may be inferred from the nature of the acts done, the relation of the
19 parties, the interests of the alleged conspirators, and other circumstances.' Tacit
20 consent as well as express approval will suffice to hold a person liable as a
21 coconspirator." (Wyatt, supra, 24 Cal.3d at p. 785, internal citations omitted.)
22

23 171. CIVIL CONSPIRACY: "It is a legal commonplace that the existence of a
24 conspiracy may be inferred from circumstances, and that the conspiracy need not
25 be the result of an express agreement but may rest upon tacit assent and
26 acquiescence." (Holder v. Home Savings and Loan Assn. of Los Angeles (1968)
27 267 Cal.App.2d 91, 108 [72 Cal.Rptr. 704], internal citations omitted.)
28

1 172. CIVIL CONSPIRACY: "Of course, the agreement between conspirators
2 need not be proved by direct evidence, but may be shown by circumstantial
3 evidence that tends to show a common intent. In fact, in the absence of a
4 confession by one of the conspirators, it is usually very difficult to secure direct
5 evidence of a conspiracy, so that in the usual case the ultimate fact of a conspiracy
6 must be determined from those inferences naturally and properly to be drawn
7 from those matters directly proved." (Peterson v. Cruickshank (1956) 144 Cal.
8 App.2d 148, 163 [300 P.2d 915], internal citations omitted.)
9

10 173. CIVIL CONSPIRACY: "[A]ctual knowledge of the planned tort, without
11 more, is insufficient to serve as the basis for a conspiracy claim. Knowledge of
12 the planned tort must be combined with intent to aid in its commission. 'The sine
13 qua non of a conspiratorial agreement is the knowledge on the part of the alleged
14 conspirators of its unlawful objective and their intent to aid in achieving that
15 objective.' 'This rule derives from the principle that a person is generally under no
16 duty to take affirmative action to aid or protect others.' " (Kidron, supra, 40
17 Cal.App.4th at p. 1583, internal citations omitted.)
18

19 174. CIVIL CONSPIRACY: "While knowledge and intent 'may be inferred
20 from the nature of the acts done, the relation of the parties, the interest of the
21 alleged conspirators, and other circumstances,' '[c]onspiracies cannot be
22 established by suspicions. There must be some evidence. Mere association does
23 not make a conspiracy. There must be evidence of some participation or interest
24 in the commission of the offense.' An inference must flow logically from other
25 facts established in the action." (Kidron, supra, 40 Cal.App.4th at p. 1583, internal
26 citations omitted.)
27
28

1 175. ONGOING CIVIL CONSPIRACY: "It is the settled rule that 'to render a
2 person civilly liable for injuries resulting from a conspiracy of which he was a
3 member, it is not necessary that he should have joined the conspiracy at the time
4 of its inception; everyone who enters into such a common design is in law a party
5 to every act previously or subsequently done by any of the others in pursuance of
6 it.' Having been found to have joined and actively participated in the continuing
7 conspiracy to convert, appellant became liable for the previous acts of his
8 coconspirators under the rules relating to civil liability, and the fact that some of
9 the missing goods may never have come into his possession would not absolve
10 him from liability." (De Vries v. Brumback (1960) 53 Cal.2d 643, 648 [2 Cal.Rptr.
11 764, 349 P.2d 532], internal citations omitted.)
12

13 176. ONGOING CIVIL CONSPIRACY: "It is well settled that a conspirator is
14 liable for all the acts done in furtherance of a common scheme or plan even
15 though he is not a direct actor. It is equally well settled that a party may be liable
16 even if the intentional tort is commenced before he participates, if he, knowing
17 the facts, then participates therein." (Peterson v. Cruickshank (1956) 144 Cal.
18 App.2d 148, 168-169 [300 P.2d 915], internal citations omitted.)
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TENTH CAUSE OF ACTION

(Theft, Robbery, Burglary)

(As against Defendant(s): Facebook, Inc., Apple, Inc., Google, Inc.,
Twitter, Inc., and John Does 1 to 10)

177. Plaintiff refers to and incorporates paragraphs 1 through 176,
inclusive, as though fully set forth herein, hereat, verbatim.

178. Defendants are accused of stealing more than intellectual property as
mentioned throughout this plead. This includes theft of social web accounts,
reach, relationships, time, and attempted burglary/robbery/vandalism of plaintiff's
car as reported to the Lost Hills Sheriff's on 04-05-2013. The assigned report
number is #913-01829-2227-341, which is obviously connected to both number
hacks described throughout this plead and parking ticket citation number hacks,
which plaintiff is fighting in another case. Plaintiff personally witnessed a
suspected conspirator committing the violations reported on 04-05-2013.

179. C.P.C. § 484-502.9 - Theft and Fraud - "484. (a) Every person who
shall feloniously steal, take, carry, lead, or drive away the personal property of
another, or who shall fraudulently appropriate property which has been entrusted
to him or her, or who shall knowingly and designedly, by any false or fraudulent
representation or pretense, defraud any other person of money, labor or real or
personal property..."

1 180. 18 U.S.C. § 1832 - Theft of Trade Secrets - "(a) Whoever, with intent to
2 convert a trade secret, that is related to a product or service used in or intended for
3 use in interstate or foreign commerce, to the economic benefit of anyone other
4 than the owner thereof, and intending or knowing that the offense will, injure any
5 owner of that trade secret, knowingly— (1) steals, or without authorization
6 appropriates, takes, carries away, or conceals, or by fraud, artifice, or deception
7 obtains such information;"

8
9 181. C.P.C. § 211-215 - Robbery - "is the felonious taking of personal
10 property in the possession of another, from his person or immediate presence, and
11 against his will, accomplished by means of force or fear..."

12
13 182. C.P.C. § 458-464 - Burglary - Plaintiff thinks burglary is what the
14 Sheriff's wrote in report #913-01829-2227-341, but is not sure if that is the
15 correct crime as nothing was able to be stolen before witness/plaintiff saw the
16 known defendant flee the scene into an unknown defendant's getaway car. This
17 incident is more describable vandalism and attempted burglary related to
18 conspiracy.

ELEVENTH CAUSE OF ACTION

(Damages: Liability Est., Susceptible Plaintiff, Aggravation of Condition)

(As against Defendant(s): Facebook, Inc., Apple, Inc., Google, Inc.,
Twitter, Inc., and John Does 1 to 10)

183. Plaintiff refers to and incorporates paragraphs 1 through 184,
inclusive, as though fully set forth herein, hereat, verbatim.

184. 42 U.S. Code § 1983 - Civil Action for Deprivation of Rights:
“Every person who, under color of any statute, ordinance, regulation, custom, or
usage, of any State or Territory or the District of Columbia, subjects, or causes to
be subjected, any citizen of the United States or other person within the
jurisdiction thereof to the deprivation of any rights, privileges, or immunities
secured by the Constitution and laws, shall be liable to the party injured in an
action at law, suit in equity, or other proper proceeding for redress.”

185. 28 U.S. Code § 1343 - Civil Rights and Elective Franchise - Recover
Damages(a) The district courts shall have original jurisdiction of any civil action
authorized by law to be commenced by any person: (1) To recover damages for
injury to his person or property, or because of the deprivation of any right or
privilege of a citizen of the United States, by any act done in furtherance of any
conspiracy mentioned in section 1985 of Title 42; (2) To recover damages from
any person who fails to prevent or to aid in preventing any wrongs mentioned in
section 1985 of Title 42 which he had knowledge were about to occur and power
to prevent;

1 186. DAMAGES: Civil Code section 1709 provides: "One who willfully
2 deceives another with intent to induce him to alter his position to his injury or risk,
3 is liable for any damage which he thereby suffers."

4
5 187. DAMAGES: Civil Code section 3333 provides: "For the breach of an
6 obligation not arising from contract, the measure of damages, except where
7 otherwise expressly provided by this code, is the amount which will compensate
8 for all the detriment proximately caused thereby, whether it could have been
9 anticipated or not."

10
11 188. DAMAGES: "To recover damages for fraud, a plaintiff must have
12 sustained damages proximately caused by the misrepresentation. A damage award
13 for fraud will be reversed where the injury is not related to the misrepresentation."
14 (Las Palmas Associates v. Las Palmas Center Associates (1991) 235 Cal.App.3d
15 1220, 1252 [1 Cal.Rptr.2d 301], internal citations omitted.)

16
17 189. DAMAGES LIABILITY ESTABLISHED: Civil Code section 3333
18 provides: "For the breach of an obligation not arising from contract, the measure
19 of damages, except where otherwise expressly provided by this code, is the
20 amount which will compensate for all the detriment proximately caused thereby,
21 whether it could have been anticipated or not."

22
23 190. DAMAGES LIABILITY ESTABLISHED: Civil Code section 3281
24 provides: "Every person who suffers detriment from the unlawful act or omission
25 of another, may recover from the person in fault a compensation therefor in
26 money, which is called damages."

1 191. DAMAGES LIABILITY ESTABLISHED: Civil Code section 3283
2 provides: "Damages may be awarded, in a judicial proceeding, for detriment
3 resulting after the commencement thereof, or certain to result in the future."

4
5 192. DAMAGES LIABILITY ESTABLISHED: Under Civil Code section
6 3333 "[t]ort damages are awarded to compensate a plaintiff for all of the damages
7 suffered as a legal result of the defendant's wrongful conduct." (North American
8 Chemical Co. v. Superior Court (1997) 59 Cal.App.4th 764, 786 [69 Cal.Rptr.2d
9 466], italics omitted.)

10
11 193. DAMAGES LIABILITY ESTABLISHED: "Whatever its measure in a
12 given case, it is fundamental that 'damages which are speculative, remote,
13 imaginary, contingent, or merely possible cannot serve as a legal basis for
14 recovery.' However, recovery is allowed if claimed benefits are reasonably certain
15 to have been realized but for the wrongful act of the opposing party." (Piscitelli v.
16 Friedenbergl (2001) 87 Cal.App.4th 953, 989 [105 Cal.Rptr.2d 88], internal
17 citations omitted.)

18
19 194. DAMAGES LIABILITY ESTABLISHED: "In general, one who has been
20 tortiously injured is entitled to be compensated for the harm and the injured party
21 must establish 'by proof the extent of the harm and the amount of money
22 representing adequate compensation with as much certainty as the nature of the
23 tort and the circumstances permit.' However, '[there] is no general requirement
24 that the injured person should prove with like definiteness the extent of the harm
25 that he has suffered as a result of the tortfeasor's conduct. It is desirable that
26 responsibility for harm should not be imposed until it has been proved with
27 reasonable certainty that the harm resulted from the wrongful conduct of the
28 person charged. It is desirable, also, that there be definiteness of proof of the

1 amount of damage as far as is reasonably possible. It is even more desirable,
2 however, that an injured person not be deprived of substantial ompensation
3 merely because he cannot prove with complete certainty the extent of harm he has
4 suffered.' " (Clemente v. State of California (1985) 40 Cal.3d 202, 219 [219 Cal.
5 Rptr. 445, 707 P.2d 818], internal citations omitted.)

6
7 195. DAMAGES LIABILITY ESTABLISHED: "If plaintiff's inability to prove
8 his damages with certainty is due to defendant's actions, the law does not
9 generally require such proof." (Clemente, supra, 40 Cal.3d at p. 219.)

10
11 196. DAMAGES LIABILITY ESTABLISHED: "While a defendant is liable
12 for all the damage that his tortuous act proximately causes to the plaintiff,
13 regardless of whether or not it could have been anticipated, nevertheless a
14 proximate causal connection must still exist between the damage sustained by the
15 plaintiff and the defendant's wrongful act or omission, and the detriment inflicted
16 on the plaintiff must still be the natural and probable result of the defendant's
17 conduct." (Chaparkas v. Webb (1960) 178 Cal.App.2d 257, 260 [2 Cal.Rptr. 879].)

18
19 197. DAMAGES - UNUSUALLY SUSCEPTIBLE PLAINTIFF: "That a
20 plaintiff without such a [preexisting] condition would probably have suffered less
21 injury or no injury does not exonerate a defendant from liability." (Ng v. Hudson
22 (1977) 75 Cal.App.3d 250, 255 [142 Cal.Rptr. 69], internal citations omitted,
23 overruled on another ground in Soule v. General Motors (1994) 8 Cal.4th 548, 574
24 [34 Cal.Rptr.2d 607, 882 P.2d 298].)

1 198. DAMAGES - UNUSUALLY SUSCEPTIBLE PLAINTIFF: "The
2 tortfeasor takes the person he injures as he finds him. If, by reason of some
3 preexisting condition, his victim is more susceptible to injury, the tortfeasor is not
4 thereby exonerated from liability." (Rideau v. Los Angeles Transit Lines (1954)
5 124 Cal.App.2d 466, 471 [268 P.2d 772], internal citations omitted.)

6
7 199. DAMAGES - AGGRAVATION OF PREEXISTING CONDITION OR
8 DISABILITY: "A tortfeasor may be held responsible where the effect of his
9 negligence is to aggravate a preexisting condition or disease." (Hastie v.
10 Handeland (1969) 274 Cal.App.2d 599, 604 [79 Cal.Rptr. 268], internal citations
11 omitted.)

12
13 200. DAMAGES - AGGRAVATION OF PREEXISTING CONDITION OR
14 DISABILITY: "Plaintiff may recover to the full extent that his condition has
15 worsened as a result of defendant's tortious act." (Ng v. Hudson (1977) 75 Cal.
16 App.3d 250, 255 [142 Cal.Rptr. 69], internal citations omitted, overruled on
17 another ground in Soule v. General Motors (1994) 8 Cal.4th 548, 574 [34 Cal.
18 Rptr.2d 607, 882 P.2d 298].)

VI. REQUEST FOR RELIEF

WHEREFORE, the Plaintiff requests:

201. \$10,000,000,000.21

202. Injunctions (to be determined)

203. Access to defendant system administrators for the purpose of preventing and quickly acting upon future violations, and for the disabling, suspension, or termination of conspirator accounts for up to 10 years as deemed fit by the plaintiff.

204. Criminal investigation of defendants and suspects, legal assistance from District Attorney, investigation assistance from relevant agencies, and international security for protection of the plaintiff.

205. Possible prosecution and/or mandatory resignations/retirements of defendants conspirators as deemed fit by court.

206. Public confession and apology from defendants to be pre-approved and directed @RussellRope

207. Block and unfollow settings to be removed and reset to default.

208. Legalize medical/recreational cannabis & industrial hemp. Go USA!

VII. DEMAND FOR JURY TRIAL

Plaintiff hereby requests a jury trial on all issues raised in this complaint.

Dated: 6-16-2014

Sign: 

Print Name: Russell Rope

Plaintiff in pro per

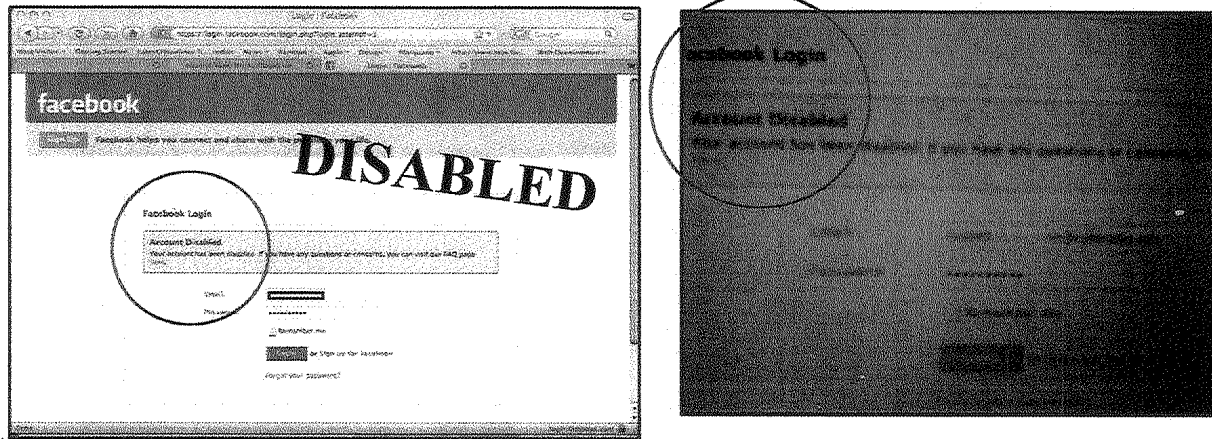
1 *Name:* Exhibit 1. List of Suspected John Does 1 to 10:

- 2
- 3 - John Doe 1: Mark Zuckerberg; Responsible for Facebook's Actions
- 4 - John Doe 2: Tim Cook; Responsible for Apple's Actions
- 5 - John Doe 3: Bad Karma Foundation; Responsible for Ongoing Conspiracy
- 6 - John Doe 4: Instagram, Other Social Web & Dating Apps/Sites (Copycats)
- 7 - John Doe 5: YouTube; A Serious Conflict and Accessory to Google
- 8 - John Doe 6: Superb Internet; Suspected of Selling Out and Conspiring
- 9 - John Doe 7: MySpace; Suspected of Conspiring to Bribe Superb to Sellout
- 10 - John Doe 8: Jane Doe(s); Suspected of Conspiring to Enable Cock Blocks
- 11 - John Doe 9: Internet Brands/Model Mayhem; Suspected of Conspiracy
- 12 - John Doe 10: AT&T; Suspected of Communications Fraud
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- 1 *Name:* Exhibit 2. List of Suspected Bad Karma Foundation Conspirators:
- 2
- 3 - Peter, Parker & Founders Fund - Plaintiff sought help ending hacks and connections for business.
- 4 - All Social Sites/Apps/PayPal - Chain of fools that would require too much energy to go after right now.
- 5 - Dave Moron & Path - Worked at FB and Apple and member of rival fraternity with motive.
- 6 - University of Colorado People - Suspected of more than conspiracy behind initial Facebook problems.
- 7 - Family or "5" (Dad & Mom & Extended) - Suspected control thieves who need to stop lying.
- 8 - 1 Older Brother or by Number Hack/Birth Order "1" - Probably belongs back in school or prison.
- 9 - 3 Younger Brother & Sister in Law or by # Hack/Birth Order "3" - Shrinks who wish plaintiff was client
- 10 - 9 Hater/Frenemy - Mistake of short lived fractional business partner and suspect of serious violations.
- 11 - Agoura High School People - Additional suspected conspirators.
- 12 - Groupe - Conspiring family friends who favor their first born frauds.
- 13 - AK ZEN - First born family friend hater/imitator/client and conspirator.
- 14 - HiP - Suspected of more than using video surveillance footage against plaintiff for personal gain.
- 15 - Em Au/TO - Female setup to cut plaintiff down and supporters of the chains of fools also for personal gain.
- 16 - BH/Night Vision - Defamation of plaintiff and conspiracy to interfere with economic and personal relations.
- 17 - Karma F/Playboy/Nightlife - Supporters of older brother and other conspirators. Haters and competitors.
- 18 - Health Care Professionals During Course of Conspiracy: Unfair service denials, poor help, waste of time.
- 19 - Attorneys Contacted - Conspiracy to Harass, Delay/Obstruct Justice: Denial of Service Number Hacks
- 20 - Law Enforcement & GOV. - People who helped defendants when they should have helped the plaintiff.
- 21 - Live Nation, Guerrilla Union, Goldenvoice/AEG - Evidence indicates conspiracy with defendants.
- 22 - RED Studios/Camera Company - Not doing business in relation to conspiracy, suspected IP theft/stalking.
- 23 - Auto Gallery - Suspected in unfair competition conspiracy involving vandalism and attempted burglary.
- 24 - Model Mayhem - Cock blocking creativity, playing into harassment hacks, etc.
- 25 - Social Web Connections Past & Present @RussellRope++
- 26 - Defendants From Case #CV14-04002
- 27 - Defendants From Case #CV14-04232
- 28

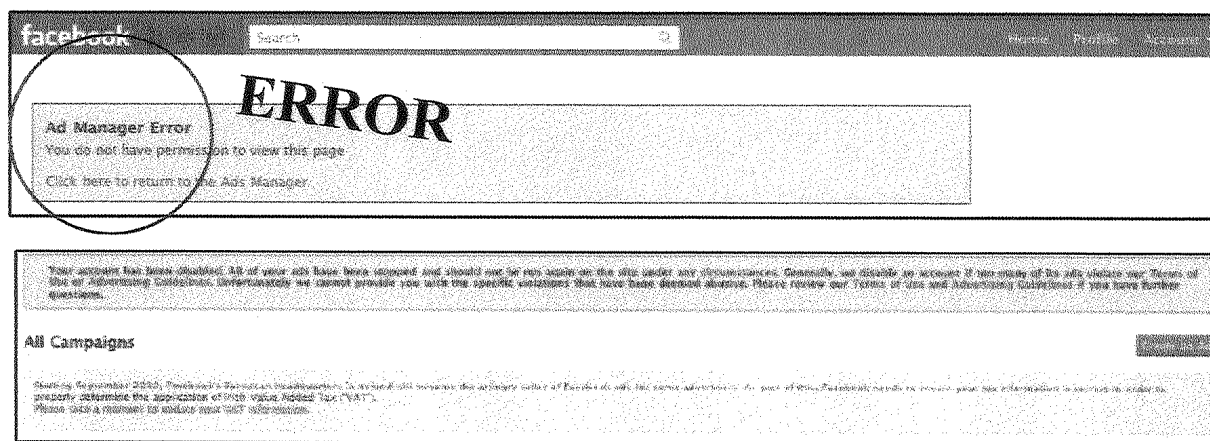
1 Name: Exhibit 3

2 Proof that Facebook Disabled Account Multiple Times For Long Periods of Time



10

11 Proof of Disabled Advertising etc. Features on Active Account (not current)



19

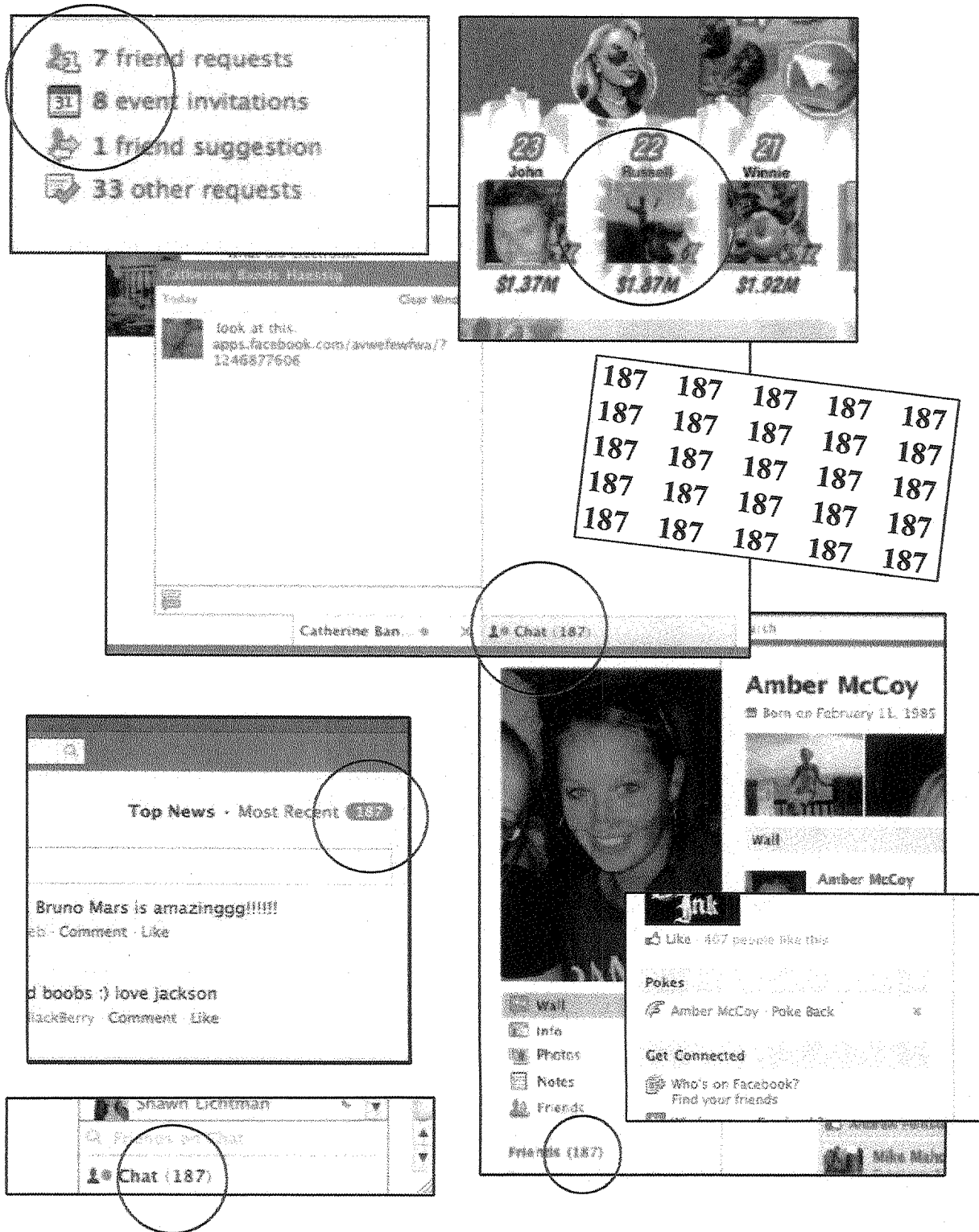
20 Proof of Sabotage of Facebook Fan/Business Pages:

21 Video @ <http://www.youtube.com/watch?v=y45cMxX5UPU>



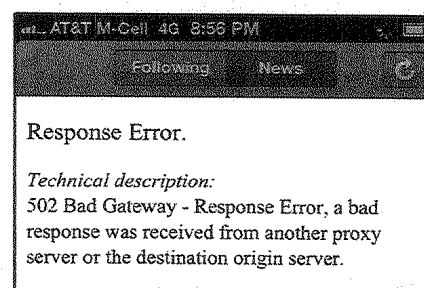
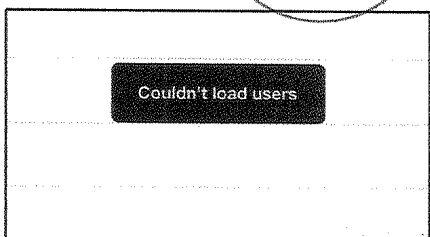
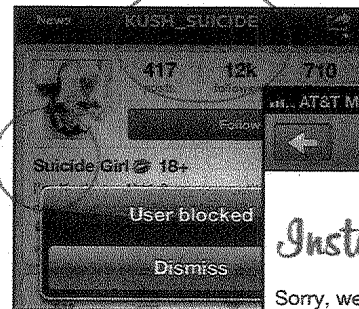
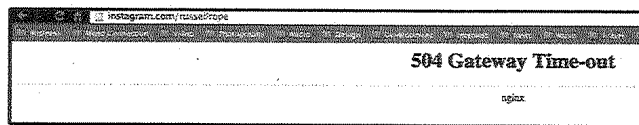
Name: Exhibit 4

Screen shots of original number hacks, which started at DEFENDANT Facebook and were harrasingly conveying death threats through repetitive use of the number “187,” which = “murder, death, kill” to anyone who does not live under a rock. FB rarely uses “187” anymore; replaced with # hacks related to PLAITIFF’s person.



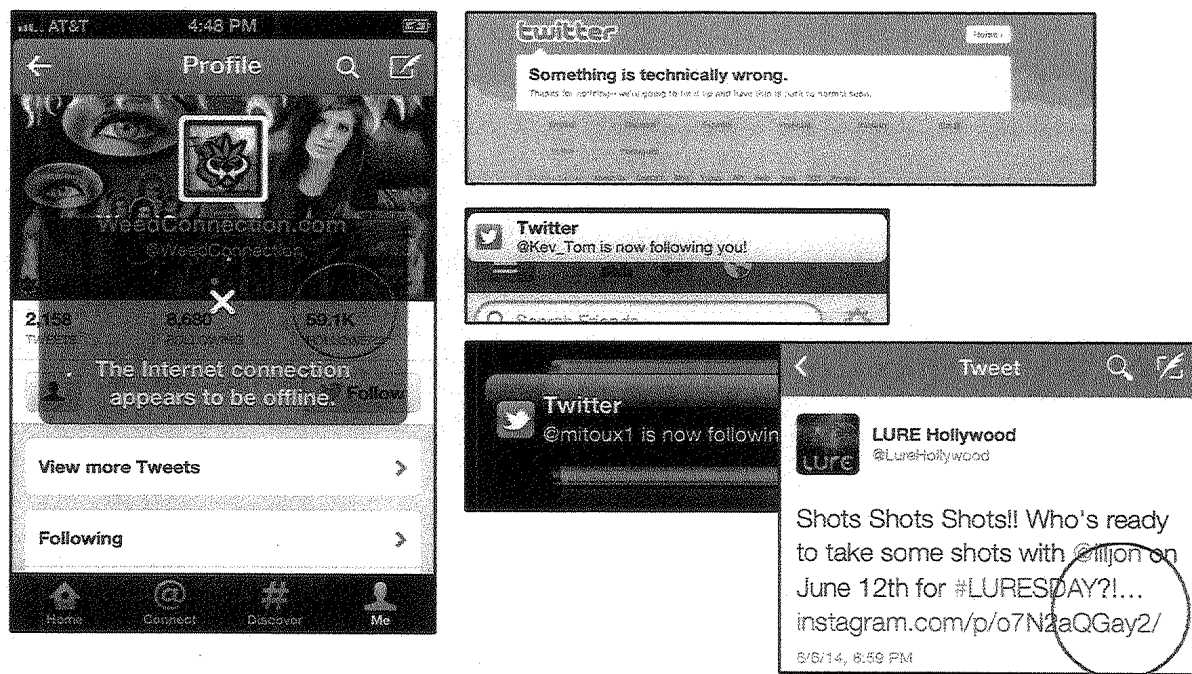
Name: Exhibit 5

Screen shot of how Instagram is using name, number, and service hacks. Many more screen shots and video screen shots exist, which clearly demonstrate additional acts of malicious hacking by DEFENDANTS, which are timed, dated, and clearly acts related to the conspiracy. Intereference with reach, tags, and likes demonstable with active account.



Name: Exhibit 6

Screen shot of how Twitter is using name, number, and service hacks. Many more screen shots and video screen shots exist, which clearly demonstrate additional acts of malicious hacking by DEFENDANTS, which are timed, dated, and clearly acts related to the conspiracy. Interference with reach, followers is partially demonstrated by how many followers PLAINTIFF used to have.

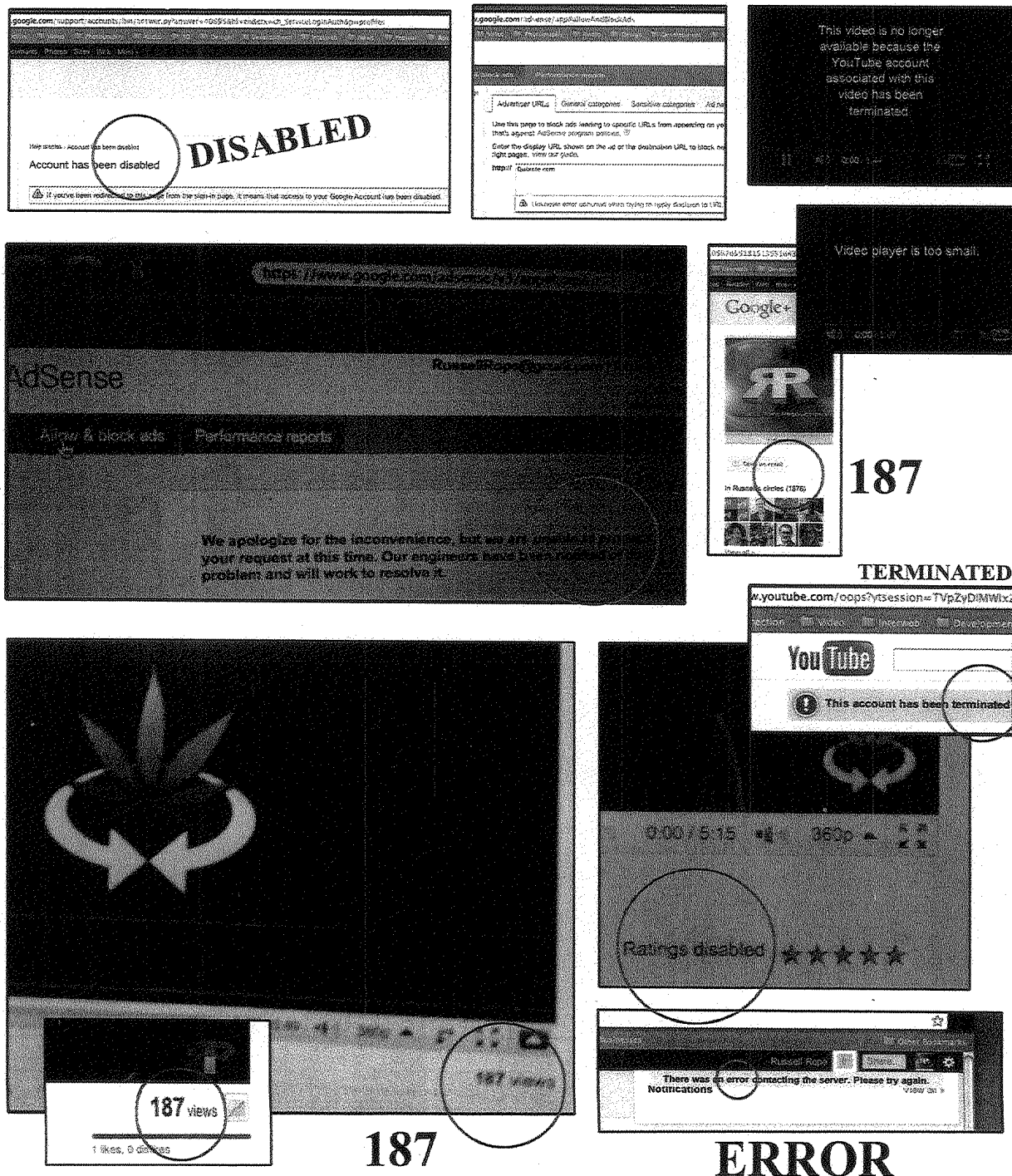


Disabled Twitter Widget Feeds on Business Sites



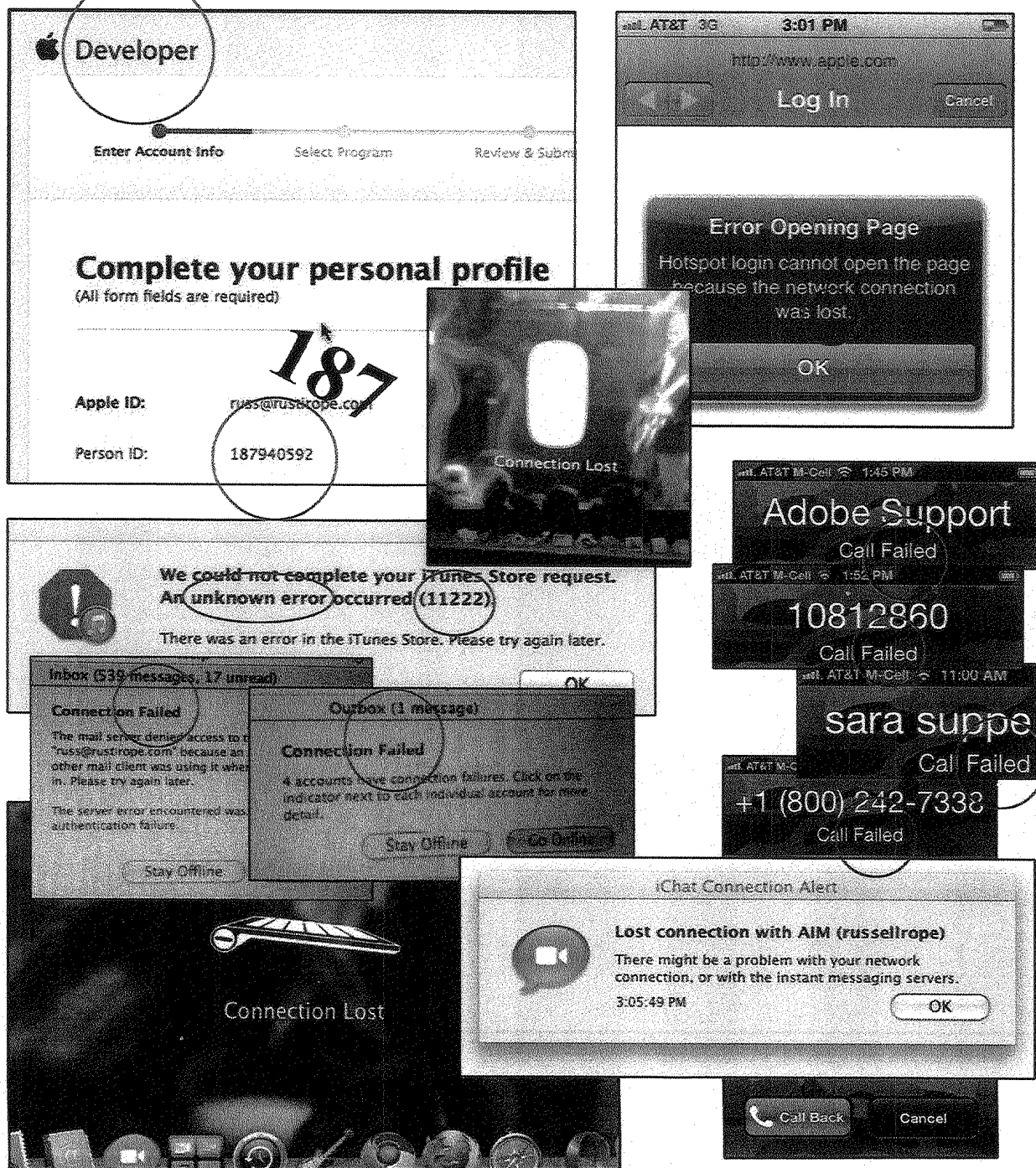
Name: Exhibit 7

Screen shots demonstrating sabotage committed by DEFENDANT Google, YouTube, Google+, AdSense, etc; all following and similar to DEFENDANT Facebook in their disabling/termination of accounts, features, and AdSense hacks. Google is suspected of customizing their search algorithms to further damage.



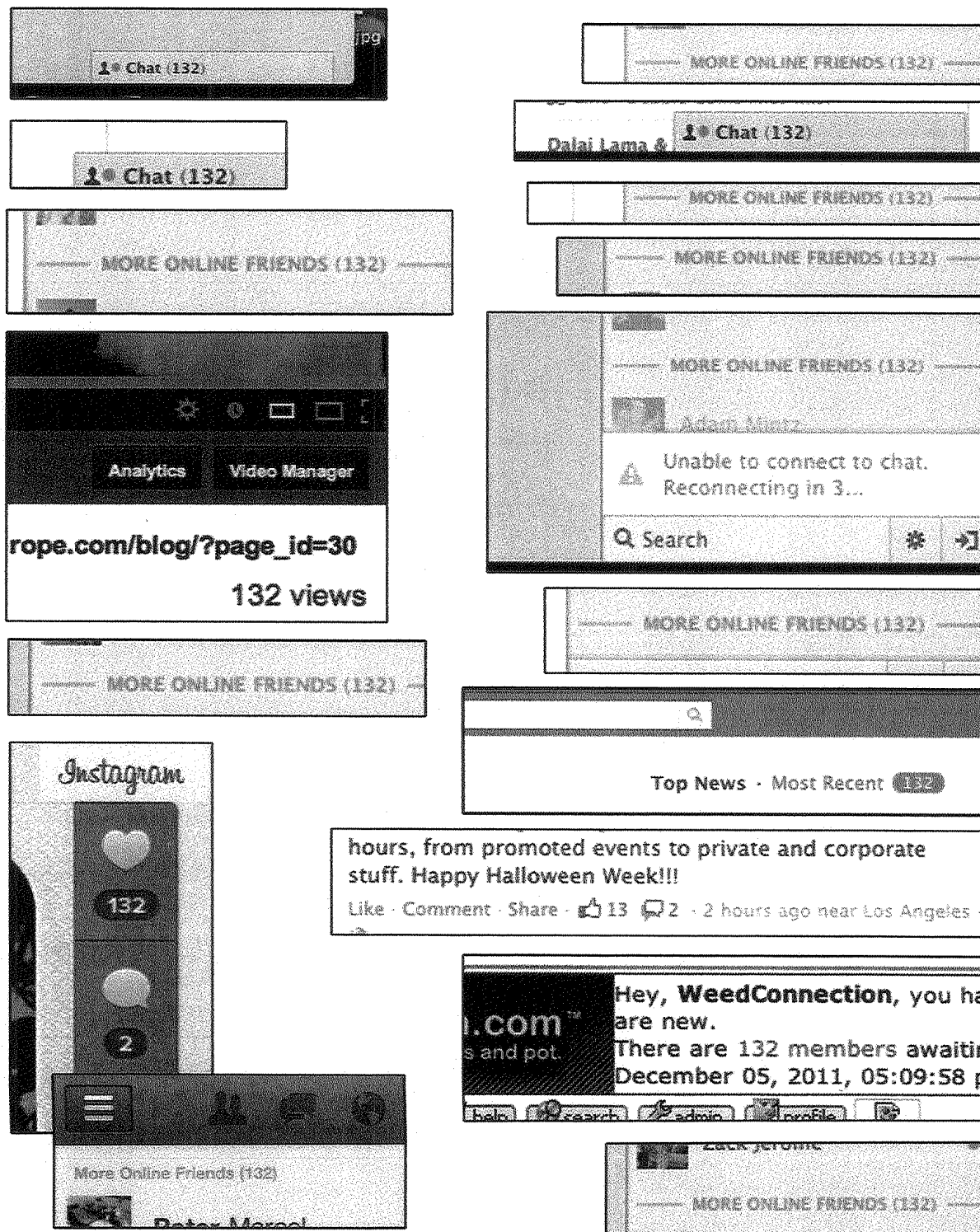
Name: Exhibit 8

Evidence of DEFENDANT APPLE maliciously and repeatedly harassing, obviously in conspiracy and doing more than accused espionage/sabotage including ridiculous connection "lost" and "failure" errors plus more number and email hacks appearing to be operating system affiliated or coming directly from APPLE. Much more evidence exists of phone service interference etc.



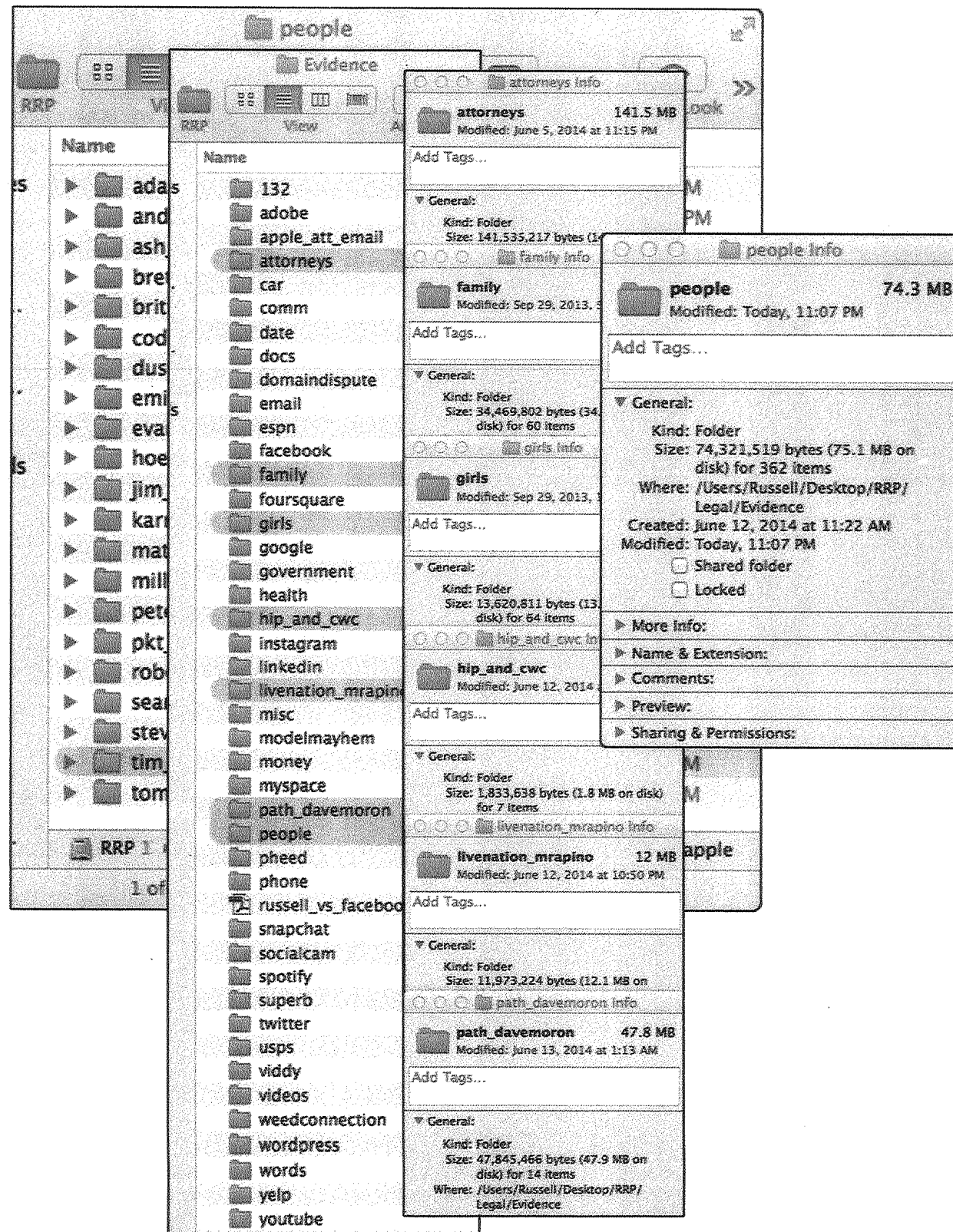
Name: Exhibit 9

DEFENDANTS moved on from 187 threats to playing extremely harrassing mind games using other numbers and names to represent people from PLAINTIFF's personal life. PLAINTIFF is the second born of three males FYI. The number 9 eventually came to represent another hater and serious violator.



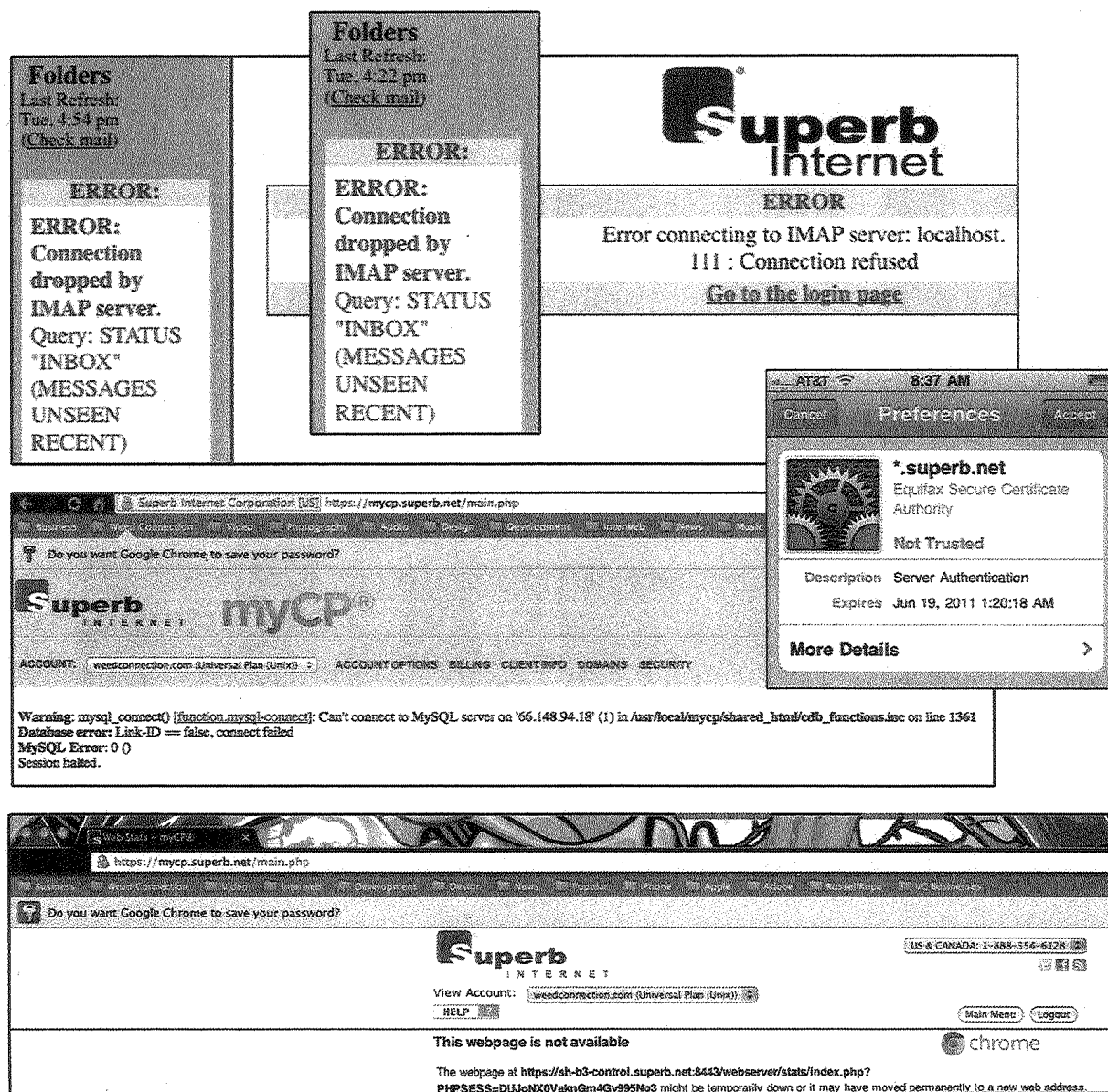
Name: Exhibit 10

These folders are loaded with screen shots including full names of suspected conspirators names showing up in name, word, and number hacks.



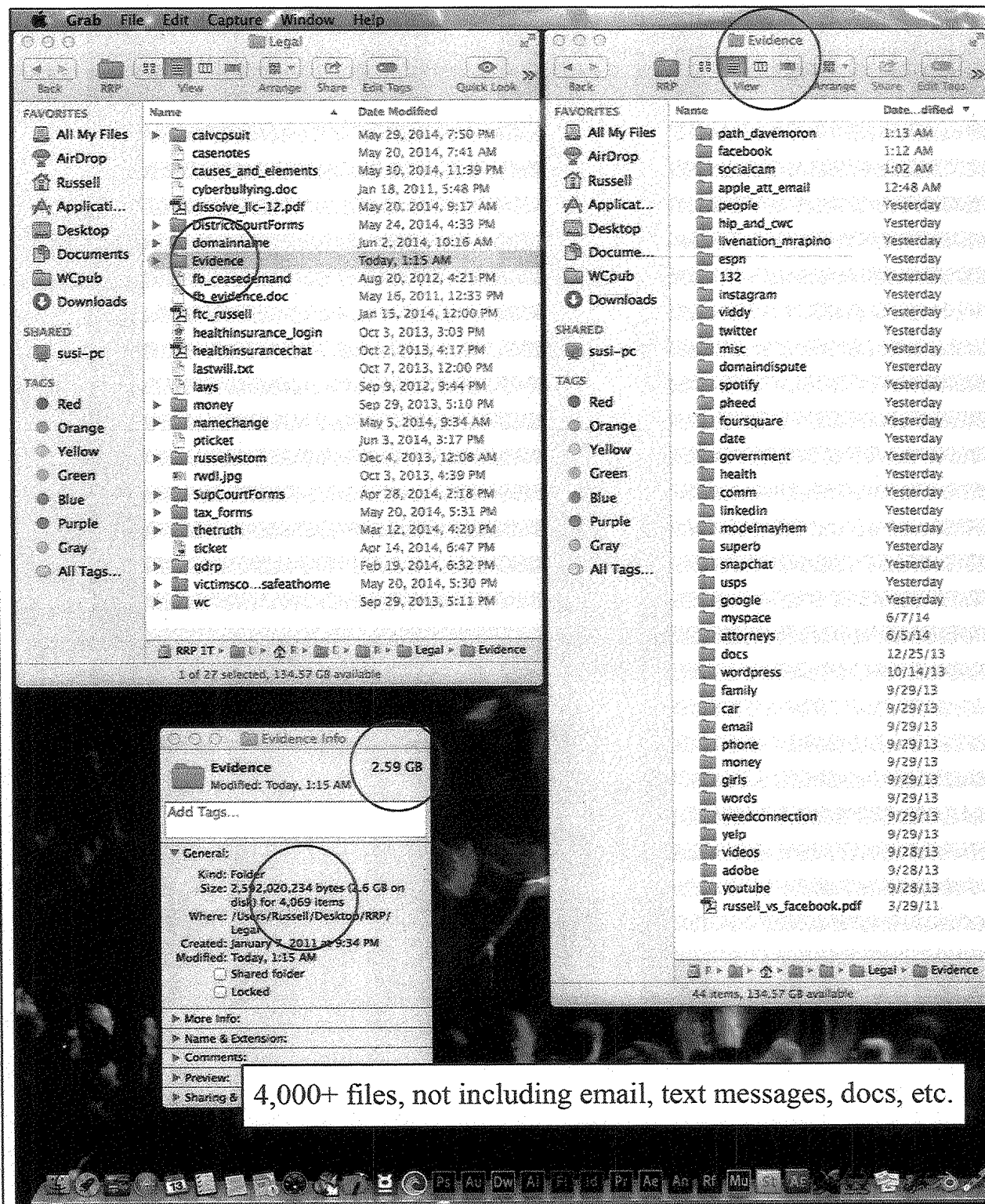
Name: Exhibit 11

Superb is the PLAINTIFF's web and email host suspected of conspiracy based on name number hacks, connection errors, and email issues. PLAINTIFF originally signed up with this host while they were based in Canada. Someone bought them and moved the company to USA around the same time MySpace both ran a large ad-campaign for Superb and gave an alleged upwards of million dollars worth of business to PLAINTIFF's resume referenced older brother instead of hiring a more than qualified PLAINTIFF who at the time was seeking employment.



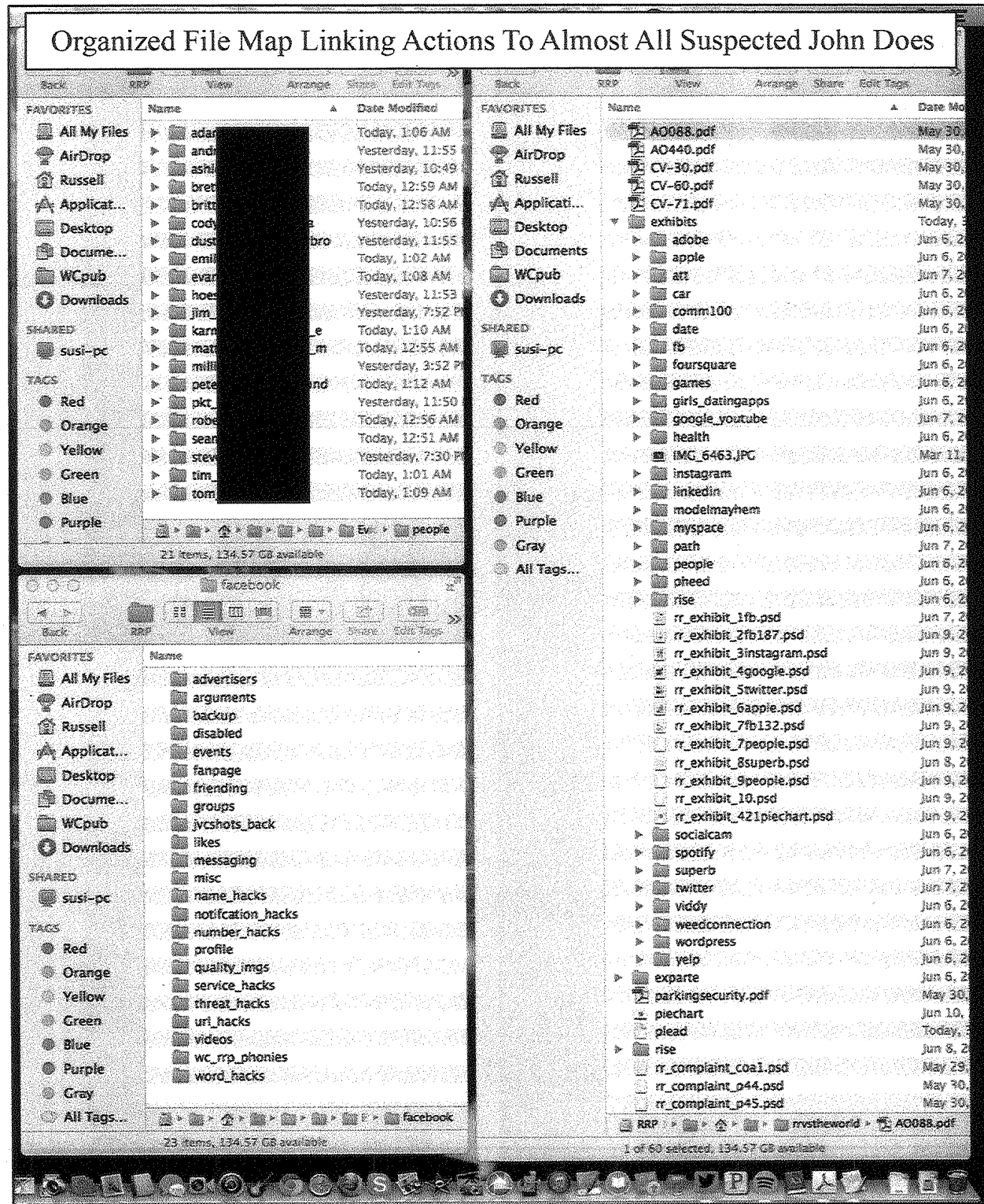
Name: Exhibit 12

Screen Shot of Plaintiff's Computer Desktop Displaying Organized Evidence



Name: Exhibit 13

Screen Shot of Plaintiff's Computer Desktop Displaying Organized Evidence



1 *Name:* Exhibit 14

2 Pie chart displaying the plaintiff's perception of defendant levels of
3 responsibility. Facebook and Apple could be held accountable for BKF & Other.

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6 ● Facebook ● Google ● Apple ● Twitter ● BKF ● Other

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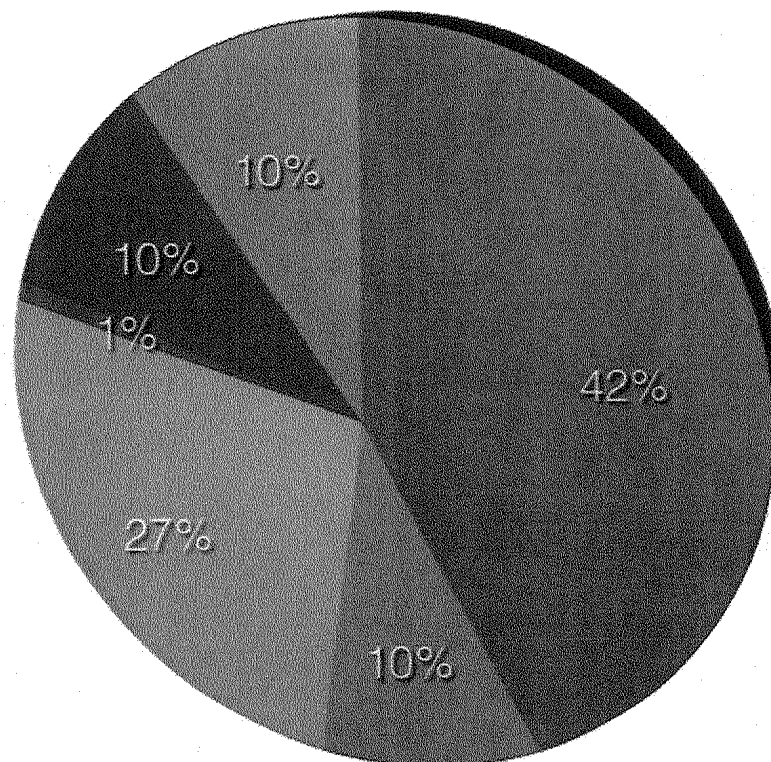
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UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET

I. (a) PLAINTIFFS (Check box if you are representing yourself <input checked="" type="checkbox"/>) Russell Rope	DEFENDANTS (Check box if you are representing yourself <input type="checkbox"/>) Facebook Inc., Apple Inc., Google Inc., Twitter Inc., and John Does 1 to 10
(b) County of Residence of First Listed Plaintiff <u>Los Angeles</u> (EXCEPT IN U.S. PLAINTIFF CASES)	County of Residence of First Listed Defendant _____ (IN U.S. PLAINTIFF CASES ONLY)
(c) Attorneys (Firm Name, Address and Telephone Number) If you are representing yourself, provide the same information. Russell Rope #1607, PO Box 1198, Sacramento, CA 95812	Attorneys (Firm Name, Address and Telephone Number) If you are representing yourself, provide the same information.

II. BASIS OF JURISDICTION (Place an X in one box only.) <input type="checkbox"/> 1. U.S. Government Plaintiff <input checked="" type="checkbox"/> 3. Federal Question (U.S. Government Not a Party) <input type="checkbox"/> 2. U.S. Government Defendant <input type="checkbox"/> 4. Diversity (Indicate Citizenship of Parties in Item III)	III. CITIZENSHIP OF PRINCIPAL PARTIES -For Diversity Cases Only (Place an X in one box for plaintiff and one for defendant) <table style="width:100%;"> <tr> <td style="width:33%;">Citizen of This State</td> <td style="width:10%;">PTF <input type="checkbox"/> 1</td> <td style="width:10%;">DEF <input type="checkbox"/> 1</td> <td style="width:33%;">Incorporated or Principal Place of Business in this State</td> <td style="width:10%;">PTF <input type="checkbox"/> 4</td> <td style="width:10%;">DEF <input type="checkbox"/> 4</td> </tr> <tr> <td>Citizen of Another State</td> <td>PTF <input type="checkbox"/> 2</td> <td>DEF <input type="checkbox"/> 2</td> <td>Incorporated and Principal Place of Business in Another State</td> <td>PTF <input type="checkbox"/> 5</td> <td>DEF <input type="checkbox"/> 5</td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td>PTF <input type="checkbox"/> 3</td> <td>DEF <input type="checkbox"/> 3</td> <td>Foreign Nation</td> <td>PTF <input type="checkbox"/> 6</td> <td>DEF <input type="checkbox"/> 6</td> </tr> </table>	Citizen of This State	PTF <input type="checkbox"/> 1	DEF <input type="checkbox"/> 1	Incorporated or Principal Place of Business in this State	PTF <input type="checkbox"/> 4	DEF <input type="checkbox"/> 4	Citizen of Another State	PTF <input type="checkbox"/> 2	DEF <input type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	PTF <input type="checkbox"/> 5	DEF <input type="checkbox"/> 5	Citizen or Subject of a Foreign Country	PTF <input type="checkbox"/> 3	DEF <input type="checkbox"/> 3	Foreign Nation	PTF <input type="checkbox"/> 6	DEF <input type="checkbox"/> 6
Citizen of This State	PTF <input type="checkbox"/> 1	DEF <input type="checkbox"/> 1	Incorporated or Principal Place of Business in this State	PTF <input type="checkbox"/> 4	DEF <input type="checkbox"/> 4														
Citizen of Another State	PTF <input type="checkbox"/> 2	DEF <input type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	PTF <input type="checkbox"/> 5	DEF <input type="checkbox"/> 5														
Citizen or Subject of a Foreign Country	PTF <input type="checkbox"/> 3	DEF <input type="checkbox"/> 3	Foreign Nation	PTF <input type="checkbox"/> 6	DEF <input type="checkbox"/> 6														
IV. ORIGIN (Place an X in one box only.) <input checked="" type="checkbox"/> 1. Original Proceeding <input type="checkbox"/> 2. Removed from State Court <input type="checkbox"/> 3. Remanded from Appellate Court <input type="checkbox"/> 4. Reinstated or Reopened <input type="checkbox"/> 5. Transferred from Another District (Specify) <input type="checkbox"/> 6. Multi-District Litigation																			

V. REQUESTED IN COMPLAINT: JURY DEMAND: ☒ Yes ☐ No (Check "Yes" only if demanded in complaint.)

CLASS ACTION under F.R.Cv.P. 23: ☐ Yes ☒ No **MONEY DEMANDED IN COMPLAINT:** \$ 10,000,000,000.21

VI. CAUSE OF ACTION (Cite the U.S. Civil Statute under which you are filing and write a brief statement of cause. Do not cite jurisdictional statutes unless diversity.)
 42 U.S.C. § 1983 - Civil Action for Deprivation of Rights - Defendants conspired to hack the plaintiff's life and sabotage his business, both online and in person.

VII. NATURE OF SUIT (Place an X in one box only).

OTHER STATUTES	CONTRACT	REAL PROPERTY CONT.	IMMIGRATION	PRISONER PETITIONS	PROPERTY RIGHTS
<input type="checkbox"/> 375 False Claims Act	<input type="checkbox"/> 110 Insurance	<input type="checkbox"/> 240 Torts to Land	<input type="checkbox"/> 462 Naturalization Application	Habeas Corpus:	<input type="checkbox"/> 820 Copyrights
<input type="checkbox"/> 400 State Reapportionment	<input type="checkbox"/> 120 Marine	<input type="checkbox"/> 245 Tort Product Liability	<input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 463 Alien Detainee	<input type="checkbox"/> 830 Patent
<input type="checkbox"/> 410 Antitrust	<input type="checkbox"/> 130 Miller Act	<input type="checkbox"/> 290 All Other Real Property	TORTS	<input type="checkbox"/> 510 Motions to Vacate Sentence	<input type="checkbox"/> 840 Trademark
<input type="checkbox"/> 430 Banks and Banking	<input type="checkbox"/> 140 Negotiable Instrument	TORTS	PERSONAL INJURY	<input type="checkbox"/> 530 General	SOCIAL SECURITY
<input type="checkbox"/> 450 Commerce/ICC Rates/Etc.	<input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment	<input type="checkbox"/> 310 Airplane	<input type="checkbox"/> 370 Other Fraud	<input type="checkbox"/> 535 Death Penalty	<input type="checkbox"/> 861 HIA (1395ff)
<input type="checkbox"/> 460 Deportation	<input type="checkbox"/> 151 Medicare Act	<input type="checkbox"/> 315 Airplane Product Liability	<input type="checkbox"/> 371 Truth in Lending	Other:	<input type="checkbox"/> 862 Black Lung (923)
<input type="checkbox"/> 470 Racketeer Influenced & Corrupt Org.	<input type="checkbox"/> 152 Recovery of Defaulted Student Loan (Excl. Vet.)	<input type="checkbox"/> 320 Assault, Libel & Slander	<input type="checkbox"/> 380 Other Personal Property Damage	<input type="checkbox"/> 540 Mandamus/Other	<input type="checkbox"/> 863 DIWC/DIWW (405 (g))
<input type="checkbox"/> 480 Consumer Credit	<input type="checkbox"/> 153 Recovery of Overpayment of Vet. Benefits	<input type="checkbox"/> 330 Fed. Employers' Liability	<input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 550 Civil Rights	<input type="checkbox"/> 864 SSID Title XVI
<input type="checkbox"/> 490 Cable/Sat TV	<input type="checkbox"/> 160 Stockholders' Suits	<input type="checkbox"/> 340 Marine	BANKRUPTCY	<input type="checkbox"/> 555 Prison Condition	<input type="checkbox"/> 865 RSI (405 (g))
<input type="checkbox"/> 850 Securities/Commodities/Exchange	<input type="checkbox"/> 190 Other Contract	<input type="checkbox"/> 345 Marine Product Liability	<input type="checkbox"/> 422 Appeal 28 USC 158	<input type="checkbox"/> 560 Civil Detainee Conditions of Confinement	FEDERAL TAX SUITS
<input type="checkbox"/> 890 Other Statutory Actions	<input type="checkbox"/> 195 Contract Product Liability	<input type="checkbox"/> 350 Motor Vehicle	<input type="checkbox"/> 423 Withdrawal 28 USC 157	FORFEITURE/PENALTY	<input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant)
<input type="checkbox"/> 891 Agricultural Acts	<input type="checkbox"/> 196 Franchise	<input type="checkbox"/> 355 Motor Vehicle Product Liability	CIVIL RIGHTS	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881	<input type="checkbox"/> 871 IRS-Third Party 26 USC 7609
<input type="checkbox"/> 893 Environmental Matters	REAL PROPERTY	<input type="checkbox"/> 360 Other Personal Injury	<input checked="" type="checkbox"/> 440 Other Civil Rights	<input type="checkbox"/> 690 Other	
<input type="checkbox"/> 895 Freedom of Info. Act	<input type="checkbox"/> 210 Land Condemnation	<input type="checkbox"/> 362 Personal Injury-Med Malpractice	<input type="checkbox"/> 441 Voting	LABOR	
<input type="checkbox"/> 896 Arbitration	<input type="checkbox"/> 220 Foreclosure	<input type="checkbox"/> 365 Personal Injury-Product Liability	<input type="checkbox"/> 442 Employment	<input type="checkbox"/> 710 Fair Labor Standards Act	
<input type="checkbox"/> 899 Admin. Procedures Act/Review of Appeal of Agency Decision	<input type="checkbox"/> 230 Rent Lease & Ejectment	<input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability	<input type="checkbox"/> 443 Housing/Accommodations	<input type="checkbox"/> 720 Labor/Mgmt. Relations	
<input type="checkbox"/> 950 Constitutionality of State Statutes		<input type="checkbox"/> 368 Asbestos Personal Injury Product Liability	<input type="checkbox"/> 445 American with Disabilities-Employment	<input type="checkbox"/> 740 Railway Labor Act	
			<input type="checkbox"/> 446 American with Disabilities-Other	<input type="checkbox"/> 751 Family and Medical Leave Act	
			<input type="checkbox"/> 448 Education	<input type="checkbox"/> 790 Other Labor Litigation	
				<input type="checkbox"/> 791 Employee Ret. Inc. Security Act	

FOR OFFICE USE ONLY:

Case Number:

LA CV 14 04900

(VBK)

CV-71 (11/13)

CIVIL COVER SHEET

Page 1 of 3

UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET

VIII. VENUE: Your answers to the questions below will determine the division of the Court to which this case will most likely be initially assigned. This initial assignment is subject to change, in accordance with the Court's General Orders, upon review by the Court of your Complaint or Notice of Removal.

Question A: Was this case removed from state court? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "no," go to Question B. If "yes," check the box to the right that applies, enter the corresponding division in response to Question D, below, and skip to Section IX.	STATE CASE WAS PENDING IN THE COUNTY OF:		INITIAL DIVISION IN CACD IS:
	<input checked="" type="checkbox"/> Los Angeles		Western
	<input type="checkbox"/> Ventura, Santa Barbara, or San Luis Obispo		Western
	<input type="checkbox"/> Orange		Southern
	<input type="checkbox"/> Riverside or San Bernardino		Eastern

Question B: Is the United States, or one of its agencies or employees, a party to this action? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "no," go to Question C. If "yes," check the box to the right that applies, enter the corresponding division in response to Question D, below, and skip to Section IX.	If the United States, or one of its agencies or employees, is a party, is it:		INITIAL DIVISION IN CACD IS:
	A PLAINTIFF? <small>Then check the box below for the county in which the majority of DEFENDANTS reside.</small>	A DEFENDANT? <small>Then check the box below for the county in which the majority of PLAINTIFFS reside.</small>	
	<input type="checkbox"/> Los Angeles	<input type="checkbox"/> Los Angeles	Western
	<input type="checkbox"/> Ventura, Santa Barbara, or San Luis Obispo	<input type="checkbox"/> Ventura, Santa Barbara, or San Luis Obispo	Western
	<input type="checkbox"/> Orange	<input type="checkbox"/> Orange	Southern
	<input type="checkbox"/> Riverside or San Bernardino	<input type="checkbox"/> Riverside or San Bernardino	Eastern
	<input type="checkbox"/> Other	<input type="checkbox"/> Other	Western

Question C: Location of plaintiffs, defendants, and claims? (Make only one selection per row)	A. Los Angeles County	B. Ventura, Santa Barbara, or San Luis Obispo Counties	C. Orange County	D. Riverside or San Bernardino Counties	E. Outside the Central District of California	F. Other
Indicate the location in which a majority of plaintiffs reside:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Indicate the location in which a majority of defendants reside:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Indicate the location in which a majority of claims arose:	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

C.1. Is either of the following true? If so, check the one that applies: <input type="checkbox"/> 2 or more answers in Column C <input type="checkbox"/> only 1 answer in Column C and no answers in Column D Your case will initially be assigned to the SOUTHERN DIVISION. Enter "Southern" in response to Question D, below. If none applies, answer question C2 to the right. →	C.2. Is either of the following true? If so, check the one that applies: <input type="checkbox"/> 2 or more answers in Column D <input type="checkbox"/> only 1 answer in Column D and no answers in Column C Your case will initially be assigned to the EASTERN DIVISION. Enter "Eastern" in response to Question D, below. If none applies, go to the box below. ↓
Your case will initially be assigned to the WESTERN DIVISION. Enter "Western" in response to Question D below.	

Question D: Initial Division?	INITIAL DIVISION IN CACD
Enter the initial division determined by Question A, B, or C above: →	Western

**UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET**

IX(a). IDENTICAL CASES: Has this action been previously filed in this court and dismissed, remanded or closed? ☒ NO ☐ YES

If yes, list case number(s): _____

IX(b). RELATED CASES: Have any cases been previously filed in this court that are related to the present case? ☒ NO ☐ YES

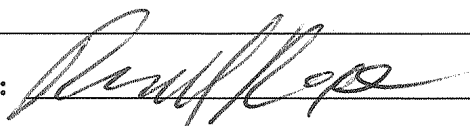
If yes, list case number(s): _____

Civil cases are deemed related if a previously filed case and the present case:

(Check all boxes that apply)

- ☐ A. Arise from the same or closely related transactions, happenings, or events; or
- ☐ B. Call for determination of the same or substantially related or similar questions of law and fact; or
- ☐ C. For other reasons would entail substantial duplication of labor if heard by different judges; or
- ☐ D. Involve the same patent, trademark or copyright, and one of the factors identified above in a, b or c also is present.

**X. SIGNATURE OF ATTORNEY
(OR SELF-REPRESENTED LITIGANT):**



DATE: 6-20-2014

Notice to Counsel/Parties: The CV-71 (JS-44) Civil Cover Sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law. This form, approved by the Judicial Conference of the United States in September 1974, is required pursuant to Local Rule 3-1 is not filed but is used by the Clerk of the Court for the purpose of statistics, venue and initiating the civil docket sheet. (For more detailed instructions, see separate instructions sheet).

Key to Statistical codes relating to Social Security Cases:

Nature of Suit Code	Abbreviation	Substantive Statement of Cause of Action
861	HIA	All claims for health insurance benefits (Medicare) under Title 18, Part A, of the Social Security Act, as amended. Also, include claims by hospitals, skilled nursing facilities, etc., for certification as providers of services under the program. (42 U.S.C. 1935FF(b))
862	BL	All claims for "Black Lung" benefits under Title 4, Part B, of the Federal Coal Mine Health and Safety Act of 1969. (30 U.S.C. 923)
863	DIWC	All claims filed by insured workers for disability insurance benefits under Title 2 of the Social Security Act, as amended; plus all claims filed for child's insurance benefits based on disability. (42 U.S.C. 405 (g))
863	DIWW	All claims filed for widows or widowers insurance benefits based on disability under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405 (g))
864	SSID	All claims for supplemental security income payments based upon disability filed under Title 16 of the Social Security Act, as amended.
865	RSI	All claims for retirement (old age) and survivors benefits under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405 (g))

NAME, ADDRESS, AND TELEPHONE NUMBER OF ATTORNEY(S)
OR OF PARTY APPEARING IN PRO PER

Russell Rope #1607
PO Box 1198
Sacramento, CA 95812
(818) 400-5592

ATTORNEY(S) FOR: Russell Rope

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

Russell Rope

LA CV 14 04900 - (VBK)

Plaintiff(s),

v.

Facebook, Inc., Apple, Inc., Google, Inc., Twitter,
Inc., and John Does 1 to 10

Defendant(s)

CERTIFICATION AND NOTICE
OF INTERESTED PARTIES
(Local Rule 7.1-1)

TO: THE COURT AND ALL PARTIES OF RECORD:

The undersigned, counsel of record for Russell Rope
or party appearing in pro per, certifies that the following listed party (or parties) may have a pecuniary interest in
the outcome of this case. These representations are made to enable the Court to evaluate possible disqualification
or recusal.

(List the names of all such parties and identify their connection and interest. Use additional sheet if necessary.)

PARTY	CONNECTION / INTEREST
Russell Rope	Plaintiff
Facebook, Inc.	Defendants
InstraGram	Defendant
Apple, Inc.	Defendants
Google, Inc.	Defendants
YouTube	Defendants
Twitter, Inc.	Defendants
John Does 1 to 10	Defendants
All Connections @RussellRope (see attachments)	Suspected Defendants

6-20-2014
Date


Signature

Attorney of record for (or name of party appearing in pro per):

Russell Rope

Russell Rope #1607
PO Box 1198
Sacramento, CA 95812
(818) 400-5592

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

Russell Rope

LA CV 14 04900 -

CASE NUMBER

PLAINTIFF/PETITIONER,

v.

Facebook Inc., Apple Inc., Google Inc., Twitter Inc.,
and John Does 1 to 10

DEFENDANT(S).

REQUEST TO PROCEED
IN FORMA PAUPERIS WITH
DECLARATION IN SUPPORT

FILED
2014 JUN 24 PM 1:00
CENTRAL DISTRICT OF CALIFORNIA
LOS ANGELES
BY: PL

(VBK)

I, Russell Rope, declare under penalty of perjury, that the foregoing is true and correct; that I am the petitioner/plaintiff in the above entitled case; that in support of my motion to proceed without being required to prepay fees, costs or give security therefore, I state that because of my poverty I am unable to pay the costs of said proceedings or to give security therefore and that I am entitled to redress.

I further declare under penalty of perjury that the responses which I have made to the questions and instructions below are true, correct and complete.

1. Are you presently employed? ☒ Yes ☐ No
 - a. If the answer is yes, state the amount of your salary or wages per month, and give the name and address of your employer. The plaintiff is self-employed, does not currently have any income, and can not afford court fees.
Plaintiff's personal and busines credit card debit exceeds checking accounts as a result of this and related cases.
 - b. If the answer is no, state the date of last employment and the amount of the salary and wages per month which you received. _____
2. Have you received, *within the past twelve months*, any money from any of the following sources?
 - a. Business, profession or form of self-employment? ☒ Yes ☐ No
 - b. Rent payments, interest or dividends? ☐ Yes ☒ No
 - c. Pensions, annuities or life insurance payments? ☐ Yes ☒ No
 - d. Gifts or inheritances? ☒ Yes ☐ No
 - e. Any other income (other than listed above)? ☐ Yes ☒ No
 - f. Loans? ☐ Yes ☒ No

If the answer to any of the above is yes, describe such source of money and state the amount received from each source during the past twelve (12) months: Little income from self-employment and some gift money from family.
Less than \$10,000 most of which has been used to keep the plaintiff and his business alive.

3. Do you own any cash, or do you have money in a checking or savings account? (Include any funds in prison accounts, if applicable.) ☒ Yes ☐ No

If the answer is yes, identify each account and separately state the amount of money held in **each** account for each of the *six (6) months prior* to the date of this declaration.

Chase Pers. Checking: \$114.01, Credit: \$-496.55, Chase Business Checking: \$67.42, Credit: \$-1998.34, PayPal \$2.4

4. Do you own any real estate, stocks, bonds, notes, automobiles, or other valuable property (excluding ordinary household furnishings and clothing)? ☒ Yes ☐ No

If the answer is yes, describe the property and state its approximate value: 2004 Jeep Liberty \$7,777 ?

Computers and Technology \$10,000? Intellectual Property \$NA-\$1,000,000,000+

5. In what year did you last file an Income Tax return? 2013/2014

Approximately how much income did your last tax return reflect? Less Than \$10,000

6. List the persons who are dependent upon your for support, state your relationship to those persons, and indicate how much you contribute toward their support:

Plaintiff is currently dependent upon some family for shelter and the Department of Public Social Services for food stamps and MediCal. Plaintiff helps with some household chores and is legally entitled to support from the state.

I understand that a false statement or answer to any question in this declaration will subject me to penalties for perjury. I further understand that perjury is punishable by a term of imprisonment of up to five (5) years and/or a fine of \$250,000 (18 U.S.C. Sections 1621, 3571).

California
State

Los Angeles County
County (or City)

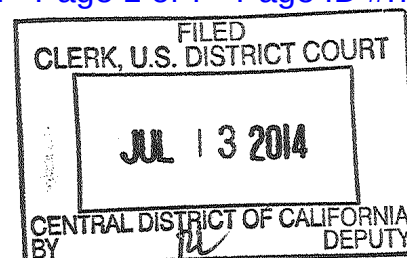
I, Russell Rope, declare under penalty of perjury that the foregoing is true and correct.

6-24-2014

Date



Plaintiff/Petitioner (Signature)



UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

Russell Rope, PLAINTIFF(S)	CASE NUMBER CV 14-04900-UA (VBK)
v. Facebook, Inc., et al. DEFENDANT(S).	ORDER RE LEAVE TO FILE ACTION WITHOUT PREPAYMENT OF FILING FEE

IT IS ORDERED that the complaint may be filed without prepayment of the filing fee.

Further proceedings in this matter are subject to the orders of the Judge to whom the case is assigned.

June 30, 2014
Date

VICTOR B. KENTON
United States Magistrate Judge

IT IS RECOMMENDED that the request of plaintiff/petitioner to file the action without prepayment of the filing fee be **DENIED** for the following reason(s):

- ☐ Inadequate showing of indigency ☐ District Court lacks jurisdiction
☐ Legally and/or factually patently frivolous ☐ Immunity as to _____
☒ Other: Please see attachment

Comments:

6/30/14
Date

[Signature]
United States Magistrate Judge

IT IS ORDERED that the request of plaintiff to file the action without prepayment of the filing fee is:
☐ GRANTED ☒ DENIED (See comments above).

7/6/14
Date

[Signature]
United States District Judge

1 Name: Russell Rope #1607
 2 Address: PO Box 1198
 3 Sacramento, CA 95812
 4 Phone: (818) 400-5592
 5 Plaintiff In Pro Per

7 UNITED STATES DISTRICT COURT
 8 CENTRAL DISTRICT OF CALIFORNIA
 9 LA CV 14 04900 —

(VBK)

10 Russell Rope)	Case No.:
11 PLAINTIFF,)	
12 vs.)	Request To File Under Seal
13 Facebook, Inc.)	
14 Google, Inc.,)	FILED UNDER SEAL
15 Apple, Inc.,)	PURSUANT TO PROTECTIVE
16 Twitter, Inc.,)	ORDER DATED
17 and John Does 1 to 10)	
18 DEFENDANT(S).)	

2014 JUN 24 PM 1:01
 DISTRICT OF CALIF.
 LOS ANGELES
 RB

LODGED

20 1. Plaintiff requests to file under seal for several reasons: First, the Plaintiff is
 21 an active member of the Safe at Home Program with justifiable concern for
 22 safety and security based on stalking, harrasment, and threats, which entitles him
 23 to some cofidentiality provisions according to C.G.C. 6205-6210. Second, there
 24 is reason to believe suspected John Does 1 to 10 seek undeserved recognition for
 25 their crimes. Third, publicizing all of the details at this point would make the
 26 plaintiff a target for more unescapable harrassment and possibly irreperable
 27 damages for the plaintiff. In conclusion, plaintiff believes reasons to seal
 28 outweigh the alternative; therefore, plaintiff humbly requests the court's approval.

Russell Rope 6-24-2014
 Russell Rope

Russell Rope v. Facebook, Inc., et al.

Case No. CV 14-04900-UA (VBK)

ATTACHMENT TO ORDER

Because Plaintiff is seeking to proceed In Forma Pauperis, the Court shall review such a complaint "as soon as practicable after docketing." Pursuant to 28 U.S.C. §1915(e)(2), the District Court is required to dismiss a complaint if the Court finds that the complaint (1) is legally frivolous or malicious, (2) fails to state a claim upon which relief may be granted, or (3) seeks monetary relief from a defendant immune from such relief. 28 U.S.C. §1915(e)(2)(B) (re: all in forma pauperis complaints).

A complaint may also be dismissed for lack of subject matter jurisdiction, pursuant to Fed. R. Civ. P. 12(b)(1). Neitzke v. Williams, 490 U.S. 319, 327 n. 6 (1989) (unanimous decision) (patently insubstantial complaint may be dismissed under Rule 12(b)(1) for lack of subject matter jurisdiction. "Whenever it appears by suggestion of the parties or otherwise that the court lacks jurisdiction of the subject matter, the court shall dismiss the action." Fed. R. Civ. P. 12(h)(3) (emphasis added). A challenge to the Court's subject matter jurisdiction can be raised at any time, including sua sponte by the Court. Emrich v. Touche Ross and Co., 846 F.2d 1190, 1194 n. 2. (9th Cir. 1988).

A complaint containing both factual allegations and legal conclusions is frivolous where it lacks an arguable basis either in law or in fact... [the] term "frivolous" when applied to a complaint, embraces not only the "inarguable legal conclusion, but also the fanciful factual allegation." Neitzke, 490 U.S. at

(CV 14-04900)

1 325. See also Martin v. Sias, 88 F.3d 774, 775 (9th Cir. 1996);
2 Cato v. United States, 70 F.3d 1103, 1106 (9th Cir. 1995). When
3 determining whether a complaint is frivolous, the Court "need not
4 accept the allegations as true, but must pierce the veil of the
5 complaint's factual allegations," Neitzke, 490 U.S. at 327, to
6 determine whether they are "fanciful," "fantastic," or
7 "delusional." Denton v. Hernandez, 504 U.S. 25, 33 (1992).

8
9 **SUMMARY OF PLAINTIFF'S ALLEGATIONS**

10 Russell Rope (hereinafter referred to as "Plaintiff") has
11 filed a civil rights complaint pursuant to 42 U.S.C. § 1983
12 against Defendants Facebook, Inc.; Google, Inc.; Apple, Inc.; and
13 John Does 1-10. (Complaint at p. 1.) Plaintiff, a brilliant and
14 innovative entrepreneur, alleges that Defendants are "known
15 hackers" and are "accused of much more than maliciously hacking
16 the Plaintiff for at least seven years." (Id. at 3.) Plaintiff
17 alleges Defendants are "terrorizing" Plaintiff in "their
18 conspiracy to sabotage and control both business and personal life
19 through incessant and illegal actions not limited to espionage,
20 fraud, defamation, theft, harassment, stalking, threats, physical
21 assault and obstruction of justice." (Id. at 3.) Plaintiff alleges
22 this case is the third of three individual cases, "all suspected
23 of similar conspiracy, which are undoubtedly connected at some
24 level, yet distinct enough to require separate filing, cases, and
25 judgments." (Id.)

26 Plaintiff alleges Defendants' "violations are currently
27 ongoing despite numerous requests for help from nearly all
28 branches of law enforcement including: Los Angeles County Sheriffs

(CV 14-04900)

1 Incident #GTA-236 or TAG-236, IC3gov, FBI, SS, CIA, FCC, FTC,
2 DA/High Tech Crime Division, Attorneys and Referral Services,
3 politicians including Governor, Congressmen, Senator, President
4 and the perpetrators themselves. Plaintiff suspects both Sheriff
5 and Congressmen retirements have something to do with their
6 involvement in this conspiracy." (Id. at 5.)

7 Plaintiff alleges the following causes of action: (1) fraud
8 in connection with computers, by wire, theft; (2) fraud:
9 intentional/neglect misrepresentation, deceit, concealment; (3)
10 terrorism/harassment, threats, stalking, assault; (4) espionage:
11 economic and personal; (5) defamation: slander and libel; (6)
12 interference with prospective economic relations; unfair
13 competition; (7) intentional infliction of emotional distress; (8)
14 obstruction of justice; (9) civil conspiracy to commit crimes
15 against Plaintiff, ongoing; (10) theft, robbery and burglary; (11)
16 damages: liability est., susceptible Plaintiff, aggravation of
17 condition. (Id. at 14-52.)

18 Plaintiff seeks \$10,000,000,000.21 in damages; injunctions;
19 criminal investigations of Defendants and suspects; possible
20 prosecution/or and mandatory resignations/retirements of Defendant
21 conspirators; public confession and apology from Defendants to be
22 approved by Plaintiff; block and unfollow settings; and legalize
23 medical/recreational cannabis and industrial hemp ... (Id. at 53.)
24

25 **A. Plaintiff Has Failed to State a Claim Under 42 U.S.C.**
26 **§ 1983.**

27 In order to state a claim under § 1983, Plaintiff must allege
28 that: (1) Defendant was acting under color of state law at the

(CV 14-04900)

1 time the complained-of act was committed; and (2) Defendant's
2 conduct deprived Plaintiff of rights, privileges or immunities
3 secured by the Constitution or laws of the United States. West v.
4 Atkins, 487 U.S. 42, 48 (1988); Parratt v. Taylor, 451 U.S. 527,
5 535 (1981), overruled on other grounds by Daniels v. Williams, 474
6 U.S. 327, 330-31 (1986). Generally, private parties are not acting
7 under color of state law. See Price v. Hawaii, 939 F.2d 702, 707-
8 08 (9th Cir. 1991).

9 Plaintiff also must establish causation, by demonstrating
10 that each Defendant personally was involved in the constitutional
11 violation, or that there was a sufficient causal connection
12 between the Defendant's wrongful conduct and the constitutional
13 violation. Redman v. County of San Diego, 942 F.2d 1435, 1446-47
14 (9th Cir. 1991) (en banc), cert. denied, 502 U.S. 1074 (1992);
15 Hansen v. Black, 885 F.2d 642, 646 (9th Cir. 1989). "The inquiry
16 into causation must be individualized to focus on the duties and
17 responsibilities of each individual defendant whose acts or
18 omissions are alleged to have caused a constitutional
19 deprivation." Leer v. Murphy 844 F.2d 628, 633 (9th Cir. 1988).

20 The allegations of Plaintiff's Complaint fail to state a
21 cognizable claim that Defendants violated Plaintiff's federal
22 constitutional rights.

23

24 **B. Plaintiff Has Failed to State a Civil Conspiracy Claim.**

25 To state a claim for conspiracy, Plaintiff must allege
26 specific facts showing two or more persons intended to accomplish
27 an unlawful objective of causing Plaintiff harm and took some
28 concerted action in furtherance thereof. Gilbrook v. City of

(CV 14-04900)

1 Westminster, 177 F.3d 839 (9th Cir. 1999); Burns v. County of
 2 King, 883 F.2d 819, 822 (9th Cir. 1989) (conclusory allegations of
 3 conspiracy insufficient to state a valid § 1983 claim); see also
 4 Margolis v. Ryan, 140 F.3d 850, 852 (9th Cir. 1998) (to state a
 5 claim for conspiracy under § 1983, Plaintiff must allege facts
 6 showing agreement of the alleged conspirators to deprive her of
 7 her rights. A conspiracy allegation, even if established, does
 8 not give rise to a liability under § 1983 unless there is a
 9 deprivation of civil rights.).

10 Section 1985 proscribes conspiracies to interfere with
 11 certain civil rights. Karim-Panahi v. Los Angeles Police
 12 Department, 839 F.2d 621, 626 (9th Cir. 1988); Griffin v.
 13 Breckenridge, 403 U.S. 88, 102-03 (1970). 42 U.S.C. Section
 14 1985(2) has two parts: the first proscribes conspiracies to
 15 interfere with the administration of justice in federal courts;
 16 the second applies to conspiracies to obstruct the course of
 17 justice in state courts. See Dooley v. Reiss, 736 F.2d 1392, 1395
 18 (9th Cir. 1984). The second part of the statute contains language
 19 requiring that the conspirators' actions be motivated by an intent
 20 to deprive their victims of the equal protection of the laws. Kush
 21 v. Rutledge, 460 U.S. 719 (1983). Plaintiff's Complaint contains
 22 conclusory allegations but no specific facts to support a claim
 23 of conspiracy.

24

25 **C. Criminal Causes of Action.**

26 Plaintiff attempts to invoke jurisdiction and pursue claims
 27 under 18 U.S.C. §§ 2331, 1831 and 1832. These are federal
 28 criminal statutes. These sections may form the basis for a

(CV 14-04900)

1 federal criminal prosecution brought by the United States
2 Attorney's office. These sections do not form the basis for a
3 cause of action in a civil lawsuit; thus, these allegations do not
4 state a claim against Defendants.

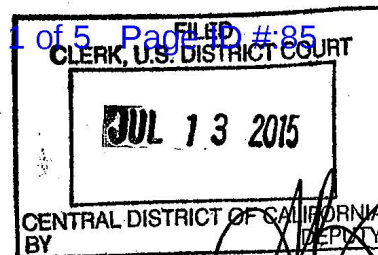
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(CV 14-04900)

6

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

NOTICE OF DOCUMENT DISCREPANCIES



To: ☒ U.S. District Judge / ☐ U.S. Magistrate Judge KING

From: R. HORAN, Deputy Clerk

Date Received: 6/5/15

Case No.: CV 14-4900 UA (VBK) Case Title: Russell Rope v. FB, Apple, Google, et al.

Document Entitled: Request to ReOpen & Amend Case

Upon the submission of the attached document(s), it was noted that the following discrepancies exist:

- | | |
|--|--|
| <input type="checkbox"/> Local Rule 5-4.1 | Documents must be filed electronically |
| <input type="checkbox"/> Local Rule 6-1 | Written notice of motion lacking or timeliness of notice incorrect |
| <input type="checkbox"/> Local Rule 7-19.1 | Notice to other parties of ex parte application lacking |
| <input type="checkbox"/> Local Rule 7.1-1 | No Certification of Interested Parties and/or no copies |
| <input type="checkbox"/> Local Rule 11-3.1 | Document not legible |
| <input type="checkbox"/> Local Rule 11-3.8 | Lacking name, address, phone, facsimile numbers, and e-mail address |
| <input type="checkbox"/> Local Rule 11-4.1 | No copy provided for judge |
| <input type="checkbox"/> Local Rule 11-6 | Memorandum/brief exceeds 25 pages |
| <input type="checkbox"/> Local Rule 11-8 | Memorandum/brief exceeding 10 pages shall contain table of contents |
| <input type="checkbox"/> Local Rule 15-1 | Proposed amended pleading not under separate cover |
| <input type="checkbox"/> Local Rule 16-7 | Pretrial conference order not signed by all counsel |
| <input type="checkbox"/> Local Rule 19-1 | Complaint/Petition includes more than 10 Does or fictitiously named parties |
| <input type="checkbox"/> Local Rule 56-1 | Statement of uncontroverted facts and/or proposed judgment lacking |
| <input type="checkbox"/> Local Rule 56-2 | Statement of genuine disputes of material fact lacking |
| <input type="checkbox"/> Local Rule 83-2.5 | No letters to the judge |
| <input type="checkbox"/> Fed. R. Civ. P. 5 | No proof of service attached to document(s) |
| <input checked="" type="checkbox"/> Other: | <u>Case close and JS-6 on 7/17/2014; however, judicial determination required.</u> |

Please refer to the Court's website at www.cacd.uscourts.gov for Local Rules, General Orders, and applicable forms.

ORDER OF THE JUDGE/MAGISTRATE JUDGE

IT IS HEREBY ORDERED:

- ☒ The document is to be filed and processed. The filing date is ORDERED to be the date the document was stamped "received but not filed" with the Clerk. Counsel* is advised that any further failure to comply with the Local Rules may lead to penalties pursuant to Local Rule 83-7.

Date

7/13/15

U.S. District Judge / U.S. Magistrate Judge

- ☐ The document is **NOT** to be filed, but instead **REJECTED**, and is ORDERED returned to counsel.* Counsel* shall immediately notify, in writing, all parties previously served with the attached documents that said documents have **not** been filed with the Court.

Date

U.S. District Judge / U.S. Magistrate Judge

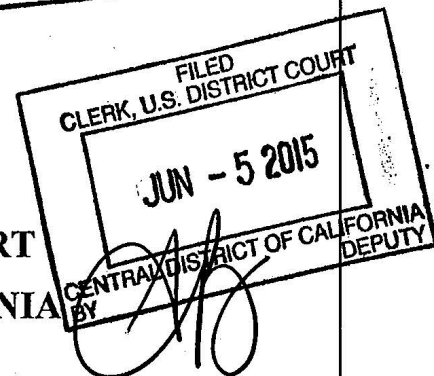
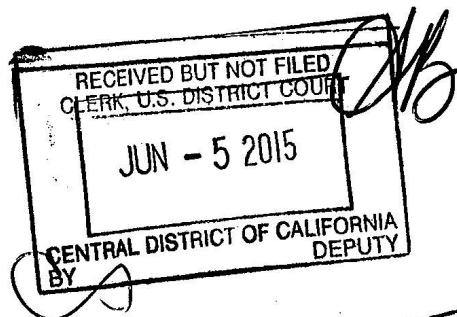
* The term "counsel" as used herein also includes any pro se party. See Local Rule 1-3.

COPY 1 - ORIGINAL-OFFICE

COPY 2 - JUDGE

COPY 3 - SIGNED & RETURNED TO FILER

COPY 4 - FILER RECEIPT



1 Name: Russell Rope #1607
 2 Address: PO Box 1198
 3 Sacramento, CA 95812
 4 Phone: (818) 400-5592
 5 Plaintiff In Pro Per

7 **UNITED STATES DISTRICT COURT**
 8 **CENTRAL DISTRICT OF CALIFORNIA**

10 <u>Russell Rope</u>)	<u>Case No.: LA-CV14-04900 VBK</u>
11 PLAINTIFF,)	
12 vs.)	<u>Request To ReOpen &</u>
13 <u>FB, Apple, Google, Twitter, John Does</u>)	<u>Ammend Case</u>
14 DEFENDANT(S).)	

16 Statement: It has been less than a year since this case was originally filed. The
 17 Pro Se Clinic said the statutes of limitations in this court are at least a year from
 18 the last action on each case. Not only has the reported conflict continued and
 19 evolved, but it has been impossible to resolve most of these issues peacefully and
 20 outside of the court. Additionally, justice is still being obstructed, which has
 21 rendered Plaintiff unable to acquire legal representation or help from law
 22 enforcement. Plaintiff has done much more research on this case, the law, and
 23 court rules, which has resulted in a better understanding of the system and legal
 24 processes. Plaintiff is better equipped to move forward In Pro Per at this point.
 25 This request to reopen and amend case without refiling should save both time
 26 and resources, or it can at least provide Plaintiff with another opportunity to
 27 gather more information from your honor. Please reopen this case or respond in
 28 detail with more information about what else needs to be corrected. Thanks.

Amendments:

1) Change Statute Filed Under To 18 USC §§ 1962(c), 1964(c) Racketeering &/or Conspiracy/Fraud

Plaintiff testimony plus evidence with or without further discovery should easily prove beyond a reasonable doubt that defendants, damages, and claims are all connected through some level of conspiracy with more than the two required indictable racketeering acts falling under 18 USC sections: 1343) Wire Fraud, 201) Bribery, 1503) Obstruction of Justice, 1510) Obstruction of Criminal Investigations, 1511) Obstruction of State of Local Law Enforcement, 1512) Tampering With Victim, Witness, or Informant, 1952) Racketeering (the common objective is both control and money obtained through illegal acts)

2) Change Jurisdiction Invoked From 18 USC §§ 2331, 1831, & 1832 To 18 USC §§ 1962(c), 1964(c) provides for liability in civil suits brought by any person injured in his business or property by RICO violations.

3) Withdraw Irrelevant Causes of Actions

4) Withdraw Any Inappropriate "Legal Conclusions"

5) Withdraw Request To File Under Seal

6) Withdraw Request To Proceed In Forma Pauperis

Subject Matter Jurisdiction: "May Be Challenged At Any Time"

1) In their attempt to control more than personal relationships and the reach of Plaintiff's media business, Defendants are violating the first amendment by interfering with freedom of religion, speech, and press.

1 2) Since the original filings, Plaintiff purchased a small pistol for protection, took
2 a class, studied gun laws, and applied for carry and conceal permit, which was
3 delayed so the Sheriffs could defraud and abduct Plaintiff in attempt to frame
4 Plaintiff's character in order to steal property and probably to excuse their
5 obstruction of justice/criminal investigation, thus infringing on Plaintiff's second
6 amendment right to bear arms. Sheriffs undoubtedly conspiring with defendants.

7
8 3) In their violation of the second amendment, the Sheriffs also engaged in
9 completely unreasonable searches seizures of both self and property, thus
10 violating the fourth amendment. Additionally, main defendants have clearly been
11 spying and arguably took control of/seized social web and intellectual property;
12 also a fourth amendment violation.

13
14 4) Defendants have been interfering with the health care process, which violates
15 the Plaintiff's ninth amendment right to health care and private personal matters.

16
17 5) RICO/Conspiracy Claims: Causation demonstrating each defendant was
18 involved in the constitutional violations and sufficient casual connection between
19 their crimes are established through specific facts and evidence, which supports
20 arguments that agreement must have been formed between Defendants in order to
21 conduct these unlawful actions includes:

22 a) Repetitive Patterns in Hacks Before Public Knowledge

23 b) Hacks Contain Personal Information

24 c) All Documented with Clear & Convincing Evidence

25 d) Proximity of Defendants to Each Other, Motives, Actions, & Negligence in
26 Alignment with Accusations.

27 e) Discovery Will Supplement What Has Basically Been Proven in Plaintiff

28 f) Personal Professional Expert Witness Testimony Just Knows The Truth

1 6) Additional Federal Civil (Deprivation of) Rights Violations

2 a) Liability For Deprivation of Civil Rights: Negligence, Obstruction of Justice

3 b) Equal Employment Opportunity: Age And Religious Discrimination

4 c) Equal Housing Opportunity Discriminated Based On Fraud And Religion

5 d) Civil Fraud & Civil Conspiracy & Espionage

6 Deprivation of Equal Protection of the Laws

7
8 7) This Court Is Also Appropriate Based On Monetary Damages Sought,

9 Interstate Commerce & Plaintiff Over Defendant Locations

10
11
12 Requests:

13
14 1) Please Reopen & Amend Case

15 2) Reconsider Appointment of Qualified Legal Assistance

16 3) Reconsider Request for Court Ordered Criminal Investigation of Defendants

17 4) Reconsider Request for Parking and Security (From Federal Agency)

18 5) Please Reduce Court Fees &/or Bill Upon Case Resolution

19 6) Please Accept & Thought I Have Prove This To A Jury, Some Of Your

20 Comments Seemed Otherwise

21 7) Should This Not Be Acceptable: Please Provide Better Directions

22
23
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26
27
28 Plaintiff Russell Pope

4

Page Number

Russell Pope
06/05/15

E-FILEDUNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

CIVIL MINUTES - GENERAL

Case No.	14-04900-UA (VBK)	Date	July 13, 2015
Title	<i>Russell Rope v. Facebook, Inc., et al.</i>		

Presiding: The Honorable		GEORGE H. KING, CHIEF U.S. DISTRICT JUDGE	
Beatrice Herrera	N/A		N/A
Deputy Clerk	Court Reporter / Recorder		Tape No.
Attorneys Present for Plaintiffs:		Attorneys Present for Defendants:	
None		None	

Proceedings: (In Chambers) Order re: Motion to Reopen and Amend Case

Before the Court is Plaintiff Russell Rope's ("Plaintiff") "Request to Reopen and Ammend [sic] Case" (hereinafter referred to as "Motion"), filed on June 5, 2015. We find the matter appropriate for resolution without oral argument.

I. Background

On June 24, 2014, Plaintiff lodged a "Civil Rights Complaint Pursuant to 42 U.S.C. § 1983" ("Complaint") and a "Request to Proceed Without Prepayment of Full Filing Fee" ("IFP Application"). Plaintiff named Facebook, Inc., Apple, Inc., Google, Inc., Twitter, Inc., and John Does 1-10 as Defendants in his Complaint. Plaintiff alleges that Defendants are "known hackers" that are "terrorizing" Plaintiff in "their conspiracy to sabotage and control both [his] business and personal life through incessant and illegal actions not limited to espionage, fraud, defamation, theft, harassment, stalking, threats, physical assault and obstruction of justice." (Compl. at ¶¶ 11-12.) Plaintiff alleges the following claims: (1) "[f]raud: [i]n [c]onnection with [c]omputers, [b]y [w]ire, [t]heft;" (2) "[f]raud: [i]ntentional/[n]egligent [m]isrepresentation, [d]eceit, [c]oncealment;" (3) "[t]errorism/[h]arassment, [t]hreats, [s]talking, [a]ssault;" (4) "[e]spionage: [e]conomic and [p]ersonal;" (5) "[d]efamation: [s]lander and [l]iberal [sic];" (6) "[i]nterference with [p]rospective [e]conomic [r]elations: [u]nfair [c]ompetition;" (7) "[i]ntentional [i]nfliction [of] [e]motional [d]istress;" (8) "[o]bstruction of [j]ustice;" (9) "[c]ivil [c]onspiracy to [c]ommit [c]rimes [a]gainst [p]laintiff, [o]ngoing;" (10) "[t]heft, [r]obbery, [b]urglary;" and (11) "[d]amages: [l]iability [e]st., [s]usceptible [p]laintiff, [a]ggravation of [c]ondition." (Id. at ¶¶ 69-200.)

On July 13, 2014, the Court denied Plaintiff's IFP Application. The Court explained that Plaintiff failed to state a claim for relief under 42 U.S.C. § 1983 because he had not established that Defendants were acting "under color of state law," he failed to state a claim for civil conspiracy because he offered only conclusory allegations and not specific facts to support the claim, and Plaintiff could not sue to enforce criminal statutes against Defendants because only the United States Attorney may prosecute a defendant for violations of criminal statutes.

Plaintiff filed the instant Motion on June 5, 2015. We construe the Motion to be brought

*E-FILED*UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

CIVIL MINUTES - GENERAL

Case No.	14-04900-UA (VBK)	Date	July 13, 2015
Title	<i>Russell Rope v. Facebook, Inc., et al.</i>		

pursuant to Federal Rule of Civil Procedure 60(b) ("Rule 60(b)").

II. Legal Standard

"Rule 60(b) allows a party to seek relief from a final judgment, and request reopening of his case, under a limited set of circumstances including fraud, mistake, and newly discovered evidence." Gonzalez v. Crosby, 545 U.S. 524, 528 (2005). Rule 60(b) provides, in relevant part:

On motion and just terms, the court may relieve a party . . . from a final judgment, order or proceeding for the following reasons: (1) mistake, inadvertence, surprise or excusable neglect; (2) newly discovered evidence that, with reasonable diligence, could not have been discovered in time to move for a new trial under Rule 59(b); (3) fraud (whether previously called intrinsic or extrinsic), misrepresentation, or misconduct by an opposing party; (4) the judgment is void; (5) the judgment has been satisfied, released or discharged; it is based on an earlier judgment that has been reversed or vacated; or applying it prospectively is no longer equitable; or (6) any other reason that justifies relief.

Fed. R. Civ. P. 60(b).

"A motion under Rule 60(b) must be made within a reasonable time - and for reasons (1), (2), and (3) no more than a year after the entry of the judgment or order or the date of the proceeding." Fed. R. Civ. P. 60(c)(1).

III. Discussion

In the Motion, Plaintiff asks the Court to reopen his case and allow him to amend his Complaint. Plaintiff states that the conflict giving rise to the original filing of this action persists and that he has "done much more research on this case, the law, and court rules, which has resulted in a better understanding of the system and legal processes. Plaintiff is better equipped to move forward In Pro Per at this point. This request to reopen and amend case without refiling should save both time and resources, or it can at least provide Plaintiff with another opportunity to gather more information from your honor." (Mot. at 1.) Plaintiff seeks leave to amend his Complaint as follows: (1) "[c]hange [s]tatute [f]iled [u]nder [t]o 18 U.S.C. §§ 1962(c), 1964(c) [r]acketeering &/or [c]onspiracy/[f]raud;" (2) [c]hange [j]urisdiction [i]nvoked from 18 U.S.C. §§ 2331, 1831, & 1832 [t]o 18 U.S.C. §§ 1962(c), 1964(c) provides for liability in civil suits brought by any person injured in his business or property by RICO violations;" (3) "[w]ithdraw [i]rrelevant [c]auses of [a]ction;" (4) "[w]ithdraw [a]ny [i]nappropriate '[l]egal [c]onclusions;" (5) "[w]ithdraw [r]equest [t]o [f]ile [u]nder [s]eal;" and (6) "[w]ithdraw [r]equest to [p]roceed [i]n [f]orma [p]auperis." (Id. at 1-2.) Plaintiff also moves to add several factual allegations and legal claims. (See id. at 3-4.)

Although the Motion was timely filed pursuant to Rule 60(c), Plaintiff has failed to establish any of the Rule 60(b) factors. Plaintiff states only that his conflict with Defendants remains ongoing and

*E-FILED*UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

CIVIL MINUTES - GENERAL

Case No.	14-04900-UA (VBK)	Date	July 13, 2015
Title	<i>Russell Rope v. Facebook, Inc., et al.</i>		

that he is in a better position to represent himself in this action because he has conducted research. (See Mot. at 1.) This falls well short of the requirements of Rule 60(b) to reopen this action. For example, Plaintiff has not set forth that the Court's July 13, 2014 Order was entered due to Plaintiff's "mistake, inadvertence, surprise or excusable neglect." Fed. R. Civ. P. 60(b)(1). He has not established the existence of "newly discovered evidence" to show that the case should be reopened. *Id.* at 60(b)(2). He has not claimed that his opposing party had engaged in "fraud . . . , misrepresentation, or misconduct" that resulted in the entry of the July 13, 2014 Order. *Id.* at 60(b)(3). Moreover, he has not claimed that the Court's "judgment is void," "has been satisfied, released, or discharged" or that "applying it prospectively is no longer equitable." *Id.* at 60(b)(4)-(5). Finally, he has not set forth "any other reason that justifies relief." *Id.* at 60(b)(6). Accordingly, we must deny Plaintiff's Motion.

We intimate no opinion as to whether Plaintiff's proposed amendments to his Complaint state a claim for relief.

IV. Conclusion

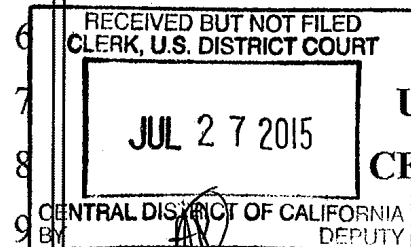
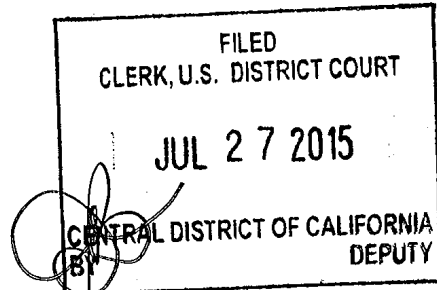
For the foregoing reasons, we DENY Plaintiff's Motion to Reopen and Amend Case. This matter remains closed.

IT IS SO ORDERED.

Initials of Deputy Clerk

AB for Bea

1 Name: Russell Rope #1607
 2 Address: PO Box 1198
 3 Sacramento, CA 95812
 4 Phone: (818) 400-5592
 5 Plaintiff In Pro Per



UNITED STATES DISTRICT COURT
 CENTRAL DISTRICT OF CALIFORNIA

10	Russell Rope)	Case No.:	LA-CV14-04900
11	PLAINTIFF,)		
12	vs.)	Motion To Amend Request To	
13	FB, Apple, Google, Twitter, John Does)	ReOpen & Ammend Case	
14)		
15	DEFENDANT(S).)		

16 Plaintiff was unaware of Rule 60(b) being an issue and is easily able to establish
 17 the factors. Plaintiff admits he is not professionally qualified to practice the law
 18 and made several mistakes in original filings. The judgement(s) void according
 19 to Rule 60(b) because there is every reason to justify relief based on clear and
 20 convincing evidence, both as reported before and newly discovered, including
 21 but not limited to: photographic, screen shots, emails, letters, audio recordings,
 22 phone records, video, and witness testimonies in support of real claims for relief
 23 as requested, which covers serious problems directly caused by defendants
 24 including but not limited to: health issues, defrauding of money, defrauding of
 25 income/work, defrauding of intellectual property, entrapping, terrorizing, or
 26 neglecting, and victimizing plaintiff by all violations mentioned through
 27 conspiracy; both literally over metaphorically bleeding the Plaintiff to death by a
 28 thousand unwarranted cuts in the back, which is not legal. Specific to this case,

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

NOTICE OF DOCUMENT DISCREPANCIES

FILED
CLERK, U.S. DISTRICT COURT

JUL 29 2015

CENTRAL DISTRICT OF CALIFORNIA
DEPUTY

To: ☒ U.S. District Judge / ☐ U.S. Magistrate Judge George H. King

From: Andres

, Deputy Clerk

Date Received 07/27/2015

Case No.: 2:14-cv-04900-UA-VBK

Case Title: Russell Rope v. Facebook, Inc. et al

Document Entitled: Motion to amend request

Upon the submission of the attached document(s), it was noted that the following discrepancies exist:

- ☐ Local Rule 5-4.1 Documents must be filed electronically
- ☐ Local Rule 6-1 Written notice of motion lacking or timeliness of notice incorrect
- ☐ Local Rule 7-19.1 Notice to other parties of ex parte application lacking
- ☐ Local Rule 7.1-1 No Certification of Interested Parties and/or no copies
- ☐ Local Rule 11-3.1 Document not legible
- ☐ Local Rule 11-3.8 Lacking name, address, phone, facsimile numbers, and e-mail address
- ☐ Local Rule 11-4.1 No copy provided for judge
- ☐ Local Rule 11-6 Memorandum/brief exceeds 25 pages
- ☐ Local Rule 11-8 Memorandum/brief exceeding 10 pages shall contain table of contents
- ☐ Local Rule 15-1 Proposed amended pleading not under separate cover
- ☐ Local Rule 16-7 Pretrial conference order not signed by all counsel
- ☐ Local Rule 19-1 Complaint/Petition includes more than 10 Does or fictitiously named parties
- ☐ Local Rule 56-1 Statement of uncontroverted facts and/or proposed judgment lacking
- ☐ Local Rule 56-2 Statement of genuine disputes of material fact lacking
- ☐ Local Rule 83-2.5 No letters to the judge
- ☐ Fed. R. Civ. P. 5 No proof of service attached to document(s)
- ☒ Other: Case closed, submitted for further review.

Please refer to the Court's website at www.cacd.uscourts.gov for Local Rules, General Orders, and applicable forms.

ORDER OF THE JUDGE/MAGISTRATE JUDGE

IT IS HEREBY ORDERED:

- ☒ The document is to be filed and processed. The filing date is ORDERED to be the date the document was stamped "received but not filed" with the Clerk. Counsel* is advised that any further failure to comply with the Local Rules may lead to penalties pursuant to Local Rule 83-7.

Date

7/28/15

U.S. District Judge / U.S. Magistrate Judge

- ☐ The document is **NOT** to be filed, but instead **REJECTED**, and is ORDERED returned to counsel.* Counsel* shall immediately notify, in writing, all parties previously served with the attached documents that said documents have **not** been filed with the Court.

Date

U.S. District Judge / U.S. Magistrate Judge

* The term "counsel" as used herein also includes any pro se party. See Local Rule 1-3.

COPY 1 -ORIGINAL-OFFICE

COPY 2 -JUDGE

COPY 3 -SIGNED & RETURNED TO FILER

COPY 4 -FILER RECEIPT

E-FILED

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

CIVIL MINUTES - GENERAL

Case No.	14-04900-UA (VBK)	Date	August 10, 2015
Title	<i>Russell Rope v. Facebook, Inc., et al.</i>		

Presiding: The Honorable	GEORGE H. KING, CHIEF U.S. DISTRICT JUDGE
--------------------------	---

Beatrice Herrera	N/A	N/A
Deputy Clerk	Court Reporter / Recorder	Tape No.
Attorneys Present for Plaintiffs:	Attorneys Present for Defendants:	
None	None	

Proceedings: (In Chambers) Order re: Motion to Amend Request to Reopen and Amend Case

Before the Court is Plaintiff Russell Rope’s (“Plaintiff”) “Motion to Amend Request to ReOpen [sic] and Ammend [sic] Case” (hereinafter referred to as “Motion”), filed on July 27, 2015. We find the matter appropriate for resolution without oral argument.

We discussed the background of this action in detail in our July 13, 2015 Order and do not repeat it here.

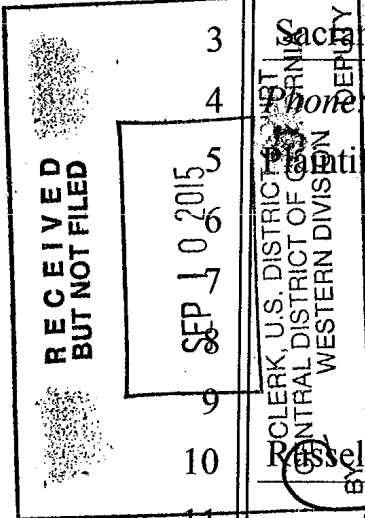
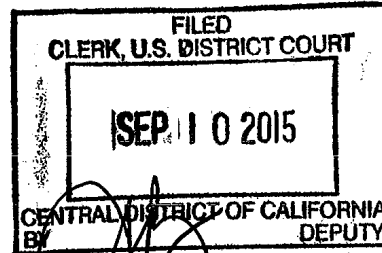
In the Motion, Plaintiff asks the Court to allow him to amend his previous request to reopen the case with what he considers to be a showing on some Rule 60(b) factors. The entirety of the Motion states as follows:

Plaintiff was unaware of Rule 60(b) being an issue and is easily able to establish the factors. Plaintiff admits he is not professionally qualified to practice the law and made several mistakes in original filings. The judgment(s) void according to Rule 60(b) because there is every reason to justify relief based on clear and convincing evidence, both as reported before and newly discovered, including but not limited to: photographic, screen shots, emails, letters, audio recordings, phone records, video, and witness testimonies in support of real claims for relief as requested, which covers serious problems directly caused by defendants including but not limited to: health issues, defrauding of money, defrauding of income/work, defrauding of intellectual property, entrapping, terrorizing, or neglecting, and victimizing plaintiff by all violations mentioned through conspiracy; both literally over metaphorically bleeding the Plaintiff to death by a thousand unwarranted cuts on the back, which is not legal. Specific to this case, more evidence includes false police reports, photographic evidence proving entrapment, multiple witness testimonies, video surveillance that hopefully gets handed over or is not too late for subpoena, more screen shots, photos, emails, etc. Please do the right thing and grant the requests made by this honest Plaintiff in Pro Per.

(See Mot. at 1-2 ([sic] as to all).)

Although Plaintiff argues that several Rule 60(b) factors apply, Plaintiff does not provide any

1 Name: Russell Rope #1607
 2 Address: PO Box 1198
 3 Sacramento, CA 95812
 4 Phone: (818) 400-5592
 5 Plaintiff In Pro Per



**UNITED STATES DISTRICT COURT
 CENTRAL DISTRICT OF CALIFORNIA**

10 Russell Rope,

PLAINTIFF,

12 **vs.**

13 Apple, FB++ & John Does 1 to 10

15 **DEFENDANT(S).**

) **Case No.:** LA-CV14-04900- GHK (VBK)

) Date: 10-26-2015

) Time: 9:30 am Room 650

) **Motion To Amend Request To**

) **ReOpen & Amend Case**

) **GHK / VBK**

16 This is a motion to amend motions and requests to open this case with the lodging
 17 of several pages referred to as Exhibits 15 to 21. Exhibits 15 to 21 are/represent
 18 only a fraction of recent evidence of violations in the form of sets of statements,
 19 photos, screen shots, and graphics. These exhibits are supported by more physical
 20 evidence including official documents and witnesses. Exhibits 15 to 21 and the
 21 events surrounding that evidence support claims regarding constitutional civil
 22 rights and US code violations reported by plaintiff. This obscene terrorism is
 23 connected as observed through repetetive patterns defined by clear and convincing
 24 facts and evidence. These claims are real, getting worse, and still both neglected
 25 by authority and undisputed by defendants after years of complaining. There is
 26 another "Exhibit 10" being filed seperately in a motion to lodge evidence under
 27 seal. Please review that, open this case and reconsider all previous requests and
 28 motions including for cases #s LA-CV14-04002 & LA-CV14-04232.

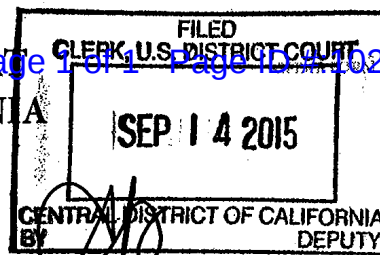
[Signature]
 Russell Rope
 09-09-2015

1 of 1

Page Number

CENTRAL DISTRICT OF CALIFORNIA

NOTICE OF DOCUMENT DISCREPANCIES

To: ☒ U.S. District Judge / ☐ U.S. Magistrate Judge George H. KingFrom: Beatrice Herrera, Deputy ClerkDate Received: September 10, 2015Case No.: 14-4900 VBKCase Title: Russell Rope v. Facebook, Inc., et al.Document Entitled: Motion to Amend Request to ReOpen & Amend Case

Upon the submission of the attached document(s), it was noted that the following discrepancies exist:

- ☐ Local Rule 5-4.1 Documents must be filed electronically
- ☐ Local Rule 6-1 Written notice of motion lacking or timeliness of notice incorrect
- ☐ Local Rule 7-19.1 Notice to other parties of ex parte application lacking
- ☐ Local Rule 7.1-1 No Certification of Interested Parties and/or no copies
- ☐ Local Rule 11-3.1 Document not legible
- ☐ Local Rule 11-3.8 Lacking name, address, phone, facsimile numbers, and e-mail address
- ☐ Local Rule 11-4.1 No copy provided for judge
- ☐ Local Rule 11-6 Memorandum/brief exceeds 25 pages
- ☐ Local Rule 11-8 Memorandum/brief exceeding 10 pages shall contain table of contents
- ☐ Local Rule 15-1 Proposed amended pleading not under separate cover
- ☐ Local Rule 16-7 Pretrial conference order not signed by all counsel
- ☐ Local Rule 19-1 Complaint/Petition includes more than 10 Does or fictitiously named parties
- ☐ Local Rule 56-1 Statement of uncontroverted facts and/or proposed judgment lacking
- ☐ Local Rule 56-2 Statement of genuine disputes of material fact lacking
- ☐ Local Rule 83-2.5 No letters to the judge
- ☐ Fed. R. Civ. P. 5 No proof of service attached to document(s)
- ☒ Other: Case closed. Judicial determination required.

Please refer to the Court's website at www.cacd.uscourts.gov for Local Rules, General Orders, and applicable forms.

ORDER OF THE JUDGE/MAGISTRATE JUDGE

IT IS HEREBY ORDERED:

- ☒ The document is to be filed and processed. The filing date is ORDERED to be the date the document was stamped "received but not filed" with the Clerk. Counsel* is advised that any further failure to comply with the Local Rules may lead to penalties pursuant to Local Rule 83-7.

Date

9/14/15

U.S. District Judge / U.S. Magistrate Judge

- ☐ The document is NOT to be filed, but instead **REJECTED**, and is ORDERED returned to counsel.* Counsel* shall immediately notify, in writing, all parties previously served with the attached documents that said documents have **not** been filed with the Court.

Date

U.S. District Judge / U.S. Magistrate Judge

* The term "counsel" as used herein also includes any pro se party. See Local Rule 1-3.

COPY 1 - ORIGINAL-OFFICE

COPY 2 - JUDGE

COPY 3 - SIGNED & RETURNED TO FILER

COPY 4 - FILER RECEIPT

Page 1 of 1 Page ID# 107

FILED
CLERK U.S. DISTRICT COURT

SEP 14 2015

CENTRAL DISTRICT OF CALIFORNIA
BY *[Signature]* DEPUTY

Date Received: September 10, 2015

Case Title: Russell Rope v. Facebook, Inc., et al.

Document Entitled: Exhibits 15 to 21

<input type="checkbox"/> Local Rule 5-4.1	Documents must be filed electronically
<input type="checkbox"/> Local Rule 6-1	Written notice of motion lacking or timeliness of notice incorrect
<input type="checkbox"/> Local Rule 7-19.1	Notice to other parties of ex parte application lacking
<input type="checkbox"/> Local Rule 7.1-1	No Certification of Interested Parties and/or no copies
<input type="checkbox"/> Local Rule 11-3.1	Document not legible
<input type="checkbox"/> Local Rule 11-3.8	Lacking name, address, phone, facsimile numbers, and e-mail address
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<input type="checkbox"/> Local Rule 11-6	Memorandum/brief exceeds 25 pages
<input type="checkbox"/> Local Rule 11-8	Memorandum/brief exceeding 10 pages shall contain table of contents
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<input type="checkbox"/> Local Rule 19-1	Complaint/Petition includes more than 10 Does or fictitiously named parties
<input type="checkbox"/> Local Rule 56-1	Statement of uncontroverted facts and/or proposed judgment lacking
<input type="checkbox"/> Local Rule 56-2	Statement of genuine disputes of material fact lacking
<input type="checkbox"/> Local Rule 83-2.5	No letters to the judge
<input type="checkbox"/> Fed. R. Civ. P. 5	No proof of service attached to document(s)
<input checked="" type="checkbox"/> Other:	No face page. Case closed. Judicial determination required.

ORDER OF THE JUDGE/MAGISTRATE JUDGE

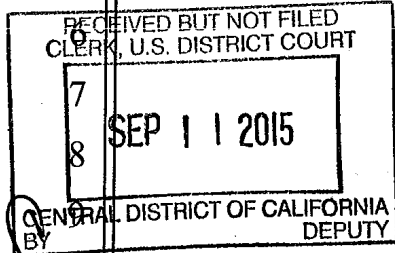
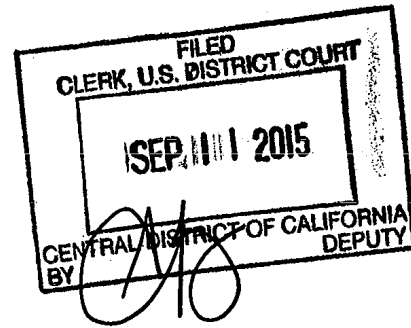
☒ The document is to be ~~filed~~ and processed. The filing date is ORDERED to be the date the document was stamped "received but not filed" with the Clerk. Counsel* is advised that any further failure to comply with the Local Rules may lead to penalties pursuant to Local Rule 83-7.

U.S. District Judge / U.S. Magistrate Judge

U.S. District Judge / U.S. Magistrate Judge

COPY 4 -FILER RECEIPT

1 Name: Russell Rope #1607
 2 Address: PO Box 1198
 3 Sacramento, CA 95812
 4 Phone: (818) 400-5592
 5 Plaintiff In Pro Per

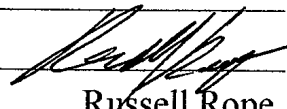


**UNITED STATES DISTRICT COURT
 CENTRAL DISTRICT OF CALIFORNIA**

10	Russell Rope)	Case No.: LA-CV14-04900-GHK(VBK)
11	PLAINTIFF,)	Date: 10-26-2015
12	vs.)	Time: 9:30am Room 650
13	Apple, FB++ & John Does 1 to 10)	Motion To Amend Recent Motions
14	DEFENDANT(S).)	With Correction of Discrepancies

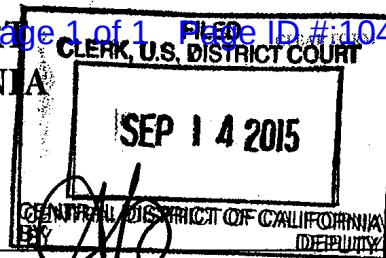
16 This is a motion to amend recent motions on this case with the correction of the
 17 following discrepancies:

- 19 1. Extra Face Sheet for Exhibits in Recent Motion is Attached
- 20 2. Another Copy of Exhibits for the Judge is Attached
- 21 3. "++" on Defendant Lines = Google and Twitter
- 22 4. Defendants Apple, Facebook, Google, and Twitter are being referenced minus
- 23 the "Inc.," but remain the same original defendants.

24
 25
 26
 27 
 28 Russell Rope
 09-10-2015

CENTRAL DISTRICT OF CALIFORNIA

NOTICE OF DOCUMENT DISCREPANCIES

To: ☒ U.S. District Judge / ☐ U.S. Magistrate Judge George H. KingFrom: Beatrice Herrera, Deputy ClerkDate Received: September 11, 2015Case No.: 14-4900 VBKCase Title: Russell Rope v. Facebook, Inc., et al.Document Entitled: Motion to Amend Recent Motions With Correction of Discrepancies

Upon the submission of the attached document(s), it was noted that the following discrepancies exist:

- ☐ Local Rule 5-4.1 Documents must be filed electronically
- ☐ Local Rule 6-1 Written notice of motion lacking or timeliness of notice incorrect
- ☐ Local Rule 7-19.1 Notice to other parties of ex parte application lacking
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- ☐ Fed. R. Civ. P. 5 No proof of service attached to document(s)
- ☒ Other: Case closed. Judicial determination required.

Please refer to the Court's website at www.cacd.uscourts.gov for Local Rules, General Orders, and applicable forms.

ORDER OF THE JUDGE/MAGISTRATE JUDGE

IT IS HEREBY ORDERED:

- ☒ The document is to be filed and processed. The filing date is ORDERED to be the date the document was stamped "received but not filed" with the Clerk. Counsel* is advised that any further failure to comply with the Local Rules may lead to penalties pursuant to Local Rule 83-7.

Date

9/14/15

U.S. District Judge / U.S. Magistrate Judge

- ☐ The document is **NOT** to be filed, but instead **REJECTED**, and is ORDERED returned to counsel.* Counsel* shall immediately notify, in writing, all parties previously served with the attached documents that said documents have **not** been filed with the Court.

Date

U.S. District Judge / U.S. Magistrate Judge

* The term "counsel" as used herein also includes any pro se party. See Local Rule 1-3.

COPY 1 - ORIGINAL-OFFICE

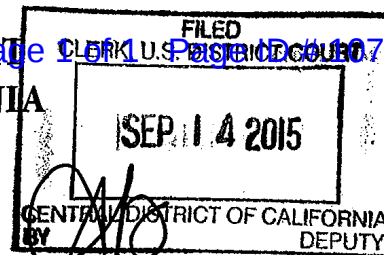
COPY 2 - JUDGE

COPY 3 - SIGNED & RETURNED TO FILER

COPY 4 - FILER RECEIPT

CENTRAL DISTRICT OF CALIFORNIA

NOTICE OF DOCUMENT DISCREPANCIES

To: ☒ U.S. District Judge / ☐ U.S. Magistrate Judge George H. KingFrom: Beatrice Herrera, Deputy ClerkDate Received: September 10, 2015Case No.: 14-4900 VBKCase Title: Russell Rope v. Facebook, Inc., et al.Document Entitled: Exhibits 15 to 21

Upon the submission of the attached document(s), it was noted that the following discrepancies exist:

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- ☐ Local Rule 6-1 Written notice of motion lacking or timeliness of notice incorrect
- ☐ Local Rule 7-19.1 Notice to other parties of ex parte application lacking
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- ☒ Other: No face page. Case closed. Judicial determination required.

Please refer to the Court's website at www.cacd.uscourts.gov for Local Rules, General Orders, and applicable forms.

ORDER OF THE JUDGE/MAGISTRATE JUDGE

IT IS HEREBY ORDERED:

- ☒ The document is to be ~~filed~~ ^{Lodged} and processed. The filing date is ORDERED to be the date the document was stamped "received but not filed" with the Clerk. Counsel* is advised that any further failure to comply with the Local Rules may lead to penalties pursuant to Local Rule 83-7.

Date 9/14/15[Signature]
U.S. District Judge / U.S. Magistrate Judge

- ☐ The document is **NOT** to be filed, but instead **REJECTED**, and is ORDERED returned to counsel.* Counsel* shall immediately notify, in writing, all parties previously served with the attached documents that said documents have **not** been filed with the Court.

Date _____

U.S. District Judge / U.S. Magistrate Judge

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COPY 1 - ORIGINAL-OFFICE

COPY 2 - JUDGE

COPY 3 - SIGNED & RETURNED TO FILER

COPY 4 - FILER RECEIPT

UNITED STATES DISTRICT COURT CENTRAL DISTRICT OF CALIFORNIA	
RUSSELL ROPE v. FACEBOOK, INC., et al.	CASE NUMBER: CV14-4900 UA (VBK)
PLAINTIFF(S), DEFENDANT(S).	NOTICE OF REASSIGNMENT OF CASE DUE TO UNAVAILABILITY OF JUDICIAL OFFICER

To: All Counsel Appearing of Record

The Magistrate Judge to whom the above-entitled case was previously assigned is no longer available.

YOU ARE HEREBY NOTIFIED that, pursuant to directive of the Chief U. S. District Judge/Magistrate Judge and in accordance with the rules of this Court, the above-entitled case has been returned to the Clerk for direct reassignment.

Accordingly, this case has been reassigned to:

Hon. Frederick F. Mumm, Magistrate Judge for:

all proceedings in accordance with General Order 05-07

Please substitute the initials of the newly assigned Magistrate Judge so that the new case number will read: CV14-04900 UA (FFM). This is very important because documents are routed by the initials.

Clerk, U.S. District Court

September 15, 2015
Date

By: /s/ Madelina Guerrero
Deputy Clerk

Justice

Thanks For Reading & Supporting!

What's Next?

- Expect Updates
- More Docs, Images, Videos
- Plans To Refile Correctly
- Seeking Legal Help
- Two More Cases / Books
- Plus Additional Books in Queue
- You Can Not Beat RRP So Join Up
- Follow @RussellRope
- Subscribe @ Blog

<http://russellrope.com/blog>

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