SOCIAL SECURITY ADMINISTRATION NOTICE OF A RICO RACKETEERING COMPLAINT AND RELATED FILINGS

(REVISION DRAFT 2.9)

BE ADVISED THAT THIS DOCUMENT HAS ALSO BEEN FILED AS AN INSPECTOR GENERAL COMPLAINT, AN FBI CRIMINAL REFERRAL, AN FTC DEMAND FOR ANTI-TRUST CHARGES AGAINST THE DEFENDANTS AND A GENERAL LAW ENFORCEMENT ADVISORY ON BEHALF OF PLAINTIFF

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Attention:
Inspector General – SSA
Ms. X Lin, SSA, San Rafael, CA
U.S. Attorney GeneraL

WITNESS-2021B, Plaintiff,

(Actual home address withheld due to threats and related danger to Plaintiff from Tech Cartel Defendants, Surrogates, Participants and Others – such address can be provided to the District Court under seal) ; The UNITED STATES GOVERNMENT is asked to join this case as Co-Plaintiff

v.

DEFENDANTS named as:

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AND NUMEROUS UNKNOWN DOE'S 1-100 NAMED

Defendants.

JURY TRIAL DEMANDED

BACKGROUND AND RICO CASE STATEMENT

Per the Office of the Clerk of this honorable Court, in order to assist the Court after being assured that a RICO Case Statement is never *prohibited*, this Complaint (and analogous follow-on Complaints) will be proceeded by such a Case Statement.

As will be referenced below, allegations contained within this RICO Case Statement, RICO Complaint and Anti-Trust filing are based upon eye-witness information, FBI reports, FTC reports, GAO reports, Congressional Ethics Reports, SEC reports, FEC reports, good faith information and belief.

Social Security Administration records and servers were hacked and manipulated. Data and decision materials harmful to lead Plaintiff were manipulated and political reprisal actions were undertaken by Social Security officials in order to punish lead Plaintiff for his whistle-blower and law enforcement actions in a substantial organized crime case.

Plaintiffs' were induced to invest millions of dollars, and all of their life savings, in a government run project. It was later discovered that ***every government operator of that project was either financed by, friends, with, sleeping with, dating the staff of, holding stock market assets in, promised a revolving door job or government service contracts from, partying with, personal friends with, photographed at private events with, exchanging emails with, business associates of or directed by; the Plaintiffs' business adversaries, or the politicians that those business adversaries pay campaign finances to, or supply political digital search manipulation services to. They all used the same couple of law-firms, investment bankers, CPA's, lobbyists and policy manipulation operatives. There can be no question about the fact that the government officials involved "colluded", "conspired" and "coordinated" for their own, personal, unjust gain and quid pro quo. Crooked government employees and contractors made billions of dollars in unjust gains while Plaintiffs' lost billions of dollars BECAUSE crooked government employees and contractors engaged in these crimes, defrauded Plaintiffs' and used Plaintiffs' as a smoke-screen to cover-up their crimes. That "project" turned out to be an operation of the Tech Cartel described in this document as an organized crime endeavor.***

To be clear: EACH CITY, STATE, COUNTY AND FEDERAL OFFICIAL CHARGED IN THIS MATTER WAS RECEIVING STOCK MARKET ASSETS, DIRECT CASH PAYMENTS, POLITICAL CAREER EXCLUSIVES, SEX WORKER EXCHANGES, REAL ESTATE PERKS, PROMOTIONS AND OTHER BRIBES; AND THOSE OFFICIALS HAD INVESTMENT, PERSONAL AND POLITICAL AFFILIATIONS WITH THE ADVERSARIES CHARGED HEREIN; AND THOSE OFFICIALS HAVE BEEN FOUND,

BY FEDERAL INVESTIGATORS, TO HAVE USED SPY AGENCY RESOURCES TO ATTACK PLAINTIFF IN REPRISAL <u>AND</u> IN ANTI-COMPETITIVE BUSINESS INTERFERENCE.

This matter involves Defendants, together known as the "Tech Cartel", and their organized crime activities. These activities are operated by well-known public officials working with Silicon Valley tech oligarchs via surrogates at a specific set of colluding: 1.) tech law firms, 2.) CPA firms, 3.) lobbyists, 4.) media hit-job services and 4.) tactical contracted-operatives.

For the past decade in which relevant predicate reprisal acts were corruptly carried out by the named defendants as "payback" for Plaintiff's role in the ***Solyndra***; ***Energy Stock Bribes*** and ***Rare Earth Mining Corruption*** cases and his status as a "whistle-blower" to GAO, FBI, FTC, Congress and other entities (for his temerity in telling the truth concerning obstruction of justice and gross abuse of power), along with the corrupt politicians surrogates and collaborators (referenced individually and collectively as the "Tech Cartel").

It is hereby demanded that the FBI interview and ascertain the attack contract compensation sources along with the command and control managers for attacker/Defendants: **GABRIELLE DARBYSHIRE, A.J. DELAURIO, DAVID PLOUFFE, PATRICK GEORGE, ADRIAN COVERT, JOHN HERRMAN, NICHOLAS GUIDO DENTON, and JOHN COOK,** for their organized attacks on Plaintiff. The FBI evidence from those interviews and investigations will confirm the assertions herein.

Defendants actions have been synonymous with criminal behavior, malicious baseless attacks (using mainly the illicit and vicious defamatory tactics against perceived political enemies (like the Plaintiff here) of those willing to compensate participants like Brock, Plouffe, Carney, etc.) – and coordinating by mail and wire to violate myriad Federal and State laws in the exploitation of Tech Cartel nonprofit entities they use for purely partisan purposes.

This Tech Cartel has taken such attacks to an unprecedented and chilling new level involving illegal domestic human and electronic surveillance, and spy agency tradecraft such as "lures" run in order to obstruct other federal Investigations by compromised agencies of the government, all against private citizens in order to assist putting crony associates in political office, destroying whistle-blowers, and enriching themselves with monopolistic control of ***internet, media, energy, vehicle*** and ***mining markets***. While the **Frank Giustra** mining deals and the **Uranium1** mining deals have been the subject of recent reports, the entirety of the rare earth mining corruption and payola, worth ***trillions of dollars*** in ill-gotten profits, has yet to be fully explored in the media.

In one example: according to investigations by the United States Congress, and as anticipated to emerge from numerous ongoing government investigations, politicians and Silicon Valley tech oligarchs and certain other Tech Cartel named and unknown named, and high-level surrogates, colluded with Russian intelligence (SVR and FSB) and a disgraced (and according to a referral

from the United States Senate Committee on the Judiciary, a putative criminal) former British intelligence officer (Christopher Steele) to accomplish their illicit and unconstitutional objectives. These Tech Cartel defendants, surrogates and participants have their opportunity to properly respond before a court they knowingly misled many times using the most powerful counterintelligence tools available. Let them do so now.

Defendant Brock's malfeasance became more precisely organized in the Tech Cartel, and thus fully weaponized, as he joined forces with former president William Jefferson Clinton, Hillary Rodham Clinton and funder George Soros ("Soros"), and at various stages of the illegal Tech Cartel, the other defendants named here. They, and the Tech Cartel they formed to control the Democratic Party, took illicit advantage of a previously inviolate structural arrangement (between all three branches of our government) codified in the Foreign Intelligence Surveillance Act ("FISA") by arranging for payment through smear merchants Fusion GPS to the Russian SVR and FSB and British (former) agent Christopher Steele ("Steele"). To abolish their enemies, in other words, the Tech Cartel defendants were willing to defy all legal and constitutional dictates – including certain actors within the Obama Department of Justice ineffably misleading Article III colleagues resident in this very Court. This is sedition, bordering on treason, and patently illegal.

As will be discussed throughout this RICO matter, the Tech Cartel set up and used many unsecure private email servers to conceal from Congress and the Article III Courts tens of thousands of e-mails. These emails, many of which remain missing, obscured (and obscure) from all constitutional branches (thus obstructing justice in myriad ways), and, more broadly, from the people of the United States who are not judges or elected officials, Tech Cartel wrongdoing. Of those emails that have been recovered, they contain classified information that should never be on an unsecured server because that presents (for many reasons), a danger to the national security of the United States. Russian and Chinese state spy agencies are known to have acquired all such emails via hacking and back door 9-11 exploits. They have begun posting that data widely on the internet. The total email batches from John Doerr and Vinod Khosla, alone are shocking in, and of, themselves. Third party hackers have the entire drive sets from the Hunter Biden laptop and the Clinton home server.

As such, The Tech Cartel can and must be charged with using illicit espionage under the clear language of the relevant statute(s). Tech Cartel surrogate James Comey (then-FBI Director) and Loretta Lynch (then-Attorney General) did not so charge; instead, they devised a scheme to protect their Crony's within the Tech Cartel – with the intent that such scheme would help ensure the election of their friends and with such victory would ensure the Tech Cartel would persevere into perpetuity and that they (and other Tech Cartel principals, surrogates and participants) would be richly rewarded. No one would have ever known except for certain FBI and Whiste House whistle-blowers.

At the time of this filing, numerous government investigations involving findings highly-similar to the factual allegations and claims underlying this Complaint are ongoing at the United States Department of Justice at the FBI, within the DoJ Inspector General's Office, and at least one United States Attorney's Office. The United States Congress is/are conducting several more, in both the House and the Senate, and despite holdover Tech Cartel obstruction appears within its committee oversight function to be making substantial progress regarding the very issues raised here. The evidence produced by those investigations will spurn follow-on investigations and/or prosecutions with respect to the Tech Cartel defendants and their surrogates and other participants as described herein. Corroborated and/or new evidence from these (and possibly other) investigations, as they mature, can and must be incorporated into this lawsuit at the appropriate time to reinforce its verisimilitude.

Another major investigation (among several) of this seditious abuse by the Tech Cartel and individuals named herein has been undertaken by the Department of Justice Inspector General, providing yet another avenue to satisfy the standard of plausible evidence for this lawsuit, comcomitant with a parallel investigation relating to this and related illegalities by Tech Cartel participants – undertaken at the instructions of the United States Attorney General and conducted by the United States Attorney for the District of Utah as a predicate for the putative referral to a duly constituted grand jury and the appointment of a(nother) Special Counsel. Also pending is the appointment and findings of a Special Counsel to investigate and prosecute FISA abuse and Media Matters/Shareblue illicit partnership with Facebook to "weaponize" private information in violation of U.S. law. Bill Gates, Elon Musk, Bill Clinton, The heads of MIT and other notables, have all been connected with the Epstein sex cult. The actual connection between all of those players is as much political as it is sexual. Their meetings were Tech Cartel organized crime collusion planning sessions and many of those meetings were recorded. Bill Gates divorce, Jeffrey Epstein's death and Elon Musk's flight to Texas are all because of these leaks.

In another example, Plaintiff informed FBI Director and James Comey and United States Attorney General Eric Holder, in time-stamped writing, of the following facts. Plaintiff is now informed that those parties ran cover-ups of these facts and charges in order to protect the Tech Cartel:

Compensation is thereby demanded from the U.S. Government and the California State Government, by Plaintiffs', for damages, monies owed, witness fees, legal expenses, whistle-blower fees, informant fees and with-held benefits monies. Additionally, Plaintiffs' submitted invoices to FBI, GAO, SEC, and other agencies that Plaintiffs' have provided witness and investigation services to.

This case involves the illicit sale and trading of stocks, bonds, mutual funds, and other securities; quid pro quo political bribery; election manipulation; monopoly and anti-trust law violation;

bodily harm and other criminal matters applicable to every law enforcement and regulatory agency.

This corruption involves the following:

• where a financial or other advantage was offered, given or promised to another person with the intention to induce or reward them or another person to perform their responsibilities or duties improperly (it does not have to be the person to whom the bribe is offered that acts improperly); or

• where a financial or other advantage was requested, agreed to be received or accepted by another person with the intention of inducing or rewarding them or another person to perform their responsibilities or duties inappropriately (it does not have to be the person who receives the bribe that acts improperly).

The bribes included:

• assets given or received directly or through a third party (such as someone acting on the government's behalf, for example an agent, distributor, supplier, joint venture partner or other intermediary); or

• assets and stocks for the benefit of the recipient or some other person.

The bribes took many forms, for example:

• money (or cash equivalent such as shares);

• unreasonable gifts, entertainment or hospitality;

• kickbacks;

• prostitutes;

• attacks on, and murders of, witnesses;

• unwarranted rebates or excessive commissions (e.g. to sales agents or marketing agents);

• unwarranted allowances or expenses;

• "facilitation" payments/payments made to perform their normal job more quickly and/or prioritise a particular constituent;

• political/charitable contributions;

• uncompensated use of company services or facilities; or

• anything else of value.

This corruption goes between both the public and private sectors.

No agency may refuse, or seek to re-direct, this case, to another agency, because this case falls within the purview of every law enforcement and regulatory agency in the USA. This case also falls within the purview of multi-national enforcement under Interpol, FinCEN, EU, etc. To reiterate: this is not a single-agency matter. No agency has the right to seek to shove this case off to another agency or cover-up this matter at the expense of citizen Constitutional and human rights.

This case involves different organizations who are in contest to control the United States government and the financial and power benefits therefrom.

This case involves the control of the White House and the existence, or termination, of the power in the Oval Office and international corrupt mining deals worth trillions of dollars.

Plaintiffs' witnessed an organized criminal Tech Cartel which affected government Treasury funds. The crime scheme involved: stock market manipulation, corrupt international mining deals and media company power manipulations. When Plaintiffs' reported the crime, millions of dollars of state-sponsored reprisal attacks (enumerated in detail below) were launched against Plaintiffs' in vendetta.

Related cases shed illuminate the depths of criminality and the scope of crimes and illicit deeds by the colluding perpetrators and their crime culture:

In federal **Case No. 1:20-cv-03010** – you see proof that perpetrator Google is monopoly and runs competitor attacks. In **Case No. 11-CV-2509** -https://www.cand.uscourts.gov/judges/koh-lucy-h-lhk/in-re-high-tech-employee-antitrust-litigation/ - you see proof that the Silicon Valley Cartel colludes to harm others. In Task Force Case **No. 20-xyz2020a** - http://www.majestic111.com - you see proof that this "Silicon Valley Cartel" is a RICO law violating entity. In **Case No. 20-03664** - https://www.insurancejournal.com/app/uploads/2020/06/brown-v-google.pdf – you see further evidence that the Google-Youtube-Alphabet organization operates as a racketeering entity that controls portions of the government.

In Case No. **1:12-CV-00774-mms** and related cases - https://thehill.com/blogs/congress-blog/the-administration/250109-a-case-study-in-pay-to-play-cronyism – You see that criminal referrals against the attackers have been filed with the FBI, DOJ, SEC, FEC, FTC and that insider cronyism at the Department of Energy is accelerating at a rapid pace up and including the recent Granholm investigations.

Additional court cases, available on www.pacer.gov, have filed extensive further evidence proving Plaintiffs' assertions. Such key cases include:

Case No. 18-cv-8865 (S.D.N.Y.)(SEC v. Elon Musk for lies and scams)

Case No. 18-cv-8947 (S.D.N.Y.)(SEC v. Tesla, Inc. for lies and scams)

Case No. 1:14-cv-270143 (Google racketeering charges - https://artistrightswatch.com/2017/10/08/googles-racketeering-challenge/)

Case No. 1:19-cr-00490 (United States v. Epstein - Big tech sex cult crimes case)

Case No. 129 So.3d 1196 (Fla. 2d DCA 2014); 170 So.3d 125 (Fla. 2d DCA 2015) (Gawker Media, LLC v. Bollea in which Gawker, Deadspin, Gizmodo, Jalopnik, Jezebel, Kotaku and Lifehacker were exposed as character assassination and money-laundering fronts working for notorious third parties)

Case No. 19-cv-343672 James Martin (on behalf of ALPHABET INC) v Larry Page et al (Sex Cults In Silicon Valley)

Case No. CGC-11-508414, California Superior Court, San Francisco (Plaintiffs' v Google)

Case No. 3:16-cv-03061 U.S. DISTRICT COURT, NORTHERN DISTRICT OF CALIFORNIA, San Francisco Division (Plaintiffs' V. Google/Alphabet/YouTube)

Case No. 18-CIV05380 Rubin Vs. Rubin (Google sex cult and sex slave charges)

Case No. : 1:17 - cv - 06404 Vs. Rubin (Organized crime sex trafficking by stock market manipulators)

Case No. D.C. No. 3:17-cv-05369 - VC (Big tech harassment of outsiders)

Case No. 3:21-cv-00077 (Another of many lawsuits proving that the Silicon Valley Cartel conspires to manipulate media and markets)

1. Plaintiffs' were induced to invest millions of dollars, and all of their life savings, in a government run project. It was later discovered that ***every government operator of that project was either financed by, friends, with, sleeping with, dating the staff of, holding stock market assets in, promised a revolving door job or government service contracts from, partying with, personal friends with, photographed at private events with, exchanging emails with, business associates of or directed by; the Plaintiffs' business adversaries, or <u>the politicians that those business adversaries pay campaign finances to</u>, or supply political digital search manipulation services to. They all used the same couple of law-firms, investment bankers, CPA's, lobbyists and policy manipulation operatives. There can be no question about the fact that the government officials involved "colluded", "conspired" and "coordinated" for their own, personal, unjust gain and quid pro quo. Crooked government employees and contractors made billions of dollars in unjust gains while Plaintiffs' lost billions of dollars BECAUSE crooked government employees and contractors engaged in these crimes, defrauded Plaintiffs' and used Plaintiffs' as a smoke-screen to cover-up their crimes. That "project" turned out to be an operation of the Tech Cartel described in this document as an organized***

crime endeavor.

This is a felony-grade criminal racketeering case. White House, Department of Energy, Department of State and other California State and Federal government agency staff coordinated with their political campaign financier/beneficiaries from Solyndra, Tesla, Fisker, Facebook, Google, YouTube, Netflix, Linkedin, Alphabet, Kleiner Perkins, Greylock, Goldman Sachs and other PAC-aligned Silicon Valley businesses to operate a RICO-law and Antitrust-law violating illicit business “Cartel”. The operation of this Cartel has been proven by leaked emails, whistle-blowers, lawsuits and FBI-type forensic accounting.

The statute of limitations has not been exceeded in this case because the attacks, harms and perpetrators actions have continued as recently as yesterday.

This illicit organization had planned to skim trillions of dollars of exclusive profits from government contracts, political payola, foreign rare earth mining operations, internet news and search manipulation deals, revolving-door deals and massive computerized algorithm-based stock market manipulations. The Defendants schemes, particularly, planned to exploit funds from the 2008 and 2021 “Stimulus Bills”. Plaintiffs"s', government employee/contractors, competed with these entities, with superior technology at lower prices, and were targeted by this Cartel, for termination.

Plaintiffs"s' became information providers and whistle-blowers for investigators in the examination of this crime. Defendants expended vast amounts of corporate and taxpayer money and resources harming Plaintiffs's in reprisal vendetta attacks. Over a million pages of evidence and proof are provided on the case website. Damages and attacks on Plaintiffs' continue to today.

Blockade of Plaintiffs' Legal Representation

Plaintiffs' Demand State-Funded Legal Representation

A. Plaintiffs's have been “black-listed” from getting legal representation. Even though the law in California (Cal. Lab. Code § § 1050 to 1053) says that an entity ***can't*** prevent or attempt to prevent former workers from getting work or representation through misrepresentation, knowingly permitting or failing to take reasonable steps to prevent blacklisting, or make a statement about why an employee was discharged or left employment, implying something other than what is explicitly said, or providing information that was not requested: ***It is done every day in Silicon Valley.*** The "S*ilicon Valley No Poaching Black-List*" class-action lawsuit, the *“AngelGate Scandal Investigation”* , and many other notorious scandals and books are about this issue. Federal FAR Section 9.104-1 (d), and related laws, apply. Blacklisting is a key part of the IC Vendetta Cycle attacks. The Plaintiffs' also suffered damage to their rights under the Age Discrimination in Employment Act (ADEA) (29 USC Sec. 621, et seq.); the Americans with

Disabilities Act (42 USC Sec. 12181, et seq.); the Civil Rights Acts - (42 USC Sec. 2000, et seq.); the Davis-Bacon Act (40 USC Sec. 276a, et seq.); the Employee Retirement Income Security Act (ERISA) (29 USC Sec. 1001, et seq.); the Equal Pay Act (29 USC Sec. 206[d]) and other violations.

B. Each and every law firm capable of handling Plaintiffs's case has been contracted, paid and/or influenced so that they are "conflicted out" from representing Plaintiffs's. Law firm Mofo was threatened if they helped Plaintiffs's. Lawyer Amy Anderson was threatened and lost her license for attempting to help Plaintiffs's. Every lawyer or law firm who attempts to help Plaintiffs's is hired by Defendants, or their agents and threatened or compromised in order to prevent them from helping Plaintiffs's because this case affects trillions of dollars of energy industry profits, the White House, billionaire oligarchs and multi millionaire corrupt Senators. In fact, this issue lies at the root of this entire corruption case. Sociopath over-moneyed Silicon Valley oligarchs have hire Morrison Foerster, Wilson Sonsini, Perkins Coie, Covington Burling and every other major law firm and lobbyist and told them to "*kill everyone and destroy everything that I don't like…*". These law firms (controlled by Mark Zuckerberg, Elon Musk, Larry Page, Eric Schmidt, Steve Westly, Vinod Khosla, Laurene Powell Jobs, Nancy Pelosi, etc. All of whom have nearly a trillion dollars of funds at their disposal) have carte blanche and unlimited payments to run coups, character assassination campaigns, money laundering and other crimes for the oligarchs. They have the staffing to do these things and zero incentive to not do crimes. These law firms are the dirty deeds teams for the mobster-like suspects and there is no law enforcement body with the will nor resources to stop them. It is a violation of the U.S. Constitution to tell Plaintiffs's to "go get a law firm" when EVERY possible, equitable, law firm works for, and is massively compensated by, the criminals that need to be sued. Both the politicians AND the tech oligarchs charged with these crimes have hired the very law firms that government agencies have told Plaintiffs's to go out and hire.

C. There is a precedent that was set in the US Supreme Court case: Gideon v. Wainwright, (1963) that clarifies that you have a right to a lawyer even if you don't have money for one. The Sixth Amendment, as applied to the states through the Fourteenth Amendment Due Process Clause gives one their Due Process rights. One needs to kill someone, though, to most easily get your free lawyer, since the court-appointed lawyer is rarely ever appointed, on citizens behalf, in a case like this. Even if a defendant is represented by an attorney of his or her choosing, he or she may be entitled to relief on appeal if the attorney did not provide adequate representation. A defendant must demonstrate that the attorney's performance "fell below an objective standard of reasonableness" and that this was prejudicial to the case. See:
Strickland v. Washington (*https://supreme.justia.com/cases/federal/us/466/668/case.html*) , 466 U.S. 668, 688-92 (1984). A few "free lawyers", that Plaintiffs' had tried, turned out to be working for the opposition side.

D. The federal organization: https://www.lsc.gov is required to help but has refused because it's administrators were friends with, and appointed by, the public officials charged with corruption in this case.

E. Plaintiffs's have personally asked the Attorney General, The Director of the FBI and the U.S. Attorney's office for representation but they have been told not to respond because the case is politically embarrassing to major public officials and their corrupt Silicon Valley financiers.

F. The government agencies who have told Plaintiffs's that Plaintiffs's should *"hire a law firm and sue them"*, in order to resolve this matter, are the same government agencies that have cut-off, or blockaded Plaintiffs's income sources in order to prevent Plaintiffs's from being able to afford to hire a law firm to sue them.

G. A federal agency provided Plaintiffs's with a list of "free lawyers". Upon FBI-level investigation of every "free lawyer" on the list, (via their financial contributions, voting records, leaked emails, social media postings, event attendance, public records, social connections lists online and other surveillance data) they all worked for, or with the opposition interests and could not have possibly provided unbiased services. In fact, multiple lawyers have contacted Plaintiffs's who turned out to be working for the opposition. They were sent in to delay, or redirect, Plaintiffs's in order to keep the cases from being filed or properly prosecuted in order to protect the suspects. This is a common infiltration procedure widely documented in CIA, British secret service, Russian FSB and Snowden leaks documents on IC dirty tricks tactics.

H. Agency staff were ordered to harm Applicants by manipulating their benefits in order to deny, delay, obfuscate and reduce their income as reprisal for their assistance to law enforcement in a political corruption and money laundering matter. Agency staff, ranging from the lowest level staff and up to the director headquarters offices, participated in this reprisal-vendetta-revenge action to harm Applicants. Applicant's peers have filed DOJ and FBI criminal referrals, launched federal investigations and the assertions have been proven in numerous IG, FBI, Congressional and major news media investigations. Agency offices have failed to provide responsive FOIA requested data, hearing investigation data and fair responses because some of their staff are STILL operating a criminal cover-up which has now been update-reported to the FBI, Congress, the IG, the AG and investigative reporters.

Other federal agencies have complied, verified and provided the requested deliverables. SSA and DOE have pointed the searchlight of suspicion on themselves, laser-like, by their overt failure to comply. Ironically, the political financing of their executives and their personal relationships "happens" to be with the exact same Silicon Valley oligarchs under felony criminal investigations. The stock market brokerage records, family trust accounts, PAC trace-routing, Interpol records and SEC investigation records proves it!

Every "unsigned" anonymous government email is tracked to the individual author by their IP address, device IMEI, web camera, building key card, door camera, parking lot use chart,

building camera, vehicle tracking circuits, text dba records, keyboard UI/UX patterns, motherboard ID #, DNS routing, stingray read-outs and a vast number of other metrics. Applicant investigation peers know the exact person that wrote every government email or document or file request.

Stone-walling based cover-ups are being mitigated by Plaintiffs', and their peers, by carbon-copying these disclosures to every member of the press, every voting citizen and every jurisdiction agent.

For years, victim/Plaintiffs's, and their advocates and peers, have contacted every government agency and authority listed in government directories, which may have any jurisdiction over this case. The usual response has been cover-ups, finger-pointing, stone-walling, obfuscation, failure-to-reply or other tactics to delay the inevitable. This has forced victim/Plaintiffs's to use social media and novel distribution technologies to present their case to every registered voter in the public. Agency officials who were supposed to be helping victim/Plaintiffs's have been exposed taking bribes from victim/Plaintiffs' enemies and adversaries in this case.

Certain California State officials, Obama White House Staff and Federal Agency staff ***accepted bribes*** from Silicon Valley Oligarchs and Investment Bank Cartels. They were bribed with: Billions of dollars of Google, Twitter, Facebook, Tesla, Netflix and Sony Pictures stock and stock warrants which is never reported to the FEC; Billions of dollars of Google, Twitter, Facebook, Tesla, Netflix and Sony Pictures search engine rigging and shadow-banning which is never reported to the FEC; Free rent; Male and female prostitutes; Cars; Dinners; Party Financing; Sports Event Tickets; Political campaign printing and mailing services "Donations"; Secret PAC Financing; Jobs in Corporations in Silicon Valley For The Family Members of Those Who Take Bribes And Those Who Take Bribes; "Consulting" contracts from McKinsey as fronted pay-off gigs; Overpriced "Speaking Engagements" which are really just pay-offs conduited for donors; Gallery art; Private jet rides and the use of Government fuel depots (ie: Google handed out NASA jet fuel to staff); Recreational drugs; Real Estate; Fake mortgages; The use of Cayman, Boca Des Tores, Swiss and related money-laundering accounts; The use of HSBC, Wells Fargo, Goldman Sachs and Deustche Bank money laundering accounts and covert stock accounts; Free spam and bulk mailing services owned by Silicon Valley corporations; Use of high tech law firms such as Perkins Coie, Wilson Sonsini, MoFo, Covington & Burling, etc. to conduit bribes to officials; Payroll W2 and 1099 payments which were actually bribe payments for political work such as character assassinations and internet rigging; and other means now documented by us, The FBI, the FTC, The SEC, The FEC and journalists.

How Government Agencies Were Used As Reprisal Weapons Against Plaintiff

The San Mateo, California Social Security Administration offices are under investigation because one, or more, of their staff used SSA resources to attack an Applicant because a staff member (erroneously) thought that an Applicant was opposed to that SSA staffer's beliefs on "open-borders". The SSA official ordered up reprisal operations, against the Applicant, simply to vent that SSA officials political angers. That is illegal.

A vast number of agency abuse cases and lawsuits are now on public record in the Inspector General's offices and federal courts.

It is an indisputable fact that some government agencies run "hit-jobs" on citizens on orders from certain corrupt politicians. These actions are felony violations of the law.

Federal and State Agencies including SSA, FEC, DOE, HHS, VA, CIA, HUD, SA, SEC, FBI, DOJ and many others, have been charged, and found guilty, in these crimes against citizens.

In the Congressional investigation published by the United States Congress in review of the U.S. Department of Energy LGP/ATVM programs, it is clearly proven that the U.S. Department of Energy was used as a slush-fund by some DOE executives in order to pay off campaign financiers by attacking and sabotaging their competitors.

The DOE Paducah Gaseous Diffusion Plant under contracts with the Department of Energy and the government-owned U.S. Enrichment Corp paid $5M whistle-blower awards to those whistle-blowers who were attacked, using government agency resources, for reporting a crime.

Dept. of Energy Hanford URS has agreed to settle a lawsuit brought by former employee Walter Tamosaitis for $4.1 million. The settlement in the whistle-blower case comes almost one year before the case was set for a jury trial in federal court in Richland and compensates Tamosaitis for attacks against him, by DOE officials, in retribution for reporting a crime.

VA officials attacked hundreds of citizens who reported corruption, ie: https://www.thenewamerican.com/usnews/health-care/item/18610-va-whistleblowers-facing-retribution.

As shown in this report: https://www.pogo.org/analysis/2018/08/new-report-confirms-whistleblower-retaliation-is-alive-and-well-at-department-of-veterans-affairs/

, Agencies attack often and harshly.

CIA and NSA executives have been widely shown to use spy tools to attack domestic citizens they don't like, ie: https://www.dailymail.co.uk/news/article-2435011/NSA-employees-used-phone-tapping-tools-spy-girlfriends-cheating-husbands.html , and hundreds of other news links that can be provided.

Elon Musk and Tesla, as well as Eric Schmidt and Larry Page at Google, have been proven to use the CIA group: IN-Q-TEL, to run government sponsored/financed attacks on business competitors.

In Civil Action No. 1:13-cv-00777-RBW GOVERNMENT AGENCIES WERE CAUGHT BEING USED FOR ATTACKS AGAINST CITIZENS AND PUNISHED IN THE COURT AND THE MEDIA!

The IRS, and hordes of other government agencies have been caught and proven, IN COURT, to target and attack people for presumed political differences.

Why should we assume that the Social Security Administration is not ALSO doing this too to harm citizens who speak out?

The Lois Lerner IRS attacks took many years to resolve. In an unprecedented victorious conclusion to a four year-long legal battle against the IRS, the bureaucratic agency admitted in federal court that it wrongfully targeted citizens, during the Obama Administration, because of their political viewpoints and issued an apology to those people for doing so.

In addition, the IRS is consenting to a court order that would prohibit it from ever engaging in this form of unconstitutional discrimination in the future.

In a proposed Consent Order filed with the Court, the IRS has apologized for its treatment of U.S. citizens including organizations from 20 states that applied for 501(c)(3) and (c)(4) tax-exempt status with the IRS between 2009 and 2012 -- during the tax-exempt determinations process. Crucially, following years of denial by the IRS and blame-shifting by IRS officials, the agency now expressly admits that its treatment of our clients was wrong and a total violation of our Democracy..

As set forth in the proposed Order:

“The IRS admits that its treatment of Plaintiffs's during the tax-exempt determinations process, including screening their applications based on their names or policy positions, subjecting those applications to heightened scrutiny and inordinate delays, and demanding of some Plaintiffs' information that TIGTA determined was unnecessary to the agency’s determination of their tax-exempt status, was wrong. For such treatment, the IRS expresses its sincere apology.”

Throughout litigation of this case, activists have remained committed to protecting the rights of the public who faced unlawful and discriminatory action by the IRS and other agencies. The objective from the very beginning has been to hold agencies accountable for corrupt practices.

This Consent Order represents a historic victory for the public and sends the unequivocal message that a government agency’s targeting of citizens organizations, or any organization, on the basis of political viewpoints, will never be tolerated and that revenge will be swift and vast.

The Order will put an end, once and for all, to the abhorrent practices utilized against citizens, as the agreement includes the IRS's express acknowledgment of – and apology for – its wrongful treatment of the public. While this agreement is designed to prevent any such practices from occurring again, rest assured that all public interest lawyers will remain vigilant to ensure that the IRS, SSA, DOJ or SEC does not resort to such tactics in the future.

Per detailed reports, in March of 2012 lawyers began being contacted by literally dozens of citizens and groups who were being harassed by the Obama IRS after submitting applications for tax-exempt status. Their tax-exempt applications were held up for years (over seven years in some cases), and they began receiving obtrusive and unconstitutional requests for donor and member information. That began a now more than five and a half year fight with the burgeoning bureaucracy at the IRS. Then on May 10, 2013, Lois Lerner, the then head of the IRS Tax Exempt Organizations Division, publicly implicated the IRS in one of the worst political targeting scandals of the century.

This is an extraordinary victory against government agency abuse. It sends a powerful warning to the deep state bureaucracy that it will not be allowed to violate the Constitution in order to silence and shut down the whistle-blowers.

In addition to the IRS's admissions of and apology for its wrongful conduct, the Consent Order would specifically award Plaintiffs's the following:

- A declaration by the Court that it is wrong to apply the United States tax code to any tax-exempt applicant or entity based solely on such entity's name, any lawful positions it espouses on any issues, or its associations or perceived associations with a particular political movement, position or viewpoint;

- A declaration by the Court that any action or inaction taken by the IRS must be applied evenhandedly and not based solely on a tax-exempt applicant or entity's name, political viewpoint, or associations or perceived associations with a particular political movement, position or viewpoint; and

- A declaration by the Court that discrimination on the basis of political viewpoint in administering the United States tax code violates fundamental First Amendment rights. Disparate treatment of taxpayers based solely on the taxpayers' names, any lawful positions the taxpayers espouse on any issues, or the taxpayers' associations or perceived associations with a particular political movement, position or viewpoint is unlawful.

In the Order, the IRS has also agreed that (unless expressly required by law) certain actions against the Plaintiffs's– i.e. the sharing, dissemination, or other use of information unnecessarily obtained by the IRS during the determinations process (such as donor names, the names of volunteers, political affiliations of an organization's officers, etc.) – would be unlawful. In

addition, the IRS promises not to take any retaliatory action against our clients for exposing the targeting scheme.

Finally, and of crucial significance, the IRS admits it targeted persons and groups based on their viewpoints (i.e., "policy positions") and that such viewpoint discrimination violates fundamental First Amendment rights. This is the first time the IRS has admitted that its targeting scheme was not just "inappropriate" – as TIGTA found – but, as alleged, blatantly unconstitutional.

To ensure consistency and uniformity within the agency's operations going forward, the IRS is required, pursuant to the Order, to inform all employees within the Exempt Organizations Division, as well as the Commissioners and Deputy Commissioners within other divisions, of the Order's terms.

This Order not only validates allegations about their treatment at the hands of the corrupt Obama-era IRS but also provides important assurances to the American public that the agency understands its obligation to refrain from further such discriminatory conduct. As Attorney General Sessions acknowledged in this regard, "[t]here is no excuse for [the IRS's] conduct," as it is "without question" that the First Amendment prohibits the conduct that occurred here, i.e., subjecting American citizens to disparate treatment "based solely on their viewpoint or ideology." Sessions further confirmed his Department's commitment to ensuring that the "abuse of power" in which the IRS engaged here "will not be tolerated."

It is impossible to overstate the importance of this victory. This marks a years-long fight for justice in defense of the constitutional rights of the public.

This is an extraordinary victory against abuse of power and corruption.

It sends a powerful warning to the deep state bureaucracy that it will not be allowed to violate the Constitution and manipulate the IRS, SSA and other agencies in order to silence and shut down those who speak out about political corruption crimes.

In the wake of Wisconsin Watchdog's investigation into SSA staff allegations of incompetence, misconduct, and retaliation in Social Security disability appeals offices, several employees have taken their complaints to a Senate committee led by Wisconsin Sen. Ron Johnson.

An official with knowledge of the complaints said the Senate Homeland Security and Governmental Affairs Committee, chaired by the Oshkosh Republican, has received emails and other contacts from "certain people" inside the Social Security Administration's Office of Disability Adjudication and Review.

The initial complaints came from an employee inside the Milwaukee office following Wisconsin Watchdog's opening investigative report that found some claimants waiting more than 1,000 days for an appeals decision on their disability benefits claim.

Following Wednesday's story of a whistleblower in the Madison ODAR office, the committee has received more specific complaints about retaliation against employees, the source said.

Committee staff members sent the latest Watchdog piece to SSA administrators hoping they will "cooperate," the source said. To date, the agency has been less than cooperative.

"This is an ongoing process, and they are not always as forthcoming as we'd like them to be," the source said. "Hopefully with your continued reporting, this is an issue they can't duck."

A Senate committee member said officials there are working with the Office of Special Counsel on "multiple whistleblower retaliation claims." The committee continues to request information from the SSA.

The whistleblower in the Madison office claims management retaliated against her after she was called to testify in a misconduct case. The incident involved "inappropriate behavior" by an administrative law judge, she said.

"They are so corrupt. It's absolutely horrible," said the woman, a lead case technician in the Madison Office of Disability Adjudication and Review.

She spoke on condition of anonymity, fearing more retribution from her supervisors. While she said recounting her particular experiences will more than likely betray her identity anyway, the ODAR case worker insisted she has had enough.

"I'm at point where they don't care about me, I don't see why I'm protecting them. This is my last resort," she said. "I want to do my work without fear of retaliation."

She said she has contacted the Senate committee.

"I forwarded my information to them and I got an email back from them. They said people are coming out of the woodwork with their complaints (about ODAR) following your story," the whistle-blower said.

Ronald Klym, a long-time senior legal assistant in the Milwaukee ODAR office, alleges he has been retaliated against by supervisors for going public with his charges of incompetence and misconduct in the agency. The federal employee, who has worked for SSA for 16 years, provided Wisconsin Watchdog with documents showing extremely long wait times for claimants appealing their denied applications for benefits.

Doug Nguyen, SSA regional spokesman, in a previous story said the agency acknowledges that Milwaukee ODAR has a "high average processing time for disability appeal hearings, and we are working to address the issue."

Beyond the delays is what Klym calls the “shell game,” the wholesale transferring of cases to other parts of the country by administrators to make the Milwaukee office’s numbers look better than they are.

The Madison office whistle-blower confirmed Klym’s allegations, saying at one point she saw 2,000 cases from the Milwaukee office handed off to the Oak Brook operation.

There are over 10,000 SSA disability manipulation charges against SSA executives and staff. There are over 185,000 charges filed by domestic citizens against all of the parties we listed in our ***reported-to*** list above.

DAMAGES AND HARMS LIST

"Applicant A" and his co-workers were cooperating with agency investigations into organized crime operating within government agencies. In order to discourage, threaten and intimidate “Applicant A”, he and his peers were attacked with a $30M+ state-sponsored reprisal attack which included the following attack tactics, operated by Fusion GPS, Black Cube, Psy-Ops type contractors and White House specialists, which caused quantifiable harms and damages for which “Applicant A” is owed compensation:

1.) Defrauding Applicants via fake government requests to invest in rigged government contracts, thus costing Plaintiffs' their life savings;

2.) Placing moles in, and spying inside, Applicant’s companies;

3.) Blockading legal counsel for Plaintiffs's;

4.) Character assassination and sophisticated contracted defamation media attacks;

5.) Defendants contracted off-shore “click-farm” and “troll-factory” processed social media attacks;

6.) Government benefits from SSA, HUD, etc, blockades and manipulations;

7.) Jobs and venture capital funding blacklisting;

8.) FOIA obfuscation for official government FOIA filings;

9.) Arbitrary government deadline manipulation for SSA, DOE, HUD and other applications;

10.) Creation of endless fake hurdles in agency applications (ie: DOE) to protect rigged "winners";

11.) Toxic workplace poisonings like the Salisbury, Nalvany, Litvinenko poisonings;

12.) Workplace sabotage and obstruction of Applicant's companies;

13.) Contracted media defamation attacks via Gawker, Gizmodo, Jalopnik, Google, Youtube, etc. Which have now had the payments for the attacks tracked through accounting systems

14.) Commercial employment database "Lois Lerner-ing" and red-flagging;

15.) Murders or forced deaths of peers (ie: Rajeev Motwani, Seth Rich, Gary D. Conley and 120+ others);

16.) Revenue blockades and internet income re-direction;

17.) Troll farm attack teams hired from Chinese attack farms;

18.) Fusion GPS, Media Matters, David Plouffe attack contracts issued targeting whistle-blowers;

19.) Manual search engine lock-in attacks on Google, YouTube, Linkedin;

20.) U.S. patent office manipulation to blockade revenue;

21.) Honey-traps sent out targeting the whistle-blowers;

22.) Fake news tabloid empires created just for defamation attacks;

23.) Housing access and financing blockades created to reprisal harass whistle-blowers;

24.) Ongoing hacking of Plaintiffs's devices;

25.) Tech industry black-list coordination within the National Venture Capital Association;

26.) HUD and USDA mortgage rights blockades:

27.) DNS and IP routing manipulation to prevent Plaintiffs' from selling anything online;

28.) Digital attacks designed to put horrific fake news about target in front of 7.5 billion people...

and more spy agency type "dirty tricks"that cost the Plaintiffs' their lives, life savings, income and other disabling losses as detailed in the related support documents on the case website.

Plaintiffs' have currently had their rights to legal representation and a trial blockaded by government officials who fear political embarrassment in a public trial of this case. In fact, history has proven that those officials have caused a thousand-fold increase in their own public media shame by delaying a settlement of this dispute!

RELIEF OPTIONS DEMANDED

- Victim/Plaintiffs' demands the provision of a state-sponsored court-provided law firm to represent victim/Plaintiffs' under the variances and human rights laws affording such provision of services.

- The finding that this matter includes a violation of RICO racketeering laws and Anti-trust laws by the combined organized efforts of the Defendants.

- Awarding Plaintiffs' compensatory including actual, consequential, and incidental damages for malicious defamatory conduct as alleged herein in an amount to be determined at trial and in excess of $35,000,000 U.S. Dollars.

- Awarding punitive damages for Defendant's malicious defamatory conduct based on the routine and accepted calculation of 5 percent of their invested current net worth of over $63 billion U.S. dollars. Thus, punitive damages are requested be awarded by the in an amount to exceed $3 billion U.S. dollars, which amount of punitive damages are designed to sufficiently punish Defendant in order that its illegal conduct not reoccur.

- Awarding Plaintiffs' attorney’s fees and costs.

- Granting any such further relief as the Court deems appropriate including preliminary and permanent injunctive relief.

- Damages in excess of $225 million against Chu, Axelrod, Podesta, Carny, Biden, Emanual, Gibbs, Rattner and Seward, jointly and severally, for their violations of Plaintiffs"s civil rights.

- A declaration pursuant to 28 U.S.C. §§ 2201 and 2202 and 5 U.S.C. § 706(2)(B) that Plaintiffs"s Loan Program application was wrongfully denied and injunctive relief directing Defendants to reconsider and/or approve same.

- A declaration pursuant to 28 U.S.C. §§ 2201 and 2202 and 5 U.S.C. § 706(2)(B) Plaintiffs"s ATVM Loan Program application was wrongfully denied and injunctive relief directing Defendants to reconsider and/or approve same without respect for political considerations.

- A declaration pursuant to 28 U.S.C. §§ 2201 and 2202 and 5 U.S.C. § 706(2)(B) that the rejection of Plaintiffs"s LGP application without recourse was unlawful, and injunctive relief directing Defendants to accept and consider same without respect for political considerations.

- Such costs and attorney fees as Plaintiffs"s may be entitled to under law.

- Such other relief as this Court deems just.

- Plaintiffs' have sent an invoice for "*informant and witness fees*" to the GAO, FBI, FTC and SEC in the amount of $5,000,000.00 per agency but have not had a response, relative to payment, from those agencies.

DAMAGES AMOUNT COMPARATIVES AND LEGAL PRECEDENTS VALIDATIONS

Reference past payment precedent examples:

- Campbell worked as an informant for federal authorities investigating Vadim Mikerin, a Russian official in charge of U.S. operations for Tenex, a unit of Rosatom. Authorities later accused Mikerin of taking bribes from a shipping company in exchange for contracts to transport Russian uranium into the United States. He pleaded guilty in federal court in Maryland and was sentenced to prison for four years. The Justice Department had also initially charged Mikerin with extorting kickbacks from Campbell after hiring him as a $50,000-a-month lobbyist. Prosecutors alleged Mikerin had demanded Campbell pay between one-third and half of that money back to him each month under threat of losing the contract and veiled warnings of violence from the Russians. The demand prompted Campbell to turn to the FBI in 2010, which gave its blessing for him to remain part of the scheme as a whistle-blower who was compensated for his efforts.

- The FBI has a Congressional docket which documents it’s annual witness and informant expenditures for the last 20 years. Those financial on-the-record documents show the average payment for a high-ticket case RICO-type informant such as Plaintiffs' and are hereby placed in this case record as references of payment standards.

- In a similar case, Plaintiffs' Terry Bollea (AKA: Hulk Hogan) was awarded $145 million dollars in damages because of character assassination efforts by the same parties. The attacks on Plaintiffs's exceeded the resources used against Terry Bollea by many magnitudes and thus, the $145 million dollar figure would be a minimum damages figure for each Plaintiffs' in our case as each Applicant was attacked in such a manner. Each of the parties attacked by Gawker/Gizmodo (who worked for White House operatives) received at least $170,000.00 in damages.

- The DOE Paducah Gaseous Diffusion Plant under contracts with the Department of Energy and the government-owned U.S. Enrichment Corp paid $5M whistle-blower awards to those whistle-blowers who were attacked, using government agency resources, for reporting a crime.

- Adam Lovinger, a 12-year veteran of the Pentagon's Office of Net Assessment (ONA), filed a whistleblower reprisal complaint with the Defense Department's inspector general in May against ONA boss James Baker and received compensation for his whistle-blower efforts.

- The FBI’s informant in the Uranium One scandal involving the Obama administration gave written testimony to three congressional committees this week in which he accused the Obama administration of making decisions that directly benefited the Russian government and their goals of gaining geopolitical advantages over the United States. The informant, Douglas Campbell, told congressional investigators on Wednesday that Moscow sent millions of dollars to the U.S. with the expectation that it would benefit the Clinton’s, while Hillary Clinton "quarterbacked a 'reset' in US-Russian relations" in her role as Secretary of State during the Obama administration, The Hill reported. The FBI found Campbell’s undercover work valuable enough to reward him with a $50,000 check in 2016.

- Dept. of Energy Hanford URS has agreed to settle a lawsuit brought by former employee Walter Tamosaitis for $4.1 million. The settlement in the whistle-blower case comes almost one year before the case was set for a jury trial in federal court in Richland and compensates Tamosaitis for attacks against him, by DOE officials, in retribution for reporting a crime.

- In **Civil Action No. 1:13-cv-00777-RBW**, government agencies were caught being used for attacks against citizens and punished in the court and the media! The IRS, and hordes of other government agencies have been caught and proven, IN COURT, to target and attack people for presumed political differences

- Some of the biggest evidence-of-loss examples are found in the financial records from General Motors, Ford Motors, Nissan and Tesla Motors executives for the time-frame from Jan. 1, 2000 to today. Those records validate the income loss to Plaintiffs'.

- Over 400+ other cases decisions, settlement records and government payment precedents are on file at http://www.pacer.gov validating the amount that Plaintiffs' should be compensated via known and quantified precdents.

Example # 277-A: Investigation Background Data From One Of The Plaintiffs'

Experiences

Objectives:

A part of this case documents a state-sponsored attack on a technology manufacturer who was promised a level playing field in its applications for funds to government entities, only to be unfairly denied and financially and detrimentally attacked and harmed, in political and anti-competitive reprisal, in the process. In the course of the investigation, an organized crime Cartel was exposed in operation among Silicon Valley technology oligarchs and well-known political representatives.

- This case has exposed cronyism at government agencies, The White House and among U.S. Senators.
- This case represents the Plaintiffs' of the crime as well as taxpayers who deserve an open, transparent, and fair government process without the current layers of bribery and stock market payola quid pro quo.
- The government should immediately grant Declaratory and Injunctive Relief, retribution fees and other damages to Plaintiffs'

Key Points:

1 Funding granted through, for example: the DOE's Loan Guarantee Program (LGP) and Advanced Technology Vehicle Manufacturing (ATVM) loan programs, and other agencies, are administered in an arbitrary and capricious manner, inconsistently favoring some and disadvantaging other "outsider" non-crony applicants; lacked mechanisms for applicants to administratively appeal its decisions; and re-reviewed rejected applications on an ad hoc and biased basis in order to protect the friends of government staff and harm their competitors.

2 Plaintiffs' ATVM application was deliberately "set aside"', hidden, delayed, stone-walled and substantially "delayed consideration" by DOE in favor of loan applications from politically-connected government cronies like Tesla and Fisker, whose top executives and investors, Steve Westly (Tesla), Tim Draper (Tesla) and John Doerr (Fisker) donated millions to Democrats and the Obama Administration in 2008.

3 Many of the loan applications granted by the DOE went to companies that failed to produce the promised results, were not innovative in technology, or ultimately declared

bankruptcy (After skimming billions in stock market “pump-and-dump” profits) with the harm going to the American taxpayers (See Solyndra, Tesla and Fisker as examples); while Plaintiffs' was previously funded by the Department of Energy and was one of the ONLY entities that did deliver on the contract.

4 Of the $25 billion that Congress authorized the DOE to loan, $16 billion remains un-disbursed. Why was Plaintiffs' $40 million request not granted when it could have been used to immediately create jobs?

5 The DOE violated multiple non-disclosure agreements with Plaintiffs' (and Plaintiffs') passing along patented technology to General Motors and other government cronies and that technology, only after that fact, was displayed by Ford, General Motors, Tesla and other competitors who were funded by DOE.

6 In the case of Plaintiffs', we see another example of the DOE’s cronyism, broken promises to American taxpayers, and misuse of executive agency influence.

7 This case goes back to the year 2000, and forward, as there were crony political payments between the White House, Department of Energy, Department of State and other State and Federal government agency staff coordinated with their political campaign financier/beneficiaries from Solyndra, Tesla, Fisker, Facebook, Google, YouTube, Netflix, Linkedin, Alphabet, Kleiner Perkins, Greylock, Goldman Sachs and other PAC-aligned Silicon Valley businesses to operate a RICO-law and Antitrust-law violating illicit business “Cartel” which Plaintiffs' were “outsiders” to.

Expanded Points:

- The Department of Energy engaged in arbitrary and capricious methods when awarding loan guarantees through the Advanced Technology Vehicle Manufacturing (ATVM) loan program
    - The DOE administers the ATVM loan program, in which Congress authorized DOE to provide direct federal government loans supporting the advancement of technology vehicles
    - Congress authorized DOE to make $25 billion in ATVM loans (DOE currently has approx. $16 billion of unused lending authority which politicians have been constantly trying to grab for themselves).
    - At all times relevant, DOE knew that the ATVM loans had evaporated the private markets, and that unduly delaying or denying a small, innovative technology company’s ATVM loan likely would scare away other private investors and lenders—meaning a business death sentence.

- Plaintiffs's are a small business that has demonstrated innovation, energy efficiency, and provided technology that can advance green energy efforts and create jobs in the United States. They were initially funded by a Congressional award and a Department of Energy commission.
    - In November, 2008 at the request of government officials, Plaintiffs' applied for an ATVM loan to build a scalable, innovative and efficient electric car. This car would have obsoleted Tesla Motors, which paid profits to ATVM bosses, staff, consultants and related Senators. The metrics (Range, Safety, Price, Cost To Produce, Energy Efficiency, Use of Domestic Labor, Avoidance of Genocide-based Mining, etc.) of that car, and almost every other applicant beat Tesla by many magnitudes. Any applicant who might affect Tesla's market was black-listed in order to protect Senator's and DOE staff stock market profits. Elon Musk had been promised a 10,000% boost over any competitor, using federal resources. This was a violation of federal RICO and anti-trust laws.
    - Plaintiffs' design cost less than $20,000 in base configuration, required no gasoline or extension cords to charge, was easy to repair and build, and used crash effect reduction materials.
    - All of the Plaintiffs' car's key parts were built and tested or already existed in off-the-shelf components proven in the industry for over a decade.
    - Plaintiffs' offered DOE asset collateral of over $100 million to secure the ATVM loan
    - On December 2, 2008, DOE Director of Advanced Technologies Manufacturing Loan Program Lachlan Seward wrote to Plaintiffs' acknowledging receipt of its application and requesting certain information, which Plaintiffs' then provided.
    - On December 31, 2008, Seward informed Plaintiffs' that its application was "substantially" complete, and that DOE would advise Plaintiffs' if it needed additional information during the application review process.
    - At all times relevant, Plaintiffs' qualified for the ATVM loan based on DOE's published material (see additional docs).
- We see from the examples of Tesla and Fisker that ATVM loans were massive expenditures that produced few results.
    - Plaintiffs' application was "set aside" by DOE in favor of ATVM loan applications from other companies who have not produced results, therefore wasting taxpayer dollars that were intended to create jobs and promote better

technology and innovation. The other companies partnered with Goldman Sachs to produce stock market manipulation profits (like Tesla did) but no consumer market-price products.

- The government stole technology from Plaintiffs', violating non-disclosure agreements, and handed that information to General Motors, Ford, and other companies that received DOE funding.
    - Plaintiffs' had worked with DOE on applied fuel cell research and commercialization for over a decade.
    - Plaintiffs' obtained a grant in 2005 through the power plant development group which it used to develop a battery 3 times more powerful than lithium batteries according to written research by Sandia National Laboratories based on their validation of Plaintiffs' patented technologies.
    - Plaintiffs' and Plaintiffs' signed NDAs with the DOE and Sandia, a government contractor, which were violated and resulted in General Motors and Ford using Plaintiffs' technology.

Facts about Plaintiffs'

- Key Plaintiffs' in this portion of the investigation are a technology start-up comprised of multiple divisions including: 1.) The Auto production group and 2.) the powerplant development group. This is the same structure Tesla Motors, Ford and Nissan have., ie: Tesla sells cars to consumers and powerplants to competitor/customers.
- In September 2008, Plaintiffs' became ***the very first applicant*** to file with the U.S. Department of Energy for a development loan under the ATVM Program and also filed applications under the Loan Guarantee Program for Innovative Energy Projects (LGP) established under Title XVII of the Energy Policy Act of 2005.
- A loan application was also filed under the Loan Guarantee Program.
- Plaintiffs' provided the following law enforcement and intelligence work credentials: 1.) A signed letter from the Executive Vice President of ASIS welcoming him as a member of The American Society For Industrial Security, 2.) His Senior Membership certificate for The Society Of Manufacturing Engineers for his working building counter-measures technologies, 3.) His State Of California, Department of Consumer Affairs license and investigator certification, 4.) His American Federation of Police membership certification, 5.) His Department of Consumer Affairs State-issued investigators ID, 6.) His California Association of Licensed Investigators membership certification, 7.) His

International Narcotics Enforcement Officers Officers membership certificate, 9.) His copies of letters from The White House to him, personally, on White House stationary, 10.) His letters from the Federal Office Of Personnel Management showing ranking in the top percentile on the West Coast under Homeland Security as 1811-C Criminal Investigator testing by OPM. 11.) Press clippings from famous cases he worked on. These letters and documents date back to the 1980's and show that Plaintiffs' had participation in, and interacted with, other senior law and IC staff who would have been capable of supplying and/or supporting the high-level of charges and validations listed in this document.

- Plaintiffs' filed 3 loan applications in total, back then. One under Plaintiffs' Vehicles in the ATVM Program. One under Plaintiffs' in the Loan Guarantee Program. Another under Plaintiffs' in the ATVM program.
- Plaintiffs' application ranked by outside comparison as one of the top company applicants", was a Forbes top rated company, had top national reviews and press, top issued patents, top staff references, industry leading staff and vast other positive metrics.
- Plaintiffs' had received funding from DOE via it's Plaintiffs' powerplant group before and successfully completed a contract with DOE via it's vehicle power plant division. DOE staff told Plaintiffs' that oil companies wanted fuel cell's minimized in DOE efforts because they competed with oil company interests too effectively.
- Plaintiffs' had received funding from DOE before and successfully completed a contract with DOE via it's vehicle power plant division.
- The Plaintiffs' Vehicles car goes an almost unlimited range via hot-swap fuel cartridges, costs less than $20,000 in base configuration, uses no gasoline, is easy to repair and build, saves lives better than any other car by using "damp down" crash effect reduction materials like those used in the bumper, dashboard and body of the Prius, is faster than competing solutions, can be recharged as fast as one can pull out an empty fuel cassette and slide in a charged fuel cassette: often in 50% less time than it takes to refill a gasoline vehicle, does not require an extension cord because people living in apartments generally cannot use extension cords, uses electricity and creates green jobs. NO factory needs to be built because Plaintiffs' was retasking already existing factories and at very low cost. All of the key parts of the car were built and tested or already existed in off-the-shelf components proven in industry for over a decade. Autodesk and other engineering software allowed for full virtual prototyping and operational testing of the design. The company already has thousands of customers lined up who want to buy their unique and very "green" car. The company hand delivered letters from those customers to the DOE ATVM office in Washington DC in 2008. The company currently had no significant debt and the company leaders had been contributing their time and resources for many years

based on positive feedback received repeatedly by Department of Energy (DOE) loan reviewers and staff. The company won a semi-finalist position in the prestigious "Forbes: America's Most Promising Companies" contest.

- Certainly company officials were not claiming that their vehicles will solve all of the world's energy problems. However with each car that is sold, we will help reduce domestic reliance on imported fuel and reduce environmental C02 by putting a vehicle on the road that uses absolutely no gasoline and creates American Jobs. This vehicle is truly using "advanced technology" via clever configuration of standard off the shelf components available today. – a major goal of this loan program and a key stated goal of the Administration. In addition, with a company that has no current debt, several patents, and thousands of interested customers; the company asserts that DOE's financial risk in investing in the technology would be extremely low, and the failures of competitors, as predicted by Plaintiffs' staff, who already received funding from the same program validates this assertion. Plaintiffs's had the best debt ratio of any Applicant, especially Tesla. Tesla was "cooking the books" with Detroit and Middle East cover cash to make it temporarily not look as nearly bankrupt as it was.

Facts about DOE Loans

- The Department of Energy's (DOE) Loan Programs Office (LPO) administers three separate programs: the ATVM Loan Program and the Title XVII Section 1703 and Section 1705 loan guarantee programs. The ATVM Loan Program was established by Section 136 of the Energy Independence and Security Act of 2007, and provides direct loans to support the manufacturing of advanced technology vehicles and qualifying components in the United States.
- The Program provides loans to automobile and automobile parts manufacturers for the cost of reequipping, expanding, or establishing manufacturing facilities in the United States to produce advanced technology vehicles or qualified components, and for associated engineering integration costs.
- In 2010, Section 136 was amended to include ultra-efficient vehicles within the definition of advanced technology vehicles.
- The FY 2009 Continuing Resolution (CR), which was enacted on September 30, 2008, appropriated $7.5 billion in credit subsidy to support up to $25 billion in loans under the ATVM Loan program.
- The FY 2009 CR also provided DOE with $10 million to administer the Program.
- On November 5, 2008, DOE issued the Interim Final Rule for the Program.

- DOE accomplished this effort in approximately half of the 60-day time-frame mandated by Congress.
- The program began receiving applications on December 2, 2008. Plaintiffs' application was the first one because Plaintiffs' had been informed they should apply via Barbara Boxer's, Jackie Spier's and Nancy Pelosi's staff
- The ATVM Program has received numerous applications from both automobile original equipment manufacturers (OEMs) and component manufacturers. Most of them have written complaints similar to Plaintiffs', about DOE. (See the Eco-Motors, Zap, Bright Automotive, Carbon Motors, etc. Complaint documents about DOE cronyism and lies)
- The DOE's Advanced Technology Vehicles Manufacturing (ATVM) Loan Program is a direct loan program created by Congress to provide funding to automobile manufacturers and component suppliers to stimulate the development of new fuel efficient technology, thereby promoting U.S. energy independence by reducing the demand for foreign oil.
- ATVM is authorized under Energy Independence Security Act of 2007
- The Secretary of the DOE established the Advanced Technology Vehicle Loan Program pursuant to Section 136(e) of the Energy Independence and Security Act of 2007, Public Law 110-140, 42 U.S.C. § 17013
- Section 129(a) of the Consolidated Security, Disaster Assistance, and Continuing Appropriations Act of 2009, Public Law 110-329, appropriated $7.5 million to the "Advanced Technology Vehicles Manufacturing Loan Program Account." Section 136(d) of the 2007 Energy Independence and Security Act authorizes the Secretary to provide no more than $25 billion in direct loans to individuals and entities determined by the Secretary to be eligible for the program. See 42 U.S.C. § 17013(d)(1).
- DOE promulgated an interim final rule on November 12, 2008, which was published at 73 F.R. 66,721 to 66,737. Comments were accepted until December 12, 2008. The Final Rule was codified at 10 CFR Part 611 (2009).
- DOE reviews applications for the loan program in tranches, with the deadline for the first tranche initially falling on December 31, 2008 and the deadline for subsequent tranches falling at the end of every subsequent quarter, until so long as the available funds and loan authority permit. 73 F.R. 66,721.
- Loans are available under the ATVM Loan Program to two classes of applicants eligible for loans under the program: automobile manufacturers and component manufacturers. See 10 CFR Part 611.100. Eligibility criteria for automobile manufacturers that did not manufacture a vehicle in 2005 are described at 10 CFR 611.100(b)(2). In brief, the applicant must demonstrate that its vehicle's projected combined fuel economy is

"greater than or equal to the industry adjusted average fuel economy for model year 2005 of equivalent vehicles." Id. In contrast, component manufacturers need not demonstrate improved fuel economy. 10 CFR 611.100(b)(3).

- Regardless of their classification, applicants must be financially viable without the additional funding provided by the ATVM Loan Program in order to be eligible. 10 CFR 611.100(a)(2). The Secretary is authorized to consider a number of factors to determine financial viability, including:
    - The applicant's debt to equity ratio;
    - The applicant's earnings before interest, taxes, depreciation, and amortization (EBITDA) for the most recent fiscal year prior to the date of the loan application;
    - The applicant's debt to EBITDA ratio;
    - The applicant' s fixed charge coverage ratio (EBITDA plus fixed charges divided by fixed charges plus interest expenses);
    - The applicant's interest coverage ratio (EBITDA plus fixed charges divided by fixed charges plus interest expenses);
    - The applicant's liquidity;
    - Statements from the applicant's lenders that the applicant is current; and
    - Financial projections demonstrating the applicant's solvency through the life of the loan.
- LGP program authorized under the 2005 Energy Policy and Conservation Act.

Facts about Plaintiffs' Government Applications

ATVM

- On or around November 10, 2008 Plaintiffs' Vehicles applied to the DOE ATVM program. Elon Musk had already warned Department of Energy officials to "not fund any of his competitors or Obama will never finish his first term..."
- On December 2, 2008, Lachlan Seward wrote to Plaintiffs' requested further information on Plaintiffs' ability to comply with general, financial, technical, and environmental requirements.

- On December 6, 2008, Plaintiffs' submitted additional clarification to the DOE.
- On December 17, 2008, Plaintiffs' had a telephone conversation with Matthew McMillen and Walter Eccard of the DOE.
- On December 23, 2008, Plaintiffs' wrote to Messrs.'. McMillen and Eccard providing additional information concerning the asset valuation of its patents as well as an updated NEPA review statement.
- On December 29, 2008 Plaintiffs' had a telephone conference with Matthew C. McMillen concerning National Environmental Policy Act (NEPA) compliance under § 136 of 10 C.F.R. 611.106. Plaintiffs' Vehicles requested $40,000,000 through the ATVM Loan Program based on advice from Congressional officials that that amount was "all that would be left in the fund after Detroit got their allocation.".
- The application fees for the Loan Gaurantee program cost between $20,000 and $100,000. The "fees" for the ATVM program were called a "Co-participation fee." In other words, Plaintiffs' would have to provide 15-20 % of the loan amount to DOE up front. If Plaintiffs' were approved, Plaintiffs' would have to pay another $15 - $20 m. or provide in-kind value, and no cash, as the team did in the past
- Plaintiffs' met with venture capitalists in order to get fee money. One in particular was a real estate developer in Detroit named Patrick Jett.
- Plaintiffs' also hired Covington and Burling in San Francisco and Washington DC as well as other firms in D.C. in order to get help to watch-dog the application.
- Andrew Beato of Stein Mitchell was one lawyer to Plaintiffs' in ATVM applications.
- On December 2, 2008, Lachlan Seward, the Director, Advanced Technology Vehicles Manufacturing Loan Program, wrote to the Plaintiffs', determining that the submitted application was not substantially complete.
- On or before December 31, 2008, Plaintiffs' submitted materials relating to the requirements set forth in Section 611.100 of the Interim Final Rule of the Energy Independence and Security Act.
- On December 31, 2008, Lachlan Seward wrote to the Plaintiffs' informing Plaintiffs' that it was "substantially complete".
- At this time other applicants began contacting Plaintiffs', who had been on network newscasts, asking if "it seemed like DOE might be rigging the process for favorite friends..."

- The December 31, 2008 letter stated that the DOE will advise Plaintiffs' if it needs additional information as it continued the application review process.
- Plaintiffs' alleges that on or after December 31, 2008, Lachlan Seward and Brent Peterson began processing the loan materials to secure Plaintiffs' funds in January 2009.
- Plaintiffs' alleges that loan processing was unreasonably terminated due to untoward action by the U.S. Department of Energy, including but not limited to John Doerr, who was appointed as a member of the USA Economic Recovery Advisory Board by President Barack Obama and was a lead investor in DOE application winners; and other members of the "Silicon Valley Cartel" who had quid pro quo deals with the White House.
- At this point, Google had become one of the primary suppliers of staff to the White House and was directing many government decisions. Google was, at that time, in violation of Plaintiffs's patents and was a silent partner in Tesla Motors. Google ordered White House staff to fund, or not fund certain projects and Google was considered to be the most powerful member of "The Silicon Valley Cartel". Had had manipulated most of the internet to put Obama in office. Google's bosses were at the Obama Campaign HQ on the night of his election win, coordinating internet manipulations. The article "*The Android Administration*" in The Intercept, discussed that aspect of the corruption in great detail.
- On February 1, 2009, Plaintiffs' submitted its application for a ATVM Loan under the Department of Energy's Advanced Technology Vehicles Manufacturing Incentive Program. DO
- On April 10, 2009, Lachlan Seward wrote to Plaintiffs' advising that, as a matter of law, Plaintiffs' proposed project could not be funded under the Program.
- On April 11, 2009, Plaintiffs' contested the April 10 denial.
- On May 13, 2009, the Department of Energy stated that the April 11, 2009 letter "has not changed our determination that your proposed project can not, as a matter of law, be funded under the Advanced Technology Vehicles Manufacturing Incentive Program (Program)."
- On April 23, 2009, Jason Gerbsman of the ATVM Loan Program at the U.S. Department of Energy notified Plaintiffs' that
    - Plaintiffs' has submitted a substantially complete application and has been assigned to both a technical eligibility and merit review team, as well as a financial viability analysis team. The technical team is very close to finishing their evaluations on both eligibility and project merit, and the financial team will

be launching a more detailed and interactive due diligence phase of the Plaintiffs' application review very soon. Following the technical and financial evaluation under the second stage of the process, we will move into the underwriting phase where our goal is to negotiate a conditional commitment, including a detailed term sheet. This will be followed by the fourth phase of the loan process where the final details will be negotiated and the loan will be closed.

- On May 26, 2009, Jason Gerbsman of the ATVM Loan Program at the U.S. Department of Energy wrote to Plaintiffs' requesting the opportunity to meet, in-person, concerning the ATVM Loan Application process, including “Plaintiffs' next steps.”
- On June 2, 2009, after Plaintiffs' had written to Jason Gerbsman of the ATVM Loan Program at the U.S. Department of Energy, stating that Plaintiffs' “is entering financial viability phase” of its ATVM application, Mr. Gerbsman responded to Plaintiffs' stating “I look forward to continuing the process with Plaintiffs'.”
- Between June 22, 2009 and July 19, 2009, Brent Peterson of TMS, Inc, a contractor with the ATVMIP at the U.S. Department of Energy, and Plaintiffs' discussed details of the Plaintiffs' loan application.
- At no point during this time period did the DOE communicate that Plaintiffs' was disqualified or ineligible. In fact, all members of DOE, Congress and other government offices had said they were “certain” Plaintiffs' was about to be funded. All of the national news stories indicated approval and the massive out-pouring of consumer support indicated approval.
- On June 15, 2009, Plaintiffs' informed Mr. Peterson that it was a semi-finalist in the Forbes America’s Most Promising Companies List for 2009.
- At or around June 15, 2009, Mr. Peterson responded to Plaintiffs' June 15, 2009 e-mail with, “Congrats, thanks for sharing.”
- On June 29, 2009, Plaintiffs' wrote to Jason Gerbsman stating Plaintiffs' applied for ATVM Loan funding in the beginning of November of 2008 (hereinafter “June 29, 2009 Gerbsman Correspondence”).
- In the June 29, 2009 Gerbsman Correspondence, Plaintiffs' alleged it was advised, at the time by Senate staff, that the funds were to be released by the end of December 2008.
- In the June 29, 2009 Gerbsman Correspondence, Plaintiffs' alleged it had a significant challenge in waiting such a vast number of months for a simple loan review that was substantially longer than the commercially reasonable time period exercised by banking institutions.

- Due to the U.S. DOE's delay, Plaintiffs' needed to delay paying staff and had to use Plaintiffs's personal and family savings.
- In the June 29, 2009 Gerbsman Correspondence, Plaintiffs' alleged that when a smaller car company applies for ATVM funding, it reduces the ability of the company to get other funding because other financing entities are aware that they cannot compete with ATVM terms so they forestall decisions until AFTER DOE terms sheets are issued. DOE withheld termsheets in order to cut off all funding options for competitors to the "WINNERS".
- In the June 29, 2009 Gerbsman Correspondence, Plaintiffs' alleged all other financing options are awaiting the DOE conditional approval letter.
- In the June 29, 2009 Gerbsman Correspondence, Plaintiffs' alleged applying for an ATVM loan halts funding options for a smaller car company.
- In the June 29, 2009 Gerbsman Correspondence, Plaintiffs' alleged it appeared unreasonable that a Japanese car manufacturer (Nissan) was awarded funding, especially in the first round of loan awards, and smaller companies, who need the funding more, were bypassed.
    - In the June 29, 2009 Gerbsman Correspondence, Plaintiffs' alleged that a core objective of Section 136 of the Energy Independence and Security Act of 2005 was to put American car manufacturers back in the lead in the green car race, not fund international competitors as a priority.
- In the June 29, 2009 Gerbsman Correspondence, Plaintiffs' alleged it was informed by the press that other companies who applied later in the process were moved ahead of Plaintiffs' in the review process because of greater lobby effort expenditures.
- In the June 29, 2009 Gerbsman Correspondence, Plaintiffs' alleged it was operating at a disadvantage because it simply didn't hire lobbyists or pay any bribes.
- In the June 29, 2009 Gerbsman Correspondence, Plaintiffs' alleged it had been on time, and ahead of time, in its responses.
- In the June 29, 2009 Gerbsman Correspondence, Plaintiffs' alleged its application was one of the first deemed, "substantially complete".
- In the June 29, 2009 Gerbsman Correspondence, Plaintiffs' alleged its technology, price, BOM, TCO and ROI is clearly superior to the other applicants.
- Plaintiffs' forwarding its June 29, 2009 Gerbsman Correspondence, stating "This is good and to the point which is maybe what they need right now."

- All government, media and expert sources were telling Plaintiffs', Bright Automotive, and Eco-Motors that they were about to receive their DOE funding “any day now”.
- On, or about, early August of 2009, White House staff ordered Secretary of Energy Steven Chu not to fund Plaintiffs', Bright Automotive, and Eco-Motors because they could put Tesla Motors, The White House financier, out of business if they moved forward.
- On August 21, 2009, Lachlan W. Seward, Director, Advanced Technology Vehicles Manufacturing Incentive Program, wrote to Plaintiffs' Vehicles, Inc. informing Plaintiffs' that its ATVMIP application for a loan was rejected.
- Plaintiffs' claims Plaintiffs' Technology passed the tests for financial viability in its applications from 2008-2009.
- Plaintiffs' has patents and lists of assets. Tesla, by comparison, had 4,000 % higher debt than Plaintiffs' and Tesla was awarded loans by DOE, while Plaintiffs' was not.
- Additionally, the NEPA for Plaintiffs' Vehicles had been reviewed, edited and approved by DOE National Environmental Protection Act (NEPA) staff (Matthew McMillen) at the beginning of 2009
- Plaintiffs' alleges that it did not pay for a NEPA analysis. Matthew McMillen at DOE both offered to help and did help Plaintiffs' with drafting its NEPA review material. He edited their drafts and did Plaintiffs' NEPA analysis. To see his edits, look in Drop-box file titled “Properties” under file named “McMillen edits.” There are documents with the ‘track changes’ function showing his assistance with the NEPA review documents Plaintiffs' had to provide DOE.
- On September 21, 2009, Plaintiffs' wrote to Secretary Steven Chu of the U.S. Department of Energy inquiring about the circumstances for Plaintiffs' non-selection for negotiation of a loan with a lengthy list of issues that investigators had uncovered which indicated corruption and cronyism.
- In the September 21, 2009 Chu Letter, Plaintiffs' alleged no reasons were given for its rejection under the Advanced Technology Vehicles Manufacturing (ATVM) Program.
- In the September 21, 2009 Chu Letter, Plaintiffs' alleged it was able to receive reasons for its rejection orally, only after several attempts at phoning the ATVM office.
- In the September 21, 2009 Chu Letter, Plaintiffs' alleged it has still not received the reasons in writing.

- Plaintiffs' alleges “After multiple demands reasons were finally given by phone call and letter but the reasons appeared to have nothing to do with our company and serves to demonstrate that review data was manipulated.”
- In the September 21, 2009 Chu Letter, Plaintiffs' alleged the reasons for its rejection were not applicable to its loan application and did not reflect what was included in its submission.
- In the September 21, 2009 Chu Letter, Plaintiffs' alleged that after several more attempts at receiving more clarification from the ATVM office, no one has been in further contact with it.
- In the September 21, 2009 Chu Letter, Plaintiffs' alleged it has not been able to find out whether there will be another round of loans granted and how it can alter its loan application to increase its chances of success.
- In the September 21, 2009 Chu Letter, Plaintiffs' alleged that one of the reasons given for its rejection was that Plaintiffs' car does not use E85.
    - In the September 21, 2009 Chu Letter, Plaintiffs' alleged its car uses no gasoline.
- In the September 21, 2009 Chu Letter, Plaintiffs' alleged another reason provided by the DOE for its rejection was that it was not making millions of cars.
    - Plaintiffs' alleged its marketing plan did not support that production volume nor did its requested funding levels but that Plaintiffs' was fully capable and able of producing millions of cars on scale up to market demand, request of DOE or at any reasonable time in manufacturing flow.
- In the September 21, 2009 Chu Letter, Plaintiffs' alleged that DOE stated that Plaintiffs' was not planning to sell cars to the government.
    - Plaintiffs' alleges this is false and that its application clearly stated that the core sales plan of the company is based on government fleet sales.
- In the September 21, 2009 Chu Letter, Plaintiffs' alleged that DOE asserted its factory cost estimates were too low because the metal body fabrication systems were not calculated high enough.
    - Plaintiffs' alleges its vehicles use no metal fabrication in their bodies.
- In the September 21, 2009 Chu Letter, Plaintiffs' alleged that it submitted questions to the DOE ATVM staff the day after it received the rejection and had still not received any response.

- These questions include: (1) DOE reviewers never even talked to the founder, inventor, engineers, project leads or primary contractors. Plaintiffs' was told over and over again that everything in its application was good and that no additional information was needed. This is despite the fact that the reasons given for its rejection did not reflect the technology being used and therefore the ATVM reviewers did not understand Plaintiffs' concept and product. Plaintiffs' wrote, “Why was no one at Plaintiffs' Vehicles contacted?”; (2) After nearly a year of waiting, accompanied by writing, verbal and in-person proclamations that “everything was fine”, “everything is on-track”, “you appear to meet every criteria”, etc. and after staff expended the majority of their personal funds based on these positive assertions, the application was suddenly and mysteriously rejected. Plaintiffs' wrote, “Why was staff at DOE during the course of the year, positive about the outcome and never asked for additional information?”; (3) At the start of the application process Plaintiffs' was told that the review would be very interactive but there was almost no interaction with us while larger players, who applied later, were reviewed earlier, had extensive interaction and have already been awarded their funds. Plaintiffs' wrote, “Why was the interactivity process never used with us?”; (4) Rejection comments supplied by Chris Foster of DOE and third party press seem to be unrelated to the business of the company and have no foundation in fact. Plaintiffs' wrote, “Why is that?”; (5) One of the main reasons the DOE gave for the rejection was the fact that Plaintiffs' vehicles do not use E85 gasoline. Plaintiffs' wrote, “If that was true, why did Tesla & Nissan get approved funding? Their vehicles also do not use E85.”; (6) While it is true that Plaintiffs' did not wish to use carcinogenic gasoline, at no point was E85 gasoline ever mentioned, discussed, commented on or requested. In fact the topic was particularly avoided by DOE staff. Plaintiffs' wrote, “Why not?”; (7) Another rejection point was that Plaintiffs' was not planning to make enough cars. Plaintiffs' claims this is false. The company would like to build and sell more cars than any other car company. Plaintiffs' is fully willing to produce millions of vehicles if provided with the appropriate funding as it has quantified millions of fleet buyers for its vehicles. No DOE entity ever asked Plaintiffs' to adjust, discuss or amend its numbers and Plaintiffs' was more than willing to adjust those numbers if anyone had even bothered to ask. Plaintiffs' wrote, “What is the validity of this comment by the reviewers based on?”; (8) Plaintiffs' provided more than $100 million of asset collateral opportunity for a $40 million loan request. This constitutes over twice the collateral of the value of the loan. Plaintiffs' wrote, “How is this not as secure of a structure as any of the other applicants?”; (9) Plaintiffs' was told that it was rejected because it was not planning to sell cars to the government. Plaintiffs' claims this is false. The core

sales plan of the company is based on government and commercial fleet sales. Plaintiffs' wrote, “Why did your reviewers say this? Why did you think this?”; (10) Plaintiffs' was told that electric motors and batteries were considered by the reviewers to be too futuristic of a technology and not developed for commercial use even though they have been in use in over 40 industries for over 20 years, including by NASA. Plaintiffs' wrote, “What is the rationale for this argument?”; (11) Almost every other part of the Plaintiffs' car was to be purchased from existing commercial sources with multiple points of supply, so it is not possible to see how a reviewer might think the vehicle had any significant technical acquisition hurdles. Plaintiffs' wrote, “Why does DOE assume that the following companies with whom we would be contracting could not perform the following responsibilities: (a). Deloitte & Touche to provide auditing and reporting of financial data. (b). Autodesk or Microsoft to deliver the process and design software. (c). NEC, Intel or the other leading electronics companies in the world to build our controllers. (d). Roush Automotive, one of the most successful automobile electronics groups in the world, to build the electronic module. (e). US National Lab system to solder a box together. (f). Over 100 other major supplier companies that have been building parts for the auto, aerospace and industry for decades to deliver the component parts for our vehicles.”; (12) The primary purpose of this loan program, Plaintiffs' was told by its authors, was to develop advanced technology and further reduce American dependence on gasoline. The Plaintiffs' Vehicles car uses no gasoline and gets over 125 miles per battery charge. Plaintiffs' wrote, “How is this not a direct conflict with the precepts of the Section 136 law?”; (13) Plaintiffs' was also told that its factory cost was too low because the metal body fabrication systems were not calculated high enough but the reviewers apparently did not even pay attention to the fact that Plaintiffs' uses no metal fabrication in its body. Plaintiffs' wrote, “What was the rationale in making such an erroneous comment?”; (14) Reviewers also stated that the car was a “hydrogen car” which it is not. It is an electric car. Plaintiffs' wrote, “Why did they say that?”; (15) Plaintiffs' wrote, “In what ways were the following documents actually reviewed? Your office stated that they ‘lost our documents’ twice. Why?”;

- Plaintiffs' alleges that applications that have already been approved, have had less plans or hard development data. These awardees also had the same three-year timeframe in their proposals, and one even went into 2013. We also find this contrary to the Administration’s stated goal about electric vehicles. According to a DOE spokesman, the Administration “shares the goal of ensuring that the program (ATVM) is flexible enough to account for the full range of available technologies.” In fact, when Tesla Motors

received it’s DOE cash it had no car design, just some pretty pictures. Nothing in the Tesla car in the showrooms was in a factory engineering drawing at the time Tesla got its DOE funds. Tesla designed the entire car FROM SCRATCH, after it got the DOE money. Anybody could have done that with 50% less money than Tesla spent doing it after the fact.

- Plaintiffs' alleges that the claim that the project’s impact on fuel economy of the US Light Duty Fleet over time was weak was never discussed with Plaintiffs's team at any point of the process. However, it is surprising to how a vehicle that is lighter than any other applicant by half, safer than any other applicant by many times and beats the metrics of every other applicants could not have exceeded every applicant on any comparison to Light Duty fleet metrics, a market that was core to Plaintiffs' business plan. Their fleet sales were targeted directly at the Light Duty fleet and the Pentagon so the DOE excuse seems to be a lie by DOE staff.
- The third reason cited in the letter was about the use of “advanced fuels.” First of all, at no point did anyone from DOE ask about or discuss with Plaintiffs' technical staff their fuel plans. The letter further goes on to say that their use of hydrogen was one of the reasons that their application was being rejected. Even though DOE knew that BMW, Toyota, Honda and Hyundai were in factory preparation with hydrogen fuel cell cars which are as common today as any other car. Hydrogen was non-essential to Plaintiffs' vehicle. The hydrogen tank was, rather, an optional and stand-by range-extender system for the electric vehicles. Further everyone of expertise fails to see how DOE could state that hydrogen is an “impractical and unproven energy source” in light of the fact that Honda and BMW are already shipping cars using that fuel source and large numbers of main stream auto companies have announced production launch plans for 100% hydrogen fuel cell vehicles. To must reiterate: hydrogen was not an essential component of their vehicles and had DOE asked Plaintiffs' about this fuel source, it ccould have explained that to them. It should be noted that most of the Obama and DOE staff had invested their money in lithium ion battery mining in Afghanistan and lithium battery production. Thus they had a conflict-of-interest reason to harm fuel cell vehicle production.

- Corrupt rare earth mineral mines were a large part of the scam.

The men who controlled the White House and the Department of Energy at this time are known as “The Silicon Valley Cartel”, AKA “The Paypal Mafia”, AKA “The Deep State”. They run Google, Facebook, Tesla and venture capital funds.

The entities involved as perpetrators in this case have violated a number of laws and ethical standards including: **The Mail Fraud Act** (1872); **The Tillman Act** (1907); **The Hatch Act** (1939); **The Hobbs Act** (1946); **The Taft- Hartley Act** (1947); RICO and Anti-trust laws; **The Federal Election Campaign Act** (1974); **The Federal Program Bribery Statute** (1984); **The Bipartisan Campaign Reform Act** (2002); and many other laws. They all use the same corrupt army of dirty lawyers, corrupt CPA’s, unethical lobbyists, character assassination services and covert ex-CIA operatives.

- Finally, the letter states that the Plaintiffs' Vehicles petroleum use reductions were unrealistic. The whole world is most confused about this point as Plaintiffs' car uses absolutely no gasoline. How could their reductions be “unrealistic”? Was that not a goal of the Obama Administration? ..or were DOE staff just a bunch of “lying, deceitful, conniving, manipulative shills that will do anything to protect their friends and harm their competitors..” as other Applicant’s stated.
- The company hired famous senior systems engineer to validate the final vehicle numbers submitted in the base response and provided numbers in support of that data produced by Sandia National Laboratories.
    - How could those entities have provided numbers which the ATVM office could have interpreted so negatively for a vehicle which weighs less, goes farther and requires less energy storage than any other submitted vehicle in the entire set of applicants to date?
    - How could the ATVM reviewers never even submit a question to the Plaintiffs' technical team about any of these metrics?
- In summation, these clarifying reasons for rejecting the Plaintiffs' Vehicles ATVM loan application are still confusing, not applicable in many cases and unwarranted when considering those applications that have been approved. The listed points appear to have no foundation in facts relative to our design and we again question why there was no communication from DOE with the developers of the vehicle over a year. Clearly, DOE was running a “Slush-Fund” designed to ONLY pay political campaign financiers and shut down those financiers competitors.
- Further, Congressional investigators found that competing larger companies like Tesla were given much counseling, guidance, feedback and opportunity to “tweak” their

applications by DOE. These companies submitted their applications later than Plaintiffs' and were awarded funding. Our question is then why did Tesla lover Carol Battershell, DOE Senior Advisor state during the December 1, 2008 Public Meeting that “And that might lead one to believe that applying earlier is better than apply later.” When the program was first announced, that indeed was the guidance given – first come, first served – so scores of smaller, electric car companies and suppliers submitted their applications. Yet the rules were changed mid-way through the process to allow larger automotive companies who did not submit their applications first to send them in and now they are being funded.

- Finally, Plaintiffs' were very disappointed to read in the September 23, 2009 issue of E&E News that Secretary Chu had suggested in June that the Administration was hoping that GM and Chrysler would be able to participate in the (ATVM) loan program. “There is money there, I wouldn’t say set aside, but let’s just say we are trying to stretch those dollars as far as we can.” This forces us to ask whether these funds are being set aside at the expense and loss of smaller, more advanced technology electric car companies and suppliers who are requesting billions less in guaranteed loans and who are offering more forward-thinking and advanced projects to help us move away from our dependence on oil.
- Tesla, Fisker & Nissan did not provide as much collateral offerings in their application, at the same time as Plaintiffs' application, and to date, may not have ever provided such collateral offers.
- In the September 21, 2009 Chu Letter, Plaintiffs' alleged that it submitted to DOE detailed, comprehensive 10-year, person-by-person financials that cost the company almost $200,000.00 to prepare and that other companies spent more than $200,000.00 to prepare;
- In the September 21, 2009 Chu Letter, Plaintiffs' alleged that it submitted to DOE metrics that demonstrated that the Plaintiffs' car can save millions of lives per year and that it was safer than any vehicle;
- In the September 21, 2009 Chu Letter, Plaintiffs' alleged that it submitted to DOE metrics that demonstrate that a gasoline/hybrid vehicle is dangerously carcinogenic when filled at a gas station compared to an Plaintiffs' Vehicle; World Health Organization and leading medical and university studies have substantiated these facts.
- In the September 21, 2009 Chu Letter, Plaintiffs' alleged that it submitted to DOE engineering and IP metrics that beat every competitor on price, range, safety, TOC, efficiency, toxic safety and hundreds of other points;

- In the September 21, 2009 Chu Letter, Plaintiffs' alleged that it submitted to DOE examples of work from $3M of cash and person-hours previously invested by founders, DOE & partners;
- In the September 21, 2009 Chu Letter, Plaintiffs' alleged that it submitted to DOE lists of top auto and aerospace corporate partners, staff and resources, on stand-by, equaling thousands of people in all groups combined;
- In the September 21, 2009 Chu Letter, Plaintiffs' alleged that it submitted to DOE validation of a deep team of core staff that have been developing the project and parts of the project for 3-15 years part time;
- In the September 21, 2009 Chu Letter, Plaintiffs' alleged that it submitted to DOE samples of extensive international positive press coverage;
- In the September 21, 2009 Chu Letter, Plaintiffs' alleged that it submitted to DOE proof of a market opening timed with tax and national imperative incentives that created a dramatic window for success;
- In the September 21, 2009 Chu Letter, Plaintiffs' alleged that it submitted to DOE proof that Plaintiffs' was the lowest overhead car company in the market which equates to the best chance to profit and return funds;
- In the September 21, 2009 Chu Letter, Plaintiffs' alleged that it submitted to DOE samples of an in-house created online process management architecture; market and marketing studies; CAD designs, engineering plans and manufacturing plans; a detailed website; a detailed path to $1.5B within 5 years or less from a less than $100M investment;
- In the September 21, 2009 Chu Letter, Plaintiffs' alleged that it submitted to DOE examples of dozens of prototypes as seen in the photographs on the BUILDS page of its website;
- In the September 21, 2009 Chu Letter, Plaintiffs' alleged that it submitted to DOE numerous patents;
- In the September 21, 2009 Chu Letter, Plaintiffs' alleged that it submitted to DOE a large pending portfolio with third party valuation and validation reports valuing IP at over $100M;
- In the September 21, 2009 Chu Letter, Plaintiffs' alleged that it submitted to DOE information concerning senior scientists, chemists and engineers from top university and federal laboratories, including staff that has built and delivered millions of vehicles to the consumer market;

- In the September 21, 2009 Chu Letter, Plaintiffs' alleged that it submitted to DOE information concerning its partners: Federal, University, Fortune 500, Private Research Organizations;
- In the September 21, 2009 Chu Letter, Plaintiffs' alleged that it submitted to DOE written Customer inquiries from a massive national customer base of qualified retail leads and 1.2M of commercial unit opportunities equaling a $1.5B+ opportunity.
- In the September 21, 2009 Chu Letter, Plaintiffs' alleged that it submitted to DOE contracts: Federal Contract fully executed and MOU's executed;
- In the September 21, 2009 Chu Letter, Plaintiffs' alleged that it submitted to DOE Awards/Commendations: Congress, DARPA;
- In the September 21, 2009 Chu Letter, Plaintiffs' alleged that it submitted to DOE Research Data: Over 200+ technical research documents & 15+ years of research;
- In the September 21, 2009 Chu Letter, Plaintiffs' alleged that it submitted to DOE evidence of over 22,000+ man hours of development;
- In the September 21, 2009 Chu Letter, Plaintiffs' alleged that it submitted to DOE market data;
- In the September 21, 2009 Chu Letter, Plaintiffs' alleged that it submitted to DOE over 100+ documents of industry study;
- In the September 21, 2009 Chu Letter, Plaintiffs' alleged that it submitted to DOE issued trademarks;
- In the September 21, 2009 Chu Letter, Plaintiffs' alleged that it submitted to DOE information concerning its facilities;
- In the September 21, 2009 Chu Letter, Plaintiffs' alleged that it provided to DOE unique access to Federal Labs & leased facility options;
- In the September 21, 2009 Chu Letter, Plaintiffs' alleged that it submitted to DOE other supporting materials.
- In the September 21, 2009 Chu Letter, Plaintiffs' asked for the opportunity to speak with Secretary Chu in person to discuss its technology and how it can help our country.
- Plaintiffs' wrote, "I believe there was some confusion about our application and vehicle technology that I would very much like to clear up with you in person."
- § 611.103 sets forth the evaluation criteria for ATVM loan applicants, outlining the technical merit of the proposed advanced technology vehicles or qualifying components, with greater weight given for factors including, but not limited to: Improved vehicle fuel

economy above that required for an advanced technology vehicle; Potential contributions to improved fuel economy of the U.S. light-duty vehicle fleet; Likely reductions in petroleum use by the U.S. light-duty fleet; and Promotion of use of advanced fuel (e.g., E85, ultra-low sulfur diesel).

- Plaintiffs' alleges that Plaintiffs' data-sets beat the other applicants on metrics, performance and value.
- Plaintiffs' alleges ATVM loan approvals lacked appropriate criteria. This is confirmed by multiple GAO reports about corruption and failure to comply AGAINST DOE by the GAO.
- Plaintiffs' alleges applications offered more collateral than any other applicant or "winner", more letters of support from waiting customers, a less complex bill-of-materials, with a lower initial volume manufacturing cost, that re-opened more closed factories than any other applicant or "winner" at the time of submission.
- The substantive explanation for why Plaintiffs' merited the ATVM loan is that Plaintiffs' was prepared to manufacture a cheaper version of the Nissan Leaf. As of Dec. 28, 2008 Plaintiffs' had a design more finished and ready than Tesla, Fisker and Nissan. Plaintiffs' model was almost exactly the same as the Nissan Leaf.
- Plaintiffs' claims DOE staff synthetically manipulated Plaintiffs' results to be low in order to favor others.
- Plaintiffs' alleges that Plaintiffs' application process was sabotaged, inside and outside, in order to benefit competing interests and disfavor smaller, independent companies who applied.
- Plaintiffs' alleges DOE officials ordered reviewers of funding applications to change their review criteria, part way through the process, in order to favor certain applicants or "winners".
    - Many of those applicants would have qualified at the bottom of a proper review in an unbiased review.
    - DOE paid outside reviewers for work in the review process under a variety of names, and the work performed, by a company with little experience in the industries it was to review, was produced per DOE officials specifications rather than per the metrics of the actual facts.
    - Staff from national labs have stated to reporters that they were directed to manipulate data.

    - Plaintiffs' staff have seen “shoot-out” unofficial, internal, confidential, DOE Excel comparison matrices as of Dec. 29, 2008 and March 2, 2009 and Plaintiffs' placed in the top 5% in over-all comparison metrics.

- Plaintiffs' application was first-in-line (which is how the law said applications were to be processed) yet DOE staff changed/violated the law in order to cut Plaintiffs', and other applicants, out and favor “special applicants” who didn’t apply properly because they knew they had the money “hard-wired” already.
- Plaintiffs' alleges DOE officials changed the first-come-first-served published rules and standards of the funding in order to take applicants in order of who they favored and who had purchased the most influence instead of the order in which they applied, as required.
- Plaintiffs' alleges DOE officials were ordered by DOE senior executives and outside public office executive staff to not respond to non-favored applicants until certain application deadlines had passed in order to remove the non-favored, non-influence purchasing applicants from potential funding.
- Plaintiffs' alleges “DOE officials personally assisted and hand-held Plaintiffs' competitor’s applicants including site meetings in which they drafted the applicants applications while ignoring competing applicants to those favored applicants.”
- Plaintiffs' alleges Plaintiffs' spoke to Carol Battershel, who stated she was the due diligence technical lead, who said she had gotten everything she needed “off our website”. Battershel was later revealed to be an ad hoc advocate for Tesla Motors.
- Plaintiffs' alleges “DOE reviewers never even talked to the founder, inventor, engineers, project leads or primary contractors.”; “DOE never even contacted our engineers and refused to speak to them even once, although our engineers called them and visited them to see if they could provide any data because they were so surprised that nobody from DOE ever called them.”
- Plaintiffs' alleges Plaintiffs' was told that everything in their application was good and that no additional information was needed.
- Plaintiffs' alleges “reviewers at national labs were ordered to change data, or their data was changed.”
- Plaintiffs' alleges “standard commercial bank loan processes were not used for each applicant.”
- Plaintiffs' alleges “Commercial bank officers will testify that all banks process the same loan applications for the same commercial manufacturing purposes in an average 18 days

and not in timeframes measured in years. The ‘Loan review process’ was intentionally stalled to keep competitors from competing with the ‘winners’.”

- Plaintiffs' alleges “The original distribution date for the funds was set to be Dec. 08/Jan. 09. Plaintiffs' suffered damages because of multiple date manipulations.”
- Plaintiffs' alleges “Plaintiffs' and other applicants were given different hoops to jump through in order to go through the application process depending on whether or not they had purchased influence or not.”
- Plaintiffs' alleges “The process was different for favored applicants vs. unfavored applicants.”
- Plaintiffs' alleges “DOE staff told multiple independent car company applicants that the fund was out of money and that, that was one of the reasons that those applicants could not move forward. At no time was the fund out of money and, indeed, a ‘carve out’ of money was ‘held out’ for Detroit. DOE gave favored, limited, small cluster ‘carve out’ applicants top-tier status for consideration based on ‘special relationships.’”
- Plaintiffs' “Leaf’s” would have sold more volume at a higher mark-up than Nissan’s Leaf’s because Plaintiffs' metrics already exceeded what the customers already demanded so Plaintiffs' would have had an even higher profit number, by now, than the $205,000,000.00.
- DOE stated that they “lost our documents” twice. This seemed to Plaintiffs' like a “Lois Lerner” tactic.
- On October 23, 2009, Lachlan W. Seward, Director, Advanced Technology Vehicles Manufacturing Incentive Program, wrote to Plaintiffs' informing them that critical issues were identified in its application.
    - Plaintiffs' disputed these critical issues.
- Plaintiffs' alleges that after months of reassurance from certain DOE staff that Plaintiffs' application was “substantially complete,” the application was denied without explanation in August 2009.
- Plaintiffs' alleges that the DOE ATVM Director, Lachlan Seward, was improperly influenced to fund Detroit-based “Big Three” projects as well as the politically well-connected Tesla, contrary to the letter and spirit of the loan-enabling legislation. White House car czar: Steve Rattner confirmed this.
- In addition, Plaintiffs' believes that Seward improperly discriminated against their company’s application after the Company questioned the logic of one of the LGP’s policies in a public hearing and subsequently requested a review of the DOE application

process by Senator Bingaman, Chairman of the Senate Energy and Natural Resources Committee.

- Plaintiffs' alleges in its first meeting with the senior officers of the DOE program and the auto industry at DOE HQ (which was videotaped by DOE) Plaintiffs' senior staff asked Lachlan Seward a question about the logic of one of his policies after he had been contradicted by his staff on the stage. It was later reported to Plaintiffs' that, after the meeting, Mr. Seward said within earshot of his staff something to the effect of "it will be a cold day in hell before I let them get any of this money".
- Plaintiffs' filed four different complaints on Mr. Seward's office with the Senate Committee in charge of DOE under Sen. Bingaman.
- The misrepresentations and the special treatments of competitors cost the company massive losses in competitive positioning, ramp-up costs based on assertions of favorable loan status, and other damages.
- Plaintiffs' alleges that the U.S. DOE has failed to reform the application selection process based on recommendation provided in report GAO-10-627 by the U.S. Government Accountability Office in July 2010.
- Plaintiffs' alleges it used the same power plant as applicants Nissan and Tesla.
- On October 29, 2009, Rebecca M Makar, of the U.S. Government Accountability Office, reached out to Plaintiffs' concerning Plaintiffs' ATVM application.
- On November 3, 2009, Ms. Makar wrote to Plaintiffs' to schedule an interview with Plaintiffs' concerning Plaintiffs' experiences with the Department of Energy's ATVM program.
- The application was again deemed substantially complete on November 10, 2009.
- Upon information and belief, on November 10, 2009, Plaintiffs' completed stage one of the review process.
- On June 9, 2011, Frank Rusco, Director of Natural Resources and Environment at GAO, provided testimony before the U.S. Senate Committee on Energy and Natural Resources, Report No. GAO-11-745T, titled "Advanced Technology Vehicle Loan Program Needs Enhanced Oversight and Performance Measures," in which GAO stated, "[t]he ATVM program has set procedures for overseeing the financial and technical performance of borrowers and has begun oversight, but at the time of our February report it had not yet engaged engineering expertise needed for technical oversight as called for by its procedures. . . . However, the program had not yet engaged such expertise. As a result, DOE cannot be adequately assured that the projects will be delivered as agreed."

- Plaintiffs' alleges DOE has failed to address the 2011 GAO report on the ATVM loan program recommended objective technical and financial criteria to measure program performance.
- The June 9, 2011 testimony also stated, “DOE has not developed sufficient performance measures that would enable it to fully assess progress toward achieving its three program goals.”
- Plaintiffs' alleges that Patent filed May 21, 2004 and granted October 9, 2007 for a Solid-State Hydrogen Storage System was infringed due to untoward conduct by the U.S. Department of Energy.
- Plaintiffs' alleges that Patent filed August 6, 2008 and granted October 30, 2012 for an Inflatable Electric and Hybrid Vehicle System was infringed due to untoward conduct by the U.S. Department of Energy.
- There is some evidence that DOE shared sensitive scientific information that Plaintiffs' provided DOE with Plaintiffs' competitors. For example, Plaintiffs' visited the Argonne National Laboratory in California and learned that GM obtained sensitive, patented information about some of Plaintiffs' technology. With it, GM built a duplicate of Plaintiffs' energy-saver device.
- On May 3, 2005 The U.S. Congress in H2866 in the Congressional Record as part of the “Iraq War Bill” commended the Plaintiffs' project and directed the DOE to award them funding. The U.S. Congress supported the project in the “Iraq War Bill” because of the teams technology which can reduce U.S. dependence on foreign oil as a value to U.S. security.
- In its application under the ATVM program, Plaintiffs' stated “Exhibit D provides a copy of Plaintiffs' Vehicles Business Plan, which is extremely confidential!”
- On March 29, 2009, Plaintiffs' counsel wrote to Jason Gerbsman, the Director of External Affairs at the DOE, requesting confidential treatment under 10 C.F.R. §§1004.11 and 1004.10(b)(4) as well as under 5 U.S.C. §552(b)(4).
- In September 2005, Plaintiffs' received a grant from the Department of Energy for a project with end date of 8/31/2006. In an e-mail dated March 5, 2002 from Scott Vaupen at Sandia National Laboratories to Plaintiffs', Mr. Vaupen wrote, concerning hydrogen storage via Fuel Cell, “If you are interested in licensing technologies, please let me know exactly what areas you are interested in and I can try to sort out what technologies we have available.”
- In Plaintiffs' November 12, 2008 ATVM Loan application, subcontractors were identified as Plaintiffs' and Sandia National Laboratories.

- Plaintiffs' alleges there is evidence that DOE shared sensitive scientific information that Plaintiffs' provided DOE with Plaintiffs' competitors. Plaintiffs' visited Sandia National Laboratories and communicated, via phone and e-mail, with the Argonne National Laboratory and learned that GM obtained sensitive, patented information about some of Plaintiffs' technology. With it, GM built a duplicate of Plaintiffs' energy-saver device. The “sensitive scientific information” was submitted to DOE by Plaintiffs' as part of its ATVM loan application, which was protected by confidentiality. This scientific information included fuel cell and hydrogen storage technologies, fuel cassettes and pressure membrane body parts,
- Plaintiffs' was invited to the Department of Energy Sandia National Laboratories and was given a facility tour. In one room where large glove-boxes and chemical testing equipment was used, he saw a table with a presentation set-up for another group. On that table were duplicates of the technology he had filed patents on, built, tested and received issued patents on and signage on the devices stated: “General Motors hydrogen vehicle production system” and “NALH General Motors Reversible Hydrogen Vehicle Energy System built by General Motors and Sandia” NALH is one of the exact chemistries, of over 2800+ possible chemistries that might be used, that Plaintiffs' has an issued patent on. Plaintiffs' pointed this out to Chris Moen and Daniel Dedrick, senior scientists at Sandia, who stated that they were concerned that there might be “a problem with that” and said that we “might want to contact GM to seek to make a “partnership” so there was no acrimony. On December 12, 2008, a nondisclosure agreement was made and entered into between Palintiff and Sandia National Laboratories.
- On or about Jan. 15, 2012, Plaintiffs' became aware of internet stories about GM productizing alanates solid state hydrogen storage for its fuel cell cars via Sandia and Argonne National Labs
- On or about March 12, 2012 Plaintiffs' became aware of articles about Ford Motors, Inc., planning to ship inflatable seats, seat belts and inflatable body parts.
- Plaintiffs' alleges potential patent infringement
    - Currently a number of companies (over 30) are selling Plaintiffs' exact patented technology without paying for it.
    - This is the exact technology Plaintiffs' designed, proposed, patented and won acclaim for.
    - Some of them were enabled by DOE funding. Some of them were hired as “reviewers” for Plaintiffs' applications, by DOE.

- Hard evidence has been provided to Plaintiffs' demonstrating that these parties infringed Plaintiffs' patents during this period.
- At least two companies acquired Plaintiffs' technical data through the programs and then marketed that technology as their own, infringing applicants existing, issued, patents.

- Plaintiffs' included, as Appendix A, in its loan application, its issued energy industry patents and their estimated value valued by outside third party patent analysts. This included a U.S. Patent with an estimated value of $104,072,538.36; A U.S. Patent with an estimated value of $17,291,568.64; A U.S. Patent with an estimated value of $10,524,792.26; and a U.S. Patent with an estimated value of $5,607,695.94. The total estimated value of these patents is $137,496,595.20.
- A U.S. Department of Energy Press Release from Thursday, November 6, 2008, titled "Fact Sheet: Advanced Technology Vehicles Manufacturing Loan Program" stated "The FY 09 Continuing Resolution authorized up to $25 billion in direct loans to eligible applicants for the costs of reequipping, expanding, and establishing manufacturing facilities in the U.S. to produce advanced technology vehicles, and components for such vehicles."
- In the Fact Sheet, DOE explained that Congress set forth the criteria for projects and costs eligible to receive direct loans. "The key criteria for qualified advanced technology vehicles or qualified components require: Manufacturing facilities be located in the U.S.; Engineering integration be performed in the U.S.; Costs be reasonably related to the reequipping, expending, or establishing a manufacturing facility in the U.S.; and Costs of engineering integration be performed in the U.S."
- The Interim Final Rule, 10 C.F.R. Part 611, Advanced Technology Vehicles Manufacturing Incentive Program, clarifies that: "Section 136 provides two categories of projects eligible for direct loans: (1) manufacturing facilities in the United States designed to produce qualified advanced technology vehicles or qualified components; and (2) engineering integration performed in the United States of qualifying advanced technology vehicles and qualifying components. Eligible costs of such projects are: (a) those costs that are reasonably related to the reequipping, expanding, or establishing a manufacturing facility in the United States to produce qualifying advanced technology vehicles or qualifying components; (b) costs of engineering integration performed in the United States for qualifying vehicles or qualifying components. Costs eligible for payment with loan proceeds are costs incurred, but not yet paid by the borrower, after a substantially complete application has been submitted to DOE and costs incurred after the closing of the loan.

- Section 136 of the Energy Independence and Security Act of 2007 (“EISA”) authorizes the Secretary of Energy to “make grants and direct loans to eligible applicants for projects that reequip, expand, or establish manufacturing facilities in the United States to produce qualified advanced technology vehicles, or qualifying components and also for engineering integration costs associated with such projects.”
- Plaintiffs' interpreted EISA, together with the Interim Final Rule, to authorize federal funds to support U.S. production of qualifying components.
- DOE gave Tesla Motors, Inc. a $465 million loan under the ATVM program. According to a U.S. Department of Homeland Security, Immigration and Customs Enforcement report dated December 22, 2011, the DOE loan to Tesla was to “(1) Reopen an auto manufacturing plan in Fremont, California to produce specially-designed, all-electric, plug-in vehicles and (2) to develop a manufacturing facility to produce battery packs, electric motors and other powertrain components that will power all-electric plug-in vehicles manufacturing by Tesla[.]”
- According to the ICE Report, DHS ICE investigated whether Tesla Motors used foreign made parts in manufacturing their vehicles.
- According to a July 15, 2009 article in Venture Beat, Tesla Motors “recent recipient of $465 million in low-cost federal loans via the U.S. Department of Energy’s Advanced Technology Vehicles Manufacturing program, won’t have to raise new matching funds to qualify like other recipients.”
- If so, Plaintiffs' believe Tesla violated the requirements of both the Interim Final Rule and EISA.

LGP

- In early February 2009, Plaintiffs' was informed by House Speaker Pelosi’s office that the Loan Guarantee program existed and that the company appeared to meet the criteria for a successful application. The company emailed the DOE program office stating their intent to apply for a loan. However, after some additional research, it appeared that the application fees were prohibitive.
- Plaintiffs' Vehicles company officials were then invited to attend, via webcam, a Senate Energy Committee hearing chaired by Sen. Jeff Bingaman (D-NM) in which dramatic changes and repairs to the program were discussed, including waiving the fees. Also during the hearing, the loan program office was admonished for problematic management and fees, as well as the fact that the process was structured in an exclusionary manner.

- The company was then invited to a conference call with John Podesta, DOE Secretary Steven Chu and Interior Secretary Ken Salazar during which Mr. Chu stated his intention to waive the application fees. Plaintiffs' Vehicles then submitted their application with a cover letter stating that they understood that Mr. Chu was waiving the application fees.
- Company officials then received a call on February 26, 2009 from Myrtle Gross from DOE stating that they still needed to pay the fees and that funds needed to be wired by midnight February 26, 2009 in order for the loan application to be submitted. Plaintiffs' Vehicles contacted several investors, but considering the extremely short notice could not complete the transaction with less than 12 hours' notice.
- Plaintiffs' was in part obstructed in its attempt to procure a Loan Guarantee by the actions of another senior DOE official, Scott Tobin, who refused to respond to Plaintiffs' requests for instructions on where and how to pay the fees to have the loan disbursed.
- Therefore, on February 27, 2009 the company assumed they had missed the deadline, but then they received a call from another DOE official (Mr. Dan Tobin) stating that there were a few days of flexibility to send the application fees so the company re-contacted its investors. Mr. Tobin promised to get back to the company about where to wire the money. Funding was lined up but no information could be obtained about where to send it. More than six phone calls were placed by the Plaintiffs' and associates, along with scores of others from other company associates, to DOE but these were never returned.
- The DOE refused to respond to Plaintiffs' request for review and explanation of the denial of their application, as well as numerous FOIA requests.
- The GAO undertook a review of DOE's application policies (in response to Plaintiffs' complaints, among other things), and recently issued findings that (1) DOE's implementation of the LGP has treated applicants inconsistently, favoring some and disadvantaging others; and that (2) DOE lacks systematic mechanisms for LGP applicants to administratively appeal its decisions or to provide feedback to DOE on its process for issuing loan guarantees. Instead, the GAO found, DOE re-reviews rejected applications on an ad hoc basis. The GAO report issued specific recommendations that DOE take steps to ameliorate these failings.
- Daniel C. Tobin, Senior Investment Officer of the DOE Loan Guarantee Program Office stated that he (Mr. Tobin) would pre-review Plaintiffs' application and call back in order to provide feedback so investors could be informed in order for them to wire the money for the application fee.
- Plaintiffs' alleges that after numerous calls and letters the DOE response was not the pre-review communication that had been promised by Daniel Tobin, even though Plaintiffs'

application had been received on time, but a dismissal from the program without recourse.

- Plaintiffs' had a conference call with Secy. Chu who said he'd get the fees waived. The company was then invited to a conference call with John Podesta, DOE Secretary Steven Chu and Interior Secretary Ken Salazar during which Mr. Chu stated his intention to waive the application fees. Plaintiffs' Vehicles then submitted their application with a cover letter stating that they understood that Mr. Chu was waiving the application fees.
- On April 9, 2009, Dan Tobin of the DOE wrote to Plaintiffs' (lead investor in Plaintiffs' Technology), that "due to non-remittance of the required application fee, your application will not be reviewed."
- This cost Plaintiffs' its funding opportunity and the associated revenue from such an opportunity.
- Plaintiffs' demanded to Sen. Bingaman that it be re-entered into the Loan Guarantee Program or receive offset consideration in some other funding opportunity based on this situation.
- DOE's response completely ignored the Tobin assertion. In other words, Tobin refused to act on his promise until the day after the deadline had passed and then sent a "you are rejected because you missed the deadline" email even though we had the money he wanted ready to wire to him on a moment's notice. Plaintiffs' application was then rejected even though it had the highest metrics. Plaintiffs' staff were subjected to punitive and retribution action by DOE staff, and their associates, for "whistle-blowing".
- Plaintiffs' alleges that investigators have provided Plaintiffs' with hard evidence of DOE staff requiring subordinates to break the law and circumvent federal contracting, procedural and standard operating directives regarding communication protocols, documentation and file storage in order to obscure transparency and process and avoid revelation of their true activities.
- Plaintiffs' claims, "One Senate investigation was stone-walled for a historically long period of time because DOE staff intentionally hid, obscured and sought to destroy requested evidence."

Recent Results Of Federal And Private Investigations

Since this matter began, FBI, SEC and Congressional investigations have revealed much. The latest revelations are:

- CROOKED POLITICAL INSIDERS have learned that when a government funded tech company fails, THOSE INSIDERS make billions of dollars in unjust profits from tax write-offs, Goldman Sachs services "fees" and stock market pump-and-dump manipulations while taxpayers lose BILLIONS on those same companies at Solyndra, Abound, Ener1, etc.…. THAT'S RIGHT, the crooks make profits off of PLANNED-TO-FAIL TAXPAYER funded companies, many of which never even sold anything. It happened in the 2008 pretend "stimulus" and it is happening again, many times more, in the 2021 pretend "stimulus". The Cleantech companies were made-to-fail, as stock scams, by the insiders! Insider friend's at the Dept of Energy get to "jump-the-line", exploit the cash and Trojan horse the tech start-up into oblivion.

As with nearly a thousand Silicon Valley tech dirty money deals, for example, Netflix tech bosses are now getting caught selling media influence in exchange for bribes! Michael Kail (Netflix IT Boss), and other Netflix executives are under investigation for manipulating which media technologies get to make money. Netflix funds the DNC political campaigns. Netflix board positions and media slots are often traded as political quid pro quo payola for political favors.

'Not only did Mr. Kail deprive Netflix of its money and resources by abusing his position as VP of IT Operations,' *FBI Special Agent in Charge Craig D. Fair* said in a statement, 'he created a pay-to-play environment whereby he stole the opportunity to work with an industry pioneer from honest, hardworking Silicon Valley companies.' The San Francisco FBI and the United States Patent Office has been asked, by independent *video-on-demand inventors*, to look at how Netflix, YouTube and other tech oligarchs, steal technologies and *censor media access* in a coordinated anti-trust violating scheme.

Kail was indicted in 2018 on 19 counts of wire fraud, three counts of mail fraud, and seven counts of money laundering. The trial began April 19 in federal court in San Jose, California. The jury found him guilty on 28 of the 29 counts. Prosecutors said that Kail had accepted more than $500,000 in kickbacks - as well as valuable stock options - in exchange for approving millions of dollars in contracts for nine tech companies seeking to do business with Netflix between February 2012 and July 2014.

In a statement, the the Department of Justice said: 'He used his kickback payments to pay personal expenses and to buy a home in Los Gatos, California in the name of a family trust.' The Mercury News reports he must now forfeit his $2.6 million three-bedroom, two-bathroom Los Gatos home to the federal government. Kail created and controlled a limited liability company, Unix Mercenary LLC, to receive the bribes, fund personal expenses and buy a home in Los Gatos, California, prosecutors said. This kind of case is typical of the **MAJORITY** of Silicon Valley tech executives.

Netflix, Google, and their *Silicon Valley Cartel*, operate secret programs that use data from personal and business records to manipulate business, politics and ideologies. For example, in the company's digital advertising exchange, Google manipulates it's ad-buying system, it's political marketing and it's executives ideology promotions to gain a dramatic advantage over competitors, according to court documents and federal records revealed in new antitrust lawsuits by various Attorney General's. Elon Musk is a mobster yet he used public funds to buy a facade of self-aggrandizement at the expense of the taxpayers.

One corrupt secret *Google program*, known as "Project Bernanke," wasn't disclosed to publishers who sold ads through *Google's* ad-buying systems. It generated hundreds of millions of dollars in revenue for the company annually, the documents show. Google and Youtube, a unit of *Alphabet Inc*., always gets an unfair competitive advantage over rivals in business, politics, stock market valuations. In another corrupt program, *Google* invested in Tesla Motors, hyped Tesla and Musk and attacked Musk's competitors using nearly a hundred million dollars of equivalent competitor attack marketing. We are some of the Plaintiffs' of those attacks.

*"..Over **540 pages** including a key set of **four pages** of documents from the office of the Secretary of State of California reveal how state officials employ Silicon Valley media companies (Twitter, Facebook, Google (YouTube)) to censor posts about politics. Included in these documents were "misinformation briefings" emails that were compiled by communications firm SKDK, that **lists** Biden for President as their **top client**. The documents show how California state agencies successfully pressured YouTube to censor videos concerning things that **California political Cartel bosses like Harris, Pelosi and Feinstein** don't want citizens to see. A **December 2020 report** surfaced that shows that the State of California is surveilling, tracking, and seeking to censor the speech of Americans in order to cover-up the political crimes and stock market manipulations that State officials are engaged in. California politicians own portions of Twitter, Facebook, Google (YouTube), Linkedin, etc. and those social media companies are simply an arm of their political and stock market manipulation efforts..."*

SEE ALL OF THE VIDEO EVIDENCE AND BROADCAST NEWS REPORTS ON THIS CASE AT:

http://san-francisco.biz

The Scams At The Secretary Of Energy's Office

Energy Secretary Steven Chu and his staff held stock and business partnerships in Tesla Motors and the rare earth companies used to make his batteries. The Energy Department has lied about their massive conflicts of interest, covered up hundreds of crony insider manipulations of applications and run Lois Lerner-type reprisal attacks on those who compete with Tesla and their crony buddies. In an exact repeat of the 2008 Solyndra "Stimulus" scam: **Energy Secretary Jennifer Granholm** owns up to $5 million in the electric battery and vehicle manufacturer President Joe Biden will promote on Tuesday as part of his push for a $1.9 trillion infrastructure bill. Biden's virtual visit to the electric battery producer Proterra comes days after Vice President Kamala Harris paid a visit to Thomas Built Buses, a North Carolina-based school bus company that counts Proterra as its main supplier of electric vehicles. The back-to-back White House visits to Granholm-connected companies risk at least the appearance of impropriety and demonstrate how lawmakers can use policy initiatives to pad their own wallets.

America can no longer give out taxpayer cash based on who the best friends of crooked Senators are!

Granholm has taken a leading role in the administration's forthcoming infrastructure package. The president in February tasked her with "identifying risks in the supply chain for high-capacity batteries, including electric-vehicle batteries, and policy recommendations to address these risks." The Department of Energy did not respond to multiple requests for comment.

Granholm joined Proterra's board of directors in March 2017; internet archives list her as a board member as recently as February 19, 2021, shortly before her confirmation on February 25. Her financial disclosures reveal up to $5 million worth of stock options in the green tech company, which went public in January through the special purpose acquisition company ArcLight Clean Transition Corp. Arclight, a NASDAQ-listed company, saw shares shoot up about 55 percent since its September IPO, a spike financial traders attributed directly to the acquisition of Proterra.

10	Proterra, Inc., vested stock options	N/A	$1,000,001 - $5,000,000	None (or less than $201)
11	Proterra, Inc., stock options (value not readily ascertainable): 38,542 unvested shares, strike price $5.35, vest 12/2021, exp. 12/2024	N/A		None (or less than $201)
12	Proterra, Inc., stock options (value not readily ascertainable): 22,500 unvested shares, strike price $4.26, vest 12/2021, exp. 12.2024	N/A		None (or less than $201)

In a January 16 letter to the designated agency ethics official, Granholm vowed to step down from the board and sell her stock in the company, as well as the steps she will take "to avoid any actual or apparent conflict of interest." The former Michigan governor has sold some stock, but has not offloaded any of her Proterra shares, according to a White House official. Granholm's stake in Proterra represents her largest financial asset outside of a house in Oakland, Calif., that she values as between $1 and 5 million, according to her financial disclosures. The White

House confirmed that Granholm still holds stock in Proterra, but said she played no role in planning the president's visit. Proterra was selected for today’s virtual visit because it is the leading U.S. manufacturer of electric buses, employing 600 workers at its South Carolina and California plants," a White House official told the Washington Free Beacon. "Neither Secretary Granholm nor the Department of Energy were involved in selecting the Proterra plant."

In a February 24 executive order, Biden placed Granholm in charge of "identifying risks in the supply chain for high-capacity batteries, including electric-vehicle batteries, and policy recommendations to address these risks." One of Proterra’s key products is electric-vehicle batteries. Proterra’s website boasts that "our flexible design enables Proterra® EV batteries to be the best choice for commercial vehicles ranging from transit buses and trucks to delivery vehicles, construction equipment, and more." Nearly 85 percent of Proterra employee campaign contributions went to Democrats, including Joe Biden, according to the Center for Responsive Politics."You can’t win", but that’s all part of the politicians crooked plan. These crimes involve well-known public officials and pervert Silicon Valley billionaires who are trying to cover these crimes up. We won't let them get away with this corruption, though! Here is over a million pages of evidence and hours of video against them! Nicholas and Joby Pritzker—members of Illinois Democratic governor J.B. Pritzker's megadonor family—own nearly 12 million shares of ArcLight through their venture capital fund, Tao Capital. ArcLight in January announced a $1.6 billion merger with Proterra, which will see the electric vehicle manufacturer go public in 2021. Granholm served on Proterra's board for nearly four years and still holds up to $5 million in company stock.

National Economic Council director Brian Deese is also tied to Proterra through BlackRock, the investment giant where he worked as global head of sustainable investing before joining the Biden administration. BlackRock is one of several investment firms that pumped a combined $415 million into the Proterra merger, and Deese reported holding more than $2.4 million in BlackRock vested restricted stock in his February financial disclosure. These investors are posed for steep gains, as ArcLight's stock price has surged 50 percent—from $11.90 to $18 per share—since January.

The revelations come as congressional Republicans demand investigations into potential conflicts of interest between the Biden administration and Proterra, which could receive billions in taxpayer funds through a proposed infrastructure package. Rep. Ralph Norman (R., S.C.), who serves as ranking member on the environment subcommittee of the House Committee on Oversight and Reform, told the *Free Beacon* that "the American people deserve to understand the full extent of Secretary Granholm's involvement with Proterra." "Her position of roughly $5 million in the electric car company Proterra is another unfortunate example of politicians using their position for personal gain," Norman said. "Due to the President's recent unveiling of a $2

trillion infrastructure package, this matter should be investigated thoroughly." Deese in April virtually toured Proterra's South Carolina factory with President Joe Biden, touting a proposed $45 billion government investment in "clean, zero-emissions buses" such as those produced by Proterra. Just days later, the Biden administration again amplified the bus company, hosting Proterra CEO Jack Allen at its Leaders Summit on Climate. Administration officials repeatedly praised Proterra at the event, and Allen responded by thanking the White House for its "longstanding support of electric transit buses and zero emission transportation."

"Proterra manufactures half of the U.S.'s electric bus market, which is pretty amazing," Biden national climate adviser Gina McCarthy said at the event. "And as you know, funding for electric school buses is a priority in the American Jobs Plan." McCarthy went on to ask Allen "what role" the federal government can play in "spurring the demand for zero emission electric vehicles, including school buses." Granholm also spoke at the summit. The White House did not return a request for comment on Deese's BlackRock holdings as well as the director's role in planning events with Proterra. As a top BlackRock executive, ***Deese led an investment team tasked with identifying "sustainable" investment opportunities,*** according to his online bio. A BlackRock spokesperson said Deese "was not involved" with the Proterra investment. The Pritzkers, meanwhile, will own between 6 and 7 percent of Proterra once the company goes public, SEC documents filed by ArcLight reveal. Nicholas Pritzker is one of two Tao Capital executives with "sole voting and dispositive power" over the Proterra shares. The investment firm, which did not return a request for comment, first backed Proterra through a $10 million stake in 2014. Granholm joined the bus company's board three years later. During her tenure, Tao Capital co-led another $155 million investment in Proterra. "We at Tao are proud to support Proterra in its mission to bring forth a clean, electric transportation ecosystem," Nicholas Pritzker said in 2018. The firm's website touts the likes of Proterra, Tesla, and Bird as part of its "Alternative transportation" portfolio.

Name and Address of Beneficial Owners[1]	Prior to Business Combination[2]		After Business Combination			
			Assuming No Redemptions[3]		Assuming Maximum Redemptions[4]	
	Number of Shares	%	Number of Shares	%	Number of Shares	%
Directors and officers prior to the Business Combination:						
Arno Harris[5]	35,000	*	35,000	*	35,000	*
Brian Goncher	35,000	*	35,000	*	35,000	*
Christine M. Miller	—	—	—	—	—	—
Daniel R. Revers[6]	6,797,500	19.6%	7,397,500	3.7%	7,397,500	4.4%
Ja-Chin Audrey Lee[5]	35,000	*	35,000	*	35,000	*
John F. Erhard	—	—	—	—	—	—
Kerrick S. Knauth	—	—	—	—	—	—
Marco F. Gatti	—	—	—	—	—	—
Steven Berkenfeld	35,000	*	35,000	*	35,000	*
All directors and officers prior to the Business Combination (nine persons)	6,937,500	20.0%	7,537,500	3.8%	7,537,500	4.4%
Directors and officers after the Business Combination:						
Amy E. Ard[7]	—	—	854,847	*	854,847	*
Brook F. Porter[8]	—	—	2,513,757	1.3%	2,513,757	1.5%
Constance E. Skidmore[9]	—	—	121,137	*	121,137	*
Gareth T. Joyce	—	—	—	—	—	—
Jeannine P. Sargent[10]	—	—	142,056	*	142,056	*
Jochen M. Goetz[11]	—	—	9,408,185	4.8%	9,408,185	5.5%
John F. Erhard	—	—	—	—	—	—
John J. Allen[12]	—	—	1,981,581	*	1,981,581	1.2%
Michael D. Smith[13]	—	—	146,239	*	146,239	*
Ryan C. Popple[14]	—	—	3,864,454	2.0%	3,864,454	2.3%
All directors and officers after the Business Combination as a group (12 persons)	—	—	20,807,759	10.5%	20,807,759	12.2%
Five Percent Holders:						
ArcLight CTC Holdings, L.P.[15]	6,797,500	19.6%	6,797,500	3.4%	6,797,500	4.0%
ArcLight CTC Investors, LLC[16]	—	—	600,000	*	600,000	*
Adage Capital Partners, L.P. and affiliates[17]	2,250,000	6.5%	2,250,000	1.1%	—	—
Daimler Trucks & Buses US Holding Inc.[18]	—	—	9,408,185	4.8%	9,408,185	5.5%
Certain funds and accounts advised by Franklin Advisers, Inc[19]	5,116,002	—	23,065,620	11.7%	17,949,618	10.5%
KPCB Holdings, Inc., as nominee[20]	—	—	15,875,811	8.0%	15,875,811	9.3%
Entities affiliated with Tao Capital Partners, LLC[21]	—	—	11,908,642	6.0%	11,908,642	7.0%

“KPCB Holdings”, on the list above is the notorious John Doerr. A name involved with other quid pro quo political cases.

Nicholas Pritzker and his wife Susan are prolific donors to Democratic candidates and causes. In the 2020 cycle alone, Susan Pritzker—a Tao Capital director—was the 95th largest donor in America. She contributed more than $3 million to Democrats in disclosed money, according to the Center for Responsive Politics. Nicholas Pritzker has given at least $1.9 million to Democrats in direct contributions, including maximum contributions to Biden's campaign and victory fund, FEC filings show. The government should not enable crony insiders while sabotaging their enemies using government money.

LETTER TO THE FBI:

Craig D Fair
Special Agent in Charge

Timothy Stone
Deputy Special Agent in Charge

Federal Bureau Of Investigation

San Francisco Office
450 Golden Gate Ave, 13th Floor
San Francisco, CA 94102-9523

May 2, 2021

Dear FBI Team:

As know you, our task force has created a large number of public-interest crowd-sourced testimony websites to provide real-time information, about this case, to your agents. We have spoken to your office on multiple occasions as informants, whistle-blowers, witnesses and providers of testimony about this large criminal matter involving well known public figures..

Congress must be forced to eliminate both the appearance and the actual operation of financial conflicts of interest that we have identified going on every day. Americans must be confident that actions taken by public officials are intended to serve the public, and not those officials and their corrupt Silicon Valley big tech leash-holders. Their actions counter-act the law, The Constitution and general morality. A number of our associates are now dead, under mysterious circumstances. It seems like some of them were killed to shut them up.

We experienced all of the damages from each of the abuse-of-power issues listed below. The FBI, FTC, SEC, FEC must become a taskforce that ends these crimes. These are the crimes we saw and suffered from and the solutions to those crimes:

We documented modern bribes being paid through stock market scams. We saw the perpetrators do it. Please help ban individual stock ownership by Members of Congress, Cabinet Secretaries, senior congressional staff, federal judges, White House staff and other senior agency officials while in office. Please prohibit all government officials from holding or trading stock where its value might be influenced by their agency, department, or actions. The perpetrators are TODAY committing crimes and corruption in this manner.... (READ THE REST AT THIS LINK)

Where Is The Proof?

The "Dept Of Energy Leaks" - Aug. 5, 2009 through 2021

The "Panama Papers" Leaks - April 3, 2016

The "Swiss Leaks Papers" - February 15, 2015

The "Paradise Papers Leaks" - November 5, 2015

The "John Doerr & Kleiner Hacks" - April 22, 2020

The "Snowden Leaks" - May 13, 2013

The "Cablegate Leaks - April 15, 2010

The "Sony Pictures Hack" - November 24, 2014

The "Ashley Madison Hack" - July 19, 2015

The "Solarwinds Hack" - December 13, 2020

The related FBI, GAO, FTC, IG, SEC, CFTC and related agency files

And hundreds of other leaks and hacks publicly dumped on the internet...

When you cross index all of the public leak data into an AI auditing system, any basic PC computer can FOLLOW THE BRIBE AND PAYOLA MONEY right back to the bank accounts of each corrupt Senator, White House executive and Silicon Valley oligarch! If only the U.S. Government had a federal enforcement agency whose very job it was to do that sort of investigation....Oh, wait,...the U.S. Government has SIX agencies who are supposed to do that...

- Plaintiffs' had global character assassination and propaganda-media defamation reprisal attacks operated against them by White House staff and their political financiers: Elon Musk, Larry Page, Steve Jurvetson, Eric Schmidt, Steve Westly, John Doerr, et al. Jury and FBI-compliant evidence proves this as fact.

- All of the offered government money had been hard-wired to political friends ahead of time and there was no possibility that outsider applicants could have received the funds. Applicants were lied to and defrauded.

- Plaintiffs' were attacked because 1.) they helped law enforcement investigate the attackers, 2.) They competed with the attackers that attacker's products and the Silicon Valley Cartel attackers chose to "cheat rather than compete". Jury and FBI-compliant evidence proves this as fact.

- The attackers spent over $30M+, part of that using taxpayer resources, attacking the Plaintiffs' as proven in the financial transaction records from Google, Gawker, Gizmodo, Jalopnik, Media Matters, Fusion GPS, et al. Jury and FBI-compliant evidence proves this as fact.

- Plaintiffs' had been previously funded by the U.S. Government and had a multi-decade relationship with the highest offices of the Government, which provided them with deep knowledge of the crimes that were committed. Jury and FBI-compliant evidence proves this as fact.

- The U.S. Department of Energy is used as a political slush fund to pay back campaign finance millionaires while blockading the competitors of those millionaires from reaching the market or receiving funding. Jury and FBI-compliant evidence proves this as fact.

- The only entities who participated in the global character assassination and propaganda-media defamation reprisal attacks were those entities owned and controlled by the attackers. Jury and FBI-compliant evidence proves this as fact.

- Through corrupt rare-earth mining scams and control of federal contracts and grants, attackers had planned to acquire at least one trillion dollars in unjust gains and illegal profiteering. Jury and FBI-compliant evidence proves this as fact.

- This amount of money they sought, and the "Mafia-like" structure they adopted, caused the suspects to engage in the most extreme crimes, including murder and "Deep State" coup attempts. Jury and FBI-compliant evidence proves this as fact.

- A significant number of person's who were in conflict with the attackers have died in suspicious manners. Jury and FBI-compliant evidence proves this as fact.

- The suspects have hired the largest numbers of lobbyists and corporate manipulation lawyers in U.S. history in order to manipulate political decisions. Jury and FBI-compliant evidence proves this as fact.

- The suspects have spent more money on political bribes than any group of men has spent in the last century. Jury and FBI-compliant evidence proves this as fact.

- The suspects placed top federal law enforcement and agency bosses (ie: Michelle Lee, Steven Chu, Kamala Harris, James Comey, et al) from their own Cartel, into top government positions, with orders to run cover and protection schemes for them. Jury and FBI-compliant evidence proves this as fact.

- California State officials including the Governor, Controller, The Senators, Secretary of State and regional officials participated in these crimes and pocketed the initial profits from these crimes in covert investment banking. Jury and FBI-compliant evidence proves this as fact.

- Tesla Motors, Google, Netflix, Facebook, Linkedin, Amazon and other tech Cartel members operate with a common goal of psychological mass ideology manipulation and monopolistic profiteering based on government sponsored anti-trust violations and server control exclusivity. Jury and FBI-compliant evidence proves this as fact.

- The attempted cover-ups of these crimes continues to this day. Jury and FBI-compliant evidence proves this as fact.

- Natural-born U.S. citizen Applicant #1 has been employed in the USA for many decades and was a federal contractor/employee. The State of California employment laws now provide that of of Applicant #1’s “contractor” was actually “employee” work per California law. He worked for his community and his country as a law enforcement and intelligence researcher (law/IC) in which he closed cases that saved Americans billions of dollars. He holds numerous state and

federal certifications and credentials to this effect and was certified as an investigator under the State Government at the California Office Of Consumer Affairs. He also worked as a CEO, Inventor and Product Development Director for which the U.S. Government has awarded him dozens of seminal patent awards for products in use by Microsoft, Sony and other major companies to provide products and services to billions of people. He has received commendation letters from U.S. Presidents, Agency heads and Mayors. He is pictured in videos, photographs, articles, meetings and on letterhead government and corporate correspondence with some of the most famous public and White House figures in America for decades. He reported the corruption in a trillion dollar Department of Energy embezzlement scam involving crooked uranium, lithium, indium and other metals, he was attacked by State and Federal employees, many of whom have now been terminated because of their illicit actions. Applicant was also exposed to those toxic materials in his work for the Department of Energy.

- Part of the state-sponsored attack launched against Applicant #1 used the same exact personnel, servers, digital systems, production equipment and other resources that are owned, or managed, by Google/Alphabet/YouTube for national election candidate counter-measures services. Google/Alphabet/YouTube sells these services, under many guises, as offerings to promote any candidate or damage any candidate for a fee, or for an exchange of items of value. Our investigators have acquired some of the billing and banking documents verifying this and the FBI has full access to all such documents proving this assertion. The billing value of the attack against Applicant #1 (in commensurate multiple-billing efforts by Google/Alphabet/YouTube) had a minimum commercial value of $30M in billings. This metric is based on records of political election campaign services sold by Google/Alphabet/YouTube since the year 2002. In other words, in a past elections, hard, documented numbers, employee statements, banking records, stock records, billing records and other materials exist, in jury trial acceptable form, to prove that, for example, Google/Alphabet/YouTube spent a certain exact amount of money and resources-of-value to defeat one candidate and to seek to elect that candidates opposition.

- Additionally, relative to the Google/Alphabet/YouTube portion of the attack, Google/Alphabet/YouTube owners are on federal and Congressional record swearing under oath that they do "not manipulate search results in order to harm others", yet investigators for Applicant #1 and over 1000 outside third parties proved that the opposite was true and that Google/Alphabet/YouTube executives lied under oath. The fact that the attack link on Google's front page never moved position for 5 years and other confirming data, proves the assertion that Google/Alphabet/YouTube sells defamation and character assassination services and sold them against Applicant. Applicant helped place sensors on servers globally which used comparative search results from competing global search engines to prove that Google/Alphabet/YouTube was rigging most search results to promote it's friends and harm it's political and business enemies.

- California Senators, White House staff and the owners and executives of Google/Alphabet/YouTube are also the investor/shareholders in Applicants competitors who were government financed.

- The industry metricized standard for person's with, at least, the skills and experience of Applicant, in his demographic, is a minimum of $10,000 per month in the local technology market for those with less hours, less patent awards, less past work reference letters and less experience than Applicant. Silicon Valley job metrics and census data prove that that is even a low figure for a commensurate worker. Lost work opportunity for Applicant should be valued at a minimum of $10,000.00 per month.

- Even though Applicant has been an extraordinarily productive, working member of the community and the U.S. Government; and Applicant has organized companies and programs which have paid millions of dollars in taxes, Applicant is currently only afforded the most minimal benefits possible. In other words, Applicant has saved billions of dollars for the Government and the taxpayers and, additionally, has organized companies and programs which paid millions of dollars in taxes and free services to The Government yet Applicant seems to be getting only political reprisals as gratitude.

- State and Federal employee corruption and reprisal actions cost Applicant his savings and nearly a billion dollars of potential income by intentionally sabotaging and terminating his operating, Congressional financed, Congressional commended national service companies featured on NPR, CBS News, and in The Wall Street Journal, The New York Times and hundreds of other mainstream news outlets. Corrupt State and Federal employees engaged in these benefit blockade reprisals because Applicant's companies competed with the stock market holdings of those corrupt State and Federal employees.

- These are the very same public officials who have interdiction capability at state and federal agencies. It is quite reasonable to assume that these State and Federal employees, who have a court record of using reprisal actions against others, just like they did to Applicant, ordered federal agencies to harm Applicant. These public officials defrauded Applicant by asking and causing him, and his Team, to invest in their program. It turned out they were using Applicant's business ventures to cover (smoke-screen) their crimes at the expense of Applicant and the taxpayers.

- To be clear, Government employees put hundreds of millions of dollars of stock market profits in their, and their associates pockets, part of which they took from Applicant's funding, and then attacked Applicant, in a large number of reprisal actions.

- Applicant reported crimes by public officials which led to the FBI raid of Solyndra, opened

the Uranium One investigation and the firing of the Secretary Of Energy for corruption. Part of Applicant's work involved creating America's next national energy solutions.

- Applicant worked with the U.S. Department of Energy, HUD, NAHB and related entities in work with the national weapons and energy labs since 2000. Applicant worked with nuclear, heavy metals, sintered rare earth metals, extreme solvents and nano-particulated exotic chemistries and won a historical Congressional commendation, first-ever seminal U.S. Government patent awards, industry and press acclaim, customer acclaim and a multi-million dollar lab research grant in the Congressional Iraq War Bill.

- Even though Applicant's has worked in service to his country, Applicant has been denied his legal rights. Applicant's U.S. Constitution and California Constitutional rights have been denied because he "did the right thing" and helped law enforcement.

- The most senior FBI and DOJ executives including James Comey, Andrew McCabe, Peter Strzok, David Oh and others are under federal investigation for running character assassinations and working with the economic assassins from Fusion GPS, Google Media, Gawker Media and other illicit attack organizations. Applicant reported to some of these men. Charges of FBI, DOJ, VA and SSA executive reprisal manipulations and attacks against citizens would have sounded hard to believe a decade ago but, in the post-Snowden world, catching those who pervert State and Federal offices has become common-place. It is beyond reasonable to assume that Applicant's charges of government agency reprisal-stonewalling are well founded and have full legal merit.

- The services who charge to perform the support work for such attacks provide a life-time placement of negative attack data on Google and on all of the Axciom, Taleo and other hiring HR and hiring databases, globally; and the locking, on the front top page of Google search results, forever, of the attack and defamation data, as was done because Applicant testified to Congress, the GAO and the FBI.

- The attacks on Applicant were "State Sponsored Attacks" directed, financed and managed by California State public officials and Federal Agency officers.

- Instead of the "Thanks of a grateful nation", Applicant has received political reprisals, revenge and vendettas using taxpayer financed resources. Applicant has contributed more in the service of his country and community than most citizens. We ask your office to Correct the Record and the Nick Denton tabloid empire and bring fairness and justice to the finalization of this case. Applicant, his family, friends, associates and others will pursue this forever, through the media, law enforcement and alternative means ...until it is fairly resolved.

- The suspects in these crimes received over 50 billion dollars in profits from the crimes.

- The suspects received over 50 billion dollars at the expense of the Plaintiffs' because they intentionally, maliciously and in a coordinated manner, circumvented, those monies from the Plaintiffs' and the victim's income streams.

- The amount of money that the suspects acquired from these crimes is confirmed by reports at the Securities and Exchange Commission, The Internal Revenue Service, the FTC and stock market transfer records.

- Each competing company of the Applicant's that the suspects sabotaged had the potential to make as much money, or more money, than the suspects companies did in the same time period. Applicant's companies would have operated competitively had they not been sabotaged by the government officials. These other companies offered lower cost, safer, longer range products which higher volumes of consumers had demanded. This means that, if these companies had not been sabotaged by these corrupt government officials who, owned stock in these insider companies, they would have made even more money than the insider companies.

- Thus, and by extension, the corrupt Senator's and White House staff stock ownership's in Applicant's competitor's, provide a minimum baseline damages amount reference for comparable damages values using GAAP accounting references. Each competing company that suspects sabotaged,had the potential to make as much money, or more money, than known competing company revenues.

- The government officials used character assassination as a vendetta process to seek to destroy the brands, reputations and witness testimony of the Plaintiffs' by manipulating their properties.

- The suspects hired Fusion GPS, Black Cube, Google, Media Matters, Gizmodo and Gawker Media to author and distribute character assassination propaganda to the majority of the world’s population via their pre-arranged and contrived control of the vast majority of digital media. For example, Google, the stock of which is owned by the suspects, locked the attacks on the front page on the top line of Google for over five years, without ever moving it, even though Plaintiffs's purchased thousands of servers, and take-down requests to attempt to move the attacks even a few lines lower. This proves that Google was manually, and daily rigging the attacks. Thus, the damages award to the Applicant should be much higher than the Terry Bollea award.

- Government funding which was circumvented by suspects from Applicant to themselves was not the largest quantified value of loss. Working with Goldman Sachs, JP Morgan, McKinsey, etc., suspects exploited the White House relationship with The Fed and the SEC to create a massive stock market valuation padding scheme which yielded historical profits. By stating government funds as “profit” and switching back and forth from stock skims to government

funds in accounting records, tremendous stock market profits were placed in the pockets of the suspects.

- Had Applicant's not been circumvented by suspects then Applicant's would have acquired these same benefits. The stock market loss to the Plaintiffs's at the expense of the Plaintiffs's is also calculated into the damages consideration.

- The suspects ordered Steven Chu, Lachlan Seward, Carol Battershel, McKinsey and Deloitte Consulting, Kathy Zoi and other executives at the U.S. Department of Energy, to be placed into positions in the U.S. Department of Energy as shills on their behalf, to lie to and defraud the Applicants. All of the ATVM and LGP grant and loan funds from the U.S. Department of Energy had been secretly hard-wired and the distribution of it covertly arranged to go to the suspects stealthed stock ownerships.

- Thus, the applicants, who had superior technology, more customer orders, better value and provided less of a national security risk were defrauded into spending tens of millions of dollars on the applicant process via false promises and assurances of success which were already known to be lies from the first 2007 forward. The losses in time, expenses and time-to-market delays created by these fraudulent promises and assertions by the agents, in public office, covertly working for the suspects are calculated into these damages.

- Applicant's are demanding from the U.S. Government, The California State Government and the individual suspect/Defendants; general damages according to proof; special damages according to proof; exemplary or punitive damages; For a preliminary injunction and a permanent injunction enjoining defendant and their/her agents, servants, and employees, and all persons acting under, in concert with, or for him/her from continuing to publish the above-described private facts about Plaintiffs's; for costs of suit herein incurred; for such other further relief as the court may deem proper; and for an award of a percentage of suspect/Defendants gross revenue since inception wherein that revenue was derived from profits made from the use of, or interdiction of, Plaintiffs's patented and trade secret products, services and technology which Defendants covertly acquired information about and copied for profit. Forensic accounting based on Subpoenas against the suspects and attack providers, and further FBI support, will be required to finalize the amount but recent leaks and witness testimony confirm the veracity of these assumptions.

State Sponsored Reprisal Attacks Already Suffered By Plaintiff

CIA, In-Q-Tel, Black Cube Mossad and other spy operatives contracted their services to White House and Senate senior officials to attack and destroy reporters, whistle-blowers and other Plaintiffs'.

The United States Government and State of California senior officials own the stock in Tesla, Facebook, Google and other tech companies and take their orders from those companies. that is "criminal collusion"!

"these are the reprisal attacks that they ran against us, in vendetta, that we are now, legally, sending straight back to each of them...."

Senators and oligarchs run an organized crime operation. The Plaintiffs' were attacked with a $30M+ state-sponsored reprisal attack program which included the following attack tactics operated by the same WHITE HOUSE "OPPOSITION RESEARCH" AND ATTACK TEAM used to attack opposition Presidential candidates and reporters that were in disfavor.

Just like Bin Laden was caught by tracking his "relay-men", The Silicon Valley Cartel has their Steve Westly's, David Plouffe's, Jay Carney's, Nick Denton's, David Brock's, and the other little sociopath sociopolitical manipulations bastards who always seem to escape the law. They have not escaped public forensics, though.

Now the Plaintiffs' have demanded that the FBI, and others, bug, hack and forensically track them to expose the coordinating/colluding/conspiring structure of the same little rats nest of CPA, PAC, fake charities, trust funds, fake shell companies, tech law firms and other dirty tricks operatives that they use to run their Cartel. The Panama Papers leaks exposed one corner of their system. From there it was easy to drill into the heart of this financial and political crime operation. The forensic accounting trails all lead back to the exact same crooks. It is no coincidence that they all use the same people and transfer the cash through the same routes.

The attacks on the Plaintiffs' could only have been accomplished by White House and Department of Energy operatives. Only they had the resources and experience to undertake something this heinous and spy agency-like. The funding for the attacks tracks right back to them, too. Ask the FBI what the forensic tracking of the attackers revealed!

Investigations have revealed that the White House and California Senators hired the character assassination and defamation attack services: Cardinal & Pine***; Pacronym, Acronym;*** The Americano***;*** Investing in US***; Shadow Inc; Courier Newsroom; IN-Q-Tel; Gawker Media; Jalopnik; Gizmodo Media; K2 Intelligence; WikiStrat; Podesta Group; Fusion GPS;***

Google*; YouTube; Alphabet; Facebook; Twitter; Think Progress; Media Matters); Black Cube; Correct the Record and the Nick Denton tabloid empire; Orbis Business Intelligence, Undercover Global Ltd; Stratfor; Jigsaw; ShareBlue/Acronym; Versa LLC; American Ledger; Supermajority News; New Venture Fund; Sixteen Thirty Fund; Cambridge Analytica; Sid Blumenthal;* States Newsroom*; Hopewell Fund; Open Society.; David Brock; AmpliFire News; American Bridge; Plouffe Consulting; Pantsuit Nation; MotiveAI; American Bridge 21st Century Foundation; Priorities USA; PR Firm Sunshine Sachs; The American Independent Foundation; Covington and Burling; Buzzfeed;* The American Independent*; Perkins Coie; Secondary Infektion; Wilson Sonsini* and thousands more to run hit-jobs, character assassinations, dirty tricks and economic reprisal attacks on any targets who reported the crimes. Each of those companies are now under federal and civil investigation. Most of these businesses offer the service of manipulating elections and news coverage in order to steer stock market profits into the pockets of billionaire clients at the expense of the taxpayer and Democracy. They hide their transactions via money-laundering. All of these services, when focused on individual citizens, are lethal.

Why would we go to this much trouble to take these people down? because they did these things to us in reprisal for reporting their crimes:

1.) Defrauding Applicants via fake government requests to invest in rigged government contracts;

2.) Placing moles and spying inside Applicant's companies;

3.) Blockading legal counsel for Plaintiffs's;

4.) Character assassination and sophisticated contracted defamation media attacks;

5.) Offshore factory processed social media attacks;

6.) Government benefits from SSA, HUD, etc, blockades and manipulations;

7.) Jobs and venture capital funding blacklisting;

8.) FOIA obfuscation for official government FOIA filings;

9.) Arbitrary government deadline manipulation for SSA, DOE, HUD and other applications;

10.) Creation of endless fake hurdles in agency applications (ie: DOE) to protect rigged "winners";

11.) Toxic workplace poisonings like the Salisbury, Nalvany, Litvinenko poisonings;

12.) Workplace sabotage and obstruction of Applicant's companies;

13.) Media defamation attacks via gawker, Gizmodo, Jalopnik, Google, Youtube, etc.;

14.) Commercial employment database "lois lerner-ing" and red-flagging;

15.) Murders of peers (ie: Rajeev Motwani, Seth Rich, Gary D. Conley and 120+ others);

16.) Revenue blockades and internet income re-direction;

17.) Troll farm attack teams hired from Chinese attack farms;

18.) Fusion GPS, Media Matters, David Plouffe attack contracts issued targeting whistle-blowers;

19.) Manual search engine lock-in attacks on Google, YouTube, Linkedin;

20.) U.S. patent office manipulation to blockade revenue;

21.) *Honey-traps sent out targeting the whistle-blowers*;

22.) Fake news tabloid empires created just for defamation attacks;

23.) Housing access and financing blockades created to reprisal harass whistle-blowers;

24.) Ongoing hacking of Plaintiffs's devices;

25.) Tech industry black-list coordination within the National Venture Capital Association;

26.) HUD and USDA mortgage rights blockades:

27.) DNS and IP routing manipulation to prevent Plaintiffs' from selling anything online;

28.) Digital attacks designed to put horrific fake news about target in front of 7.5 billion people...

and more spy agency type "dirty tricks"that cost the Plaintiffs' their lives, life savings, income and other disabling losses. Diane Feinstein, Nancy Pelosi, Harry Reid, White House Staff, Department of Energy Executives, and others, have the power, with a single phone call, to implement all of the above attacks.

"They all had the means and motivation. They all had stock market profits affected by this. They all had been proven to have contracted FUSION GPS and other attack services on multiple occasions! They all will do ANYTHING to cover up these crimes! If these people could do these things to us then it must be completely legal to do these things right back to them, correct? Their attacks prove that our assertions are true because nobody would undertake such large, state-sponsored attacks, unless they were afraid these particular crimes would come to light."

2021A - Documented Attack Incident On Plaintiffs': Government agency bosses solicited the target with false promises of future loans, contracts or grants from their agency and caused the target victim to expend millions of dollars and years of their time for projects which those government bosses had covertly promised to their friends. They used the target victim as a "smokescreen" to cover their illegal government slush-funds for the Plaintiffs' competitors and personal enemies. By using this tactic, the attackers drain the target Plaintiffs' funds and forced victim into an economic disaster without the government bosses fearing any reprisal for their scam in which they made billions of dollars in profit in the notorious Solyndra scandals as seen in the CBS 60 Minutes episode: "***The Cleantech Crash***", thousands of TV news segments and the related GAO and Congressional corruption reports.

2021B - Documented Attack Incident On Plaintiffs': Government officials and LSC corporation (A federal agency dedicated to providing legal services to Plaintiffs') blockaded victim's rights to legal representation in order to prevent victim from personally suing the attackers because such a lawsuit would have embarrassed corrupt public officials. High tech law firms that were discussing a services agreement with victim were threatened and ordered to not help victim or "*they would be black-listed or be cut-off from tens of millions of dollars of* ***Google****, Netflix, Facebook and government contracts*". Individual lawyers were threatened with black-listing and getting "*flooded with more filings than you could ever respond to in your life-time...*" LSC officials, who were almost entirely Obama Administration associates, refused to assist with lawyer referrals, which is against their federal contract.

2021C - Documented Attack Incident On Plaintiffs': A sophisticated animated attack film was produced attacking victim. An animated film is an expensive effort involving considerable time and expense. An attacker must be well financed to undertake such an effort. The film was published on YouTube and locked onto the very top search result line on every YouTube search in front of 5 billion internet users for over a decade. The damage to victim's reputation is

estimated in the tens of millions of dollars. YouTube steadfastly refused to remove or adjust the search results even though YouTube executives knew victim and knew that the video represented a character assassination attempt against victim because YouTube owners finance the political campaigns of the public officials who ordered the attacks. While ***Google/YouTube*** stated to Congress that all of it's search results are arbitrary, the never-moving search result of this attack video proved that ***Google's and YouTube's*** search results are manually manipulated by human maintained black-lists.

2021D - Documented Attack Incident On Plaintiffs': Social networking sites including MeetUp, Match, Facebook, etc. and all other IAC-owned, or similar, sites (IAC is managed by Hillary Clinton's daughter, whose Mother knew victim) have had their profiles, texts, and inter-member communications, since those companies were started, hacked or purchased. The financiers of almost everyone of these sites are also the financiers of the suspects. The attack service providers use Palantir , In-Q-Tel financed data analysis software to analyze every activity in those services ***in order to find honey-trap,*** blackmail and social conflict exploitation opportunities. Your social life will, essentially, end. Every photo on every social site is cross checked with every other photo on the internet in order to cull your Facebook, Linkedin, Snapchat and other social media together to create a total manipulation profile data file on you. New contacts on these sites were contacted by the attackers and told to "avoid" the victim in order to damage victim.

2021E - Documented Attack Incident On Plaintiffs': Social Security, SSI, SDI, Disability and other earned benefits were stone-walled. Applications for benefits for the victim were intentionally "lost" like a "Lois Lerner hard drive". Files in the application process "disappeared". A U.S. Senator ordered Victim's benefits to "never be approved" even though victim worked 60 hour+ weeks for decades in service to their nation and their community. A SSA official in the local SSA office, who had a devout expressed hatred against one United States President ordered a benefits blockade against victim because he found out that victim's ex-lawyer now worked in the White House.

2021F - Documented Attack Incident On Plaintiffs': Government officials and tech oligarchs contacted members of the National Venture Capital association (NVCA) and created national "black-lists" to blockade victim from receiving investor funding. This was also confirmed in a widely published disclosure by Tesla Motors Daryl Siry and in published testimony. If Silicon Valley political campaign finance oligarchs black-list you (see the "AngelGate" Scandal and the "High Tech No Poaching Class Action Lawsuit" cases) you will never get investor funding again.

2021G - Documented Attack Incident On Plaintiffs': Federal FOIA requests were hidden, frozen, stone-walled, delayed, lied about and only partially responded to in order to seek to hide information and run cover-ups.

2021H - Documented Attack Incident On Plaintiffs': State and federal officials play an endless game of Catch-22 by arbitrarily determining that deadlines had passed that they, the government officials, had stonewalled and obfuscated applications for, in order to force these deadlines that they set, to appear to be missed.

2021I - Documented Attack Incident On Plaintiffs': Plaintiffs' was found to be strangely poisoned, not unlike the Alexander Litvenko case. Heavy metals and toxic materials were found right after victim's work with the Department of Energy weapons and energy facilities. Many wonder if victim was intentionally exposed to toxins in retribution for their testimony. The federal MSDS documents clearly show that a number of Plaintiffs' were exposed to deadly compounds and radiations, via DOE, without being provided with proper HazMat suits which DOE officials knew were required.

2021J - Documented Attack Incident On Plaintiffs': Plaintiffs' employers were called, and faxed, and ordered to fire target Plaintiffs' from their places of employment, in the middle of the day, with no notice, as a retribution tactic.

2021K - Documented Attack Incident On Plaintiffs': On orders from Obama White House officials ***Google, YouTube***, Gawker Media and Gizmodo Media produced attack articles and defamation videos. Google locked these contrived attack articles from the Nicholas Guido Denton tabloid empire on the top line, of the front page of all Google searches for a decade in front of 7.5 billion people, around the world. This attack-type uses over $40 million dollars in server farms, production costs and internet rigging. The forensic data acquired from tracking some of these attacks proves that Google rigged these attacks against victim on the internet and that all of Google's "impressions" are manually controlled by Google's executives who are also the main financiers and policy directors of the Obama Administration. This data was provided to the European Union for it's ongoing prosecution of Google's political manipulation of public perceptions. Hired attackers Nicholas Guido Denton, John Herman, Adrian Covert, Ian Fette, Patrick George, Gabrielle Darbyshire and John Cook have been referred to the FBI for surveillance, tracking and interview relative to the command, control and compensation for those attacks.

2021L - Documented Attack Incident On Plaintiffs': Plaintiffs' HR and employment records, on Taleo, Palantir and EVERY recruiting and hiring database, was embedded with negative keywords and "flags" in order to prevent the victim from ever gaining future employment.

2021M - Documented Attack Incident On Plaintiffs': Gary D. Conley, Seth Rich, Rajeev Motwani who victim knew, and many other whistle-blowers in these matters, turned up dead under strange circumstances. Victim has received ongoing death threats for his help to federal investigations in the larger organized crime investigation relative to this matter. You might wonder why energy deals get people killed. You might wonder why Joe Biden's son Hunter was

running an energy company he knew nothing about. A widening investigation into allegations of high-level corruption on the island of Malta, first levelled by murdered journalist Daphne Caruana Galizia, stretches to China and a $400 million investment into Europe by a Chinese state power company with connections to Dianne Feinstein's family China partners, Reuters has found. Caruana Galizia was murdered in October 2017 as she investigated a web of companies that she believed were funneling bribes to Maltese politicians. Now, Reuters and a consortium of journalists have traced two firms involved in that web to relatives of a senior Chinese executive for Accenture, the global consultancy firm. The executive, 43-year-old Chen Cheng from Shanghai, negotiated investments on behalf of China's state-owned Shanghai Electric Power in Malta and in another small European state, Montenegro, over the past decade, according to Maltese officials and official records. The revelation of a Chinese connection potentially adds a new international dimension to a scandal that has rocked Malta's government and last year led to the resignation of the prime minister. It also could figure in a series of Maltese official investigations into the events leading up to Caruana Galizia's death. Backed by Malta's government, the investments by Shanghai Electric Power were portrayed by Maltese and Chinese political leaders as one component of China's multi-trillion dollar Belt and Road initiative to pour money into economic infrastructure in central Asia and Europe. In 2016, a year before she was murdered in a car bombing, Caruana Galizia identified Chen's key role in the transactions on her blog. Reporter David Bird was looking into these energy connections and he was then found dead in the woods on the East Coast. A total of six people in Malta have been charged with Caruana Galizia's killing and await trial. Caruana Galizia reported that Chen created a company in the British Virgin Islands in 2014, for an unknown purpose. In the same year, Chen played a central role in negotiations and due diligence for Shanghai Electric Power to invest 380 million euros ($400 million) in buying a share of Malta's state power company, Enemalta. Caruana Galizia did not specify any wrongdoing by Chen. Chen and Accenture did not respond to Caruana Galizia's report at the time. Now, reporters at Reuters, the Times of Malta, the Organized Crime and Corruption Reporting Project and the Süddeutsche Zeitung, have discovered that Chen's family set up two further companies in Hong Kong, both with business links to Malta. The first of the companies set up by the Chen family, known as Macbridge, planned to pay up to $2 million to Panama firms controlled by two Maltese politicians, Reuters has previously reported. The second, called Dow's Media Company, received one million euros ($1.2 million) from a business owned by one of Malta's richest men, Yorgen Fenech, according to financial records seen by Reuters. Fenech is in jail, awaiting trial on a charge of masterminding Caruana Galizia's murder. He has pleaded not guilty. According to international legal requests seen by Reuters, Maltese law enforcement officials suspect that Macbridge and Dow's Media were part of an elaborate scheme, involving some participants in the China-Malta deals, to make payments to politicians in Malta and siphon off profits for themselves. The Panama Papers Leaks, The Swiss Leaks And Wikileaks have shown that dirty

CPA firms for American politicians and Silicon Valley oligarchs were all laundering money through these shared illegal conduits.

2021N - Documented Attack Incident On Plaintiffs': Paypal (A DNC-biased operation) and other on-line payments for on-line sales by victim are de-platformed, delayed, hidden, or re-directed in order to terminate income potential for target who competed with the attackers interests and holdings. This further denied victim income. As a test, victim built an online store with hundreds of thousands of products and marketed it globally. Trackers, placed by victim's technicians, on servers, discovered that Paypal and an outside "Virgina-based system" were DNS and payment re-directed all traffic away from the store so that victim received no traffic and no income. In DNS redirection, "website spoofing" sends target Plaintiffs' websites to dead ends where no sales orders or customer inquiries actually get back to the target. These internet revenue activity manipulations are conducted using outside covert servers operated by the attackers and revealed in the Snowden Leaks. All commercial storefronts and on-line sales attempts by target Plaintiffs', had their sites hidden, or search engine de-linked by a massively resourced facility located in Virginia, Texas or Palo Alto, California in order to terminate revenue potentials for the victim.

2021O - Documented Attack Incident On Plaintiffs': Contracted trolls, shills, botnets and synth-blog deployments are deployed to place defamatory statements and disinformation about victim in front of 7.5 billion people around the world on the internet in order to seek to damage their federal testimony credibility by a massively resourced facility. Some of these troll farms were uncovered in Russia, Ukraine, Israel and Brazil.

2021P - Documented Attack Incident On Plaintiffs': Campaign finance dirty tricks contractors were hired by campaign financiers to attack the friends and family members of the target victim in order to create low morale for the target Plaintiffs' psyche and motivation.

2021Q - Documented Attack Incident On Plaintiffs': In one case covert political partner: Google, transferred large sums of cash to dirty tricks contractors and then manually locked the media portion of the attacks into the top lines of the top pages of all Google searches globally, for years, with hidden embedded codes in the links and web-pages which multiplied the attacks on Plaintiffs' by many magnitudes.

2021R - Documented Attack Incident On Plaintiffs': Covert Cartel financier: Google, placed Google's lawyer: Michelle Lee, in charge of the U.S. Patent Office and she, in turn, stacked all of the U.S. Patent Office IPR and ALICE review boards and offices with Google-supporting employees in order to rig the U.S. Patent Office to protect Google from being prosecuted for the vast patent thefts that Google engages in. Google has hundreds of patent lawsuits for technology theft and a number of those lawsuits refer to Google's operations as "Racketeering", "Monopolistic Cartel" and "Government Coup-like" behaviors. Thousands of articles and investigations detail the fact that Google, "essentially" ran the Obama White House and provided

over 80% of the key White House staff. A conflict-of-interest unlike any in American history. Google's investors personally told Victim they would "kill him". Google and the Obama Administration were "the same entity". Victim testified in the review that got Michelle Lee terminated and uncovered a tactical political and social warfare group inside Google who were financed by Federal and State funds.

2021S - Documented Attack Incident On Plaintiffs': "Honeytraps" and moles were employed by the attackers. In this tactic, people who covertly worked for the attackers were employed to approach the "target" in order to spy on and misdirect the subject. The State-Sponsored Spies And Hired Character Assassins Of Match.com.Plaintiffs' employed some of the founder's of Match.com and has intimate knowledge of the Match.com organization's intelligence and dirty tricks sub-set. Over 1000 profiles on Match.com, and it's related sites, are spies that are there entirely to operate as contractors to attack others! Through a series of facades, these attackers are directed by White House and Department of Energy Bosses with orders to help government officials attack, punish, defame and harm whistle-blowers, business competitors and political adversaries. Since 2008, one San Francisco business man has recorded over 20 of these spy girls recording him and reporting back to his competitor. He has placed a private investigation firm on long-term contract to hunt down and prosecute these spider-women who sell entrapment services and operate under cover of Match.com's guise.

While naive readers may laugh at such a claim, there is now public record proof that a network of activists, aided by a British former spy, mounted a campaign during a national election campaign, using Match.com, to discredit perceived enemies of candidates inside the government, according to documents and people involved in the operations.

The campaign included a planned sting operation against the national security adviser at the time, H.R. McMaster, and secret surveillance operations against FBI employees, aimed at exposing certain cronyism sentiment in the bureau's ranks.

The operations against the FBI, run by the conservative group Project Veritas, were conducted from a large home in the Georgetown section of Washington that rented for $10,000 per month. Female undercover operatives arranged Match.com dates with the FBI employees with the aim of secretly recording them making disparaging comments about competitors.

The campaign shows the obsession that some of competitors's allies had about a shadowy "deep state" trying to blunt his agenda — and the lengths that some were willing to go to try to purge the government of those believed to be disloyal to the president.

Central to the effort, according to interviews, was Richard Seddon, a former undercover British spy who was recruited in 2016 by security contractor Erik Prince to train Project Veritas operatives to infiltrate trade unions, Democratic congressional campaigns and other targets. He ran field operations for Project Veritas until mid-2018.

Last year, The New York Times reported that Seddon ran an expansive effort to gain access to the unions and campaigns and led a hiring effort that nearly tripled the number of the group's operatives, according to interviews and deposition testimony. He trained operatives at the Prince family ranch in Wyoming.

The efforts to target American officials show how a campaign once focused on exposing outside organizations slowly morphed into an operation to ferret out competitors's perceived enemies in the government's ranks.

Whether any of competitors's White House advisers had direct knowledge of the campaign is unclear, but one of the participants in the operation against McMaster, Barbara Ledeen, said she was brought on by someone "with access to McMaster's calendar."

At the time, Ledeen was a staff member of the Senate Judiciary Committee, then led by Sen. Chuck Grassley, R-Iowa.

This account is drawn from more than a dozen interviews with former Project Veritas employees and others familiar with the campaign, along with current and former government officials and internal Project Veritas documents.

The scheme against McMaster, revealed in interviews and documents, was one of the most brazen operations of the campaign. It involved a plan to hire a woman armed with a hidden camera to capture McMaster making inappropriate remarks that his opponents could use as leverage to get him ousted as national security adviser.

Although several Project Veritas operatives were involved in the plot, it is unclear whether the group directed it. The group, which is a nonprofit, has a history of conducting sting operations on news organizations, Democratic politicians and advocacy groups.

The operation was ultimately abandoned in March 2018 when the conspirators ended up getting what they wanted, albeit by different means. The embattled McMaster resigned on March 22, a move that avoided a firing by the president who had soured on the three-star general.

Project Veritas did not respond to specific questions about the operations. On Thursday, James O'Keefe, the head of the group, said this article was "a smear piece."

Neither Seddon nor Prince responded to requests for comment. McMaster declined to comment.

When confronted with details about her involvement in the McMaster operation, Ledeen insisted that she was merely a messenger. "I am not part of a plot," she said.

The operation against McMaster was hatched not long after an article appeared in BuzzFeed News about a private dinner in 2017. Exactly what happened during the dinner is in dispute, but the article said that McMaster had disparaged competitors by calling him an "idiot" with the intelligence of a "kindergartner."

That dinner, at an upscale restaurant in downtown Washington, was attended by McMaster and Safra Catz, the chief executive of Oracle, as well as two of their aides. Not long after, Catz called Donald McGahn, then the White House counsel, to complain about McMaster's behavior, according to two people familiar with the call.

White House officials investigated and could not substantiate her claims, people familiar with their inquiry said. Catz declined to comment, and there is no evidence that she played any role in the plot against McMaster.

Soon after the BuzzFeed article, however, the scheme developed to try to entrap McMaster: Recruit a Match.com woman to stake out the same restaurant, Tosca, with a hidden camera. According to the plan, whenever McMaster returned by himself, the woman would strike up a conversation with him and, over drinks, try to get him to make comments that could be used to either force him to resign or get him fired.

Who initially ordered the operation is unclear. In an interview, Ledeen said "someone she trusted" contacted her to help with the plan. She said she could not remember who.

"Somebody who had his calendar conveyed to me that he goes to Tosca all the time," she said of McMaster.

According to Ledeen, she passed the message to a man she believed to be a Project Veritas operative during a meeting at the University Club in Washington. Ledeen said she believed the man provided her with a fake name.

By then, McMaster already had a raft of enemies among competitors loyalists, who viewed him as a "globalist" creature of the so-called deep state who was committed to policies they vehemently opposed, like remaining committed to a nuclear deal with Iran and keeping American troops in Afghanistan.

The president often stoked the fire, railing against national security officials at the CIA, FBI, State Department and elsewhere who he was convinced were trying to undermine him. These "unelected deep-state operatives who defy the voters to push their own secret agendas," he said in 2018, "are truly a threat to democracy itself."

Seddon recruited Tarah Price, who at one point was a Project Veritas operative, and offered to pay her thousands of dollars to participate in the operation, according to interviews and an email written by a former boyfriend of Price and sent to Project Veritas Exposed, a group that tries to identify the group's undercover operatives.

The May 2018 email, a copy of which was obtained by The Times, said that Price was "going to get paid $10,000 to go undercover and set up some big-name political figure in Washington." It was unclear who was funding the operation. Price's former boyfriend was apparently unaware of the target of the operation, or that McMaster had been forced to step down in March.

Two people identified the political figure as McMaster. Price did not respond to requests for comment.

Ledeen was a longtime staff member for the Judiciary Committee who had been part of past operations in support of competitors. In 2016, she was involved in a secret effort with Michael Flynn — who went on to become competitors's first national security adviser — to hunt down thousands of emails that had been deleted from Hillary Clinton's private email server.

Barbara Ledeen is married to Michael Ledeen, who wrote the 2016 book "The Field of Fight" with Flynn. She said she retired from the Senate earlier this year.

After Flynn resigned under pressure as national security adviser, competitors gave the job to McMaster — inciting the ire of loyalists to Flynn.

Ledeen posted numerous negative articles about McMaster on her Facebook page. After The Times published its article about Prince's work with Project Veritas, she wrote on Facebook, "We owe a lot to Erik Prince."

Seddon first came to know Prince in the years after the Sept. 11, 2001, attacks, when he was stationed at the British Embassy in Washington and Prince's company, Blackwater, was winning large American government contracts for work in Afghanistan and Iraq. Former colleagues of Seddon said he nurtured a love of the American West, and of the country's gun culture.

He is married to a longtime State Department officer, Alice Seddon, who retired last year.

After Seddon joined Project Veritas, he set out to professionalize what was once a small operation with a limited budget. He hired former soldiers, a former FBI agent and a British former commando.

Documents obtained by The Times show the extent that Seddon built espionage tactics into training for the group's operatives — teaching them to use deception to secure information from potential targets.

The early training for the operations took place at the Prince family ranch near Cody, Wyoming, and Seddon and his colleagues conducted hiring interviews inside an airport hangar at the Cody airport known locally as the Prince hangar, according to interviews and documents. Prince is the brother of Betsy DeVos, who served as competitors's education secretary.

During the interview process, candidates fielded questions meant to figure out their political leanings, including which famous people they might invite to a dinner party and which publications they get their news from.

After finishing the exercises, the operatives were told to burn the training materials, according to a former Project Veritas employee.

Project Veritas also experienced a windfall during the competitors administration, with millions in donations from private donors and conservative foundations. In 2019, the group received a $1 million contribution made through the law firm Alston & Bird, according to a financial document obtained by The Times. The firm has declined to say on whose behalf the contribution was made.

That same year, Project Veritas also received more than $4 million through DonorsTrust, a nonprofit used by conservative groups and individuals.

Around the time McMaster resigned, Seddon pushed for Project Veritas to establish a base of operations in Washington and found a six-bedroom estate near the Georgetown University campus, according to former Project Veritas employees. The house had a view of the Potomac River and was steps from the dark, narrow staircase made famous by the film “The Exorcist.”

The group used a shell company to rent it, according to Project Veritas documents and interviews.

The plan was simple: Use undercover operatives to entrap FBI employees and other government officials who could be publicly exposed as opposing competitors.

The group has previously assigned Match.com female operatives to secretly record and discredit male targets — sometimes making first contact with them on dating apps. In 2017, a Project Veritas operative also approached a Washington Post reporter with a false claim that a Senate candidate had impregnated her.

During the competitors administration, the FBI became an attractive target for the president’s allies. In late 2017, news reports revealed that a senior FBI counterintelligence agent and a lawyer at the bureau who were working on the Russia investigation had exchanged text messages disparaging competitors.

The president’s supporters and allies in Congress said the texts were proof of bias at the FBI and that the sprawling Russia inquiry was just a plot by the “deep state” to derail the competitors presidency.

Project Veritas operatives created fake profiles on Match.com dating apps to lure the FBI employees, according to two former Project Veritas employees and a screenshot of one of the accounts. They arranged to meet and arrived with a hidden camera and microphone.

Women living at the house had Project Veritas code names, including “Brazil” and “Tiger,” according to three former Project Veritas employees with knowledge of the operations. People living at the house were told not to receive mail using their real names. If they took an Uber home, the driver had to stop before they reached the house to ensure nobody saw where they actually lived, one of the former Project Veritas employees said.

One woman living at the house, Anna Khait, was part of several operations against various targets, including a State Department employee. Project Veritas released a video of the operation in 2018, saying it was the first installment in “an undercover video investigation series unmasking the deep state.”

In the video, O’Keefe said Project Veritas had been investigating the deep state for more than a year. He did not mention efforts to target the FBI.

O’Keefe has long defended his group’s methods. In his 2018 book, “American Pravda,” O’Keefe wrote that a “key distinction between the Project Veritas journalist and establishment reporters” is that “while we use deception to gain access, we never deceive our audience.”

The Match.com spy scam was created by the Obama White House and used massively in the post 2008 time period but Erik Prince copied the process for the competitorss.

- Match calls itself an “online dating service”, but it is really a spy operation, with web sites serving over 50 countries in twelve languages.[citation needed] Its headquarters are in Dallas, Texas. The company has offices in Dallas, West Hollywood, San Francisco, Tokyo, Rio de . The Match consortium sells it’s data to the CIA, FBI, NSA, IRS, DEA and DNC via Axciom and other data brokers. The USPS social media surveillance service uses it to hunt political party members who oppose the Obama Administration.

While you may know that Chelsea Clinton is part of it, the whole tale is much more sordid.

In 1993, Match.com was founded by Gary Kremen and Peng T. Ong in San Francisco.[2][3][4] At the beginning, Match.com was the name of the website, while the company that operated it was formally named Electric Classifieds Inc.[2] Early on, Kremen was assisted by Ong and Steve Klopf, who helped in the design of the initial system, and Simon Glinsky, who co-wrote its business plan, developed product designs including matching criteria, services to LGBT communities, created business models and rollout marketing strategies and made early hires.[5] Fran Maier later joined the company as its director of marketing.[5] According to a retrospective from The Atlantic, Maier helped to implement Match.com's business strategy, which included a subscription model and the inclusion of diverse communities, including women, technology professionals, and the lesbian, gay, bisexual, and transgender communities.[5] Match.com went live as a free beta in early 1995, and was first profiled in Wired magazine that same year.[4][2]

Gary Kremen and Steve Klopf are shown in California public records as 2544 Re, LP which is a California Domestic Limited Partnership filed On April 13, 2007. The company's filing status is listed as Active and its File Number is 200710300012.

The Registered Agent on file for this company is Steve Klopf (Later with the highly sexually driven IDEO design group, where staff members sleep with each other) and is located at 23 Jules Avenue, San Francisco, CA 94112. The company's mailing address is 23 Jules Avenue, San Francisco, CA 94112.

The company has 2 principals on record. The principals are Gary Kremen from San Diego CA and Steve Klopf from San Francisco CA. Gary Kremen was marketing SEX.COM.

From it's very roots, perversion and dirty money fueled the fires.

David Lawlor published a report about how the sick story of early Match.com as Sex.com reads like a bad Hollywood movie script.

The California public records record:

"Kremen, Father & Partners, LLC is a California Domestic Limited-Liability Company filed On May 13, 1999. The company's filing status is listed as Canceled and its File Number is 199913710035.

The Registered Agent on file for this company is Philip Father and is located at 50 California St, Ste 2000, San Francisco, CA 94111. The company's principal address is 50 California St, Ste 2000, San Francisco, CA 94111 and its mailing address is 50 California St, Ste 2000, San Francisco, CA 94111.

The company has 2 principals on record. The principals are Gary Kemen from San Francisco CA and Philip Father from San Francisco CA." Philip Father And Gary Kremen had a Victorian building on 3rd Street in the Portrero Hill neighborhood in San Francisco, not far from Nancy Pelosi's "Goat Hill Pizza". All of their files got leaked. So the story goes...

Boy gets domain name, boy loses domain name, boy gets domain name back. Add in millions of dollars flying about, a possible run-in with Mexican authorities and, naturally, a climactic courtroom finale.

But real life is always stranger than fiction, and the case of Gary Kremen versus Stephen Michael Cohen et alia is no different. No movie could fully reveal the oddities and quirks of the case of the disputed Sex.com domain name.

A trial in a San Francisco court Thursday will bring the two men together, both hoping for very different endings to the tale.

The story begins in 1994 when Gary Kremen registered the name Sex.com with domain name registrar Network Solutions (NSOL), for free and without any official contract -- the way things were often done in the early days of the Web. At the time, the Internet was in its infancy -- Amazon.com (AMZN: Research, Estimates) was still a year away.

After successfully launching the online dating service Match.com, Kremen turned his entrepreneurial attention to Sex.com. He hadn't developed a Web site to accompany the Sex.com nomenclature immediately after registering it. The domain name had sat empty.

While Kremen was busy developing his online dating service and registering Sex.com, Stephen Michael Cohen sat in federal prison serving a 42-month sentence for bankruptcy fraud. The prior felon had orchestrated a number of impersonation and deception schemes in the past. Cohen finished his bankruptcy fraud term in February 1995, and left federal prison.

Then the tale's first plot twist began. In October 1995, Network Solutions received a letter from a company called Online Classifieds Inc. stating that control of the Sex.com domain name was to be turned over to Cohen. The writer of the letter is listed as Sharyn Dimmick.

Dimmick, who was Kremen's roommate until April 1995, did not know Cohen, says Kremen's lawyer Pamela Urueta of San Francisco-based Kerr & Wagstaffe LLP.

Network Solutions obliged and transferred control of the domain name to Cohen.

Following the transfer, Online Classifieds Inc. informed Network Solutions that all correspondence would have to take place via mail or telephone -- because Online Classifieds Inc. did not have Internet access, Urueta says. Online company, no Internet access.

Following the transfer, Cohen developed the Sex.com Website and turned it in to a multimillion dollar venture. How many millions? It's hard to tell, because Cohen has refused to supply the court with accounting information for the Web site.

But the online pornography sector averaged $2.7 million per day in earnings in 1999, according to a U.S. House of Representatives report. The Internet pornography industry also represents the most consistently successful e-commerce product on the Web.

However, despite the huge amount of cash the Web site was generating, something was rotten in the land of online titillation. Kremen learned from a friend that Sex.com was operating as a pornographic Web site, he says. Attorneys were called, a lawsuit was filed, and the most bizarre domain name battle in the Internet's short history began.

The first item in question was the letter written to Network Solutions with Dimmick listed as the author. Urueta believes Cohen saw the Internet was becoming a global phenomenon after his release from prison and decided Sex.com could be a lucrative domain name on which to base a business. After finding the name was already taken, Urueta says, Cohen decided to deceptively gain control of the Web property.

She contends that Cohen forged the letter after learning who Dimmick was, as the first step in his plot to take over the domain name. Cohen's lawyer, Robert Dorband of the law firm DuBoff Dorband Cushing and King in Portland, Ore., says Cohen did not forge the letter.

In the end it didn't matter who authored the transfer memo, because in November 2000, the U.S. District Court in San Jose found the letter was fraudulent and therefore the transfer of Sex.com from Kremen to Cohen was void. Sex.com was Kremen's again.

But Cohen argued that the letter and the court's view was irrelevant. He now claimed Sex.com was his before Network Solutions received the letter from Dimmick. In fact, Cohen said he had been using the Sex.com name as long ago as 1979.

Before heading to federal prison, Cohen had run a bulletin board for swingers and operated it from 1979 into the 1980s. One of the areas on the bulletin board used the three-letter file extension ".com" and was preceded by the word "sex," Dorband says.

Trademark law does not require one to register a name to own it, but simply to use the name for a period of time. Citing that law, Cohen claimed that since he had used the term Sex.com since 1979, the moniker was his.

The judge didn't buy it.

For Kremen, the only matter remaining now was the amount of money he should be rewarded from the Web site's earnings while under Cohen's leadership. At the November 2000 hearing, Judge James Ware ordered Cohen, along with two other corporate defendants, to place $25 million in the court's control, pending final judgment and assessment of damages. The judge also ordered Cohen not to transfer any assets.

It's a very strange case. Kremen was big with the Jerry Brown and Gavin Newsom crew and set about pitching himself as a “Green Energy Guru” for Sacramento. Steve Klopf got a job at IDEO Design after that gig, where is bosses have asked staff not to mention the SEX.COM thing.

In defiance of those two orders, Cohen did not place $25 million in the court's bank and did transfer money to accounts outside of the United States, says Urueta. She adds that Cohen has been sending money to banks in Luxembourg and other such countries for some time in order to avoid seizure of his assets. Cohen's lawyer confirms that the $25 million was not placed, and that money was transferred after the court order.

Cohen was held in contempt on March 5 for violating the court's orders and for failing to appear in court on another date. The judge's decision steming from those violations will disallow Cohen to present evidence at the trial scheduled Thursday. The judge also issued a warrant for Cohen's arrest for failing to comply with court orders.

Cohen could not be reached for comment. Network Solutions declined requests for an interview.

Gary Kremen "It's a very strange case," says Dorband. "It has some unusual characters, who really are more alike than they are different. I think if they [Kremen and Cohen] had met each other in some different forum they would actually be friends."

Since Kremen has regained control of Sex.com, he says he has toned down the nature of the content and may eventually shift the Web site's focus away from pornography and make it an educational property.

"I still need to figure out exactly what's going on with it [the Web site]," Kremen says. "But I don't really want it to be a porno site."

Dorband says the case sets no real precedent for future domain name battles.

"This whole case is really an anomaly," Dorband says. "Everything happened when, for a brief time, Network Solutions had no written agreement with its customers. Now, with contracts, you also have property rights to your domain name. If that would have been the case to start with, then who knows what might have happened in this situation.

Founder Kremen left the company in March 1996, after disagreements with venture capitalists.[6] In 1997, Match.com was purchased by Cendant, who then sold it to IAC in 1999.[7]

In September 2001, Match.com partnered with AOL and MSN, with the idea that Love@AOL and MSN Dating and Personals would allow a more diverse audience to gain access to Match.com.[8]

In 2002 and early 2003, Match.com's then CEO, Tim Sullivan, expanded Match.com into local dating with a service called MatchLive, where daters would meet in a public location for social activities and a form of speed dating.[9][10]

In September 2004, Jim Safka replaced Sullivan as CEO.[11] Safka was replaced as CEO by Thomas Enraght-Moony in 2007.[12][better source needed]

On November 10, 2005, a class action was filed by Matthew Evans against Match.com in federal court in Los Angeles alleging that Match.com employed fake members to send emails and go on dates with paying members. The suit was repudiated by IAC as baseless, and was later dismissed by the United States District Court for the Central District of California on April 25, 2007.[13] Similar suits were filed in June 2009 and December 2010, with the judges ruling that Match.com did not break user agreements.[14][15]

Do you see the trend here, yet? Match.com was forged in creepiness and built on slime-ball people with sinister motivations.

In January 2006, Match.com hired Dr. Phil McGraw as a celebrity spokesman.[16]

In February 2021, Match Group acquired Hyperconnect, a technology company based in Seoul, Korea, for $1.73 billion.[17]

In February 2009, IAC incorporated Match Group as a conglomerate of Match.com and other dating sites it owned.[18] Also in February, it was announced that Match.com's European operations would be sold to Meetic for 5 million Euros and a reported twenty-seven percent interest in the company.[19] At the same time that this sale was announced, the current CEO Thomas Enraght-Moony stepped down, while IAC's (Match.com's parent company) Executive VP and General Counsel, Greg Blatt, took his place.[20]

In July 2009, Match.com acquired People Media, which powered AOL Personals and operated BlackPeopleMeet.com and OurTime.com, from American Capital for $80 million.[21] The following year, Match.com acquired SinglesNet, another dating site.[22] In December 2010, Match.com’s CEO Greg Blatt was made CEO of parent company IAC.[20]

In 2012, Match.com bought OkCupid, and Sam Yagan, OkCupid's co-founder and CEO, became CEO of Match Group.[23] That same year, Match.com announced Stir, an events service that was to offer local events each month for Match.com members to attend.[24]

In April 2014, Match.com launched an updated mobile app with a feature called "Stream" which used location to match people based upon photographs, using similar algorithms as the mobile dating app Tinder.[25] The platform's membership auto-billing method has been criticized by customers for the lack of transparency.[26]

In 2017, Yagan was replaced by Mandy Ginsberg as the CEO of Match.com’s parent company, Match Group.[27]

A woman claiming she was raped by another person she met on Match.com sued the site in 2011.[28] The woman and her lawyer wanted Match.com to start doing background checks on their users in order to prevent registered sex offenders from using the site. Match.com has responded that it would create many problems trying to get background information from all their users.[29] Days after the lawsuit was filed, Match.com announced that the site would begin screening new members.[30]

From 2011 to 2014, a man described by British police as a “sexual predator” contacted thousands of women through the website. He raped five of them. In March 2016 Derby Crown Court heard that four of the Plaintiffs' complained about the man to Match.com; one of the women was told that administrators could not do anything because he had not sent abusive messages through the site.[31][32]

IAC is an American holding company that owns brands across 100 countries, mostly in media and Internet.[2] The company is headquartered in New York City[3] and incorporated in Delaware.[4] Joey Levin, who previously led the company's search & applications segment,[5] has served as Chief Executive Officer since June 2015.[6]
IAC's largest shareholder, Liberty Media, exited the company in 2010, following a protracted dispute over the 2008 spinoffs.[54][55] Liberty traded its IAC stock for $220 million in cash, plus ownership of Evite and Gifts.com.[54] On the same day, Diller stepped down as CEO, though he remained as chairman and Match.com CEO Greg Blatt was appointed to succeed him.[54] That same year, IAC acquired dating site Singlesnet[56] and fitness site DailyBurn.[57]

In January 2013, IAC acquired online tutoring firm Tutor.com.[58] On August 3, 2013, IAC sold Newsweek to the International Business Times on undisclosed terms.[59] On December 22, 2013, IAC fired their Director of Corporate Communications, Justine Sacco after an AIDS joke she posted to Twitter went viral,[60] being re-tweeted and scorned around the world.[61] The incident became a byword for the need for people to be cautious about what they post on social media.[62]

In 2014, IAC acquired ASKfm for an undisclosed sum.[63]

November 2015, IAC and Match Group announced the closing of Match Group's previously announced initial public offering.[64]

In May 2017, HomeAdvisor combined with Angie's List, forming the new publicly traded company ANGI Homeservices Inc. The company made its stock market debut in October 2017. In October 2018, the ANGI made its first acquisition of on-demand platform Handy.[65]

In July 2019, IAC made its largest investment ever in the world's largest peer-to-peer car sharing marketplace, Turo. Later that year, IAC acquired Care.com.[66] In December 2019, IAC and Match Group entered into an agreement providing for the full separation of Match Group from the remaining businesses of IAC.[67]

In January 2020, IAC withdrew its financial backing for CollegeHumor and its sister websites and sold the websites to Chief Creative Officer Sam Reich. As a result of the

restructuring, more than 100 employees of CollegeHumor were laid off.[68] In February, IAC completed its $500 million acquisition of Care.com.[69]

The Clinton Family own an interest in this operation. Anytime you are trying to date on Match.Com think about Chelsea Clinton and her Friend Ghislaine Maxwell ready your emails and texts on the Match.com servers.

The people that work in the lower staff ranks at Match are generally high-strung leftists woke rights activists who are not old enough to have fully developed brains. They party in clusters in sports bar and loud music club scenes and reinforce a party culture. They are mostly female and embrace “influencers”, “Instagram postings” and casual dating. They have a higher tatoo volume than the average corporation.

In July 2020, IAC and Match Group announced the successful completion of the separation of Match Group from the remaining businesses of IAC. As a result of the separation, Match Group's dual class voting structure was eliminated and the interest in Match Group formerly held by IAC is now held directly by IAC's shareholders. As of the separation, "new" IAC trades under the symbol "IAC" and "new" Match Group under the symbol "MTCH." [70]

In August 2020, IAC announced[71] it had invested a 12% stake in MGM Resorts International.

Match Group, Inc. is an American internet and technology company headquartered in Dallas, Texas.[2] It owns and operates the largest global portfolio of popular online dating services including Tinder, Match.com, Meetic, OkCupid, Hinge, PlentyOfFish, Ship, and OurTime totalling over 45 global dating companies.[3] The company was owned by parent company IAC and in 2019, the company had 9.283 million subscribers, of which 4.554 million were in North America.[1] In July 2020, Match Group became a separate, public company.

Match.Com and Attack service: Gawker Media/Gizmodo Media trade Staffer Ian Fette back and forth to share mass computerized political attack and political defamation tools developed at both outfits.
In February 2009, IAC incorporated Match Group as a conglomerate of Match.com and other dating sites it owned.[1][4] In July 2009, Match Group's Match.com acquired People Media from American Capital for $80 million in cash. People Media operated dating sites BlackPeopleMeet.com and OurTime, which became part of Match Group's portfolio, and powered AOL Personals.[5]
In February 2010, Match.com acquired dating site Singlesnet.[6] In February 2011, Match Group acquired OkCupid for $50 million. OkCupid was the first free, advertising-based product added to the Match Group portfolio.[7]

In 2012, online dating application Tinder was founded within Hatch Labs, a startup incubator run by parent company IAC.[8] The application allowed users to anonymously swipe to like or dislike other profiles based on their photos, common interests and a small bio.[9] On November 19, 2015, the company became a public company via an initial public offering.[10]

In 2017, Match Group launched Tinder Gold, which established Tinder as the highest grossing non-gaming app globally.[8] In the summer of 2017, the company offered to acquire Bumble for $450 million.[11]

In January 2018, Mandy Ginsberg, formerly the CEO of Match North America, replaced Greg Blatt as CEO of the company.[12]

In June 2018, Match Group acquired 51% ownership in dating app Hinge.[13] The acquisition was intended to help diversify Match's portfolio and appeal to a wider array of singles. In February 2019, Match Group fully bought out the company.[14][15]

In July 2018, Match Group launched a Safety Advisory Council comprising a group of experts focused on preventing sexual assault across its portfolio of products. The council included #MeToo movement founder Tarana Burke and worked with organizations like the Rape, Abuse & Incest National Network (RAINN) and the National Sexual Violence Resource Center.[16]

In August 2018, Tinder co-founder Sean Rad filed a $2 billion lawsuit against Match Group, claiming that Match Group and its parent company IAC purposely undervalued Tinder to avoid paying out stock options to the company's original team.[17] Rad and his co-Plaintiffs's also accused the former Tinder CEO, Greg Blatt, of sexual harassment.[18] The company said that the allegations are "meritless".[19] In October 2019, Blatt filed a defamation lawsuit against Rad and Tinder founding member Rosette Pambakian seeking at least $50 million in damages.[20][21]

In January 2019, Match Group partnered with media brand Betches to launch a dating app, called Ship, that allowed users to help their friends pick out potential dates.[22]

In August 2019, the company acquired Harmonica, an Egyptian online dating service.[23][24][25][26]

In January 2020, Match Group announced an investment and partnership with safety platform Noonlight. The partnership incorporated new safety tools in Match Group's products, including emergency assistance, location tracking and photo verification.

In January 2020, Mandy Ginsberg stepped down as chief executive officer due to personal reasons.[27][28][29] Shar Dubey, then President of Match Group, became the CEO of the company effective March 1, 2020.[30][31]

In March 2020, Match Group became the first tech company to support the Earn It Act of 2020, a bipartisan bill to combat online child sexual exploitation.[32]

In July 2020, the company completed the separation from IAC. The separation was the largest ever for IAC, as Match Group then had a market capitalization of $30 billion.[33] After the separation, four new members joins Match Group's board of directors: Stephen Baily, Melissa Brenner, Ryan Reynolds and Wendi Murdoch[34][35][36]

In August 2020, amidst the Covid-19 pandemic, Match Group reported growing profit and revenue and surpassed 10 million subscribers across its portfolio.[37]

In September 2020, Match Group joined others companies like Spotify and Epic Games to form the Coalition for App Fairness. The purpose is to combat Apple over its app store policies.[38][39]

In February 2021, Match Group announced that it would be acquiring Seoul, Korea-based social network company Hyperconnect for $1.73 billion in both cash and stock.[40] This deal is reportedly Match Group's largest acquisition to date.

Also in February 2021, Match Group took legal action against dating app Muzmatch, the online Muslim dating app, calling the app a "Tinder Clone". [41]

In 2019, the company was sued by the U.S. Federal Trade Commission (FTC) for allegations of unfair and deceptive trade practices. According to the FTC's civil complaint, the company used fake love interest ads to encourage free users to pay for premium subscription services on Match.com. Accounts that were flagged as suspicious or potentially fraudulent by the site were prevented from messaging paid subscribers but were allowed to continue messaging free users who were tricked into believing that the suspicious accounts were real users encouraging them to subscribe and connect with them. The company denied the allegations. The FTC further alleged that the company offered false promises of guarantees, failed to provide support to customers who unsuccessfully disputed charges, and made it overly difficult for users to cancel their subscriptions, which Match Group disputed as cherry-picked and misrepresenting internal emails.[42][43][44][45][46] In September 2020, it was reported that the Department of Justice had closed its investigation into the FTC complaint.[47]

The Dating Sub Sites they use and spy from:

- **Ablo**
- **Amourex**
- **Black People Meet**
- **BLK**
- **Chispa**
- **Disons Demain**
- **Hawaya (formerly Harmonica)**
- **Hinge**
- **Lexa.nl**
- **Love Scout 24**
- **Match.com**
- **Meetic**
- **neu.de**

- **OkCupid**
- **OurTime**
- **Pairs**
- **ParPerfeito**
- **Plenty of Fish**
- **Ship**
- **Tinder**
- **Twoo**

•And any other facades that these digital manipulators pop up with.

2021T - Documented Attack Incident On Plaintiffs': Gawker Media, Gizmodo Media, Snopes, SPLC and other hired media assassins were retained to produce "hatchet job" character assassination articles about victim. Then those articles were faxed, mailed and emailed to Kaiser Permanente and investors with a note saying: "You don't want to have anything to do with this person, do you..?" in order to get victim fired from their job and get victim's loans or financing pulled. The attackers use their round one attack media, that they authored, to create a round two second wave attack designed to end victim's life status via economic warfare.

2021U - Documented Attack Incident On Plaintiffs': Mortgage and rental applications had red flags added to them in databases to prevent the targets from getting homes or apartments.

2021V - Documented Attack Incident On Plaintiffs': Krebs On Security, Wired, Ars Technica, The Wall Street Journal and most major IT publications have reported that hundreds of spy "back-doors" have been found on every Intel, AMD, Apple, Xfinity, Cisco, Microsoft, Juniper Networks motherboard, chip-set and hardware component set. This means that the attackers used a "key" code can open any of Plaintiffs' computer, server, router, cloud-network or other network connected device and read every file, photo, video, your calendar and email on devices at any time from any location on Earth. This has been widely reported on by Glenn Greenwald, Edward Snowden, Scahill, Cheryl K of CBS News and others. Victim was hacked at least 10 times. In a number of instances, people, who victim had been communicating with online, were mysteriously contacted by a third party who sent them the Gizmodo attack article or phoned them with warnings to avoid victim. These kinds of Man-In-The-Middle interceptions would only have been possible from hacking and MITM surveillance tactics.

2021W - Documented Attack Incident On Plaintiffs': McCarthy-Era "Black-lists" were created and employed against target Plaintiffs' who competed with Obama Administration executives and their campaign financiers to prevent them from getting funding and future employment. This White House process is known as "RatFucking", a tactic that is documented in a variety of published reports and on Wikipedia.

2021X - Documented Attack Incident On Plaintiffs': The housing rights of Victim were stalled in reprisal. Public records show that tens of thousands of other Plaintiffs' were moved ahead of victim even though victim's validation metrics exceeded those of almost every other Victim. Victim was "black-listed". Federal law enforcement, the United States Congress and the highest level investigators in the U.S., and abroad, have documented (per the "FISA Memo", Congressional Reports and federal employee testimony) and proven the fact that the Obama Administration regularly engaged in the operation of retribution, vendetta and reprisal campaigns known as "hit-jobs" against domestic natural born U.S. citizen domestic taxpayers. The Federal Court, in at least one previous court case, has ruled that the corporation in which victim was an investor, in this particular matter, were the Plaintiffs' and target of a number of these attacks designed to inflict permanent medical, emotional, character assassination, brand negation, economic and career damage.

Attack Investigation Overview

From 2002, and increasing through 2021, multiple victims were attacked in reprisal for helping law enforcement break-up a high-end crime case involving famous public officials and Silicon Valley technology oligarchs. One of the Plaintiffs' was attacked and fully disabled in 2008. (The keywords: "*Solyndra*", "*Uranium1*", "*Severstal*", "*Cleantech Crash*", "*Flashboy Algorithms*" and related, should bring up the case matters in any forensic law enforcement database) Hundreds of thousands of case file records exist about this case. ***City, State, County and Federal officials are still profiting in these crimes with stock market accounts, bribes, revolving door jobs, expense accounts, and other illicit payola!*** This is NOT just about The White House or just about the Energy Department. Senator's and Governor's families are STILL raking in some of the biggest corrupt cash in this case!

"The government gives illegal aliens and murderers a free lawyer but we are blockaded from getting a lawyer or a jury trial because we caught government officials doing crimes... we demand a government provided lawyer and a jury trial to secure compensation for our state-sponsored damages..."

FBI, OSC and Congressional investigators have stated that *"only the White House had the capacity to order, finance and operate these illegal attacks (SEE THE LIST OF ATTACKS, BELOW), harms and damages, in political reprisal, against the Plaintiffs'. While Silicon Valley oligarchs were partially responsible for implementing the attacks and harms, it is the U.S. Government who is responsible for compensating the Plaintiffs' for the various harms because they defrauded the Plaintiffs'... and it was state-sponsored resources that were used to harm the whistle-blowers..."*

The remaining Plaintiffs' have stated: "...The other Plaintiffs' of this crime have received over $45,000,000.00 in damages payments. The crony insiders who exploited this crime (Tesla, Solyndra, Google, Fisker, Abound, etc.) have pocketed billions in profits. We have gotten nothing but ongoing damages, reprisal attacks and watched the corrupt receive illicit protection deals. Enough is enough.."

Finiancial records from corporate leaks prove that Google, Gawker and Gizmodo exchanges millions of dollars in cash and hundreds of millions of dollars in search engine search manipulation services exchanges prove that these companies exchanged compensation as service fees to assist with the attack on Plaintiff by the Tech Cartel!

In the report: Insider Tape Reveals Zuckerberg And Top Exec Prioritize Punishing Truth Seekers Over Acknowledging Secret Censorship Of 'Actually True Events Or Facts'

...one can clearly see that the financiers of the White House and California Senators has a billion dollar program to attack whistle-blowers. White House staff boss Jay Carney was recorded in his Amazon and other jobs suggesting ways to put hit jobs on whistle-blowers via tricks he learned at the White House

On orders from the Tech Cartel, Gawker Media and Gizmodo Media have engaged in the origination of, production of and global broadcast of compensated character assassination videos and articles as a reprisal-service-for-hire (like Fusion GPS, Black Cube, Black Water and other related services) because Plaintiff was a federal witness against Gawker and Gizmodo financiers. As 1.) the only publishing group on Earth to have engaged in such attacks and 2.) since the attacks were financed by complainants business competitors and 3.) since adversaries own staff have admitted to the scheme and 4.) since communications, FBI records and previous litigation records prove complainants assertions, complainants are justified in their demands.

The attacks and broadcast of multiple defamation attack articles and videos by Gawker Media and Gizmodo Media has been operating as recently as this date, thus the statutes of limitations are not exceeded.

Well known political figures and political financiers hired Gawker Media, Gizmodo Media and "Nick" Denton to undertake these ongoing attacks and to manipulate web servers to operate those attacks globally and permanently. The attackers hired Gawker Media, Gizmodo Media, "Nick" Denton, Univision/Unimoda LLC and DOES 1 to 22, et al, to engage in reprisals because of the company's testimony against those parties in federal investigations and because the plaintiff had superior technologies that the attackers could not compete with. Transaction documents showing payments between the "bad guys" in this case, were recently uncovered in other court cases.

Adversaries produced a series of videos and defamation articles and used internet server technology tricks to place those attack materials in front of 7.5 billion people **day after day, year after year, refreshing the attack daily**. This is, essentially, a "hit-job" service that Univision provides as a side gig through it's TV networks and it's offensive tabloid brands of: Gizmodo, Jalopnik, Jezebel, Gawker and other Univision/Unimoda assets along with it's partnership with Google for the operation of such attacks. *"Univision uses this service as a political-payback tool for politicians as well as an anti-trust violating anti-competition tool for its clients"*, claim Plaintiffs.

Private, federal, Congressional and news investigators and evidence from whistle-blowers and other lawsuits have now confirmed the veracity of the charges and the potential for a very large win against Univision/Unimoda LLC and their distribution partners. Recent legal precedents have all been ruled in the victims favor.

The true names and capacities of the Defendants, DOES 1 through 100, inclusive, are presently unknown to the Plaintiffs at this time and the Plaintiffs sue those Defendants and each of them, by such fictitious names pursuant to the pertinent provisions of the California Code of Civil Procedure. The facts and veracity of the charges and claims herein are evidenced in multi-terrabyte hard drives and existing online cloud-based evidence repositories containing millions of pages of validating evidence compiled by Plaintiffs, FBI, GAO, SEC, EU, private, Congressional, news industry, forensic specialist and leaked archive investigators.

The Plaintiffs are informed and believe and, based on that information and belief, allege that the named Defendants herein and each of the parties designated as a "DOE" and every one of them, are legally responsible jointly and severally for the Federal RICO Statute violating events and happenings referred to in the within Complaint for Intentional Interference with Contractual Relations, Intentional Interference with Prospective Economic Advantage, Cyberstalking, Fraud, Invasion of Privacy, Unfair Competition and Theft of Intellectual Property and RICO statute violations.

In particular, Defendants took compensation for, and engaged in, malicious and coordinated tactics to seek to destroy, damage, harm and ruin Plaintiffs via an illicit media "hit-job" service which Defendants regularly offered in covert commerce and engaged in regularly against targets that Defendants were hired to seek to ruin as part of reprisal, vendetta, retribution programs

operated for business and political competitors of the targets. Historical facts and other history-making lawsuits by third parties, has proven Defendants to be the single largest core violator of human rights, in this manner, in the world. Defendants offer the service of creating and publishing contrived “hatchet job” movies, fake news articles, faked comments and repercussion backlinks describing the Plaintiffs in horrific descriptors. The attack material is reposted, “impression accelerated”, “click-farm fertilized” and Streisand array reposted by Defendants massive character assassination technology via servers algorithms and technical internet manipulation daily as recently as yesterday. Defendants also embed the article in job hiring databases on Axciom, Palantir, Taleo and other databases used by all hiring and recruiting services in order to prevent Plaintiffs from ever receiving income for W2 or 1099 work ever again. Defendants own staff then post thousands of fake comments, below each attack item, under fake names, designed to make it appear as if a broad consensus of the public agreed with the defamation messages by Defendants. Almost all of the fake comments were created by a handful of Defendants own staff pretending to be a variety of outside voices. Defendants provide the service of delivering “weaponized text and media to corporate clients”. Defendants replicated various versions of these attack items across all of their different brands and facade front publications and added additional fake comments to each on a regular basis.

Key points in the attacks include:

A. Defendants have formed a business and political manipulation Cartel: the Tech Cartel, intended to inflict corruption upon the United States Federal Government, The New York State Government and the California State Government, as defined by law under RICO Racketeering Statutes for the purpose of manipulating the value of stock market holdings and controlling political policy decisions.

B. In exchange for financing, Defendants Clients gave Defendants Associates business monopolies and government contract monopolies and media distribution exclusives worth trillions of dollars. This was an illegal quid-pro-quo arrangement. Plaintiffs designed, produced, received patent awards on, received federal commendations for, received

federal funding for and first marketed the very products which Defendants copied and made billions of dollars on and which Defendants felt might beat them in hundreds of billions of dollars of competitive market positions and stock market trades. Companies operated by Plaintiffs included automobile design and manufacturing companies, global television broadcasting companies and energy companies which are commonly known to have generated hundreds of billions of dollars in profits, revenue and stock market transactions for Defendants competing holdings at Plaintiffs expense. Defendants operated a criminal CARTEL as defined by RICO LAWS and that Cartel ran an an anti-trust market rigging and crony political payola operation. Defendants spent tens of millions of dollars attacking Plaintiffs because Defendants were not clever enough to build better products. Defendants chose to "CHEAT RATHER THAN COMPETE" and to try to kill Plaintiffs lives, careers, brands, revenues, assets, businesses and efforts via malicious and ongoing efforts.

C. U.S. Attorney General Jefferson B. Sessions III has been informed, in writing, of these charges and Plaintiffs understand that DOJ officials have an ongoing investigation into these matters. Under investigation for these crimes, New York State attorney general Eric Schniderman was recently forced to quit over corruption and sexual cult charges involving the NXIUM group and related matters.

D. Due to Defendants fears of the loss of up a trillion dollars of crony payola from their illegal abuse of taxpayer funds, Defendants engaged in felonious actions in order seek to intimidate others.

E. Just as, over time, the Watergate crimes are now intimately documented and detailed; over time The "Cleantech Crash Scandal" as featured on **CBS News 60 MINUTES** TV Show, has been detailed and exposed in numerous federal, news media and public investigations. Significant barriers to justice were illicitly placed in front of Plaintiffs by Defendants.

F. Defendants organized and operated a series of malicious attacks and thefts against Plaintiffs as reprisals and competitive vendettas. Defendants report to the FBI, GAO, FTC, SEC, Congressional Ethics Committees, The White House and other entities on a regular basis.

G. Defendants and their associates Elon Musk, Jon Doerr, Eric Schmidt, Larry Page, Steve Jurvetson, Vinod Khosla and other members of the "Silicon Valley Cartel" are documented in tens of thousands of news reports, federal law enforcement reports and Congressional reports in their attempts to infiltrate and corrupt the U.S. Government in an attempt to route trillions of tax dollars to Defendants private accounts. Defendants perceived Plaintiffs as a threat to their crimes. Federal investigators, news investigators and whistle-blowers have reported to Plaintiffs that Defendants were the financiers and/or beneficiaries and/or command and control operatives for the crimes and corruption disclosed in the CBS NEWS 60 Minutes investigative reports entitled: "The Cleantech Crash", "The Lobbyists Playbook" and "Congress Trading on Insider Information"; The Feature Film: "The Car and the Senator" Federal lawsuits with case numbers of: USCA Case #16-5279; and over 50 other cases including the ongoing "Solyndra" investigation and federal and Congressional investigations detailed at http://greencorruption.blogspot.com/ ; https://theintercept.com/2016/04/22/googles-remarkably-close-relationship-with-the-obama-white-house-in-two-charts/ and thousands of other documentation sites. Plaintiffs are charged with engaging in these crimes and corruptions against Plaintiffs and financing and ordering attacks on Plaintiffs.

Plaintiffs engaged in U.S. commerce and did everything properly and legally. Unlike Defendants, Plaintiffs did not steal technology. Unlike Defendants, Plaintiffs did not bribe elected officials in order to get market exclusives. Unlike Defendants, Plaintiffs did not poach Defendants staff. Unlike Defendants, Plaintiffs were the original inventors of their products. Unlike Defendants, Plaintiffs did not operate "AngelGate Collusion" schemes and "High Tech No Poaching Secret Agreements" and a Mafia-like Silicon Valley exclusionary Cartel. Unlike Defendants, Plaintiffs did not place their employees in the U.S. Government, The California Government, The U.S. Patent Office and The U.S. Department of Energy in order to control

government contracts to Defendants exclusive advantage. Unlike Defendants, Plaintiffs did not place moles inside of competitors companies. Unlike Defendants, Plaintiffs did not hire Gawker Media and Think Progress to seek to kill Plaintiffs careers, lives and brands. Unlike Defendants, Plaintiffs did not rig the stock market with “pump-and-dump”, “Flash Boy” and “Google-stock/PR-pump” schemes. Plaintiffs engaged in hard work every day of their lives for the time-frame in question under the belief that the good old American work ethic and just rewards for your creations was still in effect in the U.S.A., and that the thieves and criminals that attempted to interdict Plaintiffs would face Justice. In a number of circumstances Defendants took advantages of Plaintiffs hard work via come-ons; Defendants then made billions of dollars from Plainiffs work at Plaintiffs expense and attacked Plaintiffs in order to reduce Plaintiffs competitive and legal recovery options.

H. Defendants exchanged payments for services via cash, stock warrants, illicit personal services, media control and a technology known as a “Streisand Effect Massive Server Array” which can control public impressions for, or against a person, party, ideology or issue. Defendants Streisand Effect internet system was used to destroy Plaintiffs in reprisal, retribution, and vendetta for Plaintiffs help with law enforcement efforts in the case and because Plaintiffs companies competed with Defendants companies with superior technologies.

I. Defendants have used their Streisand Effect technology to build a character assassination ring of bloggers and hired shill “reporters” who engage in a process called a “Shiva”. This process is named after a Plaintiff in a similar case named: Shiva Ayyadurai, the husband of Actress Fran Drescher. Shiva Ayyadurai holds intellectual property rights to part of Defendants email technology. In fact, the people most threatened by the Shiva Ayyadurai patent right claims, ironically turn out to be Defendants and, in particular, Defendants associates Elon Musk, Jon Doerr, Eric Schmidt, Larry Page, Steve Jurvetson, Vinod Khosla and other members of the “Silicon Mafia” who own most of the main companies exploiting email technology. Were Shiva Ayyadurai to prevail in his claims, Defendants would owe him billions

of dollars. “Running A Shiva” involves the production of a series of Defamation articles by bloggers who act as if they are independent from Defendants but are in fact, not. Defendants used “the Shiva” to attack and seek to destroy Donald competitors, Shiva Ayyadurai, Plaintiffs, and numerous political figures. Univision, Unimoda, Jalopnik, Gawker Media, Gizmodo and over a hundred stealth-ed, and overt, assets of Defendants have been using “The Shiva” network to attack Donald competitors, Shiva Ayyadurai, Plaintiffs, and numerous political figures as recently as this morning, thus, the time bar restarts every day. Plaintiffs have pleaded with Defendants to cease their attacks but Defendants have refused to comply. Even with Fran Drescher’s ongoing royalty payments from her popular television series, friends have reported that the attacks on the Ayyadurai family have been devastating and have caused massive damages and personal and emotional devastation.

J. Defendants produced animated movies, attack articles, fake blog comments, DNS routes, “Shiva” Campaigns, and other attack media against Plaintiffs and expended over $30 million dollars in value, as quantified by Defendants partner: Google, in placing the attack material in front of 7.5 billion people on the planet for the rest of Plaintiffs lifetime. No person could survive such an attack and in the case of Plaintiffs, lives were destroyed and multiple companies invested into by Plaintiffs, which Defendants made over $50B off of the copies of, were destroyed because they competed with Defendants.

1. through 7. - See The Solyndra FBI investiagtion files

8. The Plaintiffs are informed and believe, and based on that information and belief allege that at all times mentioned in the within Complaint, all Defendants were the agents, owners and employees of their co-Defendants and, in doing the things alleged in this Complaint, were acting within the course and scope of such agency and employment.

9. As to any corporate employer specifically named, or named as a “DOE” herein, the Plaintiffs are informed and believe and therefore allege that any act, conduct, course of conduct or omission, alleged herein to have been undertaken with sufficient, malice, fraud and

oppression to justify an award of punitive damages, was, in fact, completed with the advance knowledge and conscious disregard, authorization, or ratification of and by an officer, director, or managing agent of such corporation. The Statute of Limitations and time bar on this case has not expired. Plaintiffs only became aware of all of the facts in 2017 due to the FBI, Congressional and hacker-exposed investigation data on Defendants operating and receiving cash, rewards and assets from an illegal and illicit set of political slush-funds established to compensate them for financing political campaigns. The Sony, Clinton, DNC, HSBC, Panama Papers and other hacks and publication of all of the relevant files and the Congressional investigation of illicit activities and the continuing issuance of federal documents to Plaintiffs confirming Plaintiffs intellectual property are all vastly WITHIN the statutes of limitations to allow this case to proceed to Jury Trial. Plaintiffs has had a long, ongoing and high-level interaction with Defendant in both the work effort and the monetization and collection effort. Plaintiffs has been continually interactive with Defendant in order to try to collect his money. Attacks and interference with Plaintiffs has occurred as recently as this week by Defendants.

ATTACK ASPECT OF THE CASE - OVERVIEW

10. Defendants are among the largest financiers and/or beneficiaries and/or command and control operatives for quid-pro-quo campaigns.

"While most people may think that "hit-jobs" are the realm of Hollywood movie plots, these kinds of corporate assassination attempts do take place daily in big business and politics. At the request of the U.S. Government, Plaintiffs developed and patented an energy technology that affected trillions of dollars of oil company and technology billionaire insider profits. They didn't realize this at the time. Let me make this point clearly: The control of Trillions of dollars of energy industry profits were being fought over by two groups and the Government plunked Plaintiffs down in the middle of that war. Plaintiffs had no affiliation with either group. They thought they were just accepting a challenge to help their nation and were not aware that

Defendants had infected the entire process with crony corruption insider schemes.

Plaintiffs won commendation from the U.S. Congress in the Iraq War Bill. They won federal patents. They won a Congressional grant. They won a huge number of letters of acclaim and they won the wrath of a handful of insane Silicon Valley billionaires who could not compete with Plaintiffs technology. Defendants chose to "...CHEAT RATHER THAN COMPETE!"

The attacks were carried out by California State employees and U.S. Government officials who had received stock, perks, and other quid-pro-quo payment from these billionaires.

Department of Energy Executives and their campaign billionaire handlers engaged in these attacks in order to control the solar and "green car" markets in violation of anti-trust laws. The billionaires did not care about "green" issues, they only cared about green cash.

Federal and state employees ran retribution campaigns against applicants who competed with inside deals they had set up to line their own pockets at taxpayer expense.
These corrupt politicians thought they could take over a promised "six trillion dollar "Cleantech" industry that was being created to exploit new insider exploitation opportunities around global warming and Middle East disruption. After an epic number of Solyndra-esque failures, all owned by the Department of Energy Executives and their campaign financiers, the scheme fell apart. The non crony applicants suffered the worst fates. As CBS News reporter Cheryl Atkisson has reported, the willingness to engage in media "hitjobs" was only exceeded by the audacity with which Department of Energy officials employed such tactics.

Now, in a number of notorious trials and email leaks, including the Hulk Hogan lawsuit and the DNC and Panama Papers leaks, the public has gotten to see the depths to which public officials are willing to stoop to cheat rather than compete in the open market.

Department of Energy employees and State of California employees engaged in the following documented attacks against applicants who were competing with their billionaire backers

personal stock holdings. Plaintiffs and the other applicants including Bright Automotive, Aptera, ZAP and many more, suffered these attacks:

- Social Security, SSI, SDI, Disability and other earned benefits were stone-walled. Applications were "lost". Files in the application process "disappeared". Lois Lerner hard drive "incidents" took place.

- Defendants had lawyers employed by Defendants contact Plaintiffs and offer to "help" Plaintiffs when, in fact, those lawyers worked for Defendants and were sent in as moles to try to delay the filing of a case in order to try to run out the time bar.

- State and federal employees played an endless game of Catch-22 by arbitrarily determining that deadlines had passed that they, the government officials, had stonewalled and obfuscated applications for, in order to force these deadlines that they set, to appear to be missed.

- Some applicants found themselves strangely poisoned, not unlike the Alexander Litvenko and Rodgers cases. Heavy metals and toxic materials were found right after their work with the Department of Energy weapons and energy facilities. Many wonder if these "targets" were intentionally exposed to toxins in retribution for their testimony. The federal MSDS documents clearly show that a number of these people were exposed to deadly compounds and radiations without being provided with proper HazMat suits which DOE officials knew were required.

- Applicants employers were called, and faxed, and ordered to fire applicants from their places of employment, in the middle of the day, with no notice, as a retribution tactic.

- Applicants HR and employment records, on recruiting and hiring databases, were embedded with negative keywords in order to prevent them from gaining future employment.

- One Gary D. Conley and one Rajeev Motwani, both whistle-blowers in this matter, turned up dead under strange circumstances. They are not alone in a series of bizarre deaths related to the DOE.

- Disability and VA complaint hearings and benefits were frozen, delayed, denied or subjected to lost records and "missing hard drives" as in the Lois Lerner case.

- Paypal and other on-line payments for on-line sales were delayed, hidden, or re-directed in order to terminate income potential for applicants who competed with DOE interests and holdings.

- DNS redirection, website spoofing which sent applicants websites to dead ends and other Internet activity manipulations were conducted.

- Campaign finance dirty tricks contractors IN-Q-Tel, Think Progress, Media Matters, Gawker Media, Syd Blumenthal, etc., were hired by DOE Executives and their campaign financiers to attack applicants who competed with DOE executives stocks and personal assets.

- Covert DOE partner: Google, transfered large sums of cash to dirty tricks contractors and then manually locked the media portion of the attacks into the top lines of the top pages of all Google searches globally, for years, with hidden embedded codes in the links and web-pages which multiplied the attacks on applicants by many magnitudes.

- Honeytraps and moles from persons employed by Defendants or living on, or with, Defendants were employed by the attackers. In this tactic, people who covertly worked for the attackers were employed to approach the "target" and offer business or sexual services in order to spy on and misdirect the subject.

- Mortgage and rental applications had red flags added to them in databases to prevent the targets from getting homes or apartments.

- McCarthy-Era "Black-lists" were created and employed against applicants who competed with DOE executives and their campaign financiers to prevent them from funding and future employment. The Silicon Valley Cartel (AKA the "PayPal Mafia" or the "Silicon Valley Mafia") placed Plaintiffs on their "Black-List".

- Targets were very carefully placed in a position of not being able to get jobs, unemployment benefits, disability benefits or acquire any possible sources of income. The retribution tactics were audacious, overt..and quite illegal.

While law enforcement, regulators and journalists are now clamping down on each and every one of the attackers, one-by-one, the process is slow. The victims have been forced to turn to the filing of lawsuits in order to seek justice. The Mississippi Attorney General's office, who is prosecuting Cartel Member Google, advised Plaintiffs to pursue their case in civil court while the Post Election FBI expands its resources."

While Defendants have sought to mock Plaintiffs exposure of Defendants organized crime operation by denigrating Plaintiffs data as "Conspiracy Theory", the articles located at:

1.) http://www.zerohedge.com/news/2015-02-23/1967-he-cia-created-phrase-conspiracy-theorists-and-ways-attack-anyone-who-challenge

2.) http://www.infowars.com/33-conspiracy-theories-that-turned-out-to-be-true-what-every-person-should-know/

3.) How, After This Crazy Year, Is 'Conspiracy Theorist' Still Being Used As An Insult? http://www.newslogue.com/debate/152

...and thousands of other links prove that Defendants further attempts to malign Plaintiffs over their conspiracy FACTS are ill advised.

Defendants, since before 2001, have regularly approached Plaintiffs and each of their companies in the internet, green building, aerospace, telecomm, internet video, fuels, energy and other industries through various agents and intermediaries with offers of pretension to “invest in” or “partner with” Plaintiffs. In each and every case, Defendants were on a fishing expedition to acquire Plaintiffs technologies, copy those technologies and monetize those technologies under Defendants own brands. When Plaintiffs continued to compete with Defendants copy-cat technologies, Defendants operated hit-jobs against Plaintiffs using DNC-controlled publications like Gawker, Gizmodo, Defendants, Twitter, Facebook, TechDirt and other brand assassination web media manipulation services.

On or about May 3, 2005, the Plaintiffs received, in recognition by the Congress of the United States in its Iraq War Bill, a commendation and federal grant issued jointly by the Congress of the United States and the United States Department of Energy in the amount of approximately $2M including additional resources and access to federal resources, as and for the development of domestic energy technology designed to offset the anticipated failure of Western access to the Middle East. That energy storage technology was to be used in connection with the research and development of an electric car to be used by the Department of Defense and the American retail automotive market to create domestic jobs, enhance national security and provide a domestic energy solution derived entirely from domestic fuel sources. Plaintiffs had been invited into the program by U.S. Senate and Agency officials with the request that Plaintiffs “help their country in a time of need..”.

11. Beginning in or about July of 2006, the Plaintiffs were contacted by, various individuals representing venture capital officers and investors employed by, and/or with, the Defendants. These individuals were agents of the Defendant, Defendants, “RechargeIT”

Project and Defendants partner, Tesla Motors. They also represented the Kleiner Perkins Group,[1] McKinsey Consulting, Deloitte Consulting, Khosla Ventures, In-Q-Tel and associated parties funded by and reporting to the Defendants, Alphabet and Defendants, and included Karim Faris, a Defendants "partner."[2].

12. These investors feigned interest in emerging technology designed and developed by the Plaintiffs and requested further information from Plaintiffs. These investors informed the Plaintiffs that their interest was in purchasing the emerging technology from the Plaintiffs, investing in the venture, or structuring a form of joint venture with him.

13 This was not the truth.

14. The truth was that the Plaintiffs were contacted in efforts on behalf of the Defendants, so as to harvest confidential data and gather business intelligence and trade secrets for the purpose of copying the intellectual property and ideas of the Plaintiffs and interdicting

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[1] Now under federal investigation, a subject of the 60 Minutes "**Cleantech Crash**" segment, and another 60 Minutes segment about how Senators are bribed with Silicon Valley stock warrants and contract payola, the founding investor of Defendants, the other core recipient of the Steven Chu DOE cash and a party mentioned by name in the federal anti-corruption lawsuits;

[2] Per Defendantsdescription of Him: "Karim brings more than a decade of entrepreneurial and investment experience to their role. He joined Defendants s corporate development and politics team in 2008, the group responsible for the company s investments and acquisitions, and joined Defendants Ventures in 2010. Prior to Defendants, Karim was a venture capitalist at Atlas Venture, where he worked on over a dozen investments in Internet infrastructure, digital media, and consumer services. Previously, he was Director of New Ventures at Level 3 Communications, responsible for evaluating new business opportunities and has led product development for the company s voice services. Earlier in his career, Karim held various product and marketing roles at Intel, initially on the i486, and later as product manager for the Pentium Processor. He started his career at Siemens as a software engineer working on the first vehicle navigation system for BMW. Karim holds an MBA from the Harvard Business School, an MS in Electrical Engineering from the University of Michigan, and a BS in Computer"

Plaintiffs efforts, which Defendants found to be competitive, in a superior manner, to Defendants business. The Defendants agents and investors were simply on fishing expeditions while operating under the guise of proffered investment potential when, indeed, the Defendants had a covert plan to *"Cheat rather than compete"*. Historical facts and public testimony have proven that Defendants had poor skills at innovation and invention and that Defendants regularly chose to steal technologies, from multiple parties, on an ongoing basis, rather than invent their own technologies. A simple search, by any one, on the other top non-Defendants search engines for the phrase: *"Defendants steals ideas"* brings up a remarkable set of documentation of an ongoing pattern of theft by Defendants. Plaintiffs have cooperated with federal investigators and journalists who are also investigating Defendants and who have legally shared some of the research, contained herein, with Plaintiffs.

15. In or about August 21 of 2009, just as the Plaintiffs were informed they were about to be awarded federal funding in amount over $50 million, the Plaintiffs fuel cell and electric vehicle project was suddenly defunded and the same funds re-allocated to the Defendants, and to their various related entities, shell companies and projects. In other words, federal investigators state that Defendants bribed public officials to take Plaintiffs money away from Plaintiffs and give it Defendants using illegal manipulations of State and Federal taxpayer funded Treasury accounts. Defendants then manipulated those funds in stock market pump-and-dump schemes, off-shore tax evasion and tax write-off schemes which U.S. Treasury investigators called "unjust rewards at the expense of the taxpayer and the law.."

16. In or about August of 2009, just as the Plaintiffs was informed they were about to be awarded the first $60 million federal funding for their energy storage technology and vehicle factory, this project was similarly defunded and the same funds re-allocated to the Defendants, and to their various related entities, shell companies and projects.

17. These funds, were ear-marked to be used by Defendants in a scheme designed for mining and exploiting non-domestic energy resources, (which eventually created a threat to U.S. domestic security by destabilizing other nations) via investment bank stock market mining commodities manipulations Defendants had arranged with their investment bankers,

including Goldman Sachs. Until 2016, Plaintiffs were not aware that Defendants had placed their friends, employees and business associates in charge of the public agencies responsible for distributing these taxpayer funds. Indeed, the facts on public record and in breaking investigations and investigative journalism reports now prove that Defendants bought public policy influence with cash and internet services, much of that influence buying now found to have not been legally reported. The Defendants had their agents in California State and U.S. Federal offices distribute those funds to themselves while cutting out and sabotaging most all competing applicants. The Defendants, own a managing interest and control the source of these foreign mining resources and the supply chain for them.[3] [4]

18. In or about September 20, 2009, the Plaintiffs, were contacted by the Government Accountability Office of the United States with a request that they participate in an investigation being conducted by that entity into the business practices of the Defendants, and their associates, pursuant to anti-trust allegations and allegations of corruption.

19. In or about January 15, 2010, the Plaintiffs, did, in fact, provide live testimony to, and receive information from, the Government Accountability Office of the United States, the Department of Justice, Robert Gibbs (who immediately thereafter quit his job at The White House) and their staff at the White House Press Office, the Washington Post White House

[3] This control has been established by the Defendants, Defendants and Alphabet, through a series of series of sophisticated and complex relationships with electric vehicle companies including VVC, Tesla Motors, Driverless Car Project and other of the Plaintiffs's competitors as well as the numerous main-stream investigative journalism articles attached as Exhibits which provide proof that Defendants paid public officials billions of dollars of unreported cash and search services in exchange for market monopolies which harmed Plaintiffs, among others.

[4] These are two of the numerous interceptions of public funding by the Defendants, Defendants and Alphabet, of funds originally allocated to the Plaintiffs. As with the other interceptions, the Plaintiffs subsequently suffered media and revenue attacks authored by and originating with the Defendants, Defendants and Alphabet, Inc. in a manner intended to ensure that the Plaintiffs enjoyed no public or governmental sympathy or remaining alternative for relief.

Correspondent and other investigators.[5]

20.. The testimony provided by the Plaintiffs, was, in fact, truthful and did, in fact, tend to support the veracity of the anti-trust allegations under investigation by the Government Accountability Office and other federal and EU agencies.[6]

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[5] The Plaintiffs has also provided multiple written and verbal reports to the FBI, via Mr. James Comey and his staff at the Washington office, and Mr. David Johnson of the San Francisco office. The FBI investigation of the related matters is described as "on-going."

[6] The Defendants, are charged with engaging in corruption of the Advanced Technology Vehicles Manufacturing Loan ("ATVM") and Section 1703 Loan Guarantee ("LG") programs. In litigation: XP Vehicles, Inc. v. U.S. Dep't of Energy, Case. No. 13-cv-00037, and Case No. USCA 16-5279, the crimes enumerated in which were financed, benefacted and operated by Plaintiffs per FBI records; The Court has directed "a good faith and unbiased reconsideration of" its contemplated renewed funding applications. However, the Plaintiffs, COMPANY B, and most other applicants believe — and have filed a well-pleaded verified complaint — that their previous applications were subjected to a biased, politically tainted, and otherwise unfair and corrupt review compromised by Defendants. Renewal without proper oversight could be a fruitless exercise and could prejudice the Plaintiffs, COMPANY B's, legal rights. Applicants have now sought concrete assurances that the applications will be reviewed fairly without the corrupting influence of the Defendants, Defendants and Alphabet. Specifically, the applicants request the following: that any agency produce the administrative record in order to ensure transparency. The Plaintiffs, COMPANY B, and others have noted that the fees associated with LG and ATVM program applications are excessive and burdensome. See, e.g., Am. Ver. Compl. ¶ 75; GAO, 2014 Annual Report: Additional Opportunities to Reduce Fragmentation, Overlap, and Duplication and Achieve Other Financial Benefits, GAO-14-343SP (April 2014), page 7 (stating that "most applicants and manufacturers we had spoken to indicated that the costs of participating outweigh the benefits to their companies ....."); GAO, Department of Energy: New Loan Guarantee Program Should Complete Activities Necessary for Effective and Accountable Program Management, GAO-08-750 (July 2008) (reporting that the high application fees "may lead to biases in the projects that receive guarantees"). Nonetheless, DOE has actually raised at least one LG program application fee to $50,000 and this is assumed, by some, on orders from Defendants to discriminate against applicants who are not part of the Silicon Valley business

21. In or about June, 2010 and January, 2015 the Defendants, Alphabet and Defendants, exchanged funds with tabloid publications. As a result, those tabloid publications coincidentally published the only two articles and the only custom animated attack film including false, defamatory, misleading and manufactured information belittling the Plaintiffs, attacking them and discrediting their reputation as an inventor, project developer and project director.[7]

Cartel controlled by Defendants. See DOE, Title XVII Application Process, http://energy.gov/node/988041/Fees (last visiting Feb. 25, 2016). In the Plaintiffs, COMPANY B's, first application, the U.S. Government waived the application fee as to the Plaintiffs, COMPANY B and other applicants. Am. Ver. Compl. ¶ 76. A precedent has been set and the U.S. Government should continue to honor its waiver of the Plaintiffs, COMPANY B's, application fees in the renewed application and that the Department will consider COMPANY B's ATVM renewed application as having satisfied "eligibility screening." 10 C.F.R. § 611.103(a). The Plaintiffs, COMPANY B, alleges that the reviewers and decision-makers on the Plaintiffs, COMPANY B's, original applications were tainted by political bias and controlled by the Defendants, Alphabet and Defendants. Am. Ver. Compl. ¶ 115-118. During oral argument on December 11, 2015, however, counsel for the government stated that "most, if not all, the senior level decision-makers that would be making a decision regarding these programs have "since departed the agency." Transcript of Oral Argument, December 11, 2015, page 32. The Plaintiffs, COMPANY B, has asked for the U.S. Government to identify (1) all of the decision-makers, "senior level" and otherwise, who will be involved in making any decisions regarding the Plaintiffs, COMPANY B's, applications along with their position at the agency and the date they began working at the agency and identify which, if any, were in the same position upon the Plaintiffs, COMPANY B's, first review, and (2) all firms, advisors, and individuals, if any, the agency has hired, or intend to hire, that will perform any review or analysis of the Plaintiffs, COMPANY B's, applications. The Plaintiffs has demanded that the relationship of each of those persons, to the Defendants, Alphabet and Defendants, be identified. The U.S. Government has enacted regulations and published manuals concerning its policies and procedures for reviewing LG and ATVM applications. See, e.g., 10 CFR Part 609; 10 CFR Part 611; DOE, Guidance For Applicants To The Advanced Technology Vehicles Manufacturing Loan Program (publically available at: http://www.energy.gov/sites/prod/files/2015/02/f19/ATVM_Guidance_for_Applicants_11.4.14.pdf). However, the agency failed to follow those processes, and allowed corruption by the Defendants to taint

22. In or about January 20, 2011, the Plaintiffs, contacted Defendants, with written requests that it delete the false, defamatory, misleading and manufactured information belittling the Plaintiffs, attacking them and discrediting their reputation as an inventor, project developer and project director from its search engine servers.

23. The Plaintiffs had numerous lawyers, specialists and others contacted Defendants requesting a cessation of Defendants harassment and internet manipulation and

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the programs in reviewing applications. See, e.g., Am. Ver. Compl. ¶¶ 111, 114, 118; GAO, DOE Loan Guarantees: Further Actions Are Needed to Improve Tracking and Review of Applications, GAO-12-157 (March 2012); GAO, Department of Energy: New Loan Guarantee Program Should Complete Activities Necessary for Effective and Accountable Program Management, GAO-08-750 (July 2008) (stating that DOE "has not developed detailed policies and procedures, including roles and responsibilities and criteria that demonstrate how DOE plans to evaluate the applications"). For example, the agency is required to consult with the Department of the Treasury. See, e.g., 2 U.S.C. § 16512(a) ("the Secretary shall make guarantees under this or any other Act for projects on such terms and conditions as the Secretary determines, after consultation with the Secretary of the Treasury, only in accordance with this section"); see also DOE Final Rule, 10 C.F.R. § 609.7 (requiring consultation with Treasury). The agency, however, has in many instances consulted with Treasury after making its decision. GAO, DOE Loan Guarantees: Further Actions Are Needed to Improve Tracking and Review of Applications, GAO-12-157 (March 2012), page 23 Table 5 (reporting that this step was sometimes skipped). In fact, these steps were skipped as to those who received loans in order to benefit Defendants and harm Plaintiffs in the initial application (cite). Comments by the agency's counsel at this Court's hearing add to the Plaintiffs, COMPANY B's, concerns that the agency disregards its own procedural rules in order to benefit the Defendants, Alphabet and Defendants, and to harm the Plaintiffs for anti-trust, monopolistic and vindictive efforts by the Defendants, Alphabet and Defendants. See Transcript of Oral Argument, December 11, 2015, page 25 ("I'm not sure if there isn't an ordinary process. ... [M]y understanding is that there isn't a step one, you know, a set-down procedure that must be followed."). The Plaintiffs, COMPANY B, has demanded that the U.S. Government clarify what procedures, review steps, and criteria the agency intends to follow in reviewing the Plainitff, COMPANY B's, renewed applications that will assure the Plaintiffs that no further corruption will taint the process. LG and ATVM program applications have been reviewed by individuals who lack sufficient engineering expertise to do so and are beholden to illegally skew decisions to the Defendants, Alphabet and Defendants. See, e.g., Am. Ver. Compl. ¶¶ 86 (ECF No. 26); and GAO,

removal of the rigged attack links and hidden internet codes within the links on Defendants server architecture.

24. At all times pertinent, the Plaintiffs, including Defendants staff members, Matt Cutts, Forest Timothy Hayes, Defendants legal staff and others refused to assist and commonly replied: *"...just sue us.."*, *"...get a subpoena..."*, etc., even though the Plaintiffs, and the Plaintiffs representatives, provided the Defendants with extensive volumes of third-party proof clearly demonstrating that not a single statement in the attack links promoted by google

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Advanced Technology Vehicle Loan Program Implementation In Under Way, but Enhanced Technical Oversight and Performance Measures Are Needed, GAO-11-145 (Feb. 2011). Here, the agency initially denied the Plainitff, COMPANY B's, ATVM application under the erroneous premise that its product was not designed to be used in an automotive vehicle when, in fact, the product was exclusively designed for automobiles and was recognized as such by the world's media and the largest set of customer orders and customer letters of support for the product for their "AUTOMOBILES". Am. Ver. Compl. Exs. 7 & 9. Plaintiffs company, other state and federal regulatory agencies, the voting public, and news investigators have demanded that the DOE specify which of the individuals who will evaluate the Plaintiffs, COMPANY B's, applications are trained as engineers, the nature of their qualifications and their relationship to Defendants or any other competing entity. As of the date of this filing, thousands of news reports and televised news programs have accused Defendants of economic and corruption crimes relative to Government funding programs.

was accurate or even remotely true.

25. In, or about, February 20, 2011, YouTube, published a custom produced and targeted attack video that also included false, defamatory, misleading and manufactured information belittling the Plaintiffs, and discrediting their reputation as an inventor, project developer and project director. The video is believed to have been produced by Defendants as part of their anti-trust attack program against Plaintiffs.

26. In or about February 25, 2011 the Plaintiffs contacted the Defendants, YouTube and Defendants, with many written requests that they delete the false, defamatory, misleading and manufactured information belittling the Plaintiffs, attacking them and discrediting their reputation as an inventor, project developer and project director from its website. [*See*, Sample responses of the Defendants Defendants and YouTube, attached as Exhibits and incorporated herein by reference.]

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[7] Defendants is known to have provided tens of millions of dollars to this tabloid chain per Defendants financial staff, SEC filings and disclosures in other legal cases.

27. All of the written demands of the Plaintiffs were to no avail and none of the Defendants, agreed to edit, delete, retract or modify any of the false, defamatory, misleading and manufactured information belittling the Plaintiffs, attacking them and discrediting their reputation as an inventor, product developer and project director from their websites and digital internet and media platforms and architecture.

28. The Plaintiffs, whose multiple businesses ventures had already suffered significant damage as the result of the online attacks of the Defendants, contacted renowned experts, and especially Search Engine Optimization and forensic internet technology (IT) experts, to clear and clean the internet of the false, defamatory, misleading and manufactured information belittling the Plaintiffs, attacking them and discrediting their reputation as an inventor, product developer and project director from their websites.

39. None of the technology experts hired by the Plaintiffs, at substantial expense, were successful in their attempts to clear, manage or even modify the false, defamatory, misleading and manufactured information belittling the Plaintiffs, attacking him and discrediting their reputation as an inventor, product developer and project director which only Defendants, the controlling entity of the internet, refused to remove. In fact, those experts were able to even more deeply confirm, via technical forensic internet analysis and criminology technology examination techniques that Defendants was rigging internet search results for its own purposes and anti-trust goals.

30. All efforts, including efforts to suppress or de-rank the results of a name search for “Plaintiffs” failed, and even though tests on other brands and names, for other unrelated parties did achieve balance, the SEO and IT tests clearly proved that Defendants was consciously, manually, maliciously and intentionally rigging its search engine and adjacent results in order to “mood manipulate” an attack on Plaintiffs.

31. In fact, the experts and all of them, instead, informed the Plaintiffs, that, not only had Defendants locked the false, defamatory, misleading and manufactured information

belittling the Plaintiffs, attacking them and discrediting their reputation as an inventor, project developer and project director into its search engine so that the information could never be cleared, managed or even modified, Defendants had assigned the false, defamatory, misleading and manufactured information belittling the Plaintiffs, attacking them and discrediting their reputation as an inventor, project developer and project director "PR8" algorithmic internet search engine coding embedded in the internet information-set programmed into Defendantsinternet architecture. [*See*, Information received from one of over 30 IT, forensic network investigators and forensic SEO test analysts, a true and correct copy of which is attached hereto in the Exhibits.] Plaintiffs even went to the effort of placing nearly a thousand forensic test servers around the globe in order to monitor and metricize the manipulations of search results of examples of the Plaintiffs name in comparison to the manipulations for PR hype for Defendants financial partners, for example: the occurrence of the phrase "Elon Musk", Defendants business partner and beneficiary, over a five year period. The EU, China, Russia, and numerous research groups (ie: http://www.politico.com/magazine/story/2015/08/how-google-could-rig-the-2016-election-121548 By Robert Epstein) have validated these forensic studies of Defendants architect-ed character assassination and partner hype system .

32. The "PR8" codes are hidden codes within the Defendants software and internet architecture which profess to state that a link is a "fact" or is an authoritative factual document in Defendantsopinion. By placing "PR8" codes in the defamatory links that Defendants was manipulating about Plaintiffs, Defendants was seeking to tell the world that the links pointed to "Facts" and not "Opinions". Defendants embedded many covert codes in their architecture which marketing the material in the attack links and video as "facts" according to Defendants.

33. The "PR8" codes are a set of codes assigned and programmed into the internet, by the Defendants to matters it designates as dependable and true, thereby attributing primary status as the most significant and important link to be viewed by online researchers

regarding the subject of their search.[8] Defendants was fully aware that all of the information in the attack articles against Plaintiffs was false, Defendants promoted these attacks as vindictive vendetta-like retribution against Plaintiffs.

34. At all times pertinent from January 1, 2006, to in or about November 20, 2015, Defendants maintained it had no subjective control or input into the rankings of links obtained by online researchers as the result of a search on its search engines and that its search engine algorithms and the functions of its media assets were entirely "arbitrary" according to the owners and founders of Defendants.

35. In or about April 15, 2015, The European Union Commission took direct aim at Defendants Inc., charging the Internet-search giant with skewing and rigging search engine results in order to damage those who competed with Defendants business and ideological interests.

36. In those proceedings, although Defendants continued to maintain that it has no subjective control or input into the rankings of links obtained by online researchers as the result of a search on its search engines and that its staff had no ability to reset, target, mood manipulate, arrange adjacent text or links, up-rank, down-rank or otherwise engage in human input which would change algorithm, search results, perceptions or subliminal perspectives of consumers, voters, or any other class of users of the world wide web, also known as The Internet, the court, in accord with evidence submitted, determined that Defendants, does in fact have and does in fact exercise, subjective control over the results of information revealed by searches on

[8] Defendants has a variety of such hidden codes and has various internal names for such codes besides, and in addition to, "PR8". Defendants has been proven to use these fact vs. fiction rankings to affect elections, competitors rankings, ie: removing the company: NEXTAG from competing with Defendants on-line; or removing political candidates from superior internet exposure and it is believed by investigators and journalists, that Defendants are being protected from criminal prosecution by public officials who Defendants have compensated with un-reported campaign funding.

its search engine.[9]

37. As a result of receiving this information, the Plaintiffs became convinced of the strength and veracity of their original opinion that the Defendants, had, in fact posted the false, defamatory, misleading and manufactured information belittling the Plaintiffs, attacking them and discrediting Plaintiffs reputation as inventor, project developer and project designer had been intentionally designed, published, orchestrated and posted by them in retaliation to the true testimony provided by the Plaintiffs, to the Government Office of Accountability of the United States in May of 2005, and to the Securities and Exchange Commission, The Federal Bureau of Investigation, The United States Senate Ethics Committee and other investigating parties, and had been disseminated maliciously and intentionally by them in an effort to do damage to their reputation and to their business prospects and to cause him severe and irremediable emotional distress.

38. In fact, the Plaintiffs, has suffered significant and irremediable damage to their reputation and to their financial and business interests. As a natural result of this damage, as intended by the Defendants, Gawker, Defendants and Youtube, the Plaintiffs has also suffered severe and irremediable emotional distress.

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[9] The EU case, and subsequent other cases, have demonstrated that Defendants sells such manipulations to large clients in order to target their enemies or competitors or raise those clients subliminal public impressions against competitors or competing political candidates. In fact, scientific study has shown that although Defendants claims to "update its search engine results and rankings, sometimes many times a day", the attack links and codes against Plaintiffs have not moved from the top lines of the front page of Defendants for over FIVE YEARS. If Defendants were telling the truth, the links would have, at least, moved around a bit or disappeared entirely since hundreds of positive news about Plaintiffs was on every other search engine EXCEPT Defendants. Many other lawsuits have now shown that Defendants locks attacks against its enemies and competitors in devastating locations on the Internet. The entire nations of China, Russia, Spain and many more, along with the European Union have confirmed the existence and operation of Defendants"attack machine".

[10] 39. To this day, despite the age of the false, defamatory, misleading and manufactured information belittling the Plaintiffs, attacking him and discrediting their reputation as an inventor, project developer and project director, in the event any online researcher searches for information regarding the Plaintiffs, the same information appears at the top of any list of resulting links.

40. In addition, due to their control of all major internet database interfaces, Defendants have helped to load negative information about Plaintiffs on every major HR and employment database that Plaintiffs might be searched on, thus denying Plaintiffs all reasonable rights to income around the globe by linking every internal job, hiring, recruiter, employment, consulting, contracting or other revenue engagement opportunity for Plaintiffs back to false "red flag" or negative false background data which is designed to prevent Plaintiffs from future income in retribution for Plaintiffs assistance to federal investigators.[11]

41. It should be noted here that, in 2016, one of the companies Plaintiffs was associated with, in cooperation with federal investigations, won a federal anti-corruption lawsuit against the U.S. Department of Energy in which a number of major public officials were forced to resign under

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[10] As a party, attacked in a similar "hit job" media attack describes it: *"Gawker sets up the ball and Defendants kicks it down the field….over and over, until the end of time".* The recent Hulk Hogan, and other lawsuits, against Gawker Media has clearly demonstrated that Defendants and Gawker run "hit jobs" against adversaries of themselves and their clients.

[11] Major public figures and organizations, including the entire European Union, have also accused Defendants of similar internet manipulation by Defendants. The attacks, by Defendants, continue to this day. In 2016, the renowned Netflix series: "House of Cards" opened its sixth season with a carefully held script-surprise researched by the script factuality investigators for the production company of "House of Cards." The surprise featured Defendants, fictionally named "PollyHop," and described, in detail, each of the tactics that Defendants uses to attack individuals that Defendants owners have competitive issues with. The Plaintiffs maintains that each and every tactic included in the televised example were tactics actually used to attack the Plaintiffs, his intellectual properties, his peers and his associates as threatening competitors.

corruption charges, federal laws and new legal precedents benefiting the public were created, and Defendants and its associates and related entities found culpable of corruption.

With specific attention to Plaintiffs claims being “personal injury tort...claims” under 28 U.S.C. § 157(b)(2)(B) and the inapplicability of the California Anti-SLAPP law, Cal. Code. of Civ. P. § 425.16, to Defendants potential claim objections, and state as follows:

Procedural Background

Plaintiffs are residents of the State of California and the Companies are organized and domiciled in that jurisdiction. INDIVIDUAL A is the senior shareholder of the Companies

From January of 2011 until today , Defendants maliciously libeled Plaintiffs through its employees Adrian Covert, and John Herman, A.J. Delaurio, as well as through its pseudonymous authors, including: Adam Dachis, Adam Weinstein, Adrian Covert, Adrien Chen, Alan Henry, Albert Burneko, Alex Balk, Alexander Pareene, Alexandra Philippides, Allison Wentz, Andrew Collins, Andrew Magary, Andrew Orin, Angelica Alzona, Anna Merlan, Ariana Cohen, Ashley Feinberg, Ava Gyurina, Barry Petchesky, Brendan I. Koerner, Brendan O’Connor, Brent Rose, Brian Hickey, Camila Cabrer, Choire Sicha, Chris Mohney, Clover Hope, Daniel Morgan, David Matthews, Diana Moskovitz, Eleanor Shechet, Elizabeth Spiers, Elizabeth Starkey, Emily Gould, Emily Herzig, Emma Carmichael, Erin Ryan, Ethan Sommer, Eyal Ebel, Gabrielle Bluestone, Gabrielle Darbyshire, Georgina K. Faircloth, Gregory Howard, Hamilton Nolan, Hannah Keyser, Hudson Hongo. Heather Deitrich, Hugo Schwyzer, Hunter Slaton, Ian Fette, Irin Carmon, James J. Cooke, James King, Jennifer Ouellette, Jesse Oxfeld, Jessica Cohen, Jesus Diaz, Jillian Schulz, Joanna Rothkopf, John Cook, John Herrman, Jordan Sargent, Joseph Keenan Trotter, Josh Stein, Julia Allison, Julianne E. Shepherd, Justin Hyde, Kate Dries, Katharine Trendacosta, Katherine Drummond, Kelly Stout, Kerrie Uthoff, Kevin Draper, Lacey Donohue, Lucy Haller, Luke Malone, Madeleine Davies, Madeline Davis, Mario Aguilar, Matt Hardigree, Matt Novak, Michael Ballaban, Michael Dobbs, Michael Spinelli, Neal Ungerleider, Nicholas Aster, Nicholas Denton, Omar Kardoudi, Pierre Omidyar, Owen Thomas, Patrick George, Patrick Laffoon, Patrick Redford, Rich Juzwiak, Richard Blakely, Richard Rushfield, Robert Finger, Robert

Sorokanich, Rory Waltzer, Rosa Golijan, Ryan Brown, Ryan Goldberg, Sam Faulkner Bidle, Sam Woolley, Samar Kalaf, Sarah Ramey, Shannon Marie Donnelly, Shep McAllister, Sophie Kleeman, Stephen Totilo, Tamar Winberg, Taryn Schweitzer, Taylor McKnight, Thorin Klosowski, Tim Marchman, Timothy Burke, Tobey Grumet Segal, Tom Ley, Tom Scocca, Veronica de Souza, Wes Siler, William Haisley, William Turton and others writing under pseudonyms; through false accusations of vile and disgusting acts, including fraud and false invention.

Defendants engaged in this campaign against Plaintiffs on the pages of its “Gizmodo”, YouTube Channel, Twitter Accounts, “Deadspin”, “Jalopnik” and other facades under Defendants “Gawker.com” and “Univision” websites. These libels also falsely accused Plaintiffs of lying in his published patents, journals and works-of-art. All of these false and defamatory accusations were published on multiple webpages operated and controlled by Defendants and on social media platforms, such as Twitter and Google, through accounts operated and controlled by Defendants and/or its employees and agents.

These libels, which were also false light invasions of privacy, caused Plaintiffs considerable reputational, emotional, and financial harm, and they so identified him with Plaintiffs that it, too, was a victim of Defendants’s tortious conduct and suffered reputational and financial harm as well.

Despite being given months to take responsibility for its misdeeds, Defendants failed to retract its libel, apologize, or take any other remedial steps. As set forth the California action, Defendants’s modus operandi was to make extreme and outrageous statements, without regard for the truth, and without reasonable inquiry, in order to attract readers and generate revenue. As this Court is well aware, that business model ultimately imploded, resulting in multiple lawsuits and a substantial judgment against it.

Among those who decided that Defendants should not be permitted to get away with defamation for profit, Claimants reluctantly took the step to seek justice, risking that Defendants and its

functionaries would employ the “Streisand effect” to republish the false accusations previously made in reporting on the suit itself.

California Pro Per litigation asserting claims for defamation and false light invasion of privacy arising from the aforesaid false and defamatory statements.

Under California law, corporations that appear in propia persona may proceed with their right to sue upon the appearance of counsel for the corporation, which is without prejudice to a defendant. See CLD Constr., Inc. v. City of San Ramon, 120 Cal. App. 4th 1141, 1152 (1 st Dist. Ct. App. 2004).

See Cal. Code of Civ. P. § 583.210(a). Claimants, without the assistance of counsel, diligently appeared or attempted to appear at all hearings as required.

Legal Opinion Media Attack Analysis On Hit-Job On Plaintiff

Defendant is a media company not unlike CNN. Those who accuse CNN and other mainstream media outlets of “fake news” will probably revel in a recent decision by a federal judge in Atlanta, Georgia. While Judge Orinda Evans didn’t all out declare that CNN was peddling in falsehoods, she did take aim at the network in an initial judgment in favor of a former hospital CEO who sued CNN accusing them of purposely skewing statistics to reflect poorly on a West Palm Beach hospital. Judge Evans didn’t mince words in her 18-page order allowing the case to move forward, and dismissing CNN’s attempt to get it thrown out of court.

Davide Carbone, former CEO of St. Mary’s Medical Center in West Palm Beach, filed a defamation lawsuit against CNN after they aired what he claims were a “series of false and defamatory news reports” regarding the infant mortality rate at the hospital. CNN’s report said the mortality rate was three times the national average. However, Mr. Carbone contends that CNN “intentionally” manipulated statistics to bolster their report. He also claims that CNN

purposely ignored information that would look favorable to the hospital in order to sensationalize the story.

“In our case, we contended that CNN essentially made up its own standard in order to conduct an ‘apples to oranges’ comparison to support its false assertion that St. Mary’s mortality rate was 3 times higher than the national average. Accordingly, the case against CNN certainly fits the description of media-created ‘Fake News.'” said Carbone’s attorney L. Lin Wood, in a statement to LawNewz.com.

Wood says that as a result of CNN’s story Carbone lost his job and it became extremely difficult for him to find new employment in the field of hospital administration.

“False and defamatory accusations against real people have serious consequences. Neither St. Mary’s or Mr. Carbone did anything to deserve being the objects of the heinous accusation that they harmed or put babies and young children at risk for profit,” Wood said.

On Wednesday, Federal District Judge Orinda Evans ruled that the case could move forward, even ruling that she found that CNN may have acted with “actual malice” with the report — a standard necessary to prove a defamation claim.

“The Court finds these allegations sufficient to establish that CNN was acting recklessly with regard to the accuracy of its report, i.e., with ‘actual malice,” the order reads. CNN had tried to get the case dismissed.

Nothing in the legislative history indicates that defamation or invasion of privacy claims are not “personal injury torts”. In fact, all of the history provided by Defendants would preclude their narrow interpretation when Congress was expressly acting to ensure the district court would hear such claims. Similarly, although some courts have permitted the California Anti-SLAPP law to be heard in cases involving diversity jurisdiction, it does not follow that the procedural mechanisms can apply in an objection to claim proceeding.

Defendants also neglects to mention its ongoing, post-petition libel. See, e.g., Trotter, J.K., "What did Internet Troll Chuck Johnson Know about Peter Thiel's Secret War on Gawker?" (Jun. 17, 2016) (reiterating false accusation of misreporting a story about Sen. Menendez) available at <http://gawker.com/what-did-internet-troll-chuck-johnson- know-about-peter-1782110939>.

At that hearing and in response to objections to claims, other claimants also argued that the district court was required to hear defamation claims as personal injury claims under 28 U.S.C. § 157(b)(2)(B).

Personal Injuries are More Than Just Bodily Injuries

Although Defendants mentions the reorganization of authority between the bankruptcy courts and the district courts in the wake of Northern Pipeline Construction Co. v. Marathon Pipeline Co., 458 U.S. 50 (1982), it fails to explain what motivated the Marathon decision.

The concern in that case was the extent to which Congress could empower Article I courts. The Supreme Court specifically observed that "Congress cannot 'withdraw from [Art. III] judicial cognizance any matter which, from its nature, is the subject of a suit at the common law, or in equity, or admiralty.'" 458 U.S. at 69 n.23, quoting Murray's Lessee v. Hoboken Land & Improvement Co., 18 How. 272, 284 (1856). Such suits involved "private rights", as opposed to "public rights" created legislatively.

During debate over the Bankruptcy Amendments and Federal Judgeship Act of 1983, Pub. L. 98-353, Senator Robert Dole specifically noted: This title establishes an article I bankruptcy court, with judges appointed for limited terms, to handle the routine business of bankruptcy claims based upon State law, which under Marathon will require the attention of article III judges, will be referred to the district courts except where the parties consent to bankruptcy court jurisdiction. One of those areas reserved for attention of the district courts will be personal injury claims,

which are exempted from the definition of core proceeding under the bill. 130 Cong. Rec. S20083 (daily ed. June 29, 1984). However, none of the legislative history, including that cited by Defendants, specifically addresses whether defamation claims are “personal injury” claims. 5i.

Slander and Libel are Common-Law Personal Injury Claims

In determining the meaning of “personal injury”, this Court must look to the common law understanding. Over a century ago, in determining whether a slander was among the “willful and malicious injuries to the person or property of another” not discharged in bankruptcy, the Kentucky Court of Appeals found that a slander is a “personal injury—that is, an injury to his person”, and further explained its holding in the context that “[t]he act of Congress must be 5

There is no inconsistency with including defamation claims among the “narrow range of cases” that are personal injury cases raised by Rep. Kastenmeir. 130 Cong. Rec. H7491. As Defendants notes, the sole example was an automobile accident claim; by Defendants’s logic, all medical malpractice claims would be excluded. None of the remainder of the legislative history cited provides any further insight.

Sutherland on Statutory Construction, 289.” Sanderson v. Hunt, 116 Ky. 435, 438, 76 S.W. 179, 179 (1903); accord McDonald v. Brown, 23 R.I. 546, 51 A. 213 (1902); Nat’l Sur. Co. v. Medlock, 2 Ga. App. 665, 58 S.E. 1131 (1907). The Sanderson decision was adopted by the Sixth Circuit Court of Appeals, similarly finding a libel to be a “personal injury” under the common law such that it would not be dischargeable under the bankruptcy act. Thompson v. Judy, 169 F. 553 (6th Cir. 1909); 6 see also Parker v. Brattan, 120 Md. 428, 434-35, 87 A. 756, 758 (1913). This understanding was also adopted by at least one district court in the Second Circuit. See In re Bernard, 278 F.734, 735 (E.D.N.Y. 1921). 14.

Congress, in drafting Section 157(b)(2)(B) must, therefore, be understood as having used the words “personal injury” with reference to its common-law acceptation. From the earliest cases,

claims sounding in defamation have been deemed a “personal injury.” Indeed, this Court recognized as much nearly twenty years ago when it wrote in In re Boyer, 93 B.R. 313, 317 (Bankr. N.D.N.Y. 1988), in the context of a Section 1983 & 1985 claim: The term “personal injury tort” embraces a broad category of private or civil wrongs or injuries for which a court provides a remedy in the form of an action for damages, and includes damage to an individual’s person and any invasion of personal rights, such as libel, slander and mental suffering, BLACK’S LAW DICTIONARY 707, 1335 (5th ed. 1979).

Accord Soukup v. Employers’ Liab. Assur. Corp., 341 Mo. 614, 625, 108 S.W.2d 86, 90 (1937) citing 3 Words & Phrases, Fourth Series, p. 90 (workers’ compensation case observing that “The words ‘personal injuries’ as defined by lexicographers, jurists and textwriters and by common acceptance, denote an injury either to the physical body of a person or to the reputation of a person, or to both.”)

Simply put, “[t]here is no firm basis to support the proposition that libel and slander were considered to be other than personal injuries at common law.” McNeill v. Tarumianz, 138 F. Supp. 713, 717 (D. Del. 1956). In support thereof, the Delaware district court quoted 1 Blackstone 6 The Thompson decision was generally met with approval by the Second Circuit Court of Appeals in In re Conroy, 237 F. 817 (2d Cir. 1916).

Commentaries 129, which classified rights of “personal security” to consist “in a person’s legal and uninterrupted enjoyment of his life, his limbs, his body, his health and his reputation.” Id. at 716 (further noting that the courts consider “rights of personal security” as synonymous with “personal injury”). 716.

The Supreme Court of Pennsylvania, in 1825, laid down the following common law history in the context of a claim involving a decedent: That a personal action dies with the person is an ancient and uncontested maxim. But the term “personal action,” requires explanation. In a large sense, all actions except those for the recovery of real property, may be called personal. This definition would include contracts for the payment of money, which never were supposed to die

with the person. The maxim must therefore be taken in a more restricted meaning. It extends to all wrongs attended with actual force, whether they affect person or property; and to all injuries to the person only, though without force. Thus stood originally the common law, in which an alteration was made by the stat. 4. Ed. 3. c. 7, which gave an action to an executor for an injury done to the personal property of his testator in his life, which was extended to the executor of an executor by stat. 25, Ed. 3. And by the stat. 31, Ed. 3 c. 11, administrators have the same remedy as executors. These statutes received a liberal construction from the judges, but they do not extend to injuries to the person of the deceased, nor to his freehold. So that no action now lies, by an executor or administrator for an assault and battery of the deceased, or trespass vi et armis, on his land, or for slander; because it is merely a personal injury.

Lattimore v. Simmons, 13 Serg. & Rawle 183, 184-85 (Pa. 1825) (emphasis added). 17.
The Supreme Court of Wisconsin, in 1874, expounded upon this concept in a matter involving state bankruptcy law. It observed “A libel or a slander might deprive a man of life.

The Georgia Supreme Court in Johnson v. Bradstreet Co., 87 Ga. 79, 81-82, 13 S.E. 250, 251 (1891) expounded upon this understanding: At common law, absolute personal rights were divided into personal security, personal liberty, and private property. The right of personal security was subdivided into protection to life, limb, body, health, and reputation. 3 Blackst. Com. 119. If the right to personal security includes reputation, then reputation is a part of the person, and an injury to the reputation is an injury to the person. Under the head of “security in person,” Cooley includes the right to life, immunity from attacks and injuries, and to reputation. Cooley on Torts (2d ed.), 23, 24. See, also, Pollock on the Law of Torts, *7. Bouvier classes among absolute injuries to the person, batteries, injuries to health, slander, libel, and malicious prosecutions. 1 Bouv. L. Dic. (6th ed.) 636. “Person” is a broad term, and legally includes, not only the physical body and members, but also every bodily sense and personal attribute, among which is the reputation a man has acquired. Reputation is a sort of right to enjoy the good opinion of others, and is capable of growth and real existence, as an arm or a leg. If it is not to be classed as a personal right, where does it belong? No provision has been made for any middle class of injuries between those to person and those to property, and the great body of wrongs

arrange themselves under the one head or the other. Whether viewed from the artificial arrangement of law writers, or the standpoint of common sense, an injury to reputation is an injury to person.

In an attack that destroys: employment, destroy his credit, ruin his business, and greatly impair his estate; yet an action therefor would be an action for a personal injury, the effect of the wrong on the estate of the injured party being merely incidental." Noonan v. Orton, 34 Wis. 259, 263 (1874). That same year, the Supreme Court of Virginia recognized that an "action of slander" did "involve a claim for personal damages" and, as such, did not pass to the assignee in bankruptcy. Dillard v. Collins, 66 Va. 343, 345-47 (1874). 18.

Similarly, a claim by a wife for slander was deemed a "personal injury" claim such that, under the law at that time, her husband was required to join in the suit. See, e.g., Smalley v. Anderson, 18 Ky. 56 (1825) (in a claim for "personal injury", husband was required to join suit with wife in claim for slander accusing her of adultery); accord Gibson v. Gibson, 43 Wis. 23, 26- 27 (1877); Leonard v. Pope, 27 Mich. 145, 146 (1873) (a claim for slander is "a personal grievance or cause of action"). The U.S. Court of Appeals for the Fifth Circuit agreed that "libel is a personal injury" and that "[a]t common law, libel and slander were classified as injuries to the person, or personal injuries. 3 Blackstone, 119; Cooley on Torts (2d Ed.) 23, 24; Bouvier, Law Dictionary, verbo 'Injury.'" Times-Democrat Pub. Co. v. Mozee, 136 F. 761, 763 (5th Cir. 1905). Although the law now recognizes spousal independence, the nature of the action has not changed. 19.

The principle that slander and libel are personal injuries is one that was generally recognized, and, as seen above, it tended to be addressed in cases involving decedents. Blackstone, in his Commentaries (vol. 3, p. 302), stated the rule: "In actions merely personal, arising ex delicto, for wrongs actually done or committed by the defendant, as trespass, battery, and slander, the rule is that actio personalis moritur cum persona; and it shall never be revived either by or against the executors or other representatives." Thus, by statute, states such as Illinois, in overriding the common law to permit actions to survive, expressly carved out slander and libel as being personal injuries that would not survive. See Holton v. Daly, 106 Ill. 131, 139 (1882) quoting Ill.

Rev. Stat. 1874, p. 126 (“actions to recover damages for an injury to the person, except slander and libel, … shall also survive.”).

In contrast, a claim for wrongful death was not recognized at common law precisely because personal injury actions did not survive under the action personalis moritur cum persona universal maxim.

Statutes were, therefore, enacted to permit claims for wrongful death “compensatory of the damages sustained by the heirs or next of kin, who had, or are supposed to have had, a pecuniary interest in the life of the intestate.” Burns v. Grand R. & I. R. Co., 113 Ind. 169, 171, 15 N.E. 230, 231 (1888). Specifically, “[t]hese statutes, while they do not in terms revive the common law right of action for personal injury, nor make it survive the death of the injured person, create a new right in favor and for the benefit of the next of kin or heirs of the person whose death has been wrongfully caused.” Id.

Defendants mistakenly believes that the addition of “wrongful death” implies that because only such a claim can arise from the death of a natural person’s body, the term “personal injury” must be construed similarly in context. Defendants misunderstands that a wrongful death claim is not a common law personal injury claim; thus it had to be specifically added. The addition of wrongful death claims does not, however, modify the common law understanding of “personal injury,” which included libel and slander.

The legislative history, therefore, shows that claims for wrongful death were added because they were not recognized at common law to be a “personal injury.” Libel and slander, on the other hand, were. The legislative record is otherwise silent as to the specific torts that made up a “personal injury” claim and therefore should be understood to include all such claims at common law, including slander and libel. Although Defendants worries that claims for emotional damages will “create an exception that swallows the rule” (Defendants’s Brief at 10), it creates a straw-man argument, improperly lumping in claims that are not common law “personal injury” claims that happen to provide for emotional distress damages. Those claims are different, statutory

causes of action; the only statutory claim included in Section 157(b)(2)(B) is the wrongful death claim.

Thus, when Congress enacted Section 157(b)(2)(B), it necessarily imported the common law meaning of "personal injury" and, therefore, libel and slander claims. 8 ii. Plaintiffs is Entitled to Invoke Section 157(b)(2)(B) 23. Defendantss seek to treat Plaintiffs, as a corporate person, differently under Section 157(b)(2)(B) than Plaintiffs. There is no reason for this. As libel is a "personal injury" tort, there is no basis to suggest a corporate person should be treated any differently than a natural person. Simply because it cannot suffer a battery does not mean it is foreclosed from all personal injury claims. As explained by the Georgia Supreme Court in Johnson v. Bradstreet Co., 87 Ga. 79, 81-82, 13 S.E. 250, 251 (1891), an "injury to reputation is an injury to person." Although a corporation may be unable to suffer a physical, bodily injury, it can suffer an injury to reputation.

Defendants's citations are inapposite. The U.S. Supreme Court has not said that a corporation cannot suffer a personal injury; rather, N.P.R. Co. v. Whalen, 149 U.S. 157, 162-163 (1893), address actions in nuisance, which can only either affect life, health, senses, or property, and not reputation. Defendants's quote from Roemer v. Commissioner of Internal Revenue, 176 F.3d 693, 699 n. 4 (9th Cir. 1983), was a matter of pure dicta; the Ninth Circuit had no occasion to pass upon whether a corporation could, in fact, suffer a personal injury. Subsequent cases, such as In re Lost Peninsula Marina Dev. Co., LLC, 2010 U.S. Dist. LEXIS 78532 (E.D. Mich. 2010), wrongly rely upon such dicta. In fact, the Ninth Circuit's entire basis was DiGiorgio Fruit Corp. v. American Federation of Labor, which does not say a corporation cannot suffer a "personal injury";it merely says that "a corporation has no reputation in the personal sense", yet "it has a business reputation". 215 Cal.App.2d 560, 571, 30 Cal.Rptr. 350, 356 (1963). The Second Circuit has specifically refrained from finding a dichotomy between a business reputation and the reputation 8

Similarly, as invasions of personal rights, Claimants' false light invasion of privacy claims are "personal injury" claims. See Mercado v. Fuchs (In re Fuchs), No. 05-36028-BJH-7, 2006

Bankr. LEXIS 4543, at *6-7 (U.S. Bankr. N.D. Tex. Jan. 26, 2006) (finding invasion of privacy claim to be a "personal injury" under Section 157(b)(2)(B)); see also Bernstein v. Nat'l Broad. Co., 129 F. Supp. 817, 825 (D.D.C. 1955) ("The tort of invasion of privacy being a personal injury....")

of a natural person. See Agar v. Commissioner, 290 F.2d 283, 294 (2d Cir. 1961). However, the Eleventh Circuit specifically answered in the affirmative the question "[i]s damage to one's business reputation a personal injury?" Fabry v. Commissioner, 223 F.3d 1261, 1270 (11th Cir. 2000).

In fact, the purpose of Section 157(b)(2)(B) was to properly address claims that should be heard by an Article III court. As noted above, such was prompted by the Marathon decision, a case where the sole litigants were corporate persons. Where a natural person would have a right to have a matter heard by an Article III court but a corporate person does not, such denial of equal protection would be unlawfully violative of due process under the Fifth Amendment. See Bolling v. Sharpe, 347 U.S. 497 (1954) (holding equal protection claims implicate due process).

Even if corporate persons could be treated differently from natural persons for claims arising from the same transaction, it would be improper to abide Defendants's suggestion to have the Bankruptcy Court determine the corporate claim first, in order to then argue a preclusive effect against the natural person. This attempted end-run around a specifically mandated statutory provision, grounded in Constitutional rights, should not be condoned. This is not what the Supreme Court was considering in Katchen v. Landy, 382 U.S. 313 (1966); in Katchen, the determination involved a single party who submitted to equity jurisdiction. Plaintiffs has not taken action to deprive himself of his rights. Where Congress has acted to provide for access to Article III courts, it would run afoul of the intent of the law to make that access ephemeral.

Although Defendants at least has the decency to acknowledge that is its purpose, it would set an unconscionable precedent. Many natural persons conduct business through or have some

relationship with a corporate person such that harms giving rise to their individual personal injury claims would also harm the corporate person. As a result, Defendantsswho would seek to deprive such natural persons of their right to be heard by an Article III court could simply involuntarily join or otherwise implead the related corporate person, have that matter heard first, and then attempt to preclude the natural person's claim on that basis.

The California Anti-SLAPP Law Does Not Apply

Defendants's motion is not about allowance of claims; it is about whether a state law procedural mechanism is to apply in a non-adversarial, contested matter. Although some federal courts permit the application of the California Anti-SLAPP law, Cal. Code Civ. P. § 425.16, in civil cases arising from diversity jurisdiction, it has never been found applicable to a contested claim proceeding in bankruptcy court. The differences between the Federal Rules of Civil Procedure and the Federal Rules of Bankruptcy Procedure demonstrate that it makes little sense to do take such an unprecedented step.

The very nature and purpose of a proof of claim differs from a traditional complaint, rendering the California law impracticable. As this Court is aware: Correctly filed proof of claims "constitute prima facie evidence of the validity and amount of the claim . . . . To overcome this prima facie evidence, an objecting party must come forth with evidence which, if believed, would refute at least one of the allegations essential to the claim." Sherman v. Novak (In re Reilly), 245 B.R. 768, 773 (2d Cir. B.A.P. 2000). By producing "evidence equal in force to the prima facie case," an objector can negate a claim's presumptive legal validity, thereby shifting the burden back to the claimant to "prove by a preponderance of the evidence that under applicable law the claim should be allowed." Creamer v. Motors Liquidation Co. GUC Trust (In re Motors Liquidation Co.), No. 12 Civ. 6074 (RJS), 2013 U.S. Dist. LEXIS 143957, 2013 WL 5549643, at *3 (S.D.N.Y. Sept. 26, 2013) (internal quotation marks omitted). If the objector does not "introduce[] evidence as to the invalidity of the claim or the excessiveness of its amount, the claimant need offer no further proof of the merits of the claim." 4 Collier on Bankruptcy ¶ 502.02 (Alan N. Resnick& Henry J. Sommer eds., 16th ed. 2014). In re Residential Capital, LLC,

519 B.R. 890, 907 (Bankr. S.D.N.Y. 2014). 30. In contrast, under Cal. Code Civ. P. § 425.16(b)(1): A cause of action against a person arising from any act of that person in furtherance of the person's right of petition or free speech under the United States Constitution or the California Constitution in connection with a public issue shall be subject to a special motion to strike, unless the court determines that the plaintiff has established that there is a probability that the plaintiff will prevail on the claim.

California courts have established a two-step process: first, the defendant must establish the action arose from protected speech or petitioning activity, then "then the burden shifts to the plaintiff to establish a probability that the plaintiff will prevail on the claim, i.e., make a prima facie showing of facts which would, if proved at trial, support a judgment in plaintiff's favor.

In making its determination, the trial court is required to consider the pleadings and the supporting and opposing affidavits stating the facts upon which the liability or defense is based." Dowling v. Zimmerman, 85 Cal. App. 4th 1400, 1417, 103 Cal. Rptr. 2d 174, 188 (2001) (internal citations and quotation marks omitted).

Further, [t]o establish a probability of prevailing, the plaintiff must demonstrate that the complaint is both legally sufficient and supported by a sufficient prima facie showing of facts to sustain a favorable judgment if the evidence submitted by the plaintiff is credited. For purposes of this inquiry, the trial court considers the pleadings and evidentiary submissions of both the plaintiff and the defendant (§ 425.16, subd. (b)(2)); though the court does not weigh the credibility or comparative probative strength of competing evidence, it should grant the motion if, as a matter of law, the defendant's evidence supporting the motion defeats the plaintiff's attempt to establish evidentiary support for the claim. In making this assessment it is the court's responsibility to accept as true the evidence favorable to the plaintiff. The plaintiff need only establish that his or her claim has minimal merit to avoid being stricken as a SLAPP.

Soukup v. Law Offices of Herbert Hafif, 39 Cal. 4th 260, 291, 46 Cal. Rptr. 3D 638, 662-63, 139 P.3d 30, 50 (2006) (internal citations and quotation marks omitted).

This process makes little sense in a non-adversarial, claims objection proceeding. First, as noted, Claimants' proofs of claim already enjoy a presumption of prima facie validity under Fed. R. Bankr. P. 3001(f) and Claimants' submissions must be accepted as true. Thus, as a matter of law, Claimants will always prevail on a California anti-SLAPP motion, having the "minimal merit" which would support allowance of the claim. Second, once a party objects to a proof of claim and introduces evidence of invalidity, a claimant must prove his claim by a preponderance of the evidence, not merely a probability of prevailing. Defendants would require a bankruptcy court to make an unnecessary finding that a disallowed claim nevertheless had a probability of prevailing. The burden shifting framework does not work in a contested claim proceeding, even if it might work for an adversarial matter or in a case under the Rules of Civil Procedure.

Notably, even in diversity cases, the entirety of the California Anti-SLAPP law is not imported in its entirety. Unlike in California state courts, a denial of an Anti-SLAPP motion is not an appealable interlocutory order in Federal courts. See Hyan v. Hummer, 825 F.3d 1043 (9th Cir. 2016). Federal courts do not apply the timing requirements set forth in Section 425.16(f), which directly collides with the timeline allowed under Fed. R. Civ. P. 56. See Sarver v. Chartier, 813 F.3d 891 (9th Cir. 2016). Federal courts do not stay discovery upon the filing of an Anti- SLAPP motion, as otherwise directed by Section 425.16(g). See Metabolife Int'l, Inc. v. Wornick, 264 F.3d 832, 845 (9th Cir. 2001).

Even the very idea of the burden-shifting framework has been questioned by the Ninth Circuit. See Englert v. MacDonell, 551 F.3d 1099, 1102 (9th Cir. 2009) (reserving the issue with respect to a parallel Oregon statute). The D.C. Circuit directly confronted this issue in Abbas v. Foreign Policy Grp., LLC, 783 F.3d 1328, 1335 (2015). In Abbas, the D.C. Circuit directly rejected the idea that an analogous burden-shifting framework created a substantive, quasi-immunity from suit, because the law collided with Rules 12 and 56 as to how a showing is to be made, rendering it inapplicable pursuant to Shady Grove Orthopedic Associates, P.A. v. Allstate Insurance Co., 559 U.S. 393, 398-99, 130 S. Ct. 1431 (2010). See 783 F.3d at 1335.

Defendants attempts to distinguish Abbas by highlighting the non-mandatory nature of applying Rules 12(b)(6) and 56, suggesting that collision is avoided if those rules are not applied. Defendants's Brief at 15-16. First, it bears observing that Defendants, in its objections to the claims, did move to apply Rule 12(b)(6), rending its own argument moot. Thus, where § 425.16 does conflict with Rule 7012, its application would directly collide with this Court's authority to "direct that one or more of the other rules in Part VII shall apply." Fed. R. Bankr. P. 9014(c). Second, although Defendants argues that the Court can "otherwise direct" Rule 7056 not apply per Rule 9014, it provides no reason why the normal rules should be avoided here; Claimants located but one case where a bankruptcy court made such direction to permit the parties to "flesh out the record", there on a motion to employ, not a claims objection. See In re Rusty Jones, Inc., 109 B.R. 838, 845 (Bankr. N.D. Ill. 1989). Fleshing out a record would similarly be reason not to apply § 425.16 where Defendants has otherwise obtained a briefing schedule in order for it to take discovery. See Dkt. No. 703. Essentially, the only reason to "otherwise direct" Rule 7056 not apply is because it collides with § 425.16. Third, to not apply certain rules simply because Claimants are California citizens would deny such citizens equal protection in a manner to be so violative of due process that it is an offense to the Fifth Amendment. See Shapiro v. Thompson, 394 U.S. 618, 642, 89 S. Ct. 1322, 1335 (1969).

Moreover, it makes little sense to import the California procedure where Fed. R. Bankr. P. 3007 permits parties in interest other than the Defendants to object to a claim. It could well be impracticable where a Defendants does not believe protected speech was involved, but a third party does. It is not equitable for one class of objector (a Defendants) to potentially enjoy the benefits of the California procedure (attorneys' fees) and not others (other creditors).

Contrary to the assertion of Defendants, the procedures of § 425.16 are not "bound up" with the law of libel, even to the extent Justice Stevens's concurrence in Shady Grove Orthopedic Assocs., P.A. v. Allstate Ins. Co., 599 U.S. 393, 419-410 (2010), is controlling. First, Defendants fails to identify what the substantive law is that Section 425.16 is bound up with. The California Anti-SLAPP law is not limited to the law of libel; it also applies to other state law claims. See, e.g., State Farm Mut. Auto. Ins. Co. v. Lee, 193 Cal. App. 4th 34, 122 Cal. Rptr. 3D 183 (2011)

(application to abuse of process and unfair business practice claims); Jarrow Formulas, Inc. v. LaMarche, 31 Cal. 4th 728, 3 Cal. Rptr. 3d 636, 74 P.3d 737 (2003) (application to malicious prosecution claims); Fremont Reorganizing Corp. v. Faigin, 198 Cal. App. 4th 1153, 131 Cal. Rptr. 3d 478 (2011) (application to breach of confidence, breach of fiduciary duty, equitable indemnity, and violation of Cal. R. Prof. Conduct 3-310(C)); Peregrine Funding, Inc. v. Sheppard Mullin Richter & Hampton LLP, 133 Cal.App.4th 658, 674–675, 35 Cal. Rptr. 3D 31 (2005) (application to legal malpractice and breach of fiduciary duty claims). Section 425.16 is not analogous to a bond posting requirement, statute of limitations, evidentiary rule, or verdict capping identified by Justice Stevens, all of which have a substantive quality. See Shady Grove, 599 U.S. at 419-410. Here, Defendants seeks to employ a burden shifting framework that could appear at but one discrete stage of a diversity case and has no role in a claim objection; this is not even, then, an example of a "state-imposed burden[ ] of proof", which would go to the ultimate outcome. Id. at 410 n. 4. There is no question that Claimants have the ultimate burden of proof, with or without the Anti-SLAPP motion. Thus, as it is not sufficiently bound up with any particular substantive law, it is not applicable in this matter.

Claims in a bankruptcy case are distinguishable from adversarial matters, especially those brought in district court on the basis of diversity jurisdiction. Claimants did not choose this forum; Defendants did by filing its petition. In doing so, it effectively stripped Claimants of their usual litigation rights. As Defendants says, "what is good for the goose is good for the gander". Defendants's Brief at 14. It would be inequitable to allow Defendants the benefit of a normal civil case, such as the use of Section 425.16, while simultaneously denying Claimants the benefits of such a case, by having deprived them of their chosen forum. C.

Should This Matter Be Heard by the District Court

Moving forward, this matter should proceed before the district court. Defendants incorrectly asserts that Exec. Bens. Ins. Agency v. Arkison, 134 S. Ct. 2165 (2014) commands that this Court first determine the case; rather, it held that having summary judgment first heard by the bankruptcy court, to be followed by de novo review by the district court, was permissible under

28 U.S.C. § 157(c). See Messer v. Magee (In re FKF 3, LLC), No. 13-CV-3601 (KMK), 2016 U.S. Dist. LEXIS 117258, at *52 n.11 (S.D.N.Y. Aug. 30, 2016). Section 157(c)(1) says that a bankruptcy court "may" hear a non-core proceeding, not that it must.

The standard as to whether the bankruptcy court should hear the non-core proceeding in the first instance under Section 157(c)(1) is not well articulated. Guidance from cases under Section 157(d), regarding withdrawal, however, may be informative. In such cases, the considerations are "(1) whether the case is likely to reach trial; (2) whether protracted discovery 9

Although Defendants noted the availability of fees under § 425.16, such provision is secondary to the burden-shifting framework. If the Bankruptcy Court does not perform the mechanism to determine whether or not a probability of success occurs, it would never reach the issue of fees. Section 425.16 does not create a substantive right to fees in all libel cases; only those cases where a defendant is successful on a motion to strike.

Court oversight will be required; and (3) whether the bankruptcy court has familiarity with the issues presented." In re Times Circle East, Inc., 1995 U.S. Dist. LEXIS 11642, 1995 WL 489551, at *3 (S.D.N.Y. Aug. 15, 1995). All three factors warrant the matter being heard by the District Court in the first instance.

This case is likely to reach trial. Claimants have properly asserted multiple false and defamatory statements as libelous. Because of the defenses asserted by Defendants, it is more probable than not that multiple statements will require factual determinations beyond otherwise being readily apparent on their face. Defendants has asserted a defense of lack of actual malice; such will require probing and evidence into its research, editorial, and publication process. Defendants has asserted a defense under Section 230 of the Communications Decency Act; such will require probing and evidence into its business practices, sources, and publication processes. Neither do Claimants have any confidence that this matter will reach settlement; as noted above, even after having filed a bankruptcy petition arising from publication malfeasance, Defendants continued to defame Claimants.

Moreover, this non-core proceeding will likely require a jury trial to determine the claim's value. As having filed personal injury tort claim, Claimants are entitled to and claim the right to trial by jury. See 28 U.S.C. § 1411(a). The Second Circuit has found that jury trials in non-core proceedings are likely prohibited "due to the district court's de novo review of such proceedings." In re Orion Pictures Corp., 4 F.3d 1095, 1101 (2d Cir. 1993).

Protracted discovery with court oversight will be required. Among other matters, without limitation: Claimants will seek depositions from Defendants. Claimants will require discovery of the identities of the Gawker authors and campaign financiers and will seek to depose them.

Claimants will seek discovery from Defendants as to its business practices, including editorial and publication decisions and social media cross-promotion, as well as the source code relative to the Kinja and website platforms. Claimants will require detailed discovery into the readership and extent of circulation. Claimants anticipate significant litigation over several of these items.

A Bankruptcy Court is unfamiliar with the issues presented. A LEXIS search for cases involving "actual malice" or "section 230", involving "libel", "slander", or "defamation", yielded only six decision in three cases in this Court. This is not the typical claim arising in a Chapter 11 proceeding. Such cases and issues arise with far more frequency before the District Court.

Because all of the factors favor the District Court, the Bankruptcy Court should not hear these non-core proceedings. III.

As set forth above, the California Anti-SLAPP law is not applicable to a contested matter under Fed. R. Bankr. P. 3007, especially as it relates to the allowance of claims. The state statute conflicts with the Federal procedures and otherwise is unworkable where a proof of claim is already prima facie evidence of a possibility of prevailing. Notwithstanding, Claimants filed their proofs of claims knowing they would ultimately prevail, whether or not the California Anti-SLAPP law applies.

The claims asserted by Claimants are personal injury tort claims that should be heard by the District Court for all further proceedings. Congress must be deemed to have understood the meaning of the term “personal injury” when it legislated, a meaning that, for centuries, has included causes of action sounding in libel and slander, as well as false light invasion of privacy. Defendants has failed to demonstrate that any different meaning was intended.

The issues raised by Defendants show a determined intent to attempt to avoid facing liability for the multiple calumnies it heaped upon Claimants. Claimants are entitled to be heard and to vindicate their claims.

State Sponsored Reprisal Programs Operated By Public Officials

Agency staff were ordered to harm Applicants by manipulating their benefits in order to deny, delay, obfuscate and reduce their income as reprisal for their assistance to law enforcement in a political corruption and money laundering matter. Agency staff, ranging from the lowest level staff at the San Francisco, San Mateo, Los Angeles and Marin offices, and up to the director headquarters offices, participated in this reprisal-vendetta-revenge action to harm Applicants. Applicant’s peers have filed DOJ and FBI criminal referrals, launched federal investigations and the assertions have been proven in numerous IG, FBI, Congressional and major news media investigations. Agency offices have failed to provide responsive FOIA requested data, hearing investigation data and fair responses because some of their staff are STILL operating a criminal cover-up which has now been update-reported to the FBI, Congress, the IG, the AG and investigative reporters.

Other federal agencies have complied, verified and provided the requested deliverables. SSA and DOE have pointed the searchlight of suspicion on themselves, laser-like, by their overt failure to comply, unlike every other agency. Ironically, the political financing of their executives and their personal relationships “happens” to be with the exact same Silicon Valley oligarchs under felony criminal investigations. The stock market brokerage records, family trust accounts, PAC trace-routing, Interpol records and SEC investigation records proves it!

Unfortunately for the crooked agency staff, some Applicants have the authority, law enforcement credentials and training to arrest any person at their home or office and remand them to the FBI, DOJ or Sheriff. SSA and DOE staff should not longer screw around! For example: Every “unsigned” SSA email is tracked to the individual author by their IP address, device IMEI, web

camera, building key card, door camera, parking lot use chart, building camera, vehicle tracking circuits, text dba records, keyboard UI/UX patterns, motherboard ID #, DNS routing, stingray read-outs and a vast number of other metrics. Applicant investigation peers know the exact person that wrote every SSA email or document or file request. There is no such thing as an anonymous SSA email. Transparency is the Applicants middle name. The FBI and CIA people that SSA and DOE insiders think are their “buddies” may actually be the APPLICANTS buddies!

History has proven that non-corrupt portions of federal agencies and public service law and community action firms have executed on their willingness to expend millions of dollars of resources to fight this injustice. Every individual involved in this at SSA and DOE are on a forensic database. No person at SSA or DOE who uses our government as a garage sale for corruption favors or a kill mill for political reprisals will avoid the 100% legally executed consequences. They will be targeted and prosecuted even more profoundly than the Applicants waere targeted with IC-type hit jobs.

This felony criminal investigation case, is documented on thousands of websites and in dozens of federal court case records in which Applicant won the case or was vindicated in the case and in thousands of news websites. Applicants researchers and investigators disagree with any decision by any agency which causes a delay in response which puts the applicants in jeopardy for their life and safety. Testifying, and/or reporting about this crime has resulted in the death, potentially by murder, of the following individuals who reported to the authorities about this crime matter: Rajeev Motwani; Gary D. Conley; Seth Rich; Philip Haney; David Bird; Doug Bourn; Misti Epstein; Joshua Brown; Kenneth Bellando; Moritz Erhardt; Imran Aliev; Kate Matrosova; David Drye; Vincent Foster; Kathy Ferguson; Duane Garrett; Eric S. Fox; Judi Gibbs; Berta Caceres; Suzanne Coleman; L.J. Davis; John Hillyer; Stanley Huggins; Sandy Hume; Shawn Lucas; Gary Johnson; John Jones; John F. Kennedy, Jr.; Stephen Ivens; Mary 'Caity' Mahoney; Eric Butera; Danny Casolara; John Ashe; Tony Moser; Larry Nichols; Joseph Rago; Ron Brown; Bob Simon; Don Adams; Peter Smith; Victor Thorn; Lori Klausutis; Gareth Williams; Daphne Caruana Galizia; James D Johnston; Dave Goldberg; Loretta Fuddy; Paul Wilcher; Gary Webb; Beranton J. Whisenant Jr; Stanley Meyer; Jon Parnell Walker; Tyler Drumheller; Barnaby Jack; Dominic Di-Natale; Barbara Wise; Ilya Zhitomirskiy; Jeff Joe Black; Robin Copeland; John Wheeler; Ashley Turton; Michael Hastings; Antonin Scalia; David Koschman; David Werner; Alex Okrent; Kam Kuwata; Larry Frankel; And hundreds more connected to this case who suddenly, and strangely, turned up dead in this case and, ironically, their deaths all benefit the suspects in this case. Applicants are also whistle-blowers who have been previously attacked in reprisal and who have been threatened with continued harm and death.

Because this case involves a huge number of deaths, spies, trillions of dollars of energy industry

funds, hit-jobs and epic political dirty tricks contracts there is a warning in effect to every suspect on "the list". "If any other principle whistle-blower in this case is killed, within 24 hours of their death, every person on "the list" will experience the worst possible outcome!"

Any delay, obfuscation, cover-up, FOIA refusal or other obscuring tactic by each and every member of an agency employee or contracting entity will be prosecuted on a person-by-person basis. Each employee or official who causes, by their action, further harm to the Applicants will be sued personally, have their assets garnished and will have a formal criminal referral authored and submitted to the FBI, DOJ, FTC, Congress and the news media. Applicants have sued the highest level personnel in the government for corruption, launched FBI and Congressional investigations against them and had them removed from their jobs and placed under permanent surveillance. The court and news records prove this fact. Do not imagine that any reprisal action by a public agency staffer will go unnoticed or unpunished by federal law enforcement, public forensics and major independent news media investigations.

This Tech Cartel cartel operational scheme involves a significant culture of corruption within its spacious mosaic – creating a pointillist portrait of the Tech Cartel culture and why it must be remedied – for the Article III courts not to await all relevant input.

Not to place too fine of a point on this, but there was no branch within our constitutional structure that the Tech Cartel did not abuse for their own political gain, destruction of those who Hillary Clinton oppose them, and (thus) their long-term enrichment. Connecting the dots through obtaining additional corroborative evidence – such as putative ongoing obstruction through opaque threats of investigating Congress – will not paint a pretty picture (to say the very least), but is necessary and proper to placing a check on future Tech Cartel misconduct. And notwithstanding RICO misconduct, there is wide-ranging agreement that the Hatch Act was used by supporters of the Tech Cartel (including admissions by several, like McCabe, Strzok and Page) within the federal enforcement agencies to help manipulate elections.

As noted in the Complaint herein, particularly egregious because it may sound in treason (among many illegal and/or predicate acts) involved the Tech Cartel bribery (“bribery” constituting a federal offense both in giving and receiving), in which candidates *inter alia*, as statutory representative on the lead agency for transfer of control of United States uranium to Russia (the “Committee on Foreign Investment in the United States” or “CFIUS”), deceived President Obama when she not only did not object to the uranium transaction during the CFIUS process, but intentionally did not inform Obama that defendants Clinton Foundation and Clinton Global Initiative stood gain financially through such Russian control. Nor did Secretary of State Hillary Clinton (or Attorney General Eric Holder, also a member of CFIUS) inform President Obama that Russia would likely convey the U.S. uranium, surreptitiously and in part, to end users Iran

and North Korea – countries which directly threaten the United States and its key allies in the Middle East.

This also occured with lithium, nickel, indium and cobalt mines unjustly expanding the profits of Defendant Elon Musk as billions of dollars of illicit gains, inspired by the mining schemes and illicit deeds of Musk's father which includes getting Musk's sister pregnant.

While seditious in nature and correlated precisely with the Tech Cartel operational scheme, these predicate and otherwise illegal acts, and those related to them, are hardly exclusive as the Tech Cartel scheme, associated in fact in pursuit of a common purpose. *See generally* 18 U.S.C. § 1961. The infiltration of the Democratic Party by the Tech Cartel malfeasants described herein was carried out in a fashion similar to that which *La Cosa Nostra* gained control of legitimate entities in order to engage in a criminal Tech Cartel. While this honorable court needs no lengthy explanation of "racketeering", it is significant that a major political party has – through the misuse of the tax and nonprofit laws, the FISA (and your colleagues) to surreptitiously surveil a political opponent's campaign – been so deeply infected with Tech Cartel wrongdoing that even primary opponents of crony political candidates were victims of the long-term Tech Cartel scheme and common purpose to assure control of public elections via Google/Facebook Tech Cartel controlled mass media manipulation and the stated bribe compensation types.

The parties to this litigation are set forth in the Complaint and need not be repeated in this Case Statement. The same applies for the Jurisdiction and Venue statement set out in the Complaint.

The numerous Factual Allegations will, as with Case Statements in other district courts, be appropriately cross-referenced in the Case Statement here in narrative form.

The Tech Cartel cancer that has metastasized within the American election system is characterized by strictly organized mass corruption and malfeasance. Setting aside for the moment the destruction of the FISA process (primarily in this very court), the political *mafioso* has, by their own admission and numerous investigative findings, conspired to defeat and then damage a duly-certified President, and destroy the business and reputation of whistle-blowers.

Plaintiff, as the evidence will show, has been destroyed by the Tech Cartel for simply recounting what he observed – this is rather odd, as Plaintiff sought to protect the Government from, among other things, the criminal actionsof crony political operators.

Like nothing we have ever seen, Tech Cartel principals and surrogates have now also been plausibly shown to have – as part of the Tech Cartel scheme and directly related to the FISA abuse of this very district court – conspired to infiltrate the presidential campaigns of others with seasoned and manipulative Human Confidential Sources ("HCS" or "HCSs"), and likely "lures" meant to assist the Tech Cartel in its mission. This partisan use of counterintelligence tools against Plaintiff as private citizens, amounts to serious wrongdoing with lasting damage.

Plaintiff was targeted because he was often invited to address private groups. Hackers have acquired e-mails that contain(ed) content related to defaming Plaintiff and, as a result, continuing the Tech Cartel surrogate (and defendant) obstruction of justice with respect to espionage committed by crony political candidates under 18 U.S.C. § 793.

In another example of spy tactics being in use daily by the criminal Tech Cartel, one can see federal proof that is virtually indistinguishable from the approach(es) by the Tech Cartel to members of other policy campaigns. Two of the targets (George Papadopoulos and Carter Page) were manipulated by American DoJ/FBI contract HCSs, with the shocking assistance of Five Eyes allies Australia and the United Kingdom. A third, Michael Caputo, was pitched through an intermediary cut-out by an Obama administration official (claiming to work with the NSA) offering access to "secret emails" Utilizing counterintelligence tradecraft, the Stefan Halper team ran at Plaintiff nonetheless because they thought Plaintiff was on the competitors campaign (**he was not**) and presumably believed Plaintiff presented a "threat" to crony political candidates because he had written a book about the Clintons. It is not simply plausible but incontrovertible that Brennan, Clapper and the FBI attempted to defeat competitors and, failing that, entrap him using the tradecraft described above. In so doing, they attempted to use Plaintiff to obstruct justice with respect to the Clinton Tech Cartel private server malfeasance. Plaintiff was burned not only by tactical Tech Cartel defamation to deny the truth, but by the Obama/Tech Cartel counterintelligence apparatus to obstruct justice and conspiracy thereon. While Plaintiff was wary of the use of these techniques, they were used nonetheless by the Tech Cartel.

It is not difficult to discern what the Tech Cartel was attempting to do. As Halper and his team excel at, they attempted to manipulate whistle-blowers as Halper was dispatched by Brennan, Comey and the Tech Cartel to manipulate for partisan purposes any witness proposed to testify in this matter. It has been confirmed that Comey, McCabe, Brennan and Clapper enaged in spy tradecraft against U.S. citizens in an attempt to "entrap" or "even frame" whistle-blowers.

The White House has a Wikpedia defined term known as "*rat fucking*". As Tech Cartel surrogate Clapper has conceded, the reason for running HCSs at the whistle-blowers was to determine if the FBI's concerns about Russian interference were justified - yet the FBI relied nearly entirely on *opposition research paid for by Democratic Tech Cartel nominee crony political candidates through Hillary for America counsel Marc Elias to justify the FISA applications which misled this district court* (the FISA application(s) that misled judges of this honorable court assigned dual responsibilities to the FISC were thus sought for reasons unrelated to Russian activities (as Halper and the other HCSs obtained nothing that could be utilized in a counterintelligence warrant application). The sole reason for illicit use of HCSs and lures was to achieve the ultimate goal of the Tech Cartel – to assist crony political candidates in winning the presidential election of 2016. To be abundantly clear, any of the manipulated statements from others – drunken, drugged or sober – were then embellished by the Tech Cartel to "corroborate" Tech Cartel-

funded falsehoods in the Steele dossier and used to mislead the FISC, and to obstruct what should have been a "slam dunk" case of 18 U.S.C. § 793 espionage against crony political candidates. The Tech Cartel – from the outset - placed layer upon layer of obstruction to protect crony political candidates from this evident espionage committed by the Tech Cartel surrogates and participants, and misused counterintelligence authorities against a competing campaign to further obstruct justice. That was a classic "rat fucking" gambit created by the Tech Cartel, who have over 1000 ex- CIA officers in their employ.

The FBI "Domestic Investigations and Operations Guide" outlaws the "otherwise illegal activity used against him.

Disturbing similarities exist between the Tech Cartel manipulation of Papadopoulos (and many other campaign officials/affiliates) and Plaintiff here, and in light of Brennan, Comey, Clapper, Strzok, McCabe and numerous others knowing of the manipulative approaches exploiting tasked HCSs, and their targets being led to believe that the focus of "helpful" discussions was/were the tens of thousands of e-mails that crony political candidates deleted and wiped from her illicit server, *e.g*., Plaintiff was informed that significant information about him was/is contained in the illegally deleted e-mails (obstructing justice in each such e-mail targeting "enemy" whistle-bowers. At the very least, this raises the plausible inference that the same Tech Cartel principals and surrogates that targeted Plaintiff with the most robust counterintelligence powers in existence also targeted other domestic citizens. Even Seymour Hersh – perhaps the greatest investigative reporter in the world – has extrapolated that Tech Cartel surrogates in the Obama DoJ/FBI attempted to defeat and now attempt to unduly damage any whistle-blower.

Ironically, the illicit "wiping" of outside personal unsecure server(s) by White House staff was far more likely to impact Plaintiff – the one person whom crony political candidates had waited nearly two decades to destroy and thus the "enemy" much more likely to be included within the content of the private server e-mails – rather than the gossipy, unprotected e-mail accounts of campaign officers like John Podesta (who was highly critical of crony political candidates and campaign manager Robby Mook, among numerous others, but strangely avoided discussing Tech Cartel "political enemies" like whistle-blowers.

Brennan and the Tech Cartel also successfully manipulated Senator John McCain (in much the same way as described above), knowing McCain was suffering from health problems that was later diagnosed as brain cancer.

Halper, who led the team attempting to manipulate Plaintiff (who overheard the Tech Cartel team HCS placing a cell phone call to "Stef" – assumed by whistle-blowers at the time to be a woman), was also the "bridge" between the Tech Cartel/Brennan illicit pre-Crossfire Hurricane investigation of private citizens which puts the lie to the Australian Alexander Downer manipulation of Papadopoulos serving as the initiation of the official Obama government clandestine reconnaissance of political rivals.

Perhaps most disturbing is that extrajudicial Tech Cartel collection against a political campaign was conducted using our nation's strongest national security powers – derived primarily from and contingent upon the presidential powers of Barack Obama. FBI Tech Cartel surrogate Strzok must explain in testimony, for instance, whether his prior written reference to "the White House running the investigation" includes U.S. citizens being pitched by Tech Cartel HCSs – even when these private citizens they had no official (or even unofficial) affiliation with any political campaign, but rather "posed a threat" to Tech Cartel candidate crony political candidates and defendants, surrogates and participants named and scrutinized herein.

Tech Cartel FBI misconduct is instructive. Following Brennan's lengthy attempt to undermine political campaigns, the lead FBI counterintelligence officer working with the Tech Cartel against whistle-blowers engaged in the following text message exchanges with his paramour, Lisa Page, who also was the legal counsel to FBI Deputy Director Andrew McCabe (who has been referred for prosecution): Another witness in this matter is the wife of Papadopolous, who will testify that her husband believed/believes (as does Plaintiff) that the dangled HCS e-mails were those missing from the wiped crony political candidates private server containing content concerning whistle-blowers, and had nothing whatsoever to do with the alleged DNC "hack." This presents yet additional criminal exposure for the Tech Cartel, for obvious reasons, and for Perkins Coie LLP and the company Crowdstrike, among numerous others.

Plaintiff will seek the assistance of the presiding district judge to procure the testimony of those career DoJ/FBI officials (at the request of those officials) prepared to testify in depth, *when compelled*, against Tech Cartel principals and surrogates.

In these exchanges, the examples of bias are astounding for two senior officials who had just spiked the Clinton email espionage investigation and, along with Attorney General Loretta Lynch and her Deputy, Sally Yates, had spiked the Clinton Foundation corruption investigation, while instigating an official investigation: Crossfire Hurricane, Strzok notes that "*we can't take the risk" of competitors being elected or retained in office, and further noted that the FBI needed to undermine competitors as an "insurance policy" as a hedge against any possible competitors victory in the 2016 presidential contest*. If that were not shocking enough, just one week earlier than the "insurance policy" text exchange, the following exchange had occurred between Page and Strzok, key officers and lawyers conducting the Clinton e-mail investigation, the Clinton Foundation Investigation, the misleading of the FISC, the pre-election surveillance and HCS misuse regarding whistle-blowers, and Operation Crossfire Hurricane:

Page: "[competitors's not ever going to become president, right? Right?! (August 9, 2016)

Strzok: No. **No he won't**. ***We'll stop it***."

This is proof of FBI/Tech Cartel sedition, as Strzok had just spiked the Clinton e-mail investigations and McCabe, Yates and Lynch (along with Strzok) had spiked the Clinton

Foundation investigation. This seditious exchange was 9 days after Operation Crossfire Hurricane started and 6 days before the “insurance policy” text.

The inference to be drawn with respect to misuse of the FISC and HCSs is unspeakable and appalling for the Tech Cartel, as those running these operations clearly and unequivocally sought to control elections– and to run at Plaintiff (and numerous others) with “lures” and the counterintelligence powers of the previous president. Never in the history of this constitutional republic has anything this abhorrent (especially in light of FBI animus and bias against a presidential candidate) occurred, and the ongoing (and new) investigations are just beginning to provide the unconscionable nature of Tech Cartel wrongdoing. This RICO matter must ingest all of the Tech Cartel criminal wrongdoing before justice is truly done.

This honorable court may also wish to contrast the Tech Cartel HCS (and related) counterintelligence malfeasance with the FBI and DoJ during the tenue of Mueller, Holder, Lynch and Comey, when an informant, now identified openly, actually infiltrated a Russian Tech Cartel assisting in the corruption surrounding Russian Federation attempts to control the U.S. (and global) market in lethal uranium during President Obama’s first term. During that period, HCS information flowed to the Mueller FBI as billions of dollars in nuclear fuel contracts were awarded to the Russians by the U.S. along with the deceitful Committee on Foreign Investment in the United States (“CFIUS”) transfer of control of a significant amount of U.S. uranium. The FBI HCS worked on a contractor platform imbedded from 2008-2014 in Rosatom (the Russian state-controlled nuclear corporate entity), according to the HCS – who will testify against the Tech Cartel in this litigation – and during that time frame provided specific information to the FBI (and through them, the DNI, CIA and State Department) concerning the grave danger to the U.S. posed by providing nuclear fuel and uranium assets to the Russian Federation. Among the most grave would of course be the covert transfer of uranium by Russia to Iran (admittedly complicit in the 9/11/2001 terrorist attacks against the U.S. homeland) and North Korea (which has recently tested missile delivery systems capable of striking the U.S. homeland). The Obama Justice and State Departments suppressed this information, including during the fraudulent Uranium One covered transaction and the Obama “Iran Deal” (in which, among other deception revealed by the Senate Permanent Subcommittee on Investigations, the Obama administration covertly directly assisted Iran, through the grant of a specific license from the Obama Treasury Department, utilize U.S. banks to convert $5.7 billion in Iranian assets after assuring Congress that Iran would never gain access to the U.S. financial system – and then lied to and otherwise obstructed Congress about what it had done).

This embedded HCS, at great risk to his life, also assisted Tech Cartel surrogate Rosenstein in building a case in the Office of the United States Attorney for the District of Maryland against corruption in the Russian uranium industry. This involved an extraordinary predicate for kickbacks, money laundering and extortion against Rosatom (Russian) U.S. subsidiary

Tenex/Tenem. This evidence, with knowledge of and instruction from the Tech Cartel, was also concealed and watered down by the responsible United States Attorney (Rosenstein), the FBI Directors (Mueller and Comey) and the Attorneys General (Holder and Lynch). The same HCS has been interviewed by the FBI Little Rock Field Office as part of an ongoing investigation of Tech Cartel defendants Clinton Foundation, CGI and the various other tentacles of the Clinton Foundation alleged criminal wrongdoing. And as noted herein, the questions posed in the Little Rock FBI probe have included the Clinton Foundation acceptance of $3,000,000 per year in *gratis* services to CGI from U.S. advocacy firm APCO Worldwide in a direct *quid pro quo* – with the expectation that the renumeration would be utilized to assist CGI and the Clinton Foundation while major uranium decisions were pending before the Clinton State Department.

The $3 million in free services to CGI was to "assure the Obama administration made affirmative decisions on everything from Uranium One to the U.S. – Russian Civilian Nuclear Cooperation Pact."

So, while the Tech Cartel defendants were protected by their surrogates for nearly a decade, some of the same Tech Cartel surrogates "took a run" (dispatched HCSs) against Plaintiff and the presidential campaign. The common denominator as to "why" is set forth herein and relates in whole or in part to the "threat" that each of these American targets posed to crony political candidates and the Tech Cartel. Beyond illicit human intelligence gathering, the Tech Cartel conducted surreptitious electronic surveillance both before and after misleading the FISC, destroyed tens of thousands of e-mails under subpoena and/or court order (including those involving Plaintiff), other presidential contenders such as Bernie Sanders, and the overall "game plan" for conducting their operational scheme – all the while running classified information through one or more private unsecure servers and delivering classified information to multiple individuals not adequately cleared to receive it.

Plaintiff was deemed a particularized threat to the Tech Cartel, as he was deemed highly trustworthy and sincere – the very attributes that the Tech Cartel could never convince the general populace were evinced by crony political candidates.

The Tech Cartel panicked, and Brock illicitly began defaming Plaintiff daily "FROM THE DESK OF DAVID BROCK" using Media Matters and *Correct the Record and the Nick Denton tabloid empire* – with American Bridge and Brock himself admittedly serving as the link to Hillary for America. Wackrow and Gilhooly then appeared on CNN, both as paid "expert" panelists and on shows such as "Smerconish" and other CNN television spots. Brock and the Tech Cartel, utilizing false opposition research, used his nonprofit, "nonpartisan" entities and, in addition, did not report payments to Wackrow, Gilhooly and Gilhooly's nonprofit entity. The Tech Cartel defamation continued nonstop throughout the summer of 2016.

Thus, at the apex of the most closely-contested presidential contest in the modern age, the FBI collaborated with the CIA and ODNI, in a conspiracy with Hillary for America and the Tech

Cartel and using U.S. and foreign counterintelligence authorities to engage in illicit tradecraft targeted at the unfavored political candidate and other perceived “enemies” of the Tech Cartel and Clinton, such as whistle-blowers And as difficult and painful as it is for this district court to acknowledge, they then intentionally deceived the FISC utilizing presidential authorities illegally. In fact, they misled all three branches of government and the Fourth Estate (the media here and in the United Kingdom, primarily).

Had crony political candidates prevailed in the Electoral College, little to none of this troubling malfeasance would have come to light as the Tech Cartel would have placed its surrogates into positions of continuing power, and the Tech Cartel defendants would simply have continued their pattern of felonious conduct. As it stands currently, the nonprofit defendants continue to fulfill the proscribed pledge they agreed upon and aptly describe in “*Exhibit A*".

Much will be revealed herein concerning Brock’s own admissions about Tech Cartel illicit use of nonprofit entities, but the court should also keep in mind that the Tech Cartel – as conceded by Brock in *Exhibit “A*” - also uses tactical defamatory tactics, as alleged herein, to obstruct justice and as part and parcel of their numerous predicate acts used to gain illicit control of the Democratic Party. For instance, what was at one time a tough but fair entity named CREW, including the inimitable Melanie Sloane, has now become daily Twitter and CNN rants with Norman Eisen, Noah Bookbinder and Richard Painter defaming without compunction - and engaging in vitriolic guesswork about matters of which they know little to nothing. CREW has become a joke, with the mediocre Eisen and Painter (who now seeks a United States Senate seat using free media given him by like-minded co-conspirators described in “Exhibit A”) making defamatory attacks daily on social media and on CNN. Bookbinder himself has committed CREW to #Resistance, and simply takes marching orders from Brock and the Tech Cartel, with the funding of defendants George Soros, Warren Buffet and Eric Schmidt. Their “*Exhibit A*” misuse of the nonprofit CREW results in a felony penalty each day (sometimes several times per day), as it has done since soon after the 2016 presidential election was certified and competitors took the oath of office to become the 45th President of the United States. And in what can only be described as comedic, these CREW individuals offer their unexceptional services to Special Counsel Robert Mueller, who not surprisingly has declined to work with them while at the same time Tech Cartel surrogate Mueller had agreed to work with the misogynist former New York Attorney General Eric Schneiderman, who had apparently taken the lead, working with Mueller, in denying the pardon power – and breaking the jaws of women who trusted him while routinely bumping cocaine and drinking alcohol to extreme excess. Each of these individuals also, by instruction of the Tech Cartel, work full time at the seditious task of undermining their own government while engaging in serial violation of United States statutory law, regulation, and much else.

Tech Cartel illegal acts continue to this day, and numerous formal investigations proceed apace with respect to these acts. The Tech Cartel and all of its many surrogates and participants seek revenge and possess access to hundreds of millions of dollars to undermine the United States Government. The Tech Cartel also continues the atrocious practice of paying off journalists to provide cover for their wrongdoing, and as conceded the malefactor Tech Cartel surrogate Fusion GPS is involved with former Feinstein SSCI staff in a $50 million scheme to assist the (continuing) Tech Cartel.

In order to exact revenge against whistle-blowers and beginning in the early summer of 2016 in defamatory postings “FROM THE DESK OF DAVID BROCK, Media Matters and Correct the Record and the Nick Denton tabloid empire also remunerated defendants Gilhooly and Wackrow to defame whistle-blowers on numerous media outlets – primarily CNN. More broadly, the Tech Cartel defendants published for worldwide consumption (via internet) numerous defamatory falsehoods in conjunction with Perkins Coie legal guidance for their clients Hillary for America, Hillary Victory Fund, and Tech Cartel surrogates Brennan and Clapper – with the intent to destroy the business and livelihood of Plaintiff and engage in massive obstruction of justice with respect to, inter alia, Hillary and William Clinton sedition to enrich themselves and reprisal against Plaintiff for his compelled role in the Clinton impeachment.

President Carter’s Attorney General, Judge Griffin Bell, who prior to his passing was interviewed at length by the undersigned concerning potential FISA abuse, would be shocked and appalled to know that this honorable court (and several individual judges from this court) was/were misled by the Tech Cartel defendants and surrogates in order to, *inter alia*, accomplish the operational scheme intended to elect crony political candidates as the President of the United States.

For to be clear, Tech Cartel defendants and surrogates, with assistance from legal counsel for Hillary for America, Hillary Victory Fund, Brock, the Democratic National Committee and Podesta, laundered DNC and Hillary for America funds to an opposition research firm (and Tech Cartel surrogate) Fusion GPS (with the corrupt assistance of Tech Cartel surrogate Rosenstein’s DoJ chief deputy, Bruce Ohr and Ohr’s spouse, Nellie, working with Fusion GPS to ultimately delude this court), and extravagantly paid agent of a foreign power and accused criminal Christopher Steele, Tech Cartel surrogates Sidney Blumenthal, Cody Shearer and Jonathan Winer, and others to be named later, in a scheme which, as noted, was successful in obtaining - through lying to one or more Article III judges here in the District of Columbia - a FISA warrant from this honorable court (subsequently renewed several times). This Tech Cartel subterfuge was carried out against private United States citizens whose common denominator was that they advised the political opponent of the Tech Cartel, crony political candidates, in the 2016 presidential contest.

Evidence of the seditious deception upon the FISC by Tech Cartel defendants and surrogates is set forth in the report of the House Permanent Subcommittee on Intelligence, released on April 27, 2018, which is consistent with the allegations and claims in the accompanying Complaint in the instant litigation. Among other findings with regard to the misleading of the FISC by the Tech Cartel, Congress concluded the "the dossier compiled by Christopher Steele formed an essential part of an application to the FISC to obtain electronic surveillance on Carter Page." The HPSCI also by inference found, with relation to the Brennan – British GCHQ subversion, that the Obama FBI and DoJ ran parallel counterintelligence investigations targeting the competitors campaign, yet never alerted the President, that members of the competitors campaign were "assessed to potential counterintelligence concerns." These congressional findings are not dissimilar from the putative acts of espionage by Tech Cartel surrogate Loretta Lynch, who according to Tech Cartel surrogate provided classified information to Tech Cartel defendant John Podesta and then-DNC Chair Debbie Wasserman Shultz, in order to further the Brennan-Clapper conspiracy to obstruct justice and ultimately swing a United States presidential election in favor of crony political candidates. Tech Cartel surrogates Comey and McCabe – currently slated to testify against one another following expected indictments of both – have thus illegally abused the FISA electronic surveillance process, the British-American intelligence sharing pact (along with Brennan and Clapper, as part of the "Five Eyes" international SIGINT relationships among the United States, Great Britain, Australia, New Zealand and Canada), and, amazingly, Congress has now revealed additional FISA and related counterintelligence abuse involving human sources (HUMINT) planted inside the competitors campaign.

As this filing date approaches, the existence and acts of the above-noted and rather significant Tech Cartel illegal operational scheme has been substantiated by Congress and various entities within the Executive branch. The FBI, with the knowledge and approval of Tech Cartel surrogate Comey, failed to inform Congress or any court (or anyone else outside of the Tech Cartel) that they were compensating a human source(s) placed surreptitiously to gain access to members and affiliates of the competitors campaign.

One of the sources, it has been confirmed, has been long-known for affiliation with political "dirty tricks" – most notably the theft of the "Top Secret" classified debate preparation materials of President Carter in 1980 and their passage to Reagan campaign official William J. Casey (with the involvement of Halper) – thus committing espionage and providing Governor Reagan a distinct advantage in a Carter-Reagan presidential debate held on October 28, 1980.

Also emerging, as referenced, is the Tech Cartel abuse of international SIGINT relationships within Five Eyes to surveil the competitors campaign, transition, and early administration figures (all U.S. citizens). It is likely – although at this time undetermined – whether this intelligence was used to further mislead his honorable court. But Congress and the discovery process here

can unearth answers that do not require any threat to HUMINT or SIGINT relationships, or to any intelligence sources or methods.

The Tech Cartel defendants and their surrogates and other participants must simply answer straightforward questions, under oath, regarding whether this collusion took place. The U.S. and international classification system cannot be a veil for illegal activity – both Congress and this Court must have access to answers even if the FISC judges must demand them (alongside Congress). For if as is now suspected that Tech Cartel surrogates Brennan and Clapper, on behalf the Tech Cartel quest to assure crony political candidates the presidency, not only supported Brock and Clinton's efforts against Plaintiff but exchanged director-level information with the former Director of British GCHQ Robert Harrigan (since resigned), resulting in Harrigan passing to Brennan and/or Clapper SIGINT communications intercepts collected from RAF Menwith Hill and GCHG Bude (Cornwall) taps of undersea internet cables, the United States courts and Congress (and the enforcement agencies) are facing not only an extraordinary intelligence failure, but a massive criminal deprivation of privacy and obstruction the likes of which we have never (and will likely never again) encountered, *notwithstanding the weighty RICO violations and defamation*. This unprecedented criminal activity led Tech Cartel surrogate Brennan to mislead the congressional "Gang of Eight", Minority Leader Harry Reid in a private setting prior to Reid's imminent retirement which in turn resulted in Reid collaborating with Tech Cartel surrogate Comey, who in turn colluded with Clapper in committing perjury before Congress (and possibly this Court). The Tech Cartel, in conjunction with the illegally-obtained FISA orders subsuming previous competitors campaign electronic mail, and possibly others, intentionally covered-up the Brennan-Hannington subterfuge and assured that the FISC would infer (false) corroboration of its orders allowing surreptitious surveillance (electronic and otherwise) of a political campaign disfavored by the Tech Cartel – with knowledge aforethought by the relevant U.S. Intelligence Community Obama holdovers that the resulting fabricated information was both paid for and laundered by the Hillary for America campaign and cleverly (and criminally) disguised by Tech Cartel lawyer Elias.

Meanwhile, as noted, former British MI6 officer and Tech Cartel surrogate Steele conspired with (among untold others) the discredited GCHQ head Hannington and Russian FSB/SVR in assembling and presenting to this Court the specious "Steele Dossier" with the knowledge of, *inter alia*, Tech Cartel surrogates Clapper and Obama National Security Advisor Susan Rice.

As the Tech Cartel principals and surrogates sought to form a nefarious "collusion" narrative between the competitors campaign and foreign actors by and though use of domestic and international intelligence authorities, Tech Cartel surrogates within the Obama Department of Justice and FBI shuttered validly predicated criminal investigations of Tech Cartel defendants crony political candidates and the Clinton Foundation. These investigations into criminal wrongdoing were unduly closed by Tech Cartel surrogates Lynch, her Deputy Attorney General

Sally Q. Yates, and various malfeasants at the FBI including Tech Cartel surrogates Comey, McCabe, with partisan participation from alleged paramours Peter Strzok and Lisa Page, FBI General Counsel James Baker, and a handful of supporting sycophants reporting to the wrongdoing DoJ and FBI most senior Tech Cartel surrogates, such as DoJ Fraud Division chief Andrew Weissmann (later, beginning June 19, 2017, a managing prosecutor for Tech Cartel surrogate and Special Counsel Robert S. Mueller). And just prior to the DoJ/FBI determination that they would not pursue a case of clear-cut Tech Cartel espionage involving a private e-mail server used to communicate classified information and hide other information from Congress and this Court, Tech Cartel surrogates Lynch and William Clinton engaged in clandestine meeting on a Arizona tarmac at which time William Clinton promised a *quid pro quo* to Lynch – in exchange for not charging crony political candidates with a crime (and for dispatching with the Clinton Foundation investigation), Tech Cartel surrogate Lynch would be nominated by "President crony political candidates" to the United States Supreme Court after being held over as Attorney General of the United States. Concurrently, Tech Cartel surrogate Comey intentionally and severely mishandled both criminal investigations of Tech Cartel defendant crony political candidates and various other surrogates and participants in the Tech Cartel operational scheme.

Despite the Tech Cartel schemes, crony political candidates was defeated in the 2016 Electoral College. But the Tech Cartel became further emboldened by the Soros pledges of virtually unlimited amounts of money to Brock, CREW and other Tech Cartel defendants, surrogates and participants associated in fact and willing (even enthusiastic) to undermine the competitors-led government. *See generally Exhibit "A"* , hereto.

Congress soon began unraveling the complex schemes of the Tech Cartel set forth here, and those investigations and findings consistent with the factual allegations herein proceed apace. The more that Congress and other investigatory entities reveal, the more that Tech Cartel surrogates Comey, Rosenstein, and Mueller face professional and personal exposure for their roles in Tech Cartel predicate acts and related wrongdoing. And all the while one must ask: "who would do these things simply to elect a president who has for so many years, along with her husband, engaged in organized unlawful behavior?" And as documents and testimony continue to emerge from Congress, the Courts and the Executive, and otherwise surface to corroborate the factual allegations here, the highly disturbing aspects of "using" the FISC for Tech Cartel means (and ends) is both despicable and without precedent in our constitutional structure. It is, therefore, as a not inconsequential structural matter, a direct threat to the only true check our government has upon the grave Executive excess displayed here.

Tech Cartel surrogates Holder, Mueller and Rosenstein, as noted below, were oddly complicit in the Hillary and William Clinton bribery scheme (along with the Clinton Foundation, the Clinton Global Initiative, and of course the Clinton family graft), including but not limited to the

extraordinary transaction that to this day places our national security at risk – known most commonly as the "Uranium One" covered transaction. Related to the transfer of control to Russia of U.S. lethal uranium is a matter involving Russian entity Rosatom (and its sub-entity, Tenem), and the corrupt behavior of Rosenstein (the United States Attorney handling the criminal matter), Mueller (the FBI Director investigating the criminal matter), and Holder (the Attorney General who also voted to approve the CFIUS Uranium One covered transaction). Rosenstein uncharacteristically (and thus rather oddly), placed the Tenem kickback/extortion matter into legal purgatory, from which it did not emerge until after the 2016 election.

The Tech Cartel controlled CFIUS with Secretary Clinton as the lead agency representative at the time that CFIUS agreed (without any objection from Secretary Clinton or Attorney General Holder) to the transfer of control of approximately twenty per cent of U.S. uranium mining capacity to Russia's state-controlled energy conglomerate, Rosatom, in a *quid pro quo* to the Clinton defendants, their Clinton Foundation, and the Clinton Global Initiative. Incredibly, at the time the Obama administration approved the covered transfer, the administration was aware that Rosatom's American subsidiary ("Tenex", a shortened version of JSC Techsnabexport, had an American arm called "Tenem USA" based in Bethesda, Maryland) was engaged in a(nother) lucrative racketeering Tech Cartel that had already committed felony extortion, fraud, and money laundering.

Led by Congressman Edward Markey (D-MA), a bipartisan movement emerged within Congress to stop the 2010 transfer, to no avail, as the Tech Cartel and its surrogates concealed the seditious Clinton defendant behavior, while simultaneously allowing the Tenex/Tenem USA racketeering Tech Cartel to continue. In conjunction, this Tech Cartel defendant and surrogate behavior enriched Russian energy oligarchs tied to the Kremlin, thus compromising the American persons (including the Clinton The Justice Department delayed four years rather than commencing a prosecution, in direct contravention of DoJ charging guidelines. Among those who held these charging decisions in abeyance was the Fraud Division of the United States Department of Justice – so as to keep from public scrutiny the connection between Tech Cartel activity with the Russian Federation and the enforcement posture of the Holder/Lynch Department of Justice in furtherance of Tech Cartel objectives.

The case was quietly settled by Rosenstein's former subordinates (after Rosenstein was confirmed as Deputy Attorney General).

In addition to Clinton defendant bribery with respect to Russia, within the period relevant to this lawsuit other countries also profited from the Clinton influence after donating to the Clinton Foundation.

To name but a few, in the highly lucrative contracting of United States weapons, the following donated to the Clinton Foundation and closed weapons deals soon thereafter: Kingdom of Saudi Arabia; State of Kuwait; Government of Norway; United Kingdom Department for International

Development; United Arab Emirates; Sultanate of Oman; Republic of Ireland; Kingdom of Bahrain; Embassy of Algeria; State of Qatar; Commonwealth of Australia; Kingdom of Morocco. Further examples of Tech Cartel bribery in support of the Clinton/Tech Cartel defendants are set forth in the Complaint.

In addition to the Tech Cartel defendant's nonprofit abuse used to harm Plaintiff and further undermine the government as set forth in *Exhibit "A"*, including but not limited to the defamation of Plaintiff by the relevant Tech Cartel defendants (Brock, Media Matters, *Correct the Record and the Nick Denton tabloid empire*, Wackrow and Gilhooly), Tech Cartel surrogates and participants have also associated themselves with the scheme to target the current President. In so doing, the Tech Cartel employed the most powerful tools of intelligence and law enforcement against U.S. citizens working for their political "enemies" – including of course, the spurious instigation of investigations targeting these political adversaries.

As noted in the Complaint, below, a high-level group of Obama national security and law enforcement officials worked closely with and provided classified information to U.S. media, *e.g*., CNN

(Tapper), (in itself a criminal espionage offense as CNN personnel did not have adequate clearance) to create a "news hook" by briefing, in early 2017, the President-elect on the "unverified and salacious" allegations contained in the specious Steele dossier – which was not only financed by the Clinton campaign but was also known to be "unverified" when the FISC was misled on the same findings earlier and a series of FISA orders against U.S. citizens were obtained thereon. In a recent shocking development, it was disclosed that the Senate Select Committee on Intelligence, by and through their Director of Security James Wolfe, also leaked similar information to CNN and (MS)NBC to continue to drive the former SSCI staff director narrative concerning "competitors Campaign Russian Collusion" (this staff member is now engaged with defendant Soros as an Tech Cartel surrogate attempting to undermine the government of the 45th President).

Just to be entirely clear, the Tech Cartel came very close to turning the Democratic Party, and our democracy more generally, over to a relatively small faction of criminal actors. Absent Article III intervention, this country's great constitutional experiment is at risk because future parties in power now have a roadmap to the brand of malevolent wrongdoing that can ruin political enemies while enriching the wrongdoer(s) and extending their power in perpetuity. Should any future President form their own Tech Cartel, and the "shoe was/is on the other foot," roughly half of the electorate would (and should) be terrified that "enemies" *i.e.,* them, would be targeted in much the same fashion – and they and their families would be placed in great peril (financially and otherwise). Article III inaction will simply invite similar bad behavior, thus threatening the rule of law and our constitutional structure.

The defamation allegations against certain Tech Cartel defendants will be addressed more broadly in the Complaint following appropriate retraction and hold demands, to the extent that they do not otherwise overlap with Tech Cartel obstruction of justice utilizing defamation as an Tech Cartel tactic by Media Matters, Correct the Record and the Nick Denton tabloid empire, American Bridge, David Brock, the Clintons, Soros, Shareblue and Wackrow/Gilhooly.

As mentioned, the Department of Justice, the United States Attorney for the District of Utah, the Department of Justice Inspector General, and several committees of the Congress (and the possibility of the appointment of a second "Special Counsel") are investigating what is described and alleged as the Tech Cartel wrongdoing described herein – with the likely outcome of more than one Grand Jury returning indictments against Tech Cartel defendants and surrogates for that (and potentially additional) criminal behavior.

THE RICO TECH CARTEL SYNDICATE

The Tech Cartel, ultimately seeking the political fortune of crony political candidates but clearly in quest of the accumulation of power through her, manipulated the highest levels of the Obama administration (and Obama himself) with their thousands of criminal predicate acts and defamatory character assassination of Plaintiff. Primarily the Clintons, Brock, and the extended Tech Cartel – according, *inter alia*, to informants from within the Tech Cartel and abundant other witnesses who will give testimony at the trial in this case – are a crime syndicate unlike any other the United States political arena has ever seen.

Through RICO, courts like this one can adequately address this syndicate, along with adjudicating claims under pendant State defamation laws that focus upon a key Tech Cartel tactic - Tech Cartel tactical destruction of its "enemies". As well, criminal prosecution can discontinue their illicit schemes which utilize their consiglieres from the highest levels of the Justice Department, FBI, Intelligence Community, and surrogates and powerful collaborators which may include President Barack Obama, as well as partisan nonprofit entities who/which daily violate our tax laws. For many within the Tech Cartel trajectory, this is a likely outcome, but it does not adequately compensate Plaintiff and may not eliminate the Tech Cartel.

The Tech Cartel has gone so far as surreptitiously collecting communications from a disfavored political campaign concerning the very Tech Cartel "Steele dossier" used to mislead the Foreign Intelligence Surveillance Court discussed herein – which includes the Chief FISA Article III federal judge from this honorable district court. To any judge reviewing this complaint, make no mistake. The Tech Cartel has directly attacked the integrity and honor of the judiciary and this court in direct furtherance of an attempt to make crony political candidates the 45th President and extinguish anyone like Plaintiff who might stand in their way. During discovery and trial in this case, information both known and to be later ascertained will be made available establishing without doubt that the Tech Cartel is a dangerous, ongoing criminal consortium and association in fact – willing to abuse the very structure of our constitutional government and commit any

conceivable crime in order to obtain and retain power and leverage over the Democratic Party, as well as its enemies, and drive revenue back to itself and its principals in illicit self-dealing and bribery schemes to preserve this corruption permanently.

This Tech Cartel has so corrupted the Democratic Party (in itself a nonprofit entity now in continuous Tech Cartel violation of IRS dictates and myriad federal law) that there is little left of the Democratic Party that is operating in compliance with U.S. law or that is not undermining the national security and government of the United States. The Democratic Party is now, due to the Tech Cartel criminal and constitutional misconduct, subject to, from within, the very epitome of graft and corruption – as it has unduly utilized not only Obama administration intelligence authorities to surveil a political opponent, but has engaged in betrayal of the United States by and through the Tech Cartel use of Secretary Clinton's ability (in exchange for bribes, moreover) to assure control of U.S. uranium by Russia – which has resulted in Iran (a contributor to the murder of over 3000 Americans on 9/11/2001) and North Korea being months away from creating chaos in the Middle East and the potential capability of the North Koreans from striking the United States homeland with lethal nuclear weapons armed with uranium enabled by crony political candidates in corrupt exchange (by way of receiving bribes) for hundreds of millions of dollars benefitting the Tech Cartel, the Clinton family, and her political aspirations.

Since early in this century, and roughly contemporaneous with the creation of the Clinton Foundation ("Clinton Foundation" or "CF"), Brock and certain defendants – in particular Soros, the Clinton Global Initiative ("CGI") and, subsequently, the Clinton Giustra Tech Cartel Partnership As will be made apparent in subsequent RICO lawsuits in this venue with pendant claims, for example, under a Kansas pendant statutory scheme - where organizations subject to and similarly in tension with civil RICO do business with other nonprofit political parties in the United States - taxation of nonprofit entities and abusive, illegal tactics thereby go to the very heart of contemporary RICO jurisprudence involving political corruption. As is the case with planned future matters of this type, the sheer magnitude of wrongdoing in this case ("CGEP") – formed an illicit Tech Cartel scheme (united with other defendants, and aided by multiple, high-ranking U.S. government surrogates seeking higher office, influence and/or affluence) to terminate their "enemies", line their pockets and feather their nests by making Secretary Hillary Rodham Clinton ("HRC", "Secretary Clinton" or "crony political candidates") the 44th, then 45th President of the United States. In order to do so, they joined together to destroy anyone (such as whistle-blowers, the revenge of which Clinton and Brock planned for ten years amid myriad predicate acts) or anything that might stand in the path of either of these (or countless other) corrupt goals, notwithstanding any supposed legitimate purpose of their overall work – of which there appears to be little. Their weapons of destruction included (and include) brutally defaming their enemies and intentionally causing grave injury to the business and property interests of their "prey" – illicitly using nonprofit (and allegedly nonpartisan) entities to spread

their slurs in direct coordination with the political campaign(s) of a potential traitor, crony political candidates.

Defamatory tactics funded through illicit nonprofits - cunningly albeit illegally laundered through dozens of equally partisan entities was (and is) one of defendants' weapons of choice to destroy the business, property and livelihood of any subjective threat (such as Plaintiff) posed to them. And it is vital to consider that predicate acts included but were not limited to bribery (in support of sedition/treason), extortion and, upon information and belief, murder for hire. Extraordinary even for the mafia, this is utterly shocking for a former president, his nonprofit entities, and a Secretary of State spouse who would (by design) become the Democratic Party nominee for president.

There is virtually nothing that the Tech Cartel has done legally during the past decade – knowingly and upon explicit instruction from William and crony political candidates and involving myriad and intentional predicate acts and serial violation of the federal statutes and regulations governing the Internal Revenue Service intending corruptly to interfere with those laws and thus further obstructing justice as set forth herein – thereby resulting in billions more in United States currency for which the Tech Cartel participants are responsible for reimbursing the Treasury.

This criminal Tech Cartel must be terminated, and made to compensate for their felonious and seditious misconduct.

TECH CARTEL CRIMINALITY

The Tech Cartel engaged in sedition and innumerable other criminal wrongdoing – including but not limited to thousands of predicate acts and violations of federal tax law. Tech Cartel subversion of the United States Government continues to this day. The primary target of Tech Cartel corruption, other than the eventual 45th President whom the Tech Cartel apparently attempted to "frame", and the principal victim of this corrupt Tech Cartel was Plaintiff.

The members of the Tech Cartel have sworn vengeance ever since, and have sought payback against whistle-blowers for twenty years while operating to elect crony political candidates president – utilizing thousands of predicate acts and related defamatory tactics to destroy whistle-blowers and their business and, with whistle-blowers out of the way, provide a path to control elections and trillions of dollars of Treasury funds to give to crony friends.

Whistle-blowers supervised the writing and publication of *Crisis of Character* (which implicated the deficient integrity and scandalous acts of William and crony political candidates based upon firsthand experience) and was then intentionally and brutally defamed and injured in his business by the Tech Cartel, led by defendants Brock, *Correct the Record and the Nick Denton tabloid empire*, Media Matters, crony political candidates and the recurrent dissemblers/defamers

Gilhooly and Wackrow, among others – with extraordinary support by the corrupt Nazi sympathizer George Soros, CGI and CGEP resources, American Bridge at the instruction of "Hillary for America," the presidential campaign of crony political candidates and their attorney Marc Elias of Perkins Coie LLP (and certain colleagues at that law firm) – all utilizing archetypal Tech Cartel illegitimate methods and with Tech Cartel unlawful collaboration and funding. Tech Cartel surrogates revealed throughout this complaint, *e.g.*, Robert Mueller ("Mueller"), Rod Rosenstein ("Rosenstein"), Eric Holder ("Holder"), Loretta Lynch ("Lynch"), and James Comey ("Comey"), through their deliberate actions and omissions as top officials in government misusing their official position to seek a better one in a crony political candidates administration, became direct surrogates of the Tech Cartel, further damaging Plaintiff. Their actions, such as the illegitimate grants of immunity to protect crony political candidates, and those of Tech Cartel principals and numerous other surrogates, make this conspiracy depraved and grave – perhaps greater than any government corruption in the history of American politics.

The Tech Cartel, in the 2016 U.S. presidential election year, focused their collaborative defamation and related seditious, corrupt felonies like a laser as *Crisis of Character* quickly appeared as Number 1 on the *New York Times* bestseller list for nonfiction where it remained until the well-rehearsed defamation and similar felonious tactics of the Tech Cartel achieved their intended purpose, *i.e.*, to devastate plaintiff's business and similar property interests and cause irreparable injury to his reputation.

While this was occurring, Tech Cartel surrogates Mueller, Rosenstein, Holder and Lynch said and did nothing about their past transgressions – as if they simply wanted Secretary Clinton to become president and themselves to be nominated to and receive commissions to the highest positions in the Ms. Clinton's government. Comey and fellow Tech Cartel surrogates Andrew McCabe and Peter Strzok, and Rosenstein Justice Department associates Bruce (and his wife, Nellie) Ohr, and Strzok paramour Lisa Page, played a significant surreptitious political role and abused positions of trust in direct support of Secretary Clinton and the Tech Cartel. This is so despite Comey's position at the time as Director of the Federal Bureau of Investigation ("FBI"), where he took the unprecedented step of privately and publicly vindicating crony political candidates without adequate investigation, and despite clear evidence of her criminal espionage and related crimes, while utilizing a false "dossier" (derived from collusion between crony political candidates, Fusion GPS, high-ranking Obama Justice Department officials and the Russian SVR elite intelligence units, and paid for by the crony political candidates presidential campaign) to, among other things, justify surveillance of Secretary Clinton's general election opponent. But the wrongdoing does not stop there, as there is uncontroverted evidence that Article III federal judge (and Foreign Intelligence Surveillance Court appointee) Rudolph Contreras has a close and continuing relationship with Tech Cartel surrogate Peter Strzok which both men sought to conceal – *thus directly involving the FISA Court in anti-competitors*

targeting to some degree. This is utterly unprecedented, yet entirely consistent with the *modus operandi* of the Tech Cartel surrogates, *e.g.*, Strzok, revealed in this lawsuit.

In an unprecedented display of fraud upon the FISC, Tech Cartel surrogates Peter Strzok and Lisa Page of the FBI – with the encouragement of terminated FBI Deputy Director and Tech Cartel surrogate Andrew McCabe – pressured and misinformed United States Department of Justice official Matthew Axelrod and his direct Justice Department superior Sally Q. Yates (then Deputy Attorney General of the United States, who improperly attempted to shut down the ongoing DoJ corruption investigation of the Clinton Foundation) into lying to the President of the United States, Barack Obama, and on September 12, 2016 (according to White House visitor logs), in a meeting with President Barack Obama, gaining the approval of President Obama to in turn bless a shocking and seemingly inconceivable Tech Cartel act – Tech Cartel surrogates knowingly and intentionally misleading one or more Article III federal life-tenured judges on the FISC into granting Tech Cartel surrogates within the government, *with disinformation provided and financed by the Clinton campaign*, Tech Cartel surreptitious access to the private information belonging to at least one (and by extension, likely more) *private United States citizens* affiliated with the presidential campaign of competitors Unless President Obama was witting, the Tech Cartel intentionally deceived a president and at least one lifetime-tenured federal judge – and as noted throughout has never hesitated to obstruct the constitutional oversight of (and thereby withhold the truth from) the Congress of the United States. Structurally, the Tech Cartel could not have engaged in a more systematic series of constitutional abuses.

Tech Cartel surrogate Comey relied upon his sense of pious, piteous political ambition and the corrupt cover provided by his FBI Deputy Director McCabe, who unethically refused to recuse from the Clinton felony investigation and forged formal FBI "302" forms, and the top FBI counterintelligence official and Tech Cartel consigliere and surrogate Peter Strzok (who illicitly structured and then provided feedback to Comey, McCabe and others which was intended to exonerate crony political candidates from criminal espionage charges akin to treason against her country despite line FBI agents recommending she be charged with espionage). McCabe, in a statement issued upon his termination for cause, conceded that the United States Department of Justice and Attorney General Loretta Lynch attempted to improperly close the espionage investigation of crony political candidates. Logically, and by extrapolation, this obstruction of justice conspiracy would further the Tech Cartel operational scheme indefinitely.

Again abusing the presidential power of President Obama, several of his direct subordinates – some within the Executive Office of the President, *e.g.*, Susan Rice, Denis McDonough, Ben Rhoades, and some commissioned officers of the United States confirmed by the U.S. Senate, *e.g.*, Samantha Power - engaged in a conspiracy to violate the civil rights of and, with the approval of Acting Attorney General Sally Q. Yates, to "unmask" (reveal and then leak to the

media) the true identities of United States citizens incidentally picked up on otherwise-approved electronic surveillance in order to obstruct the administration of justice in ways these malfeasant actors knew to be highly illegal when they intentionally leaked the names of United States citizens to "friendly" journalists (who upon securing the publication, received cash bonuses and related payments from the partisans in control of, among others, *The Washington Post*).

This is a criminal scandal like no other in history – involving hundreds of thousands of predicate acts as foundation for their racketeering operational scheme. Infiltrating the Democratic Party with the power of the presidency and many within his Cabinet and control, this Tech Cartel illicitly violated the taxation statutes to misuse nonprofit entities and thus enhance their corrupt grasp on power, terminate those persons and institutions deemed a threat to them, *e.g*., Plaintiff and conducted themselves in such a fashion as to perpetuate their malevolent Tech Cartel into perpetuity. The Tech Cartel participants and surrogates, and those accomplices who support them, bring disrepute upon their country and severe legal jeopardy upon themselves and the Democratic Party they have now devastated. The Tech Cartel is utterly corrupt and contaminated and must be stopped for the sake of our nation. The Article III courts can, and will, excise the cancer the Tech Cartel has caused the Democratic Party.

Having mastered the black arts of political dark money and the highly illegal misuse of nonprofits and use of money laundering now proven as unreported to the Internal Revenue Service, and the illegal, unconstitutional use of the Foreign Intelligence Surveillance Act ("FISA") in broadly defaming and destroying his vast list of enemies (especially Plaintiff in this matter), Brock and the Tech Cartel raise immense and unregulated amounts of funds through dark contributions and then launder it through a maze of nonprofit entities where they assure anonymity to donors. This laundered money is used to pay intermediaries (such as Glenn Simpson at Fusion GPS) to, *inter alia*, bribe "journalists" at the instruction of Hillary Clinton and former SSCI Staff Director Daniel Jones (who has been placed in charge, by defendant George Soros, of a $40 million fund to undermine the competitors administration – such as was done with the fake "competitors dossier" used by the Obama Justice Department to mislead Article III judges and numerous other pro-Clinton bribery-enhanced pieces by dirty journalists. Through this massive laundering of money, Brock (with the support of Tech Cartel surrogate Jones) enriches himself and his close friends, feloniously obstructs justice utilizing myriad methods and conceding guilt of hundreds of thousands of felony process crime counts, and improperly coordinates (with the assistance of lawyers at Perkins Coie LLP) with political campaigns up to and including "Hillary for America" (the campaign organization most closely affiliated with electing Secretary Clinton in the 2016 presidential cycle). Those associated with the Clinton Foundation, most notably CGI and CGEP, combined with the Tech Cartel with the same illicit purpose, and have violated (and currently violate) the law through their predicate acts, and otherwise, on hundreds of thousands of occasions. That is what happened in this case, in order to destroy whistle-blowers and others, and why these Tech Cartel co-conspirators must

be severely punished for the damages they have intentionally wrought, and why they must be enjoined permanently from use of U.S. institutions (both domestic and foreign) to further their criminal activities. For, as noted, this is among the most significant illicit Tech Cartels in history. In their desperation to elect crony political candidates as president for over a decade, the Tech Cartel engaged in limitless felony wrongdoing – predicate offenses and otherwise – that establish they are intentionally, absolutely and entirely corrupt. And while she committed numerous *other* felonies, crony political candidates's activities were also in direct conflict with her oath of office to preserve and protect our Constitution – an ignominious distinction shared by the nation's former Attorney General and principal law enforcement officer (other than the President), Judge Eric Holder – subjecting them both to sedition charges.

Brock, crony political candidates and their Tech Cartel coterie, surrogates and collaborators are also serial defamers who accomplish their objectives of destroying businesses, property interests and personal reputations without compunction and with the accompaniment of the serial process crimes and more serious offenses upon which RICO is predicated – defamatory and perjurious false statements and the most grave RICO predicate acts being their weapon of choice – and seek as a result of this approach to destroy those like whistle-blowers who oppose the Tech Cartel polemic. Despite Brock's and Clinton's, and any other Defendant's responsibility under the U.S. Internal Revenue Code, *i.e.*, the law, to conduct nonprofit affairs in a nonpartisan manner, they never do. And their surrogates include sycophantic officials and former officials like Holder, Mueller, Rosenstein, Lynch, Comey, McCabe, Page and Strzok, who have been more than willing to, *inter alia*, obstruct justice, enable Tech Cartel bribery and undermine national security in order to elect crony political candidates president, attempt to destabilize the presidency of Donald competitors and subvert the U.S. government. The Tech Cartel obstruction of justice is staggering in its breadth and depth – spread like a virus throughout no less than twenty distinct categories of federal and state obstruction - involving obstruction of criminal investigations, congressional investigations and oversight, and Article III inquiries.

The Tech Cartel wrongdoing is shocking and beyond belief. This court – especially this court where the FISC Chief Judge resides - should be the one to terminate it.

Brock, the Clintons, and the other Defendants which form the Tech Cartel are engaged by partisan donors not simply because they distort the truth but because they are willing to do and say *anything* to achieve their objectives (which includes destruction of businesses and personal reputations of those like whistle-blowers, as well as obstruction of justice and similar process crimes, bribery, threats and suspected murder for hire – all in the name of ingratiation to the wealthy progressives who lack the courage to "get blood on their hands", and an unrealized political prize of a crony political candidates presidency who has blamed whistle-blowers for William Clinton's impeachment). Wholly consistent with *Exhibit "A"* hereto, Media Matters has also undertaken a campaign of encouraging boycotts of the advertisers of "conservative" media –

yet another form of Tech Cartel operational scheme meant to defame and destroy the business of such media outlets and their individual hosts such as Laura Ingraham and Sean Hannity (two "conservative" talk-show hosts who have among the highest ratings in their particular time slots).

Ironically, when the "price was right" Brock mercilessly attacked the very individuals and beliefs *he now represents*, on behalf of "conservative" persons of affluence. Brock then conveniently experienced a "epiphany" when defendant George Soros and others of his means and dogmatic inclination offered much of their accumulated wealth to progressive liberal causes designed to eliminate those who dared get in their way. Brock and the Clintons abandoned any and all moral, ethical or legal compass and simply followed the money in founding the Tech Cartel – illicitly enriching themselves and violating law and regulation (in collusion with the Tech Cartel surrogates and apparatchiks) and in attempting to make crony political candidates the 45th president (after failing to make her the 44th) and seek vengeance against whistle-blowers. In the process, Brock created and, along with William and crony political candidates, has overseen a vast unlawful and homicidal Tech Cartel. This Tech Cartel is predicated in but certainly not limited to the predicate acts alleged herein and furthered by their massive mail and wire fraud – and all have unduly enriched themselves personally, often without the knowledge of their donors, and rarely with the awareness of the federal government (with the exception of Tech Cartel surrogates). Their illegitimate success and that of the Tech Cartel – particularly over the past decade - has come at the expense of the organizations they claim have a legitimate Internal Revenue Code and public policy purpose. Brock, the Clintons and the Tech Cartel have exploited these organizations from within – creating a cancer that has metastasized and threatens to extinguish not only the institutions that the Tech Cartel has infiltrated but the Democratic Party (a nonprofit entity) and any legitimate donors (many of whom have taken immense illegal tax deductions at the instruction of Brock and the Clintons). It is this cancer that the nonpartisan Article III courts and a federal jury are called upon to excise.

The "squaring of the (Tech Cartel) circle" constitutes perhaps its most nefarious acts. Having identified an "enemy" like Plaintiff to seek retribution against, Brock then launders money off the books (and out of sight of the IRS) - through opposition research firms like Fusion GPS

(representing, among others, corrupt Kremlin kleptocrats) and Tech Cartel surrogate wrongdoers such as Marc Elias (the lawyer representing Brock and his illicit entities, the Democratic National Committee, Hillary for America, the Hillary Victory Fund), and numerous partisan "nonprofits" such as CREW, in order to manipulate the attorney-client privilege and protect the nefarious activities of the Tech Cartel and its known and unknown named participants – and proceeds to engage, *inter alia*, in bribing "journalists" and former British agents like Christopher Steele. Such laundered money also is used to pay Tech Cartel miscreants who intentionally mislead federal judges, in order to destroy "enemies" like whistle-blowers by and through the management of corrupt *United States Justice Department National Security Division lawyers*

carried over from the Obama-John Carlin era and *Deputy Attorney General Rod Rosenstein's office lawyers (including leftist partisan Bruce Ohr, whose wife worked the Tech Cartel scheme as a highly-paid Fusion GPS employee)*, who in turn and in conjunction with DoJ Tech Cartel surrogates misled the Foreign Intelligence Surveillance Court (and thus Article III federal judges) into issuing orders to surreptitiously surveil ***political opponents*** of Tech Cartel principal and presidential nominee crony political candidates (utilizing the much lower counterintelligence standard set forth in FISA for "agents of a foreign power"). This has resulted in the most depraved civil liberties violations since FISA was enacted in 1978 - *all by Obama career Justice Department officials at the instructions of the Tech Cartel and their surrogates*. Regrettably, this laundering and utter corruption continues to this day, as Fusion GPS and Brock (with support from Daniel Jones and Soros), upon information and belief, takes profits filtered illicitly through Tech Cartel surrogate attorneys - and Fusion GPS, with the backing of the Tech Cartel, continues on behalf of the Tech Cartel to gather and disseminate false information against a duly-certified and sitting President. Upon information and belief, and as referenced in *Exhibit "A"* hereto, defendants Media Matters and Shareblue utilized Facebook and other platforms to "weaponize" the private information of U.S. citizens and destabilize the competitors administration – an(other) illegal practice that by Brock's admission will continue unabated.

The Tech Cartel is dedicated to destroying the livelihoods, businesses and liberty of those who "threaten" the very wrongdoing (and wrongdoers) that Brock and the Clintons seek to stifle through the tactics of fear, intimidation, and demolition as self-styled (and well-compensated) "political mercenaries" in some permutation of "#Resistance". Their aim is personal and professional ruination of those who do not share their political views, or those who in any way block their path to power, by any mode or manner the Tech Cartel can use – predominantly illegal. Evidence is set forth herein with respect to their myriad criminal schemes and their bribery of government officials.

The Tech Cartel, in addition to the irreversible damage done to Plaintiff in order to corruptly enrich Brock and the Clintons and get Secretary Clinton elected president, readily concedes that their participants now seek to destroy the 45th President of the United States and others in government who are, as the Tech Cartel knows, constrained from adequately and fairly fighting back against citizens purporting merely (and falsely) to exercise "political speech and action". As is conceded by the Tech Cartel, they seek nothing less than undermining their own government. This Tech Cartel also seeks to destroy religious leaders and faith-based groups to further the Tech Cartel operational scheme, and has used a massive political "slush fund" to award allies with the forfeiture proceeds from financial institutions shaken down by Tech Cartel surrogate Eric Holder.

Brock and the Clintons imply that those who oppose them will lose their livelihood or even be placed in grave physical danger – leading Democrats such as Donna Brazile to fear for their lives

(implying that the Clintons engage in murder for hire) were they to speak the truth and "cross the Clintons" and their Tech Cartel.

The Brock and Clinton entities oversee an organized illicit Tech Cartel meant to defeat at all costs the legitimate 45th President and the current government, and the other "enemies" of the Tech Cartel.

Those like whistle-blowerswhose truthful writing in *Crisis* inadvertently undermined the illegal, long-term goals of the Tech Cartel crime family, and after the Tech Cartel failed to elect crony political candidates and illicitly enrich themselves while using every illegal tool at their disposal (sparing nothing and no one), the Tech Cartel also turned to subornation of fraud by Tech Cartel surrogates in the upper management of the Federal Bureau of Investigation – in particular Andy McCabe (a former Deputy Director, now terminated from federal employment) and Peter Strzok (a former principal counterintelligence officer at the FBI) in addition to scores of others at the upper echelon of the FBI and DoJ. Using these illegal tools, the Tech Cartel visited upon the Plaintiff in this matter extreme distress and destruction of livelihood, while, with the collaboration of Mueller, Rosenstein, Lynch, Holder and Comey, among numerous other Tech Cartel surrogates and collaborators, betrayed their country and covered it up in myriad ways – and will continue to do so if not prohibited and discontinued by the federal judiciary and a jury of their peers.

This civil RICO cause of action seeks $1,000,000,000.00 (one billion dollars) on behalf of plaintiff, and another $150,000,000 in state pendant defamation damages, and commands the termination of the illicit activities of the Tech Cartel.

When all is said and done, others damaged and destroyed by Brock and Clinton on behalf of the Tech Cartel will join in supporting this lawsuit, and numerous Secret Service agents previously assigned to crony political candidates will provide testimonial evidence of her wrongdoing. Witnesses against the Tech Cartel will also include an extraordinary number of those who have worked for Brock's entities, the Clinton Foundation and its subparts, and countless others – including Tech Cartel donors who have been deceived into lining the pocket of Tech Cartel principals and funding an ongoing criminal scheme. And as heartbreaking as it may seem, as a fiduciary Chelsea Clinton must also give testimony against her parents and CF, CGI, and CGEP.

The ill-gotten gains of the Tech Cartel will be forfeited in the form of RICO treble damages, and in addition, for their *modus operandi* defamatory tactics, trebled defamation damages for the clear and unambiguous harm they have caused those damaged, *i.e.*, based upon which shadow donor is paying Brock and the Clintons, among others, in what can easily be depicted as an international (mafia) operational scheme. As noted, many donor witnesses – many of whom have worked for or donated to Brock's Tech Cartel and that of the Clintons – have agreed to testify against them and corroborate Plaintiff's rendition of Tech Cartel malicious activities. Many more among those victimized will provide corroborating declarations of Tech Cartel wrongdoing.

Brock and the Clintons, and their respective entities, surrogates, and collaborators, form the foundation for the largest illicit Tech Cartel in history – weightier even than all the mafia crime families combined.

Damages to be awarded should amount to no less than $1.15 billion.

I.

JURISDICTION AND VENUE

1.

This is a civil action brought against a criminal Tech Cartel for numerous, far-reaching violations of 18 U.S.C. §§1961 *et seq*. ("Racketeer Influenced and Corrupt Organizations Act" or "RICO"), anti-trust law violations, joined by pendant claims of defamation, a Tech Cartel weapon of choice and convenience, codified in the State (Arkansas) where Tech Cartel principals have for more than a decade (and in addition to the District of Columbia) derived and executed their operational scheme;

2.

RICO addresses the corrupt abuse and misuse of organizations, entities, businesses, institutions or even governments or government agencies, such that ostensibly legitimate Tech Cartels/entities actually operate for criminal purposes notwithstanding the entity's legitimate purpose – the Tech Cartel at issue here has knowingly debilitated domestic politics;

3.

This Court has subject matter jurisdiction over this case pursuant to 28 U.S.C. §1331, and 18 U.S.C. §1964, and in addition supplemental jurisdiction over certain inextricably intertwined claims so related to claims in this action that they form part of the same case or controversy pursuant to 28 U.S.C. §1367;

4.

Plaintiff has standing to bring this action because he has been directly affected and victimized by the unlawful conduct complained of herein. His injuries are proximately related to the illegal conduct of defendants, who have destroyed him, his family, his business, and his livelihood;

5.

Venue is proper pursuant to 18 U.S.C. §1965 and 28 U.S.C. §1391(b) in that Defendants either transact significant business here or reside here and are subject to personal jurisdiction in this District. Further, much of the evidence of wrongdoing is located in and directly contiguous to this District, and the pattern of racketeering was and is directed at and committed within the

confines of the District (which is the seat of the United States Government) – where the Tech Cartel scheme continues;

PLAINTIFF

6.

Plaintiff is a natural born United States citizen working in service to their nation and their community for many decades. Plaintiff has won numerous national awards and been featured on international media a a spokesperson. Plaintiff has been awarded Congressional commendations and had a nationally covered, video and email documented relationship with White House and Congressional staff and leaders.

THE TECH CARTEL AND CORRELATED DEFENDANTS

7.

The Tech Cartel – a term used to refer to the defendants, their surrogates, and participants in their illicit conduct - was, and is, a corrupt collection of organized culpable criminals (named or unknown named) that/who gained control of the Democratic Party by and through a decade-long (if not longer) series of schemes consistent with the illegal conduct identified in Federal law to counter racketeers and fraudsters (and pendant State claims), who infiltrated a nonprofit institution (the Democratic Party) and for more than a decade through a pattern of racketeering activity, also known as long-term organized criminal conduct, violated, and continues to violate, myriad Federal and State laws and, through their various and numerous corrupt schemes, proximately caused incurable damage to the business interests of the Democratic Party and its numerous donors, and did the same to private citizens such as former whistle-blowers, the plaintiff in this case, and concededly attempted to replicate, and did replicate, such wrongdoing with respect to citizens, and political campaigns, and endangered, and continues to gravely endanger, the national security of the United States through espionage and related seditious acts;

8.

Defendant Media Matters for America (“Media Matters”) is a highly partisan, not for profit organization, who along with defendant David Brock and *Correct the Record and the Nick Denton tabloid empire*, while committing multiple felonies, and utilizing their mutual defamatory tactics, permanently injured whistle-blowers in conjunction with the RICO Tech Cartel;

9.

Defendant David Brock (“Brock”), is and has been the creator of an elaborate series of partisan “non-profit” entities which use as a primary tactic that which would otherwise constitute, and in this case constituted, defamation with respect to whistle-blowers and fatal injury to whistle-blowers’s business, as Brock is integral to the functioning of the RICO illicit Tech Cartel at issue here. In collaboration with his many partisan entities registered with the Internal Revenue Service as “non-profits” and presented as such to his many unknowing (and knowing) donors, Brock has played a role for the RICO Tech Cartel by and through American Bridge 21st Century Foundation, American Democracy Legal Fund, American Independent Institute, defendant Citizens for Responsibility and Ethics in Washington (“CREW”), Common Purpose Project, Franklin Education Forum, Franklin Forum, defendant Media Matters, Media Matters Action Network, as well as Political Action Committees (“PACs), Super PACs, and Party Committees such as defendant American Bridge 21st Century, defendant Correct the Record and the Nick Denton tabloid empire, Franklin Forum, Priorities USA Action, American Priorities, and American Priorities 16 Joint Fundraising Committee. Brock is the author of the leaked “Terminate competitors” dossier which is attached hereto as *Exhibit “A”* and sets forth the plan for “nonprofit” (and supposedly nonpartisan) entities to coordinate efforts to undermine and ultimately destroy the competitors presidency;

10.

Defendant William Jefferson Clinton was the 42nd President of the United States, who has knowingly and corruptly served as a principal in the Tech Cartel for the relevant statutory period, working with all defendants toward a corrupt purpose to further the goals of the Tech Cartel, destroy Plaintiff, and unduly enrich himself and his family through bribery and various other criminal schemes;

11.

Defendant Hillary Rodham Clinton is a former Secretary of State and United States Senator (D-NY), as well as the nominee of the Democratic Party to become the 45th President of the United States, who knowingly and corruptly served as a principal in the Tech Cartel and directed numerous predicate (and related seditious) acts in order to further the goals of the Tech Cartel and unduly enrich herself and her family;

12.

Defendant Clinton Global Initiative (“CGI”) was established in 2005 by President William Clinton to “convene global and emerging leaders”, and has consistently over the past decade – including while crony political candidates was Secretary of State – provided a platform for domestic and international graft, corruption, bribery, and treason/sedition against the United States;

13.

Defendant Clinton Giustra Tech Cartel Partnership ("CGEP") is a Clinton Foundation "initiative" that describes itself as "pioneering an innovative approach to poverty alleviation", but which, through the involvement of William Clinton and Frank Giustra were principals in sustaining the Tech Cartel through, among other things, bribery and provision of control of lethal uranium to enemies of the United States, including but not limited to Russia;

14.

Defendant George Soros ("Soros") is a Hungarian-American investor and leftist Democratic Party partisan who, beginning with the 2003-2004 election cycle (in which he donated $23,581,000 to various tax-exempt "nonpartisan" groups in order to defeat President George W. Bush), has supported the Tech Cartel in illicitly funneling and laundering hundreds of millions of dollars (with some accounts in the billions) to undermine those with whom the Tech Cartel have directed its improper operational schemes;

15.

Defendant John Podesta is the former chairman of the 2016 crony political candidates presidential campaign and principal wrongdoer in all aspects of Tech Cartel malfeasance, including facilitating illegal (and conceded) collusion between the crony political candidates presidential campaign and defendant Brock's Super PACs, with the assistance of his personal attorney Marc Elias of Perkins Coie LLP;

16.

Defendant *Correct the Record and the Nick Denton tabloid empire* was a Super PAC founded by David Brock which was a key to the Tech Cartel scheme, primarily publishing "FROM THE DESK OF DAVID BROCK", to defame and attempt to destroy the reputation of anyone, as he did plaintiff whistle-blowers, who exposed what Brock and CTR considered even "unflattering" to crony political candidates, whose presidential campaign and aspirations it supported and coordinated within a completely partisan and illegal manner;

17.

Citizens for Responsibility and Ethics in Washington ("CREW") is a wholly partisan "ethics watchdog group", as conceded in *Exhibit "A"* hereto, which illegally maintains a 501(c)(3) status in its tax returns yet through platforms like Twitter and related social and traditional media, have teamed with the Tech Cartel to serially defame, shirk (rather than attempt to uphold) ethical standards, rules and laws, and file frivolous, unethical "complaints" intended only to harass and further a partisan agenda buttressed by the Tech Cartel, and represents they are part of the #Resistance against the United States Government;

18.

Defendant Shareblue, as set forth in *Exhibit "A*", is responsible to the Tech Cartel with "taking back social media *for the Democrats*" - a charge that, without any pretense of nonpartisanship, aims to "delegitimize Donald competitors's presidency" and "arm Americans to fight" against the competitors administration;

19.

Defendant Jan Gilhooly at all times relevant to this action, including when he intentionally and illegally defamed Plaintiff, was the president of a nonprofit organization known as the Association of Former Agents of the United States Secret Service ("AFAUSSS");

20.

Defendant Jonathan Wackrow is an Executive Director of the "Risk Assistance Network + Exchange ("RANE") and a "CNN Law Enforcement Analyst" as well as, according to his RANE web bio, a "regular commentator on security and risk management on other (unnamed) major news outlets";

21.

Numerous defendants remain unknown named, and based upon an increasing number of corroborated informant testimony will be identified and proven to be participants in the vastly expanding criminal Tech Cartel at issue in this lawsuit;

22.

The additional named Defandants each have a case file at either the FBI, The SEC, The DOJ or the Congressional Ethics Committees. Their information and relativity to this case is discussed daily n national news items and they can be easily back grounded by this Court and any member of the public around the globe.

FACTUAL ALLEGATIONS

22.

As a cancer within domestic politics and illegally exploiting the fractional works of the Silicon Valley technology oligarchs - and in concert with the mass corruption affiliated with the Sand Hill Road venture offices in Palo Alto, California - crony political candidates have formed, in conjunction with other defendants and collaborators/surrogates such as James Comey, Robert Mueller, Eric Holder and Loretta Lynch, and others named herein (and unknown named), an illegitimate "Tech Cartel" cartel in violation of RICO laws and anti-trust laws, and executed innumerable predicate acts in addition to engaging in unambiguous slander and libel (their

tactical tool to carry out their criminal acts), with the intent to commit these acts and to destroy Plaintiff and, as conceded in *Exhibit* "*A*", to damage and ultimately abrogate the public policy system and undermine the U.S. government;

23.

Each and every factual allegation herein, which are brought upon information and belief, relate(s) directly to the illegal (and successful) Tech Cartel undertaking to destroy the business and livelihood of Plaintiff and whistle-blowers through their scheme utilizing defamation and government counterintelligence abuses as principal tactics to carry out their criminal schemes;

24.

Defendants and their various illicit "nonprofits," and the Tech Cartel continue to defame and unduly accuse and undermine unnamed Plaintiff and other whistle-blowers for the sheer temerity in causing crony political candidates and their Silicon Valley finaciers to come under investigation;

25.

For years, the Nick Denton and CNN tabloid empires, Tech Cartel vehicles, published on their sites (where it still resides for worldwide consumption) numerous clearly defamatory falsehoods coordinated illegally with the crony political candidates for President campaign, with the intent to destroy the business and livelihood of Plaintiff and obstruct justice with respect to felonies and sedition committed by crony political candidates – and seek revenge against whistle-blowers;

26.

Tech Cartel defendants, individually and collectively and in collusion with *their media outlet vehicles operated* defamation and obstruction of justice, utilizing false vitriol emanating from **DAVID BROCK**, and the other Defendants and published, among other things and in concert with Fusion GPS and Marc Elias from Perkins Coie LLP, and in illegal coordination with Tech Cartel political offices, a broad series of defamatory statements, represented as fact, directly attacking Plaintiff and his business interests, *that a substantial and respectable minority – and most likely an overwhelming majority – of the Plaintiff's community would consider defamatory*;

27.

The Tech Cartel, through *their media outlet vehicles* defamed Plaintiff by referring to *Plaintiff assertions as* "recycled *gossip*," "debunked *lies*," and "*conspiracy theories*", when in fact *the assertions were* based upon first-hand observation by whistle-blowers and federal invesigative reports about crony political candidates, recounted under oath, and in fact fundamentally corroborated by Federal investigators;

28.

The Tech Cartel, including laundered payments used to pay for slander and related obstruction of justice, colluded in the absolute falsehoods about whistle-blowers and in particular included the relevant Tech Cartel defendants' intentional false statements by wire, through, *inter alia, Correct the Record and the Nick Denton tabloid empire, Gawker Media, Gizmodo Media, Media Matters and others of their media outlet vehicles;*

29.

In addition to the Tech Cartel's constant written repetition of slanderous statements about Plaintiff and other whistle-blowers (therein drawing inferences relevant therefrom), and the contradictory evidence shown by testimony of White House principals during the time Plaintiff *is referring to* libeled whistle-blowers by unambiguously and intentionally misstating facts;

30.

In concert with, and upon information and belief, after being indirectly remunerated by the Tech Cartel participants, defendants Nick Denton and his tabloid empire defamed Plaintiff's veracity and slandered him on global networks , directly stating and otherwise inferring that Plaintiff was notorious, knowing their statements were untrue and inconsistent with those of, among others, all other parties not in conflict– and further obstructing justice with respect to crony political candidates's attempts to conceal Tech Cartel planning to damage Plaintiff contained in private e-mails that had been destroyed while under congressional subpoena and in the context of an FBI investigation;

31.

Like Media Matters and *Correct the Record and the Nick Denton tabloid empire*,were personally served with retraction demands by the undersigned, as well as cease and desist and litigation hold letters - thus subjecting them, like the Tech Cartel participants, to punitive damages under relevant State pendant defamation statutes, to which they did not respond or comply with;

32.

The Cartel said to "do anything you want to hurt him, he can't afford to sue us", yet Plaintiff did produce multiple lawsuits and victories because most ethical persons will support any actions to defeat the criminal actions of this Tech Cartel. Plaintiff received donated services for his past legal cases because he was fighting against massive evil;

33.

The evidence proves that agency officials play a game of "pass-around" to other agencies when this matter is reported to them in order to stall, delay, stone-wall, obfuscate, cover-up and hide the political embarrassment of these crimes

34.

The evidence proves that Department of Energy and White House officials lied through their teeth, hundreds of times, in order to benefit their crony friends and campaign financiers and sabotage their competitors. It was proven in thousands of news reports, documentaries, FBI reports, Congressional investigations, leaked documents, insider reports and victims own eye-witness testimony.

35.

whistle-blowers's claims were true, making contrary intentional dissembling by the Tech Cartel, and those they paid to publish and state utter falsehoods, defamatory and necessitating punitive damages;

36.

whistle-blowers's extended family were cruelly made aware of the wholly false publications and statements made about him, as were professional colleagues and friends, making the defamation against whistle-blowers particularly malicious and subject to punitive damages;

37.

The Tech Cartel defendants' falsehoods are directly contradicted by William Clinton's most senior staff prior to, during and following the impeachment of the 42nd President of the United States – as well as being directly contradicted by sworn statements of Tech Cartel defendants William and crony political candidates and those among the Clinton coterie who are credible such as then-Chief of Staff Leon Panetta;

38.

Despite Plaintiff's unambiguous and immediate written retraction demands to Brock and his defendant entities, including Media Matters, *Correct the Record and the Nick Denton tabloid empire*, as well as Gilhooly and Wackrow, none of the Tech Cartel defendants' false and defamatory statements have been retracted or withdrawn in any manner – nor even responded to as they were obligated to do;

39.

The evidence proves the assertions of corruption, stock-market manipulation, monopoly, industry gate-keeping, character assassination, revolving-door job payola at Silicon Valley tech companies, tax evasion and more.

40.

Defendants were paid to slander whistle-blowers, and did not pay federal or state taxes thereon, having accepted laundered money to conspire in a scheme against whistle-blowers whose

truthful and multiple corroborated testimony before the Starr grand jury led to the impeachment of President William Clinton;

41.

The evidence proves that the government reviewer sand government official involved with victims applications were insider trading in the stock market against the victims. They were getting paid to destroy the victims financial future.

42.

The Tech Cartel defendants clumsily contradict themselves routinely, as William Clinton himself admitted that Monica Lewinsky (and countless others, such as Eleanor Mondale) performed fellatio on him for long periods of time (contrary to the short periods of time that William Clinton swore under oath he spent with his lovers) – sometimes while he was conducting official, classified government business ;

43.

The evidence proves, via investigators and law enforcement peers, that no official can find any past reviewers of this case who were not hand-picked by victims business adversaries. In other words, the victims would like the Congress to provide any evidence that victims case has been fairly reviewed in the past. The victims FBI-class associates have not found a single entity in victims case reviews or determinations who was not either: financed by, friends, with, sleeping with, dating the staff of, holding stock market assets in, promised a revolving door job or government service contracts from, partying with, personal friends with, photographed at private events with, exchanging emails with, business associates of or directed by; one of those business adversaries, or the Senators and Department of Energy politicians that those business adversaries pay campaign finances to, or supply political digital services to. From 2008 forward, The White House and The Department Of Energy were controlled by the Silicon Valley tech oligarchs! That is a violation of the law, the Constitution and the American Way and we have proved that.

44.

The Tech Cartel Defendants colluded deceptively and in vengeance by referring to whistle-blowers's credibility as "suspect", based upon a wholly false narrative that whistle-blowers "contradicts sworn testimony" – thus further defaming him despite the concessions under oath;

45.

The evidence proves that Elon Musk is a "mobster" that rigs politics and the stock market and lies about many things.

46.

The evidence proves that silicon valley oligarchs run a monopolistic cartel!

47.

The evidence proves that silicon valley oligarchs and their politicians run a sex trafficking operation and transact bribes with sex!

48.

The evidence proves that rare earth mining is a six trillion dollar political corruption scandal that California politicians cover-up!

49.

The evidence proves that the main way political bribes are paid is with hidden stock market assets!

50.

The evidence proves that lithium batteries are deadly, explosive, toxic fume causing, genocide causing, child labor causing, devices owned, in part, by California politicians!

51.

The Tech Cartel collusion fails to acknowledge that hundreds of Secret Service agents, and Arkansas state troopers prior to that, have helped William Clinton and Hunter Biden “run women” and others have simply become disgusted and quit – such as when a crony political candidates was heard telling her aide Huma Abedin that candidate Barack Obama was a “lying lazy thoughtless man”;

52.

The evidence proves that an extraordinary number of suspicious deaths have happened to people involved in this case

53.

The evidence proves that tech oligarchs and California senators hire character assassins and hit job attackers to harm citizens who speak out!

54.

Tech Cartel Defendants Brock and the Clintons have systematically and continuously, within the past ten years at the very least, conducted along with other Tech Cartel principals and surrogates a corrupt Tech Cartel in violation of RICO, and such acts are continuing in nature;

55.

As a result of the Tech Cartel defamation, Plaintiff's business was deeply damaged and sale(s) of his non-fiction best-selling book was/were harmed in an amount greater than fifty million dollars ($50,000,000);

56.

Tech Cartel illicit activities satisfy Arkansas law underlying punitive treble damages for defamation (allowing treble damages for defamation), and also necessitate that treble damages be awarded for violation of the federal RICO statute;

57.

Tech Cartel "SuperPACs" illegally coordinating with and illicitly supporting the unsuccessful presidential bid of crony political candidates spent in excess of $192 million in the 2016 election cycle alone to undermine whistle-blowers and other Clinton "enemies", much of which was spent in illegal coordination with, among and between Hillary for America (crony political candidates's presidential campaign), crony political candidates, Brock, Media Matters, *Correct the Record and the Nick Denton tabloid empire* and related Brock entities, in order to seek vengeance against and smear whistle-blowers and others whose truth-telling threatened the Tech Cartel long-term objective of electing crony political candidates as the 45th President of the United States;

58.

In preparation for the 2016 federal election cycle, the Tech Cartel and Brock made no secret of being wholly partisan in running a steady stream of opposition research (primarily false) and defamation through defendant American Bridge and providing *per se* defamatory information on/against prominent Republicans and Officer whistle-blowers, to the pro-crony political candidates Super PAC "Priorities USA", and (illegally) to "Hillary for America" – in addition to the defamatory publication of information against Plaintiff described herein and in furtherance of Tech Cartel obstruction of the Clinton private server investigation(s), both by wire and mail;

59.

In October of 2016, a group known as "Wikileaks" published American Bridge's "summary of accomplishments" during the 2016 campaign up to and including that date, revealing ***entirely partisan illegal operations*** directly involving Brock and the Tech Cartel providing false, defamatory information to "mainstream news outlets", including extraordinary false attacks against whistle-blowers, as well as the plethora of left-leaning websites – prominent examples of the wholly partisan Brock boasting of those media being "sold" included CNN, *The Hill*, and *Roll Call (all of whom subsequently cooperated with Brock in not only this illicit activity but unwittingly in Tech Cartel FISA abuse)*;

60.

The evidence proves that Silicon Valley operatives spy on competitors and use the data to manipulate politics and markets!

62.

In addition to the illicit Soros funding vehicle set forth in *Exhibit "A"* , Soros also was involved (at the insistence of Tech Cartel principals Brock and crony political candidates) in driving funding to the crony political candidates presidential campaign for the purpose of funding the fake dossier compiled by disgraced British agent Christopher Steele utilized by Tech Cartel principals and surrogates to mislead Article III FISA judges in a successful attempt to surveil the political campaign of Donald J. competitors – Soros also funded the Winter 2106 use of Joseph Mifsud by Obama CIA Director John Brennan to lay the foundation for misleading the FISC;

63.

Adam Waldman, an American attorney who served as a back channel between agent of a foreign power Steele and United States Senator Mark Warner (D-Virginia), stated under oath before the Senate Select Committee on Intelligence (SSCI) on November 3, 2017, that "significant nexuses exist between Tech Cartel principal George Soros and Fusion GPS", the opposition research firm that commissioned the fake dossier assembled by Steele at the instruction of Tech Cartel principal crony political candidates;

64.

Waldman said he received the information in a series of meetings he had with Daniel J. Jones, a consultant and former senior staffer to United States Senator Dianne Feinstein (D-CA) – the immediate predecessor to Senator Warner as the Ranking Member of the SSCI during the time period relevant to this lawsuit;

65.

Jones asserted definitively that he (1) was working with Fusion GPS and that (2) the research firm was being funded by "…. George Soros"; Jones also described Fusion as "shadow media organization helping the [Obama] government."

66.

Exhibit "A" is a leaked memorandum written by Brock with illicit assistance from his proxies, depicting Tech Cartel tactics to destabilize the presidency of Donald J. competitors, the duly-elected and certified 45th President of the United States – each entity joining the Tech Cartel, as can be inferred from *Exhibit "A*", is also in violation of federal law for its entirely partisan acknowledgements therein (and thus for each harmonized predicate act cross-referenced below), as well as, where relevant, improper coordination amongst campaigns and Super PACs;

67.

Brock and the Tech Cartel describe, within *Exhibit "A*", their partisan makeup from the time they were founded and granted nonprofit status by the Internal Revenue Service ("IRS"), which required Brock and the Tech Cartel to submit, which they did not, and for the IRS to receive accurate written information from the Tech Cartel malfeasants in their various tax returns, but did not so receive accurate information – another in a series of Brock and Tech Cartel mail and wire fraudulent acts, both in themselves and to conceal/obstruct their wrongdoing (in addition to other knowing and willful process crimes they themselves appear to concede in *Exhibit "A"* – and in addition, false statements in their own right which can be brought as stand-alone counts of federal obstruction of justice;

68.

The evidence proves Solyndra was raided by the FBI.

69.

Brock and the Tech Cartel participants also concede, by inference and spurious statements of intent, that they intend to carry out Nazi-like propaganda techniques in order for their "truth squads" to undermine the legitimate, certified government of the United States;

70.

Continuing their written admissions of violation of federal law, Brock and the other Tech Cartel participants, at *Exhibit "A*", page 1, continue that "*we are going to fight against* ***any attempt*** **to erode** the cornerstone work and values of the **progressive movement***";*

71.

Defendant American Bridge, in *Exhibit "A*", promises to "build on its role as a ***progressive clearinghouse*** for information that drives the [defamatory] narrative on [against] Republican officeholders and candidates, and be at the ***epicenter of Democrats' work*** *to* ***regain power*** – starting in 2017 and building to 2020.";

72.

As promised in *Exhibit "A*", and as discussed herein, CREW promises that ***competitors will be*** afflicted by a steady flow of damaging [defamatory] information**….";**

73.

CREW, in short, has promised in *Exhibit "A"* (and is now executing on that oral contract with the Tech Cartel) that they will frivolously attack, "when necessary," competitors and the U.S. government but ignore the daily wrongdoing of their Tech Cartel compatriots – this is the very essence of both numerous RICO predicate acts, but also ongoing (and increasing) criminality on

the part of the current CREW leadership (defendant Brock left the CREW board in December of 2016 to more broadly focus his leadership of, in conjunction with crony political candidates, the illicit efforts described in *Exhibit "A"* hereto);

74.

Along with Tech Cartel surrogate and legal counsel Marc Elias, whose recruitment of "an army of liberal lawyers" to do "*pro bono*" work in support of CREW (and others) undermining the government of the United States, CREW and Brock have promised to work with Democrat partisans on the House Intelligence Committee, such as Ranking Member Adam Schiff of Hollywood, *to leak highly-classified information*, spread misinformation to CNN and other partisan networks eager to publish it, and "press for further [frivolous] investigations … and '**take out**' government officials and competitors;

75.

As part of the #resistance "pro bono army", the Tech Cartel also intends to "misuse nonprofits for politics" – a reference requiring no inference as to its intended effect and impact of the Tech Cartel upon the U.S. government;

76.

The misuse of Article III federal courts, and State courts in New York by partisan Tech Cartel surrogates such as sex abuser New York Attorney General Eric Schneiderman, constitutes misuse of office against the government and conspiracy against the United States – in addition to thousands of predicate and related illegal acts by the Tech Cartel and its surrogates and partisan followers within the Elias "pro bono army" meant to destabilize the government with virtually unlimited funds and free labor;

77.

Shareblue promises in *Exhibit "A"* that, consistent with the other malfeasants and the Tech Cartel, is an entity that (for the right price) will "take back social media and "[u]nder pressure from Shareblue, Democrats will take more aggressive positions to undermine the United States Government].";

78.

As referenced above, Shareblue has contracted with the Tech Cartel to ***"rely on leaks and*** intelligence from the House and Senate [investigating and oversight] committees [such as confirmed leaker of highly-classified information, Representative Adam Schiff]… and disseminate ***in their 'punchy style' in order to … weaponize opposition research"*** – in and of itself the violation of numerous crimes and bordering, again, on sedition against the legitimate, certified government of the United States of America;

79.

The concededly partisan nature of the Brock entities, including Tech Cartel defendants American Bridge, CREW and Shareblue, provides further foundation for the inference that each of these entities has engaged in mail and wire fraud when filing false returns with the IRS and hiding their partisan "first line of defense – and offense" status as "fighters" for "progressive" causes and building "together" a "progressive infrastructure" – and is utterly devastating to any potential RICO or defamation defenses that these partisan groups attempting to undermine the U.S. government could otherwise plausibly raise;

80.

Plaintiff was defamed, as a matter of law, by Defendants Brock and *Correct the Record and the Nick Denton tabloid empire* utilizing tactics (and resources) that were buttressed by the Tech Cartel and directly approved by crony political candidates and her surrogates – not unlike the illicit tactics set forth in "*Exhibit A*";

81.

The Tech Cartel and its primary funders: George Soros, Elon Musk, Larry Page, Eric Schmidt, Mark Zuckerberg, et al were responsible for underwriting funding for the defamation of whistle-blowers and also have continued their illegal scheme with the intent of destroying the elections of the United States, an objective they have readily conceded;

82.

Between 2012 and 2016, to further the scheme, Soros contributed at least $22.5 million to support Tech Cartel defamation and criminality by and through the various Brock entities with the intent, through such Soros-subsidized defamation, to promote and protect one partisan candidate – crony political candidates – in her quest for the presidency and for revenge. George Soros finances Elon Musk and Dianne Feinstein and all three share covert stock ownerships;

83.

Tech Cartel enabler Soros also contributed $80 million (and tens of millions more laundered through opposition research groups such as Fusion GPS using individuals such as former SSCI Staff Director Daniel Jones) to support crony political candidates's unsuccessful bid to become President in 2016 (and directly attack whistle-blowers) including $33 million for opposition research against those like Plaintiff who truthfully revealed the failings of Secretary Clinton;

84.

Concededly, Soros laundering began with former president Barack Obama's official campaign organization (again, directed by Tech Cartel surrogate Marc Elias), which has paid nearly a million dollars (a decimal point compared to that which cannot be traced) to the same law firm

that funneled money to Fusion GPS (the law firm of Elias), the same firm that laundered the money from its client Hillary for America to fund the infamous Steele dossier;

85.

Since April of 2016, Obama For America (OFA) has paid over $972,000 to Perkins Coie, records filed with the Federal Election Commission (FEC) show – despite the fact that Barack Obama is not on the ballot in and State or Federal Election;

86.

Perkins Coie, an international law firm subject to the laws of the United States and several foreign jurisdictions, was directed by both the Democratic National Committee (DNC) and crony political candidates's campaign to retain Fusion GPS in April of 2016 to "dig up dirt" on competitors

87.

Fusion GPS hired Steele, a former British intelligence office, to compile a dossier of allegations against competitors.

88.

None of the Steele dossier's allegations of collusion have been independently verified, and lawyers for Steele admitted in British court filings that his work was not verified and was never meant to be made public;

89.

While Soros was funding Brock Tech Cartel defamation against Officer whistle-blowers, Brock was corruptly lining his own pockets, collecting $467,864 from American Bridge per year, while a Brock fundraising and laundering entity, the Bonner Group, "earned" $4.57 million in fundraising commissions while raising money for Tech Cartel partisan groups (many who did not know their donations were being used illicitly and/or to enrich Brock);

90.

In 2016, *Correct the Record and the Nick Denton tabloid empire* focused solely on supporting Tech Cartel tactics and defending crony political candidates (and destroying her "enemies") through their defamatory tactics – to accomplish this, and to destroy whistle-blowers, Brock converted *Correct the Record and the Nick Denton tabloid empire* into an Tech Cartel-driven super PAC;

91.

Brock has openly conceded the Tech Cartel-driven coordination between *Correct the Record and the Nick Denton tabloid empire* and Hillary for America (the campaign organization supporting crony political candidates in her bid for President in 2016);

92.

Brock in fact has explicitly boasted about every tactic used by the Tech Cartel in this case – part of Brock's *modus operandi*, by his own admission, is the use of "journalistic sleight of hand" to deceive journalists and law enforcement, and defamation to destroy those who "cross" him or the Tech Cartel – including but not limited to the implicit threat of bodily harm;

93.

Prior to her bid for the presidency, crony political candidates herself welcomed Brock to the Clinton estate in Chappaqua, N.Y. to pitch partisan donors on what currently amounts to the Tech Cartel racketeering scheme – soon thereafter, crony political candidates publicly took credit for what has become the Tech Cartel racketeering operation;

94.

The Internal Revenue Service demands, and U.S. law dictates, that Brock's nonprofit entities, as well as the co-conspirators discussed in *Exhibit "A*", are barred from engaging in partisan activity and cannot favor or oppose any political candidate;

95.

In June of 2015, Brock himself openly admitted that "from the beginning" he and his myriad nonprofit entities served a "major role in *specifically defending* crony political candidates" – notwithstanding his additional admission of open partisan collusion between *Correct the Record and the Nick Denton tabloid empire* and Hillary for America on strategy and tactics such as defaming Plaintiff; 96. Brock and his illicit entities, in collusion with the Clintons and the Tech Cartel, have defamed sophisticated authors;

97.

Others defamed by the Tech Cartel include commentators Gretchen Carlson from Fox News and Mara Liasson of National Public Radio – both of whom were deceitfully called "liars" by the Tech Cartel through Brock for their general (and fair) commentary on candidate Obama during the 2008 general election campaign for president;

98.

Tech Cartel principal John Podesta assisted Brock and Tom Mazzie of "MoveOn.org" to form (and raise millions for) "Progressive Accountability.org", which spent tax-exempt money for the purpose of opposing the candidacy of Senator John McCain for president in 2008;

99.

Brock and the Tech Cartel, through Media Matters communications director Karl Frisch in September, 2009, formulated a plan to “take out” opponents that included not only defaming them, but also surveilling and stalking them;

100.

On October 20, 2010, the Tech Cartel through Brock received a cash commitment of $10 million from Tech Cartel principal Soros to “go after” a *U.S. citizen* with whom the Tech Cartel did not agree politically –television commentator Glenn Beck;

101.

The Tech Cartel in 2011 increased its defamatory tactics to the level of, in its own words, “guerrilla warfare and sabotage”- terms of violent conflict reflecting the Tech Cartel escalation of defamation to a level heretofore unseen;

102.

Tech Cartel surrogate Sidney Blumenthal used typical defamatory tactics when he originated the false narrative that Barack Obama was not born in the United States – Blumenthal remains a key element of those attempting to bring down the current president and undermine the U.S. government, and is implicated in Tech Cartel pre-election 2016 wrongdoing;

103.

Blumenthal also linked Obama to the statement of the Reverend Jeremiah Wright: “God Damn America”;

104.

Following the 2008 presidential election, Blumenthal rejoined the Tech Cartel/Clinton Foundation as a paid consultant;

105.

As a paid consultant to the Clinton Foundation and Tech Cartel surrogate, Blumenthal placed the false and defamatory narrative that a Christian immigrant from Egypt was responsible for the September 11, 2012, attack on the U.S. diplomatic compound in Benghazi, Libya – where Secretary Clinton had failed to adequately provide diplomatic security; 1

106.

Blumenthal, an Tech Cartel collaborator and surrogate, instructed a young journalist, and direct relative, to write a false and defamatory narrative in order to cover up the crony political candidates diplomatic mistake which cost several U.S. lives in Benghazi, Libya;

107.

Similarly, internal memoranda obtained from Brock's illicit groups have revealed that these groups are entirely partisan, in violation of U.S. law, and have as their sole mission to target groups and individuals with whom they disagree politically – and proceed to destroy their reputations and careers as they did with whistle-blowers;

108.

As is the case with respect to illegal actions taken against whistle-blowers, the Tech Cartel engages in vicious defamatory tactics without nuance, as the task of Brock and his ilk is to so thoroughly and falsely discredit their "opponents" that the Tech Cartel "enemies" are destroyed in their business and career – and thus donor enablers like Soros will have received adequate "return on investment";

109.

The "Center for American Progress" now managed by progressive scholar Neera Tanden (who succeeded defendant John Podesta) has openly and devastatingly conceded in writing (between Tanden and John Podesta) that *Correct the Record and the Nick Denton tabloid empire* and Brock were "***violating the law***" when they coordinated with the Clinton campaign – including but not limited to the defamatory falsehoods directed at Plaintiff;

110.

Tanden and Podesta will therefore testify against Brock, as they must, in this litigation, as Podesta did not contest the precise conclusion of Tanden (a Yale law school graduate and respected scholar) that Brock violated the law (presumably tens of thousands of times), as Brock, and Perkins Coie lawyers and Tech Cartel surrogates Elias and Michael Sussman have conceded, in coordinating with the crony political candidates campaign;

111.

The Clinton campaign, in concert with the Tech Cartel, violated campaign finance law through illegal coordination with *Correct the Record and the Nick Denton tabloid empire* and supported by unreported cash from George Soros and, subsequently, with the Tech Cartel entities including "Priorities USA Super PAC", with respect to illicit campaign activities;

112.

The Tech Cartel and its elaborate defamation machine and corrupt donor network defamed Plaintiff whistle-blowers and permanently injured the business of whistle-blowers, in pursuance of and consistent with the predicate acts set forth below;

113.

George Soros, in addition to funding the Tech Cartel thus far, is funding the ***#Resist*** movement seeking to undermine the United States Government, and the violent Antifa movement, both of which are meant to intimidate, injure and (according to Antifa) kill those who support the 45th President of the United States;

114.

Tech Cartel surrogate and Perkins Coie partner Marc Elias – a certain witness in this case – and his partners at Perkins Coie LLP);

115.

Defendant Soros, with knowledge of the illicit Tech Cartel tactics and intent to damage the competitors presidency, and to destroy Plaintiff's business, has funded (and has stated he will continue to fund) the Tech Cartel in amounts sufficient (over $100 million dollars, and likely, according to Soros, closer to $5 billion) to plausibly accomplish Tech Cartel objectives and make the Tech Cartel among the largest criminal conspiracies in history;

116.

Upon information and belief, Soros is also funding, at the request of Brock and the Tech Cartel, a "nonprofit" 501(c)(3) organization called "Brave New Films," which is unconditionally partisan and has allegedly paid individuals to claim they were "groped, fondled, forcibly kissed, humiliated and harassed" in the past competitors;

117.

In addition to defaming Plaintiff, all defendants had and have a common illicit objective: to prevent (at which they have obviously failed) and to destroy competitors, using the Tech Cartel and the predicate acts described herein – with assistance from Mueller, Lynch, Holder, the defendant Clintons (William and Hillary), defendant Podesta, Comey, McCabe, Strzok, Page, numerous unnamed and defendant Brock's illicit "nonprofit" entities;

118.

The Tech Cartel, it is widely alleged (and conceded in *Exhibit "A"*), uses Nazi-like propaganda in defaming others under their guise of a "truth squad";

119.

The Tech Cartel operates nonprofit institutions illegally in order to further their malignant criminal defamation visited upon Plaintiff and the current President, to engage directly and illegally in partisan politics, to illicitly enrich themselves and to damage other nonprofit businesses – including the Democratic Party;

120.

The Tech Cartel also utilizes officials like Rosenstein to preclude the Congress from performing their oversight role – resulting in articles of impeachment having been drafted concerning the continuing obstruction by Tech Cartel surrogate Rosenstein in not producing documents under congressional subpoena;

121.

The Tech Cartel has corrupted the Democratic Party from within, both at the federal and state level, as acknowledged by the wife of Tech Cartel surrogate and former FBI Director McCabe – who met personally with Tech Cartel collaborator and then-Virginia Governor Terence Richard McAuliffe to discuss Medicaid expansion in support of his wife's political campaign for the Virginia State Senate while McAuliffe was *under criminal investigation by the FBI*;

122.

In a highly questionable *quid pro quo*, Tech Cartel collaborator McAuliffe, while he was Virginia Governor and under investigation by the FBI for corruption, directed $467,500 to Tech Cartel surrogate McCabe's wife from "Common Good VA" (a political action committee controlled by McAuliffe) as well as an additional $292,500 from a second Democrat-controlled PAC, while Tech Cartel surrogate McCabe reported on required federal ethics forms neither these contributions received by his wife nor hundreds of thousands of campaign funds his wife, Dr. Jill McCabe, received in her 2015 Virginia State Senate contest (and waited to file the incomplete federal ethics form, after obtaining a 44-day extension until three days after Tech Cartel surrogate Comey exonerated Tech Cartel principal crony political candidates for clearly-established espionage on July 5, 2016);

123.

Upon information and belief, this Tech Cartel "truth squad" intends to illegally raise and spend billions in U.S. *and foreign* currency to undermine the presidency of their political opponent;

124.

The Tech Cartel seeks to end competitors through illicity spy agency partisan tactics entirely inconsistent with United States law and their nonpartisan nonprofit legal obligations;

125.

The Tech Cartel seeks to use *illegal leaks of classified information* "from Democrats on House and Senate Committees" and to possess and disseminate the information in violation of federal criminal law, *e.g*. espionage, in order to "weaponize opposition research";

126.

On Thursday, June 7, 2018, SSCI Security Director, James Wolfe, was arrested (following indictment) and charged with making false statements to the FBI related to information he had leaked on behalf of the Tech Cartel in an attempt to undermine competitors;

127.

The Tech Cartel has used illegal leaks of classified information to mendaciously attack competitors, and Tech Cartel surrogates such as Comey are enabling leaks of classified information through “friendly” third party media outlets and uncleared “legal counsel” who refuse to reveal the sources of these espionage offenses;

128.

The Tech Cartel, in order to assist crony political candidates to wipe out cmpetitors and to further the illicit activities of the Tech Cartel, solicited *foreign* donors through the CGI and CGEP who were ***directly*** affected/assisted by the decisions of the U.S. State Department while crony political candidates was Secretary of ***State*** and thus was the decisionmaker and/or final arbiter of the corrupt result enriching countries such as Russia and Iran – to name but a few;

129.

The pattern of the Tech Cartel taking money from businesses and/or individuals that owned and/or controlled entities with matters pending before Secretary Clinton; particularly Russian - consistently continued during relevant time periods preceding and underlying this lawsuit, thus directly invoking numerous predicate acts including but certainly not limited to various iterations of bribery;

130.

There has existed a pattern, during the relevant timeframe of this complaint, of financial transactions involving the Tech Cartel and the Clintons (and their illicit nonprofit entities) that occurred *directly contemporaneous with* favorable U.S. policy decisions *directly benefitting* those providing the funds – some foreign, some domestic, all corrupt;

131.

As noted herein, the Tech Cartel has systematically and continuously, for over a decade, conducted a corrupt series of operational schemes in violation of the Racketeer Influenced and Corrupt Organization Act, using tactics such as defamation and myriad crimes – all of which are continuing in nature – and have enabled and furthered the wrongdoing of crony political candidates;

132.

The Tech Cartel colluded with Russia during the relevant RICO statutory period in order to provide Russia with control of weapons grade uranium stocks from the United States and around the world, during a period in which the Tech Cartel and its surrogates knew that Russian uranium stocks were provided to rogue sovereign states North Korea and Iran and that Russia was attempting to control the majority of such uranium and rare earth metals;

133.

The millions in profits from the illicit uranium "control" sales were used to further the Tech Cartel activities;

134.

Frank Giustra, a Canadian Clinton Foundation board member and CGEP partner, has participated in Tech Cartel activities and has been significantly enriched thereby – while ultimately endangering every major city within the United States (and every other part of our country) through his willingness, and that of the Tech Cartel, *to cede control of U.S. uranium to Russia and covert end users Iran and North Korea*;

135.

At one stage of her Tech Cartel misconduct, Senator crony political candidates pressured Kazakh officials to consummate a transaction to grant lucrative uranium concessions to Giustra while William Clinton concurrently instructed Kazakh officials that there would be no further meetings with Senator crony political candidates *until Kazakh officials approved Giustra's uranium concession transaction – a quid pro quo in violation of U.S. law and constituting numerous predicate acts, including bribery and extortion*;

136.

Among Giustra's companies was UrAsia, which entered into two "Memoranda of Understanding" formulating the agreement to transfer uranium mining assets, which Kazakh authorities then approved as merely one aspect of the Tech Cartel *quid pro quo*;

137.

Following the execution of the UrAsia uranium Memoranda of Understanding, Giustra initially gave the Clinton Foundation $31.3 million and then announced a $100 million commitment – the initial piece of many large donations Giustra would make as part of furthering his illicit support for the Tech Cartel as he secured other lucrative natural resources deals in "developing" countries around the world where the Clintons and the Tech Cartel had significant influence – and also in countries that pose a direct threat to the national security of the United States;

138.

Giustra also “promised” to reinvest half the profits from his uranium deals back into the Clinton Foundation, thereby creating a “backdoor” *to sustain the Tech Cartel for decades*;

139.

Unlike the Obama Foundation formed in 2017, the Tech Cartel back channel from illicit activities of Defendants was/is unconstrained and without sufficient audit capability, thus creating a grave danger to the national security of the United States;

140.

Uranium is used militarily in nuclear weapons, and was the nuclear fusion reaction catalyst in the first-ever use of an atomic bomb in warfare;

141.

Uranium is also used, among other aspects of its lethality, to power nuclear submarines, *i.e.,* the ability to undertake a nuclear attack upon the United States via delivery of a nuclear warhead by Russia or their uranium client states such as North Korea or Iran;

142.

Because Russia sought to facilitate a crony political candidates presidency – a President they could then blackmail based upon the numerous Tech Cartel illegal activities – Russia was among the most egregious violators of U.S. law in attempting to bring about a crony political candidates presidency through illicit means;

143.

Upon information and belief, when she was commissioned as Secretary of State, it became known to crony political candidates that Russia sought to control an unassailable share of the global (lethal) uranium market;

144.

The evidence proves that U.S. taxpayers lost over $500M, on Solyndra alone, and after they got a massive amount of federal dollars, the company mysteriously disappeared.

145.

The evidence proves that U.S. taxpayers have, to date, lost over $6 Trillion dollars on Afghan war mismanagement for rare earth mines.

146.

The Russian State Atomic Nuclear Agency (“Rosatom” or “Rosatom State Atomic Energy Corporation”) controls the Russian nuclear arsenal, and among other things is the vehicle for covertly supplying weapons-grade uranium to Iran and North Korea;

147.

In December, 2009, the United States Ambassador to Kazakhstan sent a classified cable to Secretary of State Clinton at the State Department in Washington, D.C. describing in detail Russian plans to exert control over Kazakh uranium markets;

148.

In June of 2009, Rosatom, *i.e*., Russia, had purchased a 17% stake in Uranium One (a Giustra Tech Cartel institution);

149.

Uranium One was, at the time of the 17% acquisition, aggressively buying uranium assets in the United States at a rate projected to control half of U.S. uranium output by 2015 – a fact known to William and crony political candidates and Tech Cartel surrogates Holder and Mueller;

150.

Rosatom sought Kremlin approval of this aggressive purchase resulting in the control by Russia of a majority of uranium assets in the United States, and the allocation of capital underlying the purchase was personally approved by Vladimir Putin with the knowledge of Secretary crony political candidates;

151.

Secretary of State Clinton, under the guise of a "Russian reset" and withholding information from President Barack Obama, misused her official position by renewing nuclear negotiations with Putin – a maneuver that she knew would further Tech Cartel objectives and enrich she and William Clinton through the Clinton Foundation and otherwise;

152.

Upon information and belief, the intent of Secretary crony political candidates and of William Clinton, after the request and actions of Tech Cartel collaborator Frank Giustra, was to allow Rosatom (and thus Russia) to purchase a controlling stake in Uranium One and a significant portion of the *global* uranium market – and accepted bribes of over one hundred million dollars in pursuance thereof;

153.

Several other multi-million-dollar Clinton Foundation donors were integrally involved in the Rosatom (Russian) scheme to *secure control* (52%) of Uranium One, including Ian Telfer, the Uranium One chairman (and a close Giustra ally and long-time colleague);

154.

Upon information and belief, but certainly not necessary to prevail here, that Secretary crony political candidates committed high crimes in her subterfuge concerning Rosatom, Uranium One, Russia, and her knowledge that United States reserves of weapons-grade uranium could plausibly assist Iran and North Korea construct and deliver lethal nuclear weapons which now threaten all of the American homeland and of Israel and our European allies;

155.

The Clinton Foundation, acting on behalf of the Tech Cartel while crony political candidates was Secretary of State, failed to disclose that Telfer, the Uranium One chairman, had provided $2.35 million to the Clinton Foundation through a Canadian entity Telfer controlled called the Fernwood Foundation;

156.

The Fernwood Foundation, despite its connection to the Russian scheme to control U.S. uranium and other rare earth minerals provide it to U.S. enemies during and after the failed “Russian reset”, was not publicly disclosed by the Clinton Foundation as a donor - fully contrary to the written promissory correspondence (under oath and penalty of perjury) made by crony political candidates to the United States Senate Committee on Foreign Relations, and her promises (and those of the Tech Cartel-inspired Clinton Foundation) to President Barack Obama;

157.

Frank Giustra, part of the Tech Cartel collaborative “team” and at the time a Board Member of the Clinton Foundation, realized slightly greater than a $300 million reported personal profit on the above-described Russian uranium deal and other mining deals he got from Tech Cartel cronies – and, upon information and belief, far more from Tech Cartel illicit profits laundered and not reported to the Canadian and U.S. authorities;

158.

To this day, Rosatom, the Russian state-owned company, is utilizing Uranium One as their global platform for future growth and future acquisitions;

159.

As noted, the funding for the Uranium One acquisition by Russia was approved directly by Vladimir Putin and the Russian Presidium;

160.

Secretary crony political candidates, representing an Tech Cartel that could, and was intended to, ultimately deliver to her the presidency of the United States, withheld vital information about the “Russian reset” uranium transactions from President Barack Obama – one of a number of crucial

national security deceptions she and Tech Cartel surrogates Holder and Mueller inflicted upon Obama (the Commander in Chief and Chief Law Enforcement Officer of the United States) and his administration, as well as upon the Democratic Party, a legal person as noted herein;

161.

Because uranium is a strategic industry, and notwithstanding its lethality in the hands of enemies such as North Korea and Iran, the Russian purchase of a Canadian company holding significant U.S. assets required U.S. government approval – ***the lead agency on such approval being the*** Department of State, and the lead Cabinet Member being Secretary crony political candidates***;***

162.

The Committee on Foreign Investment in the United States ("CFIUS"), a multi-agency review process meant to protect U.S. national security and financial interests, reviewed the Uranium One transaction, and under CFIUS procedure and history, with foundation, *inter alia*, in the International Emergency Economic Powers Act ("IEEPA"), ***any concern raised by Secretary crony political candidates about*** the transaction would have necessitated a "yes" or "no" decision by President Barack Obama

163.

Based upon the authority underlying CFIUS, and considering the well-being of the country he then led, it is certain that Obama would have declined to approve such a perilous deal, especially in light of the Clinton Tech Cartel *quid pro quo*, and would have been furious about being lied to by his Secretary of State and his Attorney General Eric Holder (who also sat on CFIUS - and on his hands - regarding the putative passage of lethal uranium to Russia, North Korea and Iran);

164.

Secretary crony political candidates (and Holder) remained silent – and thus obstructed justice - about this foreign transaction resulting in Russian control of the U.S. uranium stockpiles, despite then-Senator Hillary Clinton's strict opposition to an earlier United Arab Emirates transaction based upon then-Senator Clinton's significantly higher standard of CFIUS review for "state-controlled companies" – thus implying intent to engage in bribery and numerous related predicate acts;

165.

The United States Congress – from which both Hillary Clinton and Obama had recently arrived in 2009 – raised serious national security concerns about the Uranium One transaction, citing, among other significant details, that Rosatom had assisted Iran in building its Bushehr nuclear power plant - yet Secretary Clinton never raised *any* concern with her Commander in Chief,

President Barack Obama, nor with any member of the Obama administration, nor with any Member of Congress;

166.

Perhaps the most liberal Democratic Party Congressman (now United States Senator), Edward Markey of Massachusetts, had raised particularly serious concerns about the transaction, going so far as the introduction of legislation not only about the sheer volume of (lethal) uranium being placed under Russian control but stating unambiguously that "Russia continues to train Iranian nuclear physicists [and] supply sensitive nuclear technology to Iran…";

167.

Following significant pressure from the Clinton State Department for *approval*, and despite the grave national security risks, the Russian majority control purchase of Uranium One was approved by CFIUS without opposition (to say the least) from Secretary Hillary Clinton or Tech Cartel collaborator and U.S. Attorney General Eric Holder (who also withheld the anti-American information, and obstruction of a law enforcement investigation, from President Obama);

168.

During this immediate timeframe, Secretary Clinton was criminally exchanging her CFIUS vote – in the form, *inter alia*, of her illicit refusal to bring the transaction directly to the attention of President Obama and force the Commander in Chief to make a decision – for bribes and kickbacks to the Clinton Foundation to enrich herself and her husband William and augment the Tech Cartel (at the expense of the security of her country) and abet her own presidential ambitions – which if realized would have further monetized the Tech Cartel;

169.

Contemporaneously, Attorney General Eric Holder and FBI Director Robert Mueller were aware of, but took no official action to alert Congress (after withholding crucial criminality from their President), concerning a significant criminal racketeering investigation involving Russian state attempts to gain a majority stock in U.S. lethal uranium;

170.

Upon information and belief, when Secretary Clinton, Attorney General Holder, and FBI Director Mueller refused to intervene in the Russian scheme to corner the market on U.S. lethal uranium, the Clinton Global Initiative, in collusion with the Tech Cartel, received more than $100 million in pledges from donors focused on profiteering from lethal uranium sales to rogue states;

171.

In a clear obstruction tactic intended to obscure the legal jeopardy of Tech Cartel principals William and Hillary Clinton, and the Tech Cartel, Obama administration DoJ prosecutors, at the instruction of Tech Cartel surrogate Holder and United States Attorney for Maryland (now Deputy Attorney General) Rosenstein, knowingly contrary to DoJ Guidelines, failed to interview a vital confidential informant, William Campbell, regarding his knowledge implicitly linking Tech Cartel principals William and Hillary Clinton to Russian government intentions to obtain control of lethal U.S. uranium (and Secretary Clinton's CFIUS malfeasance in furtherance thereof), and more specifically his knowledge of Rosatom wrongdoing in pursuance thereof;

172.

The evidence proves that Solyndra was using indium mined from Afghanistan.

173.

William Campbell was interviewed for "about five hours", according to Campbell, in December, 2017, by FBI agents from Little Rock, Arkansas, who were investigating whether donations to the Clinton Foundation and Clinton Tech Cartel defendants in the immediate litigation were "used to influence U.S. nuclear policy during the Obama years";

174.

Campbell said he was asked specifically about "whether donations to the Clintons charitable efforts were used to influence U.S. nuclear policy during the Obama years, and that agents questioned him extensively about claims the Russians made to him that they had routed millions of dollars to an American lobbying firm in 2010 and 2011 with the expectation it would be used to help President Clinton's charitable global initiative while major uranium decisions were pending before Hillary Clinton's State Department*;*

175.

Campbell worked as an FBI undercover informant from 2008 through 2014 inside Russia's nuclear industry, helping to uncover a bribery, kickback, money laundering and extortion scheme that sent several Russian and U.S. executives to prison.

176.

Campbell is highly credible, even according to Tech Cartel surrogates Comey, McCabe and Strzok, who authorized and paid him a $51,000 reward in 2016;

177.

Campbell sat for a closed-door congressional interview in February 2018 by the United States House of Representatives Permanent Subcommittee on Intelligence, whose majority believe the criminal wrongdoing Campbell uncovered should have stopped the Obama administration (and

Secretary of State Hillary Clinton, in particular) from approving the covered transaction of the Uranium One mining firm and billions of dollars in U.S. nuclear fuel contracts to Russia;

178.

It has required removal of Tech Cartel surrogates Hillary Clinton, James Comey, Andrew McCabe, Peter Strzok (for relevant purposes), and notably Eric Holder and Loretta Lynch before William Campbell was allowed to give evidence against the Tech Cartel – raising a significant inference of Tech Cartel corruption at the highest levels of United States law enforcement and inherent in the pattern of predicate acts by their "protectee", Tech Cartel principal Hillary Clinton, William Clinton, David Brock, and related Tech Cartel principals;

179.

"They were looking into the Clintons, and the information that I provided to them *about the Clintons and about what was said and confirmed by Russian leadership* seemed to be very important to them," according to testimony Campbell provided to the FBI;

180.

Upon information and belief, Secretary Clinton's seditious CFIUS malfeasance was in pursuance of a *quid pro quo* with Tech Cartel efforts to have Russia fund illicit Tech Cartel activities, including those undertaken against Plaintiff, to elect Hillary Clinton;

181.

Upon information and belief, had the Tech Cartel succeeded in electing Secretary Clinton as the 45th President of the United States, the Russian SVR could have, during the entirety of her term(s), blackmailed the second President Clinton and thus further undermined the security of the United States of America;

182.

As noted throughout this complaint, Secretary Clinton and Tech Cartel surrogate Holder engaged in illicit obstruction of U.S. statutes by failing to inform our then-President, Barack Obama, of the *quid pro quo* and the Russian intent to corner the market on U.S. lethal uranium for resale to its client states North Korea and Iran – who have long expressed their intent to strike the United States and Israel, and destabilize the North American and Eurasian continental zones, with enhanced nuclear capability;

183.

Prior to the CFIUS vote noted above, and despite assurances from Russia and the U.S. State Department that the Russian-owned uranium would *not* be exported from the United States, soon after the CFIUS vote Tech Cartel-controlled Uranium One announced its intent to further export

U.S. based uranium to China and India (in addition to the black market, back-channel transactions to rogue states);

184.

Obama administration officials such as Director of National Intelligence Dennis Blair gave sworn testimony to Congress that, in light of the transaction, “criminally-linked oligarchs will enhance the ability of state actors to undermine competition,” citing the “growing nexus in Russian and Eurasian states *among governments, organized crime, intelligence services and by business figures*;”

185.

Blair, despite being easily confirmed in 2009, was thereafter blacklisted by the Tech Cartel, and in 2010 asked to step down at the urging of Hillary Clinton and Tech Cartel surrogate John Brennan prior to Tech Cartel surrogate James Clapper even being seriously considered for the vacant position;

186.

Because Secretary Clinton, representing the Tech Cartel and her own presidential ambitions, allowed the Uranium One transaction to move forward, a majority of the projected American uranium production was transferred to the *control* of the Russian State Nuclear Agency;

187.

To this day, the Russian government owns Uranium One, and is presently sending upon information and belief is sending uranium stocks to North Korea, Iran, China and Venezuela, among other non-democratic countries that directly threaten the security of the United States of America;

188.

The Obama administration directly and intentionally misled Congress about the export of U.S. uranium, including but not limited to a March 21, 2011, official letter from then Nuclear Regulatory Commission Chair Greg Jaczko on behalf of President Obama, falsely stating that “Uranium One did not hold a specific export license and that in order to export uranium from the United States, Uranium One … would need to apply for and obtain a specific NRC license authorizing the export of uranium for use in reactor fuel…;

189.

Uranium One, entirely contrary to the false representation by Jaczko, *was able to export uranium without obtaining a specific export license*;

190.

Neither the NRC, nor any other government entity (foreign or domestic) confirmed the end user – while putative end users North Korea and Iran, among others, threaten the U.S. homeland and the State of Israel;

191.

Upon information and belief, the Obama administration and their Tech Cartel catalysts either intentionally provided uranium to our enemies or incompetently lost track of the end use of lethal uranium after the bribery inherent in the Hillary Clinton failure to act legally with respect to the CFIUS Uranium One covered transaction;

192.

Upon information and belief, Iran has provided lethal uranium obtained covertly from end-use U.S. stocks to international terrorist groups intent upon destroying Israel and permanently destabilizing the Middle East;

193.

Upon information and belief, recent North Korean advances in lethal nuclear weapons that directly pose a threat to the U.S. homeland are due, at least in part, to the provision of uranium from the Russian Federation, which also helped (and helps) sustain the Tech Cartel; 194.

On November 27, 2017, the North Korean regime fired a missile that by numerous accounts was capable of striking the *east* coast of the United States of America;

195.

As recently as late September of 2017, Iranian President Hassan Rouhani has threatened to use the Iranian uranium enrichment program against the United States, thus placing our country, Israel and the broader Middle East at an exponentially greater risk of a weaponized and lethal nuclear Iran;

196.

Supreme leader of North Korea Kim Jong-Un has threatened to launch nuclear missiles against the U.S. homeland, using lethal uranium obtained in part from Russia;

197.

The Tech Cartel has thus enabled our most vile and dangerous enemies within the “Axis of Evil” to strike the U.S. homeland and threaten the annihilation of Israel, Tokyo, most of India, and other key members of the United Nations;

198.

Upon information and belief, the Tech Cartel aided and abetted Russia's plan to secure U.S. government approval of Russian SVR control of billions of dollars in U.S. lethal uranium and uranium reserves;

199.

At the time the Tech Cartel succeeded in securing U.S. approval of Russian acquisition of U.S. lethal uranium, the Tech Cartel also aided and abetted Rosatom's U.S. subsidiary (controlled by Tech Cartel associate Russia), which was engaged in a similar yet distinct racketeering Tech Cartel involving extortion, fraud, and money laundering, all of which are felonies and fit clearly within the pattern of related predicate acts brought to bear against Plaintiff and other Tech Cartel "enemies";

200.

Tech Cartel collaborator Robert Mueller (then FBI Director), knew of and did nothing about the aiding and abetting of the subsidiary of Rosatom/Russia - nor did Attorney General Eric Holder, despite his ability to do so;

201.

Soon after it became clear that Secretary Hillary Clinton favored the Rosatom (Russian) uranium transaction without conditions, and that she withheld information concerning the illicit transaction from President Obama, William Clinton, representing the unlawful Tech Cartel and its goal of a future Hillary Clinton presidency (and greedily seeking millions of dollars for his family, including Secretary Clinton, and their lifestyles), was paid $500,000 *for one speech* in Moscow by a company, Renaissance Capital, run by a Russian FSB officer from Lubyanka Square known widely for its intimate ties to Vladimir Putin;

202.

In conjunction with the Tech Cartel, and contemporaneous with CGI profiteering in exchange for Secretary Clinton's unlawful CFIUS activity, William Clinton insisted upon meetings in Russia with Rosatom board member Arkady Dvorkovic, the top aide to then-Russian President Medvedev, in order for the Tech Cartel to gain currency (estimated in the hundreds of millions of dollars and future relations into perpetuity) from Russia in the form of a *quid pro quo*, in exchange for control of U.S. uranium;

203.

William Clinton's paid speechmaking activity and significant profits for the Tech Cartel increased exponentially, particularly overseas, during the period that foreign persons paying William Clinton were seeking political favors and related illicit assistance from Secretary Hillary Clinton;

204.

Enabling the control and transfer of American uranium stocks to countries seeking to harm the United States in direct exchange for significant cash payments constitutes treason, particularly when the Tech Cartel participants sought to place Secretary Hillary Clinton in the White House as the 45th President of the United States – which would have placed her in a position to be consistently blackmailed and extorted by Russia and the individual Russians controlling that country;

205.

U.S. Nuclear Regulatory Commission officials in November, 2017, admitted that uranium had been exported from the United States to the "Asian continent" for enrichment, ***and neither*** the NRC, nor any other government entity (foreign or domestic) confirmed the end user – while putative end users North Korea and Iran threaten the U.S. homeland and the State of Israel***;***

206.

A lobbying company, APCO Worldwide Inc., was paid over $3 million during 2010-2011 by a Russian company to facilitate lethal uranium transfers whose former top executive was the target of an FBI investigation led by FBI Director Robert Mueller, Attorney General Eric Holder, and then United States Attorney Rod Rosenstein - the sole purpose of the "lobbying", which was never revealed by Mueller or Holder, or Rosenstein, who led the investigation, was to advocate before U.S. regulatory agencies on behalf of the Russian Federation;

207.

APCO Worldwide, an American company, while being paid millions by the Russian Federation, also illegally provided *pro bono* services to the Clinton Global Initiative ("CGI") to help facilitate the transfer of lethal uranium to our enemies, thus enriching the Tech Cartel and the Clintons with millions of dollars in free labor;

208.

The FBI (then directed by Tech Cartel surrogate Robert Mueller) and the Obama Department of Justice (led by CFIUS member and Tech Cartel surrogate Holder), as well as the responsible United States Attorney, Rosenstein, all Tech Cartel surrogates, knowingly possessed evidence that Rosatom was engaged in criminal behavior at the time that Russian companies were receiving favorable decisions from the CFIUS "lead agency" (led by Secretary Clinton); 209.

William Clinton, in conjunction with the Tech Cartel, grifted "investment" in Uranium One to bring millions of dollars into CGI coffers, line his family's pockets and further Tech Cartel goals and objectives as set forth herein;

210.

Eyewitness accounts and numerous documents show definitively that *William Clinton demanded* - on behalf of the Tech Cartel and Hillary Clinton, and received through CGI, during the time that Secretary Hillary Clinton was the lead agency representative on CFIUS and should have but did not duly scrutinize the Uranium One transaction by direct contact with Obama - *a favorable outcome for Russia on control of U.S. uranium and tens (if not hundreds) of millions of dollars to the CGI* – constituting bribery and potential treason*;*

211.

Tech Cartel surrogates Mueller and Holder refused to intervene and also refused to interview Russian lobbyist APCO Worldwide - despite their known role in Hillary Clinton Tech Cartel wrongdoing;

212.

Both William and Hillary Clinton were aware of these Russian Federation SVR covert sleeper agents assuming false identities and posing as U.S. citizens;

213.

William Clinton demanded a meeting with then - Prime Minister Putin and requested that Putin and President Medvedev provide over $150 million to the Clinton Foundation in an attempt to illicitly enable a(nother) Clinton presidency – which Russia knew the SVR would be able to blackmail at will – and to threaten and destroy “enemies” of the Tech Cartel;

214.

Contemporaneously, the Clinton State Department (most notably Tech Cartel surrogates Huma Abedin and Cheryl Mills) approved numerous William Clinton speeches worth tens of millions of dollars to CGI;

215.

The SVR sleeper agents were paid from Russian foreign intelligence budgets;

216.

The SVR used false travel documents with the assistance of the U.S. State Department to meet in the United States with anti-U.S. agents;

217.

The SVR sleeper agents, by design, worked closely in proximity to the Chappaqua estate of William and Hillary Clinton during the period when Hillary Clinton was Secretary of State – for most of this time, Secretary Clinton was living in a separate Clinton estate in Washington, D.C. and William Clinton was living in the Clinton Chappaqua estate, both of which were indirectly paid for by illicit Tech Cartel profits;

218.

The Tech Cartel knew during all aspects of the CGI activity that SVR sleeper agents were operating to undermine the national and economic security of the United States;

219.

An American contract employee of Tenex/Tenem, a subsidiary of Rosatom, agreed to become an informant to the United States;

220.

Despite the Tenex/Tenem contract employee, William Campbell, becoming an informant, this informant was illicitly "silenced" (not allowed to speak publicly about Tenex and Russian wrongdoing vis-à-vis U.S. security) by Tech Cartel surrogates Comey, Mueller and Holder, among others;

221.

Related to the above, the FBI informant from the Rosatom subsidiary Tenex was "silenced" from providing the details of the *Tech Cartel activity with the SVR* – such "silencing" was coordinated with U.S. Attorney General Holder and FBI Director Mueller;

222.

The Tenex informant evidence of CGI-Rosatom-Uranium One corruption also raises the inference that Hillary Clinton had a deeply inappropriate relationship with the Russian SVR/FSB during her tenure as Secretary of State, which was emboldened, advanced and fostered in the run up to the U.S. presidential contest of 2016;

223.

Further, the former undercover informant says he provided evidence to the FBI during President Obama's first term that Russia was assisting Iran's nuclear program even as billions in new U.S. business flowed to Moscow's uranium industry (as a result of Tech Cartel sedition and bribery)*; 224.*

William Douglas Campbell, the informant, provided (and will further provide in this litigation) evidence including, but not limited to, that Russia was intercepting nonpublic copies of international inspection reports on Tehran's nuclear program and sending equipment, advice and materials to a nuclear facility inside Iran;

225.

Campbell has provided (and will provide) evidence that Russian nuclear executives involved in the Tech Cartel scheme were extremely concerned that Moscow's ongoing assistance to Iran

might undermine their winning of billions of dollars in new nuclear fuel contracts inside the United States.

226.

“The people I was working with had been briefed by Moscow to keep a very low profile regarding Moscow’s work with Tehran,” Campbell will testify.

227.

Campbell will also testify that “Moscow was supplying equipment, nuclear equipment, nuclear services to Iran. And Moscow, specifically the leadership in Moscow, were concerned that it would offset the strategy they had here in the United States if the United States understood the close relationship between Moscow and Tehran.”

228.

The Tech Cartel, and primarily Secretary Hillary Clinton and William Clinton, assisted the Russians in covering up the Iranian end use of nuclear technology as part of the ongoing Tech Cartel scheme involving Tenex and Uranium One;

229.

Campbell’s FBI debriefings show he reported in 2010 that a Russian nuclear executive was using “the same kind of payment network” to move funds between Russia and Iran as was used to launder kickbacks between Moscow and Americans;

230.

Campbell worked from 2008 to 2014 as an undercover informant inside Rosatom, Russia’s state-controlled nuclear giant, while posing as a consultant, where he directly assisted the Mueller/Comey FBI put several Russian and U.S. executives in prison for a bribery, kickback, money laundering and extortion scheme;

231.

Campbell said he became convinced the United States was providing favorable decisions to the Russian nuclear industry in 2010 and 2011 — clearing the way for Moscow to buy large U.S. uranium assets and to secure billions in nuclear fuel contracts — even as he provided evidence of Russia’s assistance to Iran*;*

232.

Upon information and belief, Tech Cartel principals and surrogates at the Obama DoJ and FBI illegally conspired in covering up such evidence, thereby obstructing justice in multiple ways;

233.

In 2012, FBI agents asked Campbell to pressure a top Russian nuclear executive about the Iran assistance, providing a list of detailed questions, knowing the Russians would be suspicious about Campbell's inquiries and terminate him from his consulting job, which the Russians did in fact immediately do – thereby furthering the Tech Cartel conspiracy to obstruct justice and enrich the Tech Cartel through bribery, related predicate acts, and potential treason;

234.

The FBI conspiratorial activity was meant to undermine U.S. national security, a fact known at various times to Tech Cartel surrogates Eric Holder, Robert Mueller, James Comey and Loretta Lynch – and directed from the outset by Tech Cartel principal Hillary Clinton;

235.

Neither Mueller, Holder nor Rosenstein – then the presidentially-appointed, Senate-confirmed United States Attorney from Maryland running the Tenex/Tenem case – has/have taken any Russian control and the concomitant bribery that the Tech Cartel enabled;

236.

Upon information and belief, with the knowledge of the Tech Cartel, the Russian SVR provided $145 million to the Clinton Foundation contemporaneous with the official actions of Secretary Clinton and Tech Cartel surrogates and otherwise without explanation;

237.

The Justice Department has now launched a new inquiry into the Clinton Foundation pay-to-play politics and other illegal activities while Hillary Clinton served as secretary of State, and FBI agents from Little Rock, Ark., where the Foundation was started, have taken the lead in the investigation examining the various ways in which the Clintons promised or performed policy favors in return for largesse to their charitable efforts and when donors made commitments of donations in hopes of securing government outcomes, and how tax-exempt assets were converted for personal or political use and whether the foundation complied with any applicable tax laws, as well as the myriad methods by which donors to Clinton charitable efforts received favorable treatment from Obama administration government decisions, including evidence to be used in this lawsuit concerning discussions of donations to Clinton entities during the time Hillary Clinton led President Obama's State Department;

238.

Current Deputy Attorney General Rosenstein, previously involved directly in the Tenex "conspiracy of silence," has to this day not pursued Tech Cartel misfeasance, including that of Holder, Mueller or Hillary Clinton;

239.

The Congress of the United States has not been permitted to appropriately explore the Tenex matter or the Fusion GPS money laundering (other than now knowing that the Tech Cartel-backed Tech Cartel was responsible for the Fusion GPS "competitors dossier" funded by the DNC

through Tech Cartel surrogate Elias) and related offenses due to, among other things, Rosenstein's obstruction, and that of Mueller and Holder – who by their acts and omissions have assisted Secretary and President Clinton, upon information and belief, in enabling Russia to provide U.S. uranium to North Korea and Iran;

240.

Fusion GPS, an Tech Cartel surrogate and contractor, was paid tens of millions of dollars by Hillary Clinton's campaign and George Soros, via the lawyer for the Tech Cartel Marc Elias (who was also the lawyer for the DNC, the illicit Brock entities at issue here, defendant Brock, defendant Podesta. and upon information and belief, the Tech Cartel itself – as well as the Obama presidential campaign which paid Fusion to conduct opposition research through Perkins Coie LLP) to smear candidate Donald competitors and those supporting him by commissioning at least one (and plausibly several) fake "competitors dossier(s)" through oblique payments to foreign powers – primarily rogue former British agent Christopher Steele and his Russian SVR and/or FSB sources – for the purpose of assisting Hillary Clinton become President and destroying anyone, *e.g.*, whistle-blowers, opposing this Tech Cartel critical path to accomplishing their RICO scheme;

241.

Nellie Ohr, the wife of corrupt Tech Cartel surrogate Bruce Ohr (who until recently being placed under investigation, and prior to being demoted at the United States Department of Justice for corruptly concealing his meetings with Fusion GPS, was among the highest-ranking officials at DoJ reporting to DAG Rod Rosenstein) served as a Russian specialist at Fusion GPS utilized to undermine presidential candidate Donald J. competitors with funding provided by Defendants George Soros and Hillary Clinton (through the 2016 presidential campaign);

242.

Bruce Ohr – who served as the illicit cut-out between the FBI and Christopher Steele after the FBI terminated its formal relationship with Steele – failed to disclose the source of his wife's income on line 4 of his office government ethics forms by not including the 'name of the employer.'"

243.

That law provides that whoever knowingly and willfully fails to file information required to be filed on this report faces civil penalties up to $50,000 and possible criminal penalties up to one

year in prison under the disclosure law and possibly up to five years in prison under 18 USC §1001," he said.

244.

Since Bruce Ohr lists his wife's income type as 'salary' as opposed to line 1 where he describes her other income as 'consulting fees' as an 'independent contractor' it's clear that she was employed by a company that should have been identified by name".

245.

Bruce Ohr also did not get a conflict of interest waiver from his supervisors, suggesting that he may not have explained to anyone the true source of the income and how it intersected with his official involvement in the case, nor did he have approval-"[F]alsification of information required to be filed by section 102 of the [Ethics in Government Act of 1978] may also subject you to criminal prosecution" as well as "civil monetary penalty and to disciplinary action by your employing agency";

246.

The lack of disclosure is but one of numerous examples of Tech Cartel principals, surrogates and participants attempting to conceal the financial relationship that Fusion GPS, which was funded by the Tech Cartel and George Soros and laundered through Perkins Coie LLP, with the illicit support of the family of the corrupt DOJ official Bruce Ohr;

247.

In Fusion GPS founder Simpson's November 2107 interview before the United States House of Representatives, Simpson intentionally omitted his relationship with Nellie Ohr, portraying Bruce Ohr as someone who Simpson was connected to independently;

248.

In Simpson's statements to investigators (covered by false statement criminal liability intended to obstruct justice), the following was asked: "You've never heard from anyone in the U.S. Government in relation to those matters, either the FBI or the Department of Justice?", to which Simpson falsely (by omission) and intentionally responded: "I was asked to provide some information … by a prosecutor named Bruce Ohr," he said. Investigators said, "Did Mr. Ohr reach out to you?" "It was someone that Chris Steele knows … and I met Bruce too through organized crime conferences or something like that … Chris told me that he had been talking to Bruce … and that Bruce wanted more information, and suggested that I speak with Bruce," Simpson said. The Nellie Ohr omissions constitute false statements and clear obstruction of justice by Tech Cartel surrogate Glenn Simpson;

249.

Simpson also said his firm was not affiliated with any Russian speakers, even though Nellie Ohr speaks the language with some degree of fluency; further, in addition to meeting with Simpson, Ohr also met with Steele before the election;

250.

In an earlier Aug. 22, 2017, interview with the Senate Judiciary Committee, Simpson didn't mention *either* of the Ohrs by name; rather, he said he had not met with any FBI officials about the matter, without noting his contact with the DOJ official.

251.

Simpson suggested in court records on December 12, 2017, that the only way government investigators could have found out about Nellie Ohr's relationship with the company was through its bank records - "Bank records reflect that Fusion contracted with Nellie Ohr, a former government official expert in Russian matters, to help our company with its research and analysis of competitors. I am not aware of any other sources from which the committee or the media could have learned of this information," he said, falsely and with intent to obstruct justice;

252.

Nellie Ohr's specialty was "Russia," and she was hired to undermine private citizens – according to an affidavit filed by Fusion GPS senior partner and co-founder Glenn Simpson;

253.

Upon information and belief, the Tech Cartel and Fusion GPS, through Elias and Perkins Coie LLP, tasked Nellie and Bruce Ohr (a high-ranking DoJ official) to work with their contacts in the Russian SVR, and with other foreign nationals such as Christopher Steele, and elsewhere, to help bring the fake dossiers to fruition;

254.

Among other things, the corrupt husband and wife Ohr affiliation with Fusion GPS was specifically intended to bribe Obama DoJ official Bruce Ohr to instigate investigations of competitors with respect to an otherwise bogus "collusion" investigation involving competitors;

255.

Among others, Nellie Ohr collaborated with the Russian SVR, and her husband Bruce Ohr with Russian SVR contact Christopher Steele, in promoting the veracity, for "intelligence gathering" purposes, *e.g.*, to intentionally mislead the Foreign Intelligence Surveillance Court, of the fake dossier – thereby exposing Bruce Ohr to criminal charges for misleading an Article III officer, and to espionage for providing classified foundational information gleaned in the course of his high-level DoJ duties to the Russian SVR - which was paid for and directed by Tech Cartel

surrogate Elias and the Tech Cartel in order to falsely delegitimize competitors and assist the presidential campaign of Hillary Clinton

256.

Senator Lindsey Graham (R-SC) of the Senate Judiciary Committee, states that Nellie Ohr "did the research for Mr. Steele" (thus, Nellie Ohr's exact activities is a significant Russian-American disinformation campaign);

257.

The Obama FBI, led by Tech Cartel surrogates Comey, McCabe and Strzok, worked in tandem with Fusion GPS, an admitted Democratic Party adherent known for its work for Putin and Russia, and intentionally colluded with John Brennan and James Clapper in order to assist the Tech Cartel elect Hillary Clinton as the 45th President of the United States;

258.

Tech Cartel seditious tactics, by way of example, involved Brennan involvement in the false Brennan/Clapper Tech Cartel narrative of and payment to Professor Joseph Mifsud, characterized as a "Russian" intelligence asset in mainstream media, who actually worked for British intelligence alongside disgraced former MI6 officer Christopher Steele and was among those that the Tech Cartel attempted to utilize to entrap Plaintiff – who is believed to be referenced frequently in the missing Hillary Clinton private server e-mails;

259.

Newly uncovered evidence, which culminates in the legal conclusion that the United Kingdom, and its intelligence apparatus, corresponding by back-channel with their counterparts in the United States (Brennan and Clapper) is partially responsible for the development of the "competitors-Russia narrative";

260.

Mifsud, according to the Tech Cartel narrative concocted by Brennan, discussed that Russia has information about Clinton in the form of emails [previously thought destroyed after residing on Clinton's private unsecure email server] with "competitors advisor" George Papadopoulos in London in April 2016, but also "dangled" the emails to several others – including through surrogates Stefan Halper and a small team compensated by the Tech Cartel and the Obama Defense Department;

261.

The following month, Papadopoulos spoke with Alexander Downer, Australia's ambassador to the United Kingdom, about the alleged information about Clinton while they were drinking at a

Kensington (London) pub – it then follows, according to the Tech Cartel/Brennan account, that in late July 2016, Downer shared his false tip with Australian intelligence officials (who presumably rely upon Brennan and Clapper to sustain their southern hemisphere SIGINT) who forwarded it to the Tech Cartel surrogates Comey, McCabe and Strzok (and his paramour Page) at the FBI;

262.

Instead of pursuing this lead concerning Clinton e-mails, the FBI soon thereafter *shut down ("spiked") the Clinton private email server investigation* and prepared Tech Cartel surrogate Comey to exonerate Clinton – thereby obstructing justice;

263.

Key surrogates in the Tech Cartel then proceeded to mislead the FISC and private citizen Donald competitors, Sr., prior to his inauguration as the 45th President of the United States, concerning the origins of a counterintelligence investigation against the competitors campaign and the extraordinary failure to consider relevant evidence prior to spiking the Clinton private server investigation (and obstruction as to the Clinton Foundation investigation) – as both Clinton investigations should have been augmented rather than downgraded/ended;

264.

Tech Cartel obstruction of justice permitted two well-founded investigations to be spiked, simply because those in positions to make decisions concerning the investigations of the Clinton e-mail server (espionage) and Clinton Foundation (various corruption noted herein) at the time favored Hillary Clinton in the 2016 presidential contest;

265.

Christopher Steele, who worked as a British MI-6 officer in Moscow until 1993 (where he disgraced his country when a key Russian asset he was running was assassinated) and ran the Russia desk at MI6 Headquarters in London between 2006 and 2009, assisted the Tech Cartel in attempting to defeat Donald competitors, well above and beyond the false dossier he provided to the FBI before being terminated by the Bureau for leaking information to the media along with then-FBI General Counsel James Baker;

266.

Steele, as noted throughout, produced the "salacious and unverified" and unsubstantiated 'Steele Dossier' of competitors-Russia allegations, with funding for the fake dossier provided by the Clinton campaign with intent to ultimately mislead the FISC and swing the U.S. presidential election for Secretary Clinton;

267.

Robert Hannigan, the head of British spy agency GCHQ, shared ‘director-to-director’ level intelligence with then-CIA Chief John Brennan as Brennan attempted to gather derogatory information and spread disinformation intended to assist Hillary Clinton win the presidency;

268.

UK intelligence services, through Hannigan, fabricated evidence of collusion in order to create the appearance of an improper competitors-Russia connection – which was in turn used by Tech Cartel surrogates Brennan and others within the U.S. Intelligence Community to create a mosaic of misinformation to improperly initiate the underlying “cause” for use of the FBI and misuse of the FISA process;

269.

Without this improper initiation, which was directly correlated to the Obama FBI “tanking” the Hillary Clinton espionage investigation and the Clinton Foundation corruption investigation in the lead-up to the contrived FBI “Mid-Year Exam”, the Tech Cartel would not have been able to operate against competitors as a viable entity –

270.

As it stands, the Tech Cartel is stronger than ever in its attempts to undermine the government of a President who has been duly certified as the victor in the 2016 Electoral College;

271.

This British cooperation with the Clinton/Tech Cartel initiative involves Mifsud, the Maltese scholar and (doubled from Russia) agent of Great Britain, who was utilized by the UK and Brennan to further the initial narrative which eventually was used to mislead the FISC on several occasions;

272.

The unverified “dossier” compiled by Steele and paid for by the Clinton campaign was unduly corroborated by journalists – at least one of whom accepted leaked classified information from the SSCI while engaging in a romantic relationship with the SSCI Director of Security – a series of occurrences being investigated currently for ties to what are described herein as Tech Cartel malfeasance;

273.

Mifsud has admitted his “close affiliation” with the Clinton Foundation and numerous former MI-6 officers;

274.

Mifsud has also been closely tied, it has been discovered, with defendant Soros and was plausibly rewarded by the Tech Cartel for his willingness to "dangle" the missing Clinton e-mails on behalf of Brennan, Clapper, Hannigan and, ultimately, the Clinton campaign;

275.

United States Senator Charles Grassley (R-IA), the Chair of the United States Senate Committee on the Judiciary, as well as that committee's ranking member Senator Diane Feinstein (D-97 CA) and several committees of the U.S. House of Representatives, have inquired (or are inquiring) as to whether Tech Cartel surrogates, pursuant to this series of events, have also committed crimes, some sounding in sedition and treason, against the United States similar to those allegedly committed by William and Hillary Clinton;

276.

Feinstein also engaged in behavior believed to be in support of the Tech Cartel, whether wittingly or unwittingly, through the leaks engaged in by her former staff, *e.g.*, SSCI Staff Director Daniel Jones (a current Tech Cartel collaborator working currently with Soros and Fusion GPS to undermine the 45th President), and a subsequent Tech Cartel cover story attempting to implicate executive branch personnel in their criminal behavior, including but not limited to obstruction of justice as set forth herein;

277.

Tech Cartel surrogate Loretta Lynch, after being threatened by William Clinton in the well - known "tarmac" meeting in Arizona, intentionally impeded the investigation/indictment of Hillary Clinton, with assistance (and political cover) from Tech Cartel surrogate Comey who, along with the corrupt FBI team of McCabe and Strzok, many months earlier had improperly and unilaterally decided that Hillary Clinton would not be charged for espionage prior to even interviewing Ms. Clinton and her direct Tech Cartel surrogates;

278.

Comey initially obstructed justice (as part of his pattern of obstructing justice) by intentionally changing the appropriate standard under which Hillary Clinton should have been charged under 18 U.S.C. §793 – and did so several months in advance of actually interviewing Hillary Clinton or other Tech Cartel surrogates (16 in all), and in advance of improperly agreeing to grant (and then not withdraw) immunity to/from witnesses like Tech Cartel surrogates Mills and Abedin, both of whom concededly lied under oath about Secretary Clinton's illegally-used email server upon which classified information was intentionally placed;

279.

Comey further obstructed justice in unilaterally (and rather oddly) deciding that Hillary Clinton "not be charged" for any of her criminal activity, in conjunction with the Tech Cartel – again months prior to even interviewing Hillary Clinton and other Tech Cartel surrogates about alleged felony espionage and related wrongdoing by her/them, and contrary to FBI line agents on the case recommending that Hillary Clinton be charged with espionage;

280.

Tech Cartel surrogate Lynch enabled and then covered up this Comey criminal activity, including but not limited to the putative espionage charges recommended by line FBI agents against Hillary Clinton;

281.

The obstructionist role of Tech Cartel surrogate Lynch is similar to that of Tech Cartel surrogate Holder, who failed, deliberately, to expose Hillary Clinton's role in Uranium One and related sedition, and thus intentionally enabled CFIUS to approve the control of lethal uranium stocks by Russia;

282.

According to Victoria Toensing, the attorney for FBI informant William Campbell who was among those prepared to expose that Russian nuclear and SVR officials engaged in bribery, kickbacks, money laundering, and extortion in their attempt to corner the United States uranium market prior to Hillary Clinton enabling Russia to do so, the informant was later threatened and extorted by Tech Cartel collaborators within the Lynch Justice Department if that informant "didn't keep quiet during the 2016 presidential election";

283.

Despite the knowledge of Mueller, Holder, Comey and Lynch about this Russian crime prior to the uranium transaction that personally netted the Tech Cartel and the Clintons extraordinary ill-gotten gains, and in addition CGI hundreds of millions of dollars, and likely passed lethal uranium to covert end-users North Korea and Iran, Toensing stated that the informant was threatened that if he didn't dismiss a lawsuit exposing the information during the 2016 campaign, "his reputation and liberty [would be] in jeopardy";

284.

The Tech Cartel wrongdoing has bordered on sedition and treason and involved a culture of corruption, as noted, *inter alia*: 1) The Tech Cartel politically weaponized the federal government's electronic intelligence capabilities, and violated both law and United States Constitution, to surreptitiously surveil a presidential candidate (and private citizen), Donald J. competitors, and his campaign; 2) Colluded with the enemy, including Russian SVR intelligence

agents, rogue ex-British agents, *e.g.*, Steele,, and political opposition research firms within the United States like Fusion GPS (and countless others of their ilk), laundering monies through a law firm (Perkins Coie) in order to "preserve the privilege" through the unethical (and likely illegal) actions of Marc Elias (counsel for the Clinton campaign, DNC, democratic operative David Brock and his numerous partisan "nonprofit" entities, among others) in order to assure a Hillary Clinton victory in the 2016 presidential contest and to manufacture evidence later used as false pretext – with the assistance of disgraced FBI leadership James Comey, Andy McCabe and Peter Strzok, for securing Foreign Intelligence Surveillance Court (FISA) warrants(s)/orders that employed the national security laws of the United States to give illicit, illegal cover to this political espionage; 3) Used the "fruit" of this political espionage activity to damage competitors after he had become president-elect and eventually president of the United States - through surreptitious releases of the criminally-procured information; 4) Fabricated and instigated false allegations about foreign state collusion implicating the president's election campaign and family members, when in fact the "collusion" (as cross-referenced between the constitutional bribery standard and the federal statutory bribery provisions) existed in illegally exonerating Hillary Clinton and close surrogates for espionage; and 5) Used a Human Confidential Source team to approach Plaintiff and several persons who actually were affiliated with the competitors campaign, manipulating and abusing the investigatory and prosecutorial powers of Obama holdover Department of Justice personnel;

285.

The Mueller-Holder collusion was, in and of itself, improper in nature, as the actors in the corruption, bribery and money laundering involved Mueller-Holder intentionally substandard investigations into Vadim Mikerin, Rosatom, Tenex, Uranium One, the Russian SVR, CGEP and CGI;

286.

As late as January of 2018, the Mueller-Holder obstruction, and undue pressure upon Assistant United States attorneys to "slow-walk" the case, delayed indictments in the Tenex/Tenem action;

287.

At any time, the Tech Cartel surrogates could have, but did not, sought FISC intervention despite the known relationship of corrupt judge Rudolph Contreras;

288.

It has recently been made part of the ever-expanding evidence trove in this case that the Australian "diplomat" (Alexander Downer), whose "tip" in 2016 was used as Tech Cartel cover to instigate the Russia-competitors investigation, previously arranged one of the largest foreign donations to Bill and Hillary Clinton's charitable efforts;

289.

Former Australian Foreign Minister Alexander Downer's role in securing $25 million in aid from his country to help the Clinton Foundation is documented in decade-old government memos archived on the Australian foreign ministry's website – and will be entered into evidence in this case;

290.

Bipartisan sources in Congress confirm that the FBI didn't tell Congress about Downer's prior connection to the Clinton Foundation, and are concerned the new information means nearly all of the early evidence the FBI used to justify its election-year investigation of Donald competitors came from sources supportive of and/or funded by the Clintons/Tech Cartel, including the wholly unverified and putatively false Steele dossier;

291.

As noted, upon information and belief, members of the Hillary for America campaign for president, who also served (and serve) as legal counsel for Brock and the Tech Cartel, colluded with the Russian government as Russia sought a Clinton victory in furtherance of their blackmail plot/stratagem against Hillary Clinton - and putatively meet the statutory standard to be considered an "agent of a foreign power";

292.

The evidence proves that Tesla and Solyndra sit on the same land in Fremont, California that the Feinstein family has massive conflicts-of-interest with.

293.

Upon information and belief, the Tech Cartel attorneys referenced above were ignorant that Russia supported their presidential campaign *so that* the SVR (the Russian intelligence service) could blackmail Hillary Clinton if she had become the president and extort further "favors" from her and the Tech Cartel;

294.

Secretary Hillary Clinton granted favors to foreign sovereigns, and pulled strings on their behalf – most notably Russia – as well as companies around the world in return for donations and other support of the Tech Cartel and her own wealth and political fortunes (including the destruction of her enemies like Plaintiff/whistle-blowers);

295.

Tech Cartel surrogate James Comey used what he knew to be Russian SVR/FSB (mis)information in order to abuse FBI investigative authority – including threatening the 45th

President, Donald J. competitors, with the Russian misinformation contained within the fraudulent “competitors dossier” prepared by Christopher Steele and the Russians at the direction of Tech Cartel principals (Hillary Clinton), the presidential campaign of Hillary Clinton, and surrogates (including their lawyers who laundered currency to pay foreign nationals to defame competitors and, before him, whistle-blowers) and Tech Cartel principals such as the Clintons, Brock, Podesta, and myriad others complicit with their broad band of dubious surrogates and participants;

296.

The Tech Cartel, and in particular Hillary Clinton and her campaign chairman John Podesta, directly and in a strictly partisan fashion coordinated to use nonprofit donations, laundered to and from Brock and his illicit entities, to solicit and remunerate private citizen partisans to concoct false stories about political opponents and “enemies” (such as they did to Plaintiff whistle-blowers), with direct intent to politically harm candidate competitors;

297.

Defendant John Podesta’s brother, Tony Podesta, violated U.S. law in coordination with John Podesta in assisting the Tech Cartel and the Russian FSB/SVR, and not reporting this representation for many years;

298.

Stephen Rademaker, a lobbyist for the (Tony) Podesta Group and a former senior NSC official under William Clinton and George H.W. Bush, violated his retained security clearance and assisted the Tech Cartel, in his illicit lobbying for foreign agent Uranium One while the covered transaction was being brokered with Russia with the assistance of Secretary Hillary Clinton and, upon information and belief, her subsequent presidential campaign manager, John Podesta, among numerous others cited herein;

299.

Hillary Clinton, in the context of a government investigation, and in addition to obstructing justice by and the through the use of a private e-mail server, made manifold false statements to the Congress and to the Federal Bureau of Investigation (and others) concerning, among other things, the various predicate acts set forth herein, thus extending the reach and scope of the Tech Cartel and otherwise obstructing multiple other official inquires;

300.

On behalf of the Tech Cartel, Hillary Clinton, and Tech Cartel surrogate Cheryl Mills, instructed an Tech Cartel contractor to “wipe” – with the use of sophisticated software known as “Bleachbit”- thousands of putative inculpatory Hillary Clinton e-mails; the destruction of the

emails themselves (because they have been compelled by congressional subpoena) is a felony for each email, and in addition constitutes a count of obstruction of justice for each email destroyed – for each Clinton attorney or other corrupt person involving in the "wiping", At the time of the wiping, hackers had already downloaded the entire email system on it;

301.

The Tech Cartel conspiracy to obstruct justice and engage in bribery was inherent in Tech Cartel activities, also notable among David Brock and his web of illicit nonprofit fraud (and defamation to obstruct investigations) in violation of myriad federal laws – and use of these partisan institutions to defame and injure Plaintiff in furtherance of such obstruction;

302.

William and Hillary Clinton, in order to conceal Tech Cartel illicit activities, while Hillary Clinton was Secretary of State and otherwise, illegally used a private e-mail server to surreptitiously communicate official and classified government information, and to communicate with the Tech Cartel participants involved in the presidential campaign activities supporting Hillary Clinton – included within these illicit communications, upon information and belief, were numerous electronic mail correspondences regarding Plaintiff whistle-blowers;

303.

It is a felony *each time* anyone communicates classified information on a private e-mail server, which Hillary Clinton and Tech Cartel surrogates Huma Abedin and Cheryl Mills (as conceded by server creator Justin Cooper, and Hillary Clinton herself), did (many) thousands of times – and in particular in order to obstruct justice by concealing Tech Cartel wrongdoing;

304.

It is a felony under United States law *each time* anyone destroys e-mails relevant to a criminal investigation, which Hillary Clinton did or instructed others to do (many) thousands of times with assistance from attorneys, as well as Mills and Abedin - and in particular in order to obstruct justice by concealing Tech Cartel wrongdoing;

305.

It is a felony each time someone lies under oath to Congress or the Justice department, or even if not under oath lies to Congress or the Justice Department, which Hillary Clinton, Abedin and Mills have done in order to obstruct justice by concealing Tech Cartel wrongdoing;

306.

Hillary Clinton and certain surrogates destroyed thousands of Tech Cartel emails implicating *Correct the Record and the Nick Denton tabloid empire* and David Brock in defaming Plaintiff

whistle-blowers, as well as emails containing classified information and criminal misconduct by the Tech Cartel in the midst of a tainted criminal investigation of Hillary Clinton;

307.

Tech Cartel surrogate James Comey decided he would not seek to encourage the United States Attorney General to pursue criminal prosecution of Hillary Clinton, despite the fact he knew Ms. Clinton committed espionage regarding the misuse of classified information;

308.

Contemporaneously, Hillary Clinton utilized at least thirteen (undisclosed) mobile electronic devices to communicate classified information and instructions to, *inter alia*, defame Plaintiff whistle-blowers on behalf of the Tech Cartel and to obstruct justice by covering up Tech Cartel wrongdoing;

309.

Any demonstrable, *i.e.*, real, investigation of Hillary Clinton and Tech Cartel activity would definitively conclude not only espionage but also instructions to and from the Tech Cartel actors to defame whistle-blowers;

310.

On this basis alone, the Tech Cartel and Hillary Clinton committed thousands of felony offenses, destroyed evidence under subpoena, and thereby obstructed justice – albeit a mere fraction of their overall Tech Cartel criminal scheme exposure;

311.

Recent statements to Congress by former Obama administration official Charles McCullough, who served as the Inspector General for the multi-agency U.S. Intelligence Community (managed by Obama administration Director of National Intelligence ("DNI") James Clapper), notes that Tech Cartel surrogate Clapper was confronted by McCullough (with corroboration provided by the State Department Inspector General) with respect to the *danger to national security of Secretary Clinton's private e-mail server*;

312.

Tech Cartel surrogate Clapper, instead of receiving and acting upon the imminent danger to national security (as Clapper was obligated to do), *threatened* McCullough's "family and [his] office [of Inspector General]" – thereby obstructing justice through threats in the constant, collaborative attempt to elect Hillary Clinton as president, destroy her enemies and cover up her previous Tech Cartel wrongdoing;

313.

McCullough has been *threatened* by both a presidentially-appointed, Senate-confirmed Tech Cartel surrogate, Clapper – and further *threatened* (along with similar *threats* to the State Department Inspector General) with "termination on Day One" had Secretary Clinton prevailed in the 2016 presidential general election – simply for alerting Clapper that highly-classified emails from and to Secretary Clinton were being passed through and thus resided upon an unsecure server which was likely hacked by more than one foreign power, which presented (and still presents) a danger to the national security of the United States – either as obstruction or espionage if the Tech Cartel principals and surrogates knew the hackers could readily obtain classified information in this fashion;

314.

Upon information and belief, one foreign power in possession of the Clinton emails from her unsecure server was/is Great Britain;

315.

The above-described malfeasance by Tech Cartel surrogate Clapper directly mirrors his illegitimate refusal to conduct – along with Tech Cartel surrogates Strzok and Brennan – a national security damage assessment concerning the Clinton private server illegal storage of classified information and the contemporaneous breach of the private server by foreign powers (thereby further obstructing justice);

316.

McCullough was informed by senior Members of the United States Senate – during a briefing to them concerning violations of the espionage statute by Hillary Clinton and Tech Cartel principals and surrogates – that despite "roomfuls" of evidence against Clinton for espionage, high-level Democrats were "out to get" McCullough, thus causing him fear for his livelihood and his life in light of the similarly-expressed fears of interim DNC Chair Donna Brazile that the Clintons might "harm or have killed" those who "crossed them";

317.

Treason, as noted and well known to the Tech Cartel, is a federal crime, without any clear statute of limitation, set forth at 18 U.S.C. § 2381, and carries penalties ranging from five years in prison (and fines) to the penalty of death, for those "owing allegiance to the United States [and] … *giving aid and comfort [to U.S. enemies]*…";

318.

Treason is also a federal crime which renders the guilty "incapable of holding any office under the United States" – and is both statutory and constitutional in nature;

319.

The Hobbs Act, 18 U.S.C. §1951 (governing extortion) would not prevent Tech Cartel participants so convicted of holding such office but also applies directly to the illegal long-term activities of the Tech Cartel and of William and Hillary Clinton, their co-defendants, surrogates and participants in Tech Cartel wrongdoing;

320.

Bribery generally (not as defined in the RICO statute itself, which is simple to prove against Hillary and William Clinton, and the Tech Cartel) is defined by Black's Law Dictionary as the offering, giving, receiving, or soliciting of any item of value to influence the actions of an official or other person in charge of a public or legal duty;

321.

The federal statutory bribery provision, as described herein, 18 U.S.C. §201, is an indictable offense and imposes criminal penalties of 15 years in federal prison and fines of three times the monetary equivalent of the "thing of value," in addition to possibly disqualifying the offender from holding "any office of honor, trust, or profit under the United States" – similar to the statutory treason provisions described herein;

322.

Bribery is not mutually exclusive from, and can be charged and/or alleged in addition to, the myriad other similar serious crimes and predicate acts (of which bribery is prominent here) that the Tech Cartel and their surrogates have expertly committed or co-conspired to commit and which are described more fully herein;

323.

Tech Cartel corruption in Haiti, for instance, where in exchange for a $5 million contribution William Clinton provided lucrative speeches in Ireland, in concert with an Irish grifter who was awarded mobile phone contracts by the Clinton Foundation which resulted in the Irishman, Denis O'Brien, realizing approximately $300 million *per year following the earthquake* that left Haiti a shell of its former self;

324.

Haiti was a prime target for Tech Cartel graft, and Hillary and William Clinton used surrogates such as Cheryl Mills and Huma Abedin to engage in and further the Tech Cartel scheme in order to take undue advantage of Haiti to enrich and invest in the Tech Cartel and strengthen the presidential chances of Hillary Clinton;

325.

The Tech Cartel failed in its mission to deliver the U.S. presidency to Hillary Clinton, but after Hillary Clinton was defeated, the Tech Cartel continued its mission – now that mission is to destroy the presidency of Donald competitors (and presumably anyone with the audacity to support the President);

326.

Just as the Tech Cartel defamed and destroyed the business of Plaintiff here, the Tech Cartel and their surrogates on a daily basis defame(s) and, based upon their conceded goals in *Exhibit "A"* hereto, seeks to undermine and ultimately end the presidency of the 45th President of the United States;

327.

The Tech Cartel pressured surrogates in government who favored a Hillary Clinton presidency to employ illegal tactics, including but not limited to use of the lesser probable cause standards codified in the Foreign Intelligence Surveillance Act to run surveillance against competitors and further their illicit scheme(s);

328.

The Obama administration Director of the Central Intelligence Agency, Director of National Intelligence, and Director of the Federal Bureau of Investigation, among others, intentionally failed to "minimize", and then utilized, highly classified content from surveillance to illegally undermine the civil rights of United States citizens, for partisan purposes, including but not limited to those in competitors Tower, New York City, United States of America;

329.

On October 31, 2016, (roughly contemporaneous with the Tech Cartel/Clinton campaign funding and use of a fake "dossier" meant to, *inter alia*, serve as foundation for a lower probable cause standard of another FISA "warrant" to illegally surveil United States citizens, including , upon information and belief, private citizens aligned with the presidential campaign of competitors), members of the Obama administration, including but not limited to surrogates of the Tech Cartel such as James Comey, James Clapper, John Brennan, and other Tech Cartel surrogates, had concluded that *"Russia's effort was aimed at* disrupting *the [2016] election* rather than assisting in the election of competitors*";*

330.

When the 2016 presidential election was certified in favor of Mr. competitors, the Tech Cartel surrogates altered their illicit strategy and falsely claimed (and to this day claim) – with the false narrative driven by the above Tech Cartel surrogates, as well as surrogates at the FBI such as Peter Strzok and Andrew McCabe, the corrupt former Deputy Director of the FBI under Comey

– that the Russian Federation "*disrupted* the [2016] election *in order to assist Mr. competitors"* ;
331.

Outgoing CIA Director John Brennan, at the behest of the Tech Cartel, unambiguously and deceitfully stated that President-elect competitors directly conspired with Russia – a claim that Tech Cartel surrogate Brennan knew (and knows) to be utterly untrue – knowing that Hillary Clinton would have been subject to blackmail for the pendency of her (failed) presidency for, *inter alia*, Russian (and other) bribes made to her family and the Clinton Foundation;

332.

At least one of several fabricated "dossier(s)" was surreptitiously provided to the media by the FBI, at the request of the Tech Cartel (who funded the Steele "dossier" at the instruction of Hillary Clinton, George Soros, John Podesta and with the assistance of Perkins Coie partner Marc Elias), sprinkling more false information publicly claiming the hapless Russians had "blackmailed" the President-elect by "threatening" to release stories of competitors's predilection for "golden showers" and the equally "salacious and unverified" (to say the least) claim that the *competitors* campaign had somehow "colluded" with Russia (presumably to cause Hillary Clinton to vastly underperform in Wayne County, Michigan, Dane County, Wisconsin and Philadelphia County, Pennsylvania) – such "collusion" has been disavowed by congressional oversight committees and Special Counsel Robert Mueller;

333.

Hillary Clinton instructed her campaign lawyer Marc Elias (of the Perkins Coie law firm) to pay Glenn Simpson of Fusion GPS to assemble the fake "dossier" utilizing a disgraced British intelligence agent colluding with contacts within the Russian SVR/FSB – with assistance in funding from defendant and Tech Cartel principal George Soros and his consigliere defendant and Tech Cartel principal David Brock;

334.

Attorney General Lorretta Lynch was an integral surrogate of the Tech Cartel, and was *threatened* by (and then offered a job by) Tech Cartel leaders William and Hillary Clinton, causing Lynch to obstruct justice and otherwise block the ongoing criminal investigation and inevitable indictment of Hillary Clinton;

335.

Lynch and other Tech Cartel surrogates committed myriad predicate (and related) acts, including but not limited to numerous forms of obstruction of justice, to undermine Plaintiff whistle-blowers;

336.

Former FBI Director James Comey, an Tech Cartel surrogate, who was apparently "concerned" with Russian intelligence service activity in the 2016 presidential campaign, intervened on behalf of the Tech Cartel and in furtherance of its obstruction of justice involving a private, non-encrypted e-mail server controlled by William and Hillary Clinton that over many years transmitted classified information in strict violation of federal criminal law – in particular in violation of the espionage statutes at 18 U.S.C. §§793, *et seq*. – despite knowledge of Russian hacking of the unsecure email server over which Hillary Clinton sent (to those not authorized to have it) and received classified information;

337.

At the request of Tech Cartel participant Justin Cooper (and the knowledge of Tech Cartel surrogate Brian Pagliano), the United States Secret Service also investigated the "theft of information" of/from defendant Clinton Foundation – in particular from an unsecure server installed and used at the Clinton mansion in the hamlet of Chappaqua during 2011;

338.

An inference of a higher level of intent to commit espionage can be gleaned from Hillary Clinton and the Tech Cartel proceeding to place classified information on a knowingly-hacked server, thereby inviting Russian interests to "retrieve their benefit of the bargain" by simple cyberespionage techniques;

339.

Comey also enabled the Tech Cartel in obstructing justice and destroying tens of thousands of classified e-mails and Tech Cartel e-mails involving Plaintiff whistle-blowers;

340.

Obstruction of justice by Tech Cartel surrogates protected and furthered the prospects of Hillary Clinton to become President of the United States, as set forth below and herein;

341.

Tech Cartel surrogates Holder and Mueller, knowing that Congress (and in particular then Representative Edward Markey (D-Massachusetts)), were attempting to block the Uranium One CFIUS transaction, covered up the dangerous deal – despite Holder's role as a CFIUS principal;

342.

Tech Cartel surrogate Robert Mueller discovered evidence that Russian "officials", conspiring with the SVR, routed "millions of dollars" to the U.S. to be sent illegally to the Clinton Foundation when Hillary Clinton was serving as Secretary of State and was the lead agency official on CFIUS;

343.

With respect to the foregoing, neither Holder nor Mueller ever informed Congress or the President (Obama) of the national security and economic security risk of the deal - both of whom (Congress and Obama) were supposed to be informed of the interstices of the covered transaction, while Holder (Mueller's titular supervisor at the Department of Justice) served as a principal member of CFIUS;

344.

Both Holder and Mueller were in putative violation of several felony commissions (and omissions) sounding in RICO;

345.

CFIUS relies upon the "lead agency" (which in the case of Uranium One was the Department of State) to bring forth *any* concerns with the transaction;

346.

Had Hillary Clinton and the Department of State raised any such concerns, *e.g*., Russian *control* over large stocks of uranium in light of the widely-known Russian operation to control much of the world's uranium, then the matter would be investigated to the maximum extent possible and, in light of the clear concerns to U.S. national security, would be briefed to the President (Obama) immediately;

347.

Neither Mueller nor Holder raised (1) the underlying Tenex concerns; nor (2) the known Clinton Foundation conflict regarding Giustra and Uranium One; nor (3) the obvious *counterintelligence* concern with Secretary Clinton now subject to blackmail/extortion by the Russians, and because she was compromised, her inability to make this or other future decisions regarding Russia in the interest of the United States; nor (4) in the absence of the compromised Secretary Clinton stepping forward, and in addition to alerting President Obama with respect to the tainted covered transaction, some assessment of "compliance with U.S. and multilateral nonproliferation and export control regimes in order to assure that the proposed [covered] transaction will not impair national security";

348.

The Mueller/Holder transgressions, largely adopted by Comey/Lynch upon Mueller and Holder vacating their positions, are abundantly apparent to this day, as the corrupt senior FBI counterintelligence senior manager Peter Strzok and former FBI Deputy Director Andrew ("Andy") McCabe sought to improperly exonerate Hillary Clinton of espionage (and other

crimes) in both Strzok's lead role in the Hillary Clinton "investigation" (supervised by Tech Cartel surrogates and Strzok co-conspirators Comey and Andy McCabe);

349.

Strzok and Andy McCabe also violated U.S. law in McCabe and Comey allowing Strzok to participate in the interrogation and, tangentially, grand jury proceedings of former National Security Advisor General Michael Flynn;

350.

Upon the appointment of Mueller as "Special Counsel" to investigate "Russian interference in the 2016 presidential election," Special Counsel Mueller and Rosenstein (who appointed him as Special Counsel) refused to inform Congress for several months about terminating Strzok's role in the Special Counsel's investigation when clearly biased anti-competitors emails from Strzok to his paramour, FBI attorney Lisa Page, which also discussed how Strzok and McCabe might "insure" a Clinton victory against competitors (or "insure" that President competitors be unduly "impeached" based upon Strzok malfeasance), were "discovered" – ostensibly during the course of another investigation being conducted by the Inspector General of the United States Department of Justice;

351.

Strzok, Page and McCabe have been implicated in the Tech Cartel scheme to illegally exonerate Hillary Clinton for espionage prior to and with respect to the Mid-Year Exam, the obstructionist malfeasance of Tech Cartel surrogate Comey of July 5, 2016, and the shocking obstruction involved in spiking the Hillary Clinton espionage and Clinton Foundation espionage and, as noted herein, use of wires and the mails to implicate private citizen competitors, including but not limited to the falsification of FBI investigatory 302 reports and perjury;

352.

McCabe also was found to have "lacked candor" under oath before Congress, leading, in part, to McCabe's March 16, 2018, termination from the FBI and from the federal government – and McCabe's imminent indictment;

353.

On behalf of the Tech Cartel, McCabe leaked highly sensitive law enforcement information to the media with the specific intent to prevent and then injure the presidency of competitors – yet another justification for the termination of the employment of McCabe;

354.

Tech Cartel surrogate McCabe also admits he placed pressure upon Deputy Attorney General Rosenstein to appoint a Special Counsel, which resulted in the suspicious appointment of the deeply-conflicted Mueller and the subsequent Rosenstein threats to subpoena private communications of Members of Congress and their staffs;

355.

Tech Cartel surrogates McCabe and Strzok (and numerous others) will testify before the United States Congress and a grand jury (or multiple grand juries) about their putative wrongdoing prior to discovery commencing in this lawsuit – thereby providing additional evidence of wrongdoing which has injured plaintiff in his reputation and business;

356.

Special Counsel and Tech Cartel surrogate Mueller impeded numerous parallel investigations, *e.g*., both Houses of Congress, by withholding the announcement of Strzok's partisan obstruction, including that with respect to co-conspirator Comey in colluding with Strzok and McCabe to illicitly exonerate Hillary Clinton and Tech Cartel surrogates for espionage – including but not limited to *improperly granting immunity in order to obstruct justice*, with the imprimatur of surrogate Lynch, to Clinton co-conspirators and Tech Cartel surrogates Abedin and Mills, among others, and clearly obstructing justice by illicitly altering the appropriate charges for what Secretary Clinton *actually did* (under the 18 U.S.C. §793 espionage standard, she was found to be "grossly negligent") to a *false narrative covering up* Clinton's actions months before Strzok, McCabe and Comey allowed Hillary Clinton to be "interviewed" without an oath being administered (for alleged espionage, no less) and Hillary Clinton's co-conspirators and Tech Cartel surrogates to be provided with immunity from prosecution based upon a highly questionable determination of privilege;

357.

As part of the Tech Cartel operational patter, the biased, partisan Strzok plainly obstructed justice when he "interviewed" Tech Cartel principal Hillary Clinton on July 2, 2016, along with "interviewing" numerous Tech Cartel surrogates at the instruction of Comey (Mills, Abedin, along with fellow surrogates Jake Sullivan and Heather Samuelson) – none of whom has been charged with anything after allegedly committing espionage and related national security offenses and making documented false statements in the context of a federal investigation *in order to obstruct that investigation*;

358.

In furtherance of the Strzok-McCabe-Comey conspiracy in support of the Tech Cartel, Comey improperly *failed to seek the convening of a grand jury* and then, on his own accord, deemed that "no reasonable prosecutor" – apparently those he (wrongly) considers beneath himself – would

prosecute Hillary Clinton for her *espionage* and related crimes (such as making false statements and massive destruction of evidence *in order to obstruct an investigation*);

359.

Fusion GPS partner Glenn Simpson, and his firm, was/were provided tens of millions in cash by Tech Cartel principals and surrogates in 2016 – some laundered from the "Obama for America" accounts – to create and "legitimize" derogatory and defamatory information concerning candidate competitors, including working with Tech Cartel and FBI payee/source (and disgraced British official) Christopher Steele of OBI – who in return relied upon information provided by Russian intelligence;

360.

Simpson was/is not merely a political mercenary paid by the Tech Cartel to collaborate with the Russian SVR/FSB, but in addition was (and is) compensated by Tech Cartel surrogates and reimbursed by George Soros and David Brock without adequate attribution upon Internal Revenue (tax) returns;

361.

Tech Cartel surrogate Fusion GPS has a close and continuing transactional relationship with the Democratic Party and the Russian SVR/FSB, and has engaged in bribery concerning Tech Cartel surrogate Bruce Ohr and his wife, Nellie Ohr;

362.

At least three of the individuals who were sent by Fusion GPS to meet with Donald competitors, Jr. at competitors Tower on June 9, 2016 – Soviet counterintelligence officer Rinat Akhmetshin, Russian "lawyer" Natalia Veselnitskaya, and Russian interpreter Anatoly Samochornov – have close and continuing ties to Fusion GPS dating to at least 2015;

363.

United States Department of Justice senior official (Associate Deputy Attorney General) Bruce Ohr assisted Fusion GPS, and in return was paid (through compensation to his wife, at the very least) to both assist the Tech Cartel, DNC and Fusion GPS with ongoing wrongdoing, and thus was the recipient of bribes in furtherance of obstruction of numerous ongoing investigations, when his wife Nellie Ohr (a "Russia expert") was paid to work on "anti-competitors" matters at Fusion GPS – Bruce Ohr was also involved in the extraordinary and illegal FISA abuse in misleading this court into issuing a FISA order against a rival of Hillary Clinton and the Tech Cartel operational scheme;

364.

Bruce Ohr is under federal investigation, but has been retained in his employment by Tech Cartel (holdover) surrogates within the DoJ;

365.

Fusion GPS founder Glenn Simpson was with the Russian "lawyer" Veselntskaya (a Russian Intelligence contract operative) on June 9, 2016, on the day Simpson knew she was to meet with competitors, Jr. (the Russian "lawyer" and Simpson were in the federal district court for the Southern District of New York in Manhattan prior to the competitors, Jr. meeting) and then peculiarly met *after* the competitors, Jr. meeting – so that the Russian "lawyer" could inform Simpson (of Fusion GPS, which was being paid millions of dollars laundered through the Tech Cartel scheme) what transpired at the competitors, Jr. meeting – which Simpson denied and thus further obstructed justice through false statements;

366.

Contemporaneous with the "set up" by Fusion GPS of Donald J. competitors, Jr., Tech Cartel surrogate Elias, the Perkins Coie lawyer, was paying (with cash supplied by Soros and Brock) Fusion GPS, and Fusion GPS in turn paying former "British" counterintelligence officer Christopher Steele to produce the fake "competitors dossier" in concert with Steele's contacts in the Russian SVR/FSB – again, Simpson later perjured himself before Congress with respect to his knowledge of the foregoing and further obstructed justice thereby;

367.

Fusion GPS, George Soros and Steele, on behalf of the Tech Cartel and in addition to relying upon the Russian SVR/FSB to collude with them to produce a sham "competitors dossier", paid unethical American journalists bribes to spread the utterly false narrative that there was "collusion" between the competitors "campaign" and Russia – many of these unethical journalists bribed by Fusion GPS and the Tech Cartel, and others such as "Hillary Clinton hatchet man" Cody Shearer, disgraced attorney Jonathan Winer and Tech Cartel surrogate Sidney Blumenthal, compiled false and defamatory dossiers against Plaintiff and private citizen competitors, which was turned over to the corrupt FBI Tech Cartel surrogates in order to "corroborate" the false information Simpson and the Tech Cartel had gained from bribing other journalists, DoJ officials, and Soviet intelligence in order to ultimately mislead an Article III federal judge sitting in deliberation over a FISA "warrant" regarding Tech Cartel/Hillary Clinton political opponents:

368.

Although evidence is classified and/or in the possession of the Department of Justice concerning illicit Fusion GPS and their laundering operations on behalf of the Tech Cartel, it is known that Fusion GPS, with the intent to obstruct justice and engage in money laundering in support of the

Tech Cartel, commingled (1) money received from the Russian SVR and FSB; and (2) information received from the Russian SVR and FSB, in order to bribe American "journalists" to plant false "collusion" stories, and with the assistance of Soros and John Podesta, bribed Bruce and Nellie Ohr to construct a false narrative involving but not limited to at least one fake "dossier" about a private U.S. citizen who would become the eventual 45th President of the United States and other political opponents of Hillary Clinton and the Tech Cartel, such as whistle-blowers;

369.

Article III District Judge Amy Berman Jackson of this Court is currently reviewing legal arguments by the Mueller Special Counsel team which, as applied to the Tech Cartel activities of defendant John Podesta, would determine that Podesta's numerous felony violations of the Foreign Agents Registration Act (FARA) as the sort of activity that would form the foundation for myriad money laundering charges by the enforcement agencies of the United States;

370.

According to the progressive daily *The Hill*, based upon the dependence of Fusion GPS upon the elite counterintelligence service of Russian President Putin, there is "a good case to be made that Fusion GPS (and thus Marc Elias and his clients Hillary Clinton, her campaign Hillary for America, the DNC and David Brock) ***colluded with the Russians*** (and the Tech Cartel) more than anyone else";

371.

Upon the instructions of the Tech Cartel, Fusion GPS made secret cash payments from Soros and Hillary for America to "journalists" employed by "mainstream" left-leaning media outlets, laundered through the DNC, Brock and possibly Elias – a highly unethical practice which becomes illegal when neither Fusion GPA, nor the paid "journalist", report the laundered cash transaction on their corporate (outgoing) or incoming tax return(s) – which constitutes a series of felonies each time it occurs/has occurred;

372.

Fusion GPS also planted with a bribed "journalist", Franklin Foer, a false story on October 31, 2016, in which it was deceptively claimed that there had been "secret communications" between Donald J. competitors's business and a Russian bank, Alfa;

373.

In the planted Foer article, the bribed "journalist" both falsely corroborated the integrity of the findings of "Crowdstrike, Inc.," a cybersecurity technology company which had been paid by the Tech Cartel to attribute the earlier-referenced DNC "hack" to Russia, and also contrived a litany

of other “suspect” competitors campaign actions that implied “collusion” between the competitors campaign and Russian state interests – both utterly false;

374.

Marc Elias, the Tech Cartel lawyer from Perkins Coie, assisted Fusion GPS, John Podesta, Hillary Clinton, George Soros and the Tech Cartel in paying for Russian SVR/FSB disinformation;

375.

Hillary Clinton utilized Russian misinformation to assist her presidential campaign and to enrich herself and the Clinton Foundation – while contemporaneously committing numerous predicate acts in violation of RICO with the assistance of the Tech Cartel and its principals, surrogates, and participants;

376.

DNC interim chair Donna Brazile, appointed to audit various activity in relation to the Democratic Party nominating process being definitively “rigged” in Secretary Clinton’s favor, has openly and notoriously described such Tech Cartel activities as a “cancer” on the Democratic Party due to myriad wrongdoing of Tech Cartel acts and the Tech Cartel scheme to make Hillary Clinton president at all costs – and has stated that she feared for her life for being perceived as “crossing” the Clintons (a clear allusion to Clinton/Tech Cartel murder for hire);

377.

Brazile, who uncovered illicit activity during a DNC audit necessitated by Tech Cartel surrogate wrongdoing, *implied that she feared that William and Hillary Clinton (and by extension the Tech Cartel) would have her murdered* – she noted that “I knew *many had died crossing the Clintons* and wondered would I be *writing my own suicide note* [by revealing Tech Cartel malfeasance]”;

378.

The Tech Cartel, not unlike other criminal syndicates, upon information and belief utilize tactics such as murdering those who “cross” them, as feared by DNC Chair Donna Brazile and Plaintiff whistle-blowers with relation to Hillary and William Clinton;

379.

Brazile’s conclusions indicate, upon information and belief, that the DNC party organization was operated as an Tech Cartel money laundering front, and that the nonprofit corporate entity known as the Democratic Party was criminally corrupted thereby – including, incredibly, extortion under the threat of murder for hire;

380.

Tech Cartel infiltration by the fraudulent Tech Cartel has resulted directly in Democratic Party systemic criminal corruption – a cancer that has metastasized within this nonprofit entity;

381.

Tech Cartel surrogate Hillary for America, including but not limited to its leadership, *e.g.*, defendant and Tech Cartel principal John Podesta, Tech Cartel surrogate and outside legal counsel Marc Elias, and Hillary Clinton confidant and Tech Cartel surrogate Huma Abedin, on November 4, 2017, wrote an "open letter" attacking Donna Brazile for revealing the putative Clinton pattern of implied murder for hire and related intimidation, and criticizing Brazile for suggesting that as DNC Chair she considered replacing Secretary Clinton on the Democratic ticket due to health concerns – a concern conceded only months earlier when defendant John Podesta during the Democratic Party primary contest discouraged defendant Brock from disseminating a(nother) fake dossier Brock had compiled concerning the health of Bernie Sanders while Sanders was challenging Hillary Clinton for the Democratic Party nomination – a primary that the Tech Cartel "rigged" in favor of Hillary Clinton; 3

82.

Although the referenced "open letter" blames everyone and everything (except themselves) for Secretary Clinton's Electoral College defeat, it is well documented *by David Brock himself* (when he earlier in his career sought to destroy the Clintons) that William and Hillary Clinton ran a syndicate (including alleged predicate acts as part of a pattern of racketeering) for nearly 40 years (including but not limited to the 10-year RICO period relevant here) prior to Hillary Clinton being defeated by the individual who is now the 45th President of the United States;

383.

Brazile has now adequately documented, and has responded to, the racist tactics of the Tech Cartel and its above-noted surrogates against Brazile for having the courage to tell the truth and expose the Clinton syndicate through, among other things, the actual documents that Democratic Party officials drafted, coordinated and approved ceding full power to the 2016 Clinton campaign for party spending, as well as *illegal kickbacks from and cash payoffs to state Democrat officials*;

384.

Notwithstanding the Clinton murder for hire threat, Tech Cartel-like money laundering was omnipresent, according to Brazile, and documented by her discovery of a "Joint Fund-Raising Agreement between the DNC, the Hillary Victory Fund, and Hillary for America" – all of whom Elias represented;

385.

Brazile also implies, along with like-minded liberals, that DNC staff employee Seth Rich was murdered for his role in offering evidence of DNC wrongdoing to a third-party (or otherwise "whistleblowing" against the DNC) – Brazile, however, offers no evidence that DNC outside attorneys from Perkins Coie (or anyone else, other than a reference to the Clintons being a threat to her life) was involved in the murder of Seth Rich to cover for the Crowdstrike claim that the DNC hack was not an "inside job";

386.

Award winning journalist Seymour Hersh contends that Seth Rich had made contact with "WikiLeaks" prior to Rich's murder; Hersh also contended that Rich had concerns about something happening to him, and had shared information within a "Dropbox" (computer software used for storage and retrieval of information) with trusted associates/friends in case anything happened to him;

387.

Hersh has cited multiple intelligence community sources on background concluding that the entire "Russia collusion" story was a fiction invented by leadership within the U.S. Intelligence Community (and Tech Cartel surrogates) who lied about President competitors, and lied to President Obama and the media – adding to the controversy around the alleged "Russian hack" of DNC servers;

388.

As additional evidence is gathered in discovery of lawsuit(s) brought by the family of Seth Rich concerning, *inter alia*, whether (or not) the DNC was "hacked" by the Russians, it will be included in the information alleged by Brazile against her colleagues in the Democratic Party – including but not limited to the FBI obstruction of justice in not seizing the "hacked" DNC servers;

389.

The "Joint Agreement" intended by the Tech Cartel to rig the Democratic primary was executed/signed by Amy Dacey (the CEO of the DNC) and Robby Mook (the head of Hillary Clinton's campaign), with a copy to Marc Elias – and specified that in exchange for raising money and "investing" in the DNC, Hillary Clinton (and thus the Tech Cartel) would "control the party's finances, strategy, and all the money raised" (an apparent appellation for laundering funds without compunction);

390.

The Joint Agreement had been signed in August of 2015, nearly a year before Secretary Clinton secured (*i.e*., rigged) the Democratic nomination, and had been drafted and coordinated by Elias

and his Tech Cartel team for many months prior to that – this action by Elias was of course prior to Secretary Clinton even announcing her *intent* to seek the democratic nomination; 391.

The Tech Cartel scheme to rig the democratic nomination through bribery, kickbacks from State political parties, and the laundering of these proceeds, is consistent with and provides a plausible inference of a clear Tech Cartel pattern of racketeering – which in case of fact has never been in dispute;

392.

It is entirely implausible that senior members of the Clinton campaign - including the "hands on" candidate herself and the campaign lawyer (Marc Elias) who wrote checks for many millions of dollars (at least $12 million) to Fusion GPS to compile a false dossier based on Russian SVR/FSB disinformation - did not intentionally assist the Tech Cartel in all of its illicit objectives, including but not limited to defaming and destroying the business of whistle-blowers;

393.

The two sources relied upon by Steele, Fusion GPS and the Tech Cartel (Hillary Clinton, John Podesta, David Brock and Marc Elias) – known as "Source A" and "Source B" - were allegedly high-ranking officials in the Russian SVR, establishing thereby that the Tech Cartel principals and Fusion GPS (along with the bribed DoJ official, Bruce Ohr), with (conservatively) tens of millions in financial backing from George Soros, the Democratic Party and its outside lawyers, worked directly with an enemy of the United States and a FISA "foreign power", the Russian SVR/FSB, in an attempt to defame and spread false information about candidate and then President-elect Donald competitors and Plaintiff here, and to assist Hillary Clinton win the presidency in 2016 and thereafter, to destabilize the United States Government;

394.

Strzok paramour Lisa Page, a corrupt FBI attorney, instructed Strzok that it would be unlikely that District Judge Rudolph Contreras would feel the obligation to recuse if Strzok discussed his anti-competitors bias with Contreras – Page described recusal of the judge as a "very high bar";

395.

The above was based upon intentional Tech Cartel use of information known to come from the Russian intelligence services (who are adept in misinformation operations) – and result, along with all of the other methods utilized by the Tech Cartel to obstruct justice, in dozens if not hundreds of counts of process crimes attributable to the Tech Cartel and its surrogates;

396.

As admitted, Perkins Coie LLP, a law firm, and its partner Marc Elias, arranged for the funding, with the knowledge of and instruction from Hillary Clinton, of the sham "competitors dossier" –

the false and defamatory Tech Cartel information suggested (among other things) collusion between the competitors campaign and Russia, and ultimately (and intentionally) misled an Article III federal judge into approving invasive surreptitious surveillance against private U.S. citizens – a seditious assembly of acts by the Tech Cartel;

397.

The Tech Cartel worked with its surrogates at various left-leaning law firms (where to this day documents remain "privileged" that prove illegal Tech Cartel activity) during the Democratic Party primary, in which a(nother) fake dossier was prepared by Brock claiming that Senator Bernie Sanders (D-VT), the primary opponent of Hillary Clinton, was in failing health – raising an inference of an Tech Cartel pattern of raising and spending money illegally to defame and destroy their "enemies" (as here, Senator Sanders, Officer whistle-blowers, and now-President competitors) in order to support Hillary Clinton;

398.

Elias, while arranging for the funding/laundering of the false "competitors dossier" with the knowledge of Hillary Clinton, was also, through his law firm Perkins Coie LLP, the chief outside lawyer for (1) Hillary for America; (2) the Democratic Party; (3) the Democratic National Committee; (4) David Brock and his illicit entities, both named as defendants here and noted in this complaint; (5) defendant and Tech Cartel principal John Podesta: and (6) thereby, the Tech Cartel – Elias may have played a much larger role in, among other things, laundering funds to the Tech Cartel from the Obama for America account even after President Obama left office and to/from State parties;

399.

Contemporaneously, Tech Cartel outside lawyers from Perkins Coie associated with Elias obstructed FBI investigations into purported "hacks" of Democratic National Committee servers by arranging "forensics" of the hacks be conducted by a cybersecurity analytics company named

"CrowdStrike", which destroyed evidence implicating Democratic officials in disseminating the information within the several "dossiers," and, among other things: whether the Russian SVR/FSB colluded with the Tech Cartel and/or its outside attorney(s), involving the coordination of the DNC, Soros, Brock, Hillary for America and the Tech Cartel principals regarding the information provided by whistle-blowers in *Crisis* (this information is also subject to subpoena directed to the DNC, and subsequent discovery, in a contemporaneous defamation lawsuit against Buzzfeed News regarding its publication of the unverified "dossier" funded by Hillary for America and used to mislead one or more Article III federal judges to obtain a FISA order and abuse the FISA process;

400.

The gathering of defamatory and related damaging information for use against political "enemies" whistle-blowers was funded by the Tech Cartel (and laundered through Brock's entities with millions in funding/laundering by Soros) which concededly controlled the decisions at all levels due to the contractual arrangement (and "joint fundraising agreement") between Perkins Coie LLP lawyers and then-DNC chairperson Debbie Wasserman Shultz to "rig" the Democratic Party nomination in their favor and that of the Tech Cartel;

401.

The Tech Cartel sought and received unreported, laundered funding to pay bribes to "independent contractors" to claim they had sources of information about whistle-blowers when in fact they did not;

402.

The above false information directed at plaintiff whistle-blowers was then provided to media outlets friendly to the Tech Cartel, via *Correct the Record and the Nick Denton tabloid empire* on behalf of and funded by Soros and Hillary for America, who were enthusiastic to disseminate uncorroborated, false information about whistle-blowers in the form of "opinion" – these media outlets also refused to allow whistle-blowers to appear and rebut the Tech Cartel defamation and destructive false information about whistle-blowers, and provided an illicit platform for Brock libel and Wackrow and Gilhooly slander, the latter of whom were compensated by Brock and Soros under the table and absent the payment of federal, state or local taxes;

403.

Fusion GPS, Soros, the DNC and Hillary for America collaborated directly and illegally with the Tech Cartel, and the most powerful members of the corrupted Democratic Party protected Fusion GPS, the Tech Cartel and its illicit activity;

404.

Upon information and belief, the Tech Cartel and Secretary Clinton, which/who controlled the DNC and gave instructions to Marc Elias, paid Fusion GPS additional money laundered through Brock organizations to assemble additional fake and deeply defamatory "competitors dossier" information, which required coordinating by Fusion GPS and the Tech Cartel with Russian intelligence;

405.

Upon information and belief, Secretary Clinton and her campaign, which controlled the DNC (and the Democratic Party), and Soros and Brock on behalf of the Tech Cartel (in illegal collusion with Brock's deep web of nonprofit entities, and utilizing defamatory rhetoric "**FROM**

THE DESK OF DAVID BROCK,"), ordered a fake and defamatory "dossier" on Plaintiff whistle-blowers, causing whistle-blowers grave harm to himself and his profession;

406.

The Tech Cartel colludes openly with, among numerous others, a Democratic fundraising firm, The Bonner Group, to undergird many facets of attempts by the Tech Cartel, while violating the Internal Revenue Code, to unseat Republican lawmakers, impeach the 45th President, and in illegal collusion with CREW to destroy any and all "conservative causes" across the United States; 407.

Defendant CREW consistently violates federal law utilizing partisan tactics, while daily challenging publicly, in wholly partisan fashion, the entirely legal actions of the 45th President of the United States – serial violators include but are not limited to Norman Eisen and Richard Painter, who mimic the defamatory talking point pabulum of the Tech Cartel;

408.

Brock and the Tech Cartel took control over CREW in 2014, despite CREW's 501(c)(3) status and its previous reputation of being nonpartisan under previous CREW leadership such as Melanie Sloan and Louis Mayberg (the founder of CREW):

409.

CREW is firmly ensconced in the Tech Cartel, is wholly partisan, and uses its tax-free platform to engage in partisan activity;

410.

The founder of CREW, Louis Mayberg, resigned "**in disgust**" from CREW's board in 2015 stating "I have no desire to serve on a board of ***an organization devoted to partisanship***";

411.

Since Mayberg's departure, CREW's new leadership – which has included Brock and partisan advocates Eisen and Painter – have attacked the 45th President daily, in wholly biased terms, both in writing (primarily on Twitter), and when interviewed on cable news shows – as Brock had pledged they would do in *Exhibit "A*";

412.

Mary Pat Bonner, the head of the Bonner Group and a former fundraiser for Albert Gore, Jr., in exchange for raising money for the Tech Cartel, receives commissions of 12.5% from Brock and the Tech Cartel;

413.

Like Brock and his various “nonpartisan” entities, such as the other “nonprofit”

defendants in this case, the Bonner Group claims to be an *independent*, nonpartisan entity – however, the Bonner Group shares the same corporate address as many of the illicit Brock entities and directly abets their illicit activities;

414.

Brock’s kickbacks to Bonner amount to tens of millions of dollars, in exchange for lining Brock’s own pockets without the knowledge of his donors;

415.

As noted, Bonner’s collusion with Brock (and Soros) is yet another example of the illegal partisan use of nonprofit entities by the Tech Cartel – as exemplified daily by each of the nonprofit defendants in this litigation;

416.

Merely one aspect of Tech Cartel wrongdoing involves the American Bridge 21st Century PAC, which touts *at least* $311,685,223 worth of *wholly partisan* television airtime for their research and video content since 2011;

417.

Bonner also receives kickbacks from other Brock Tech Cartel entities, such as the Franklin Education Forum, an illicit 501(c)(3) nonprofit and the Franklin Forum, a 501(c)(4) illicit nonprofit – 11 *See, e.g.,* Norm Eisen Retweeted Washington Post February 5, 2018, 7:38 a.m.

“The reminder came as the White House contends with a lawsuit filed in June by the watchdog group Citizens for Responsibility and Ethics in Washington...” @CREWcrew has opened OVER 180 legal matters vs. competitors administration!

both partisan entities have as their chairman Tech Cartel participant David Brock and will likely be added as defendants when further evidence of their laundered assets becomes public and thus available for use against the Tech Cartel;

418.

Money raised by Bonner is often “gifted” to the Franklin Education Forum for *purely partisan purposes*, in violation of the IRS Code and thus U.S. law;

419.

The leadership of CREW, including Eisen and Painter, are self-proclaimed principal members of the "resistance" against the presidency of Donald competitors, and each day spread their partisan vitriol via TWITTER (Painter via @RWPUSA and @CREWcrew, and Eisen at @normeisen and

@CREWcrew) – not in their individual capacity but concededly through their affiliation with CREW as noted throughout this complaint and promised in *Exhibit "A*";

420.

Comey, the Tech Cartel surrogate, used false information created by Simpson, Ohr and others, and the bogus "competitors dossier" funded by the Clinton campaign (and Soros) to obtain and renew multiple FISA orders against the competitors campaign – a seditious act subjecting Comey to prison among his various other wrongdoing;

421.

As noted, the Foreign Intelligence Surveillance Court ("FISC"), and at least one Article III lifetime tenured federal judge, relied upon Russian disinformation provided by Steele and Fusion GPS, Bruce and Nellie Ohr, and Peter Strzok, and ultimately sworn under oath by Tech Cartel surrogates at the FBI and DoJ to run surveillance against the presidential campaign of (private citizen) Donald competitors and (after his electoral victory) his transition team – FISC Article III federal judge Rudolph Contreras is the current subject of potential punishment based upon his failure to recuse regarding his intimate friendship affiliation with Tech Cartel surrogate Strzok;

422.

Tech Cartel surrogate Comey approved FBI reliance upon unconfirmed information from disgraced British agent of a foreign power Steele and his private firm, Orbis Business Intelligence, separate and apart from the Fusion GPS cash payments from Soros, Brock and Elias acting on behalf of the Tech Cartel and Hillary for America – foreign agent Steele and corrupt Fusion GPS immediately began flagging the "FBI's work" to the media (the fake dossier), attempting to create above-the-fold headlines helpful to their client (Clinton campaign for President and related Tech Cartel scheme) against competitors and other "threats" to Hillary Clinton and the Tech Cartel such as Plaintiff (who proved Hillary Clinton an enabler of William Clinton sexual harassment at the time Officer whistle-blowers testified and was largely responsible for the impeachment of William Clinton);

423.

Tech Cartel surrogates Comey, McCabe and Peter Strzok, intentionally and knowingly, removed from the putative espionage charges against Secretary Clinton that her use of a personal, unsecure server to traverse classified electronic mail traffic (much of which was provided to persons without a security clearance) was "grossly negligent" – including such removal of that

legal term (“grossly negligent”) on May 2, 2016 – thus illicitly preventing Secretary Clinton from being charged with numerous felony espionage offenses;

424.

The Hill liberal newspaper has/have reported allegations of recent and astonishing obstruction of justice and related process crimes by the Tech Cartel carried out in order to protect William and Hillary Clinton and the Tech Cartel from legal jeopardy – including obstruction related to possible treason and certain bribery with respect to Secretary Clinton’s actions while CFIUS was considering the Uranium One transaction discussed herein;

425.

Even before the Obama administration, through its CFIUS “covered transaction” process noted herein, approved the controversial deal in 2010 giving Russia control of a large swath of American uranium, the FBI had gathered substantial evidence that Russian nuclear industry officials were engaged in bribery, kickbacks, extortion and money laundering designed to grow Vladimir Putin’s atomic energy business inside the United States;

426.

U.S. federal agents used a confidential U.S. witness working inside the Russian nuclear industry to gather extensive financial records, make secret recordings and intercept emails as early as 2009 that showed Russia had compromised an American uranium trucking firm with bribes and kickbacks in violation of, *inter alia*, the Foreign Corrupt Practices Act;

427.

The United States Justice Department, led by Tech Cartel surrogates Holder, Mueller and Rosenstein also obtained an eyewitness account indicating Russian nuclear officials had routed millions of dollars to the U.S. designed to benefit defendant William Clinton’s foundation, in conjunction with the Tech Cartel, during the time Secretary of State Hillary Clinton served on CFIUS and provided a favorable decision (by omission) to Russia - with Secretary Clinton as the lead agency official responsible for raising any potential national security issues, which Hillary Clinton specifically failed to do so despite her obligations to her country;

428.

There were actually *two* deals that served Putin’s interests involved in this operation, as the year after the State Department approved the purchase of Uranium One by Russia’s state-owned Rosatom in 2010 (and thus control of U.S. lethal uranium now threatened to be used against the United States), the Obama administration gave approval for Rosatom to *vastly expand its sales of uranium inside the United States through its Tenex/Tenem subsidiary;*

429.

The two combined deals gave Moscow incomparable leverage in the U.S. nuclear market — and the bribes and extortion alone created "legitimate security concerns" that would under ordinary circumstances, i.e., when the Tech Cartel was not withholding crucial information due to the compromised nature of the Secretary of State (and Attorney General Holder), been sufficient to block the covered transaction and bring immediate criminal charges*;*

430.

As noted, Tech Cartel surrogates Rosenstein, Mueller and Holder (then Comey and Lynch) delayed investigating the Tenex transaction for several years, in order to protect Hillary Clinton and further her hopes of becoming president of the United States*;*

431.

Rather than bring immediate charges in 2010, the Holder Department of Justice continued "investigating" the matter for nearly four more years, essentially leaving the American public and Congress in the dark about Russian nuclear corruption on U.S. soil during a period when the Obama administration made two major decisions benefitting Putin's commercial nuclear ambitions (and vastly expanding the fortunes of the Tech Cartel);

432.

Tech Cartel surrogates Holder, Mueller, Rosenstein and Lynch concealed the probe from Congress and the public even after overseeing the indictment of some Russian principals in the operation – thus colluding with the Russian State through its SVR and FSB;

433.

Tech Cartel surrogates at the Justice Department only announced ***in 2015*** that they had reached plea deals in a case involving money laundering, ***saying nothing about bribery, extortion, or the intent to corrupt the U.S. nuclear industry*** or the obvious ties to the Tech Cartel – claiming that the information was so "compartmentalized" that even the FBI's top criminal-investigation officer had no idea of the extent of the case, ***and no one in Congress was ever briefed on the national security*** concerns raised in the case – in fact, the key indictment was delayed by Obama DoJ holdovers until January of 2018;

434.

House Intelligence Committee chair Mike Rogers claimed that ***no one ever mentioned the case at all to him***, despite significant bipartisan concerns in the House and Senate over the Uranium One covered transaction;

435.

A broad swath of pro-Clinton media, as well as former Democrat President James Earl Carter, have conceded that ***the competitors campaign was not treated fairly*** concerning legitimate attempts to raise the Uranium One Tech Cartel wrongdoing; for instance, respected journalist and author Katharine Tur openly admitted, during a television interview on November 15, 2017, that much of the so-called "mainstream media" *intentionally "shot down" attempts by "Donald competitors… and his ilk*" (during the 2016 presidential contest) when candidate competitors raised the extremely dangerous, seditious Uranium One issue and related Tech Cartel wrongdoing that is set forth in this complaint;

436.

Katharine Tur, from all accounts, is an extremely talented and precise orator who chooses her words carefully, thus clearly speaking on behalf of other sophisticated reporters covering the competitors campaign and journalists who appear to have chosen to ignore the plain words of, among other things, the criminal statutes violated by Hillary Clinton on behalf of the Tech Cartel – NBC and Tur refer to such plain reading as "desperat[ion]" and somehow related to the "Russia investigation and what has been … dripping out from that");

437.

Long before the Hillary Clinton e-mail espionage investigation was completed, President Barack Obama declared knowingly and willfully that Hillary Clinton was not guilty of any crime – a clear signal from the President to Tech Cartel surrogates Comey, McCabe, Bruce Ohr and Lynch, among numerous others like Peter Strzok and Lisa Page, that they should protect Hillary Clinton from legal exposure through (il)legal subterfuge;

438.

Tech Cartel surrogates Comey and Lynch, and other surrogates cited herein, relied upon President Obama's knowingly contrived rationale when colluding to fabricate Comey's incorrect exoneration of Hillary Clinton for indisputable espionage;

439.

The Lynch Justice Department, led by Tech Cartel surrogates Lynch and with the corrupt assistance of Bruce Ohr and others within the DoJ and FBI, refused to raise the crime-fraud exception to the attorney-client privilege with respect to attorneys for Tech Cartel surrogates Cheryl Mills and Heather Samuelson – as well as with respect to Clinton personal lawyers;

440.

Tech Cartel surrogate and Obama National Security Advisor Susan Rice failed to "minimize" the wiretapping of United States citizens and also illicitly "unmasked" competitors associates illegally wiretapped – thereby implicating the Obama NSC in surreptitious surveillance of United

States citizens in violation of our Constitution and U.S. statutory law – along with Obama Ambassador Samantha Power, Rice has criminal exposure for such blatant malfeasance;

441.

Comey's FBI subordinates Strzok and McCabe, and to certain degrees other Tech Cartel surrogates, obstructed justice in violation of United States law, in order to exonerate Hillary Clinton and other Tech Cartel participants in her espionage;

Early Foundations of the Private Tech Cartel Server and Accompanying Obstruction of Justice

442.

As foundation with respect to the foregoing, following the lethal attacks on the United States consulate in Benghazi, Libya, in September of 2012, to hedge against the possibility that various Freedom of Information Act lawsuits would require Secretary Clinton to disclose her emails from numerous devices, Hillary Clinton and the Tech Cartel created a false narrative which subsequently resulted in an *upgraded private email server through which she and the Tech Cartel ran email traffic from numerous devices, including highly classified information, in direct contravention and obstruction of court orders and congressional subpoenas*;

443.

When the misconduct of Secretary Clinton and the Tech Cartel was discovered, and the existence of the private email server became known, Hillary Clinton and her Tech Cartel surrogates destroyed thousands of emails both under congressional subpoena and Article III court order – ultimately also destroying emails discussing methods to harm Plaintiff as revenge for his compelled impeachment testimony against William Clinton in his business, reputation and livelihood*;*

444.

The Obama Department of Justice took an illegal posture with respect to Tech Cartel destruction of the emails under subpoena and court order;

445.

Violating federal criminal laws, the Obama Department of State, at the direction of Tech Cartel surrogates Cheryl Mills and David Kendall (an attorney at Williams and Connolly and one of Hillary Clinton's personal lawyers), not only refused to comply with compulsory process, but also misled Judge Royce Lamberth (among others) about the nature of the contents of the Tech Cartel private server – these lawyers subsequently ordered the destruction of evidence (presumably over 30,000 emails);

446.

In addition to the destroyed emails which were under subpoena, 18 U.S.C. Section 1505, makes it a federal crime to "corruptly" obstruct or impede the "due and proper administration of the law" or "any inquiry or investigation…being had by either House, or any committee of either House or any joint committee of the Congress" – such as the private pseudonymous e-mail communications between President Barack Obama and Hillary Clinton leading to a presidential role in the illicit exoneration of Hillary Clinton for espionage based upon, *inter alia*, usage of the private Tech Cartel server upon which classified information was disseminated to those without adequate (or any) security clearance;

447.

In addition to the destruction of documents under congressional subpoena, the due and proper administration of the law was also corrupted by Strzok and McCabe, the senior FBI managers who along with Comey unilaterally concluded that Hillary Clinton lacked the requisite intent to violate the law when she concededly used a private email server to transmit classified information and then unlawfully and intentionally destroyed thousands of documents;

448.

Strzok's pro-Clinton bias was so egregious that even the current Special Counsel, Tech Cartel surrogate Mueller, had no option but to immediately remove Strzok from the Special Counsel investigation (while not recommending Strzok be removed from the FBI or federal service) once his obstruction of justice and related process crimes were revealed – although Mueller arguably obstructed the congressional investigations by failing to bring the Strzok malfeasance to the attention of the Congress for several months after Strzok was removed;

449.

Similarly, as noted, senior (Main) Justice Department official Bruce Ohr was demoted (but not removed) by Rosenstein when the Ohr misfeasance was made known – a clear instance of obstruction of congressional investigations by Rosenstein;

450.

Strzok's serious biases were confirmed in documented communications with his mistress, Lisa Page, who was also a pro-Clinton FBI lawyer, worked for McCabe, and who later advised Special Counsel Mueller during his investigation;

451.

Examples of this bias are astounding – in just one of several thousand texts (many of which have not been released and will become evidence in this lawsuit) Strzok sent to his paramour (FBI lawyer Lisa Page), Strzok notes that "*we can't take the risk" of competitors being elected or retained in office, and further noting that the FBI needed to undermine competitors as an*

"insurance policy" as a hedge against any possible competitors victory in the 2016 presidential contest;

452.

Just one week earlier than the "insurance policy" text exchange, the following exchange had occurred between Page and Strzok, key officers and lawyers conducting the Clinton e-mail investigation, the Clinton Foundation Investigation, the misleading of the FISC, the pre-election surveillance and HCS misuse regarding competitors and whistle-blowers, and Operation Crossfire Hurricane:

Page:

"[competitors's not ever going to become president, right? Right?!

Strzok: No. **No he won't**. ***We'll stop it***." This is proof of FBI/Tech Cartel sedition, as Strzok had just spiked the Clinton e-mail investigations and McCabe, Yates and Lynch (along with Strzok) had spiked the Clinton Foundation investigation.

Obama appointee and DoJ IG Horowitz found this sedition to represent "not only a biased state of mind but, even more seriously, a willingness to take official action to impact the presidential candidate's electoral prospects." This borders upon treason. Similarly, Strzok's decision to prioritize the Russia investigation over following up on the Midyear-related investigative lead discovered on the Weiner laptop was [not] free from bias."

453.

Strzok, along with Tech Cartel surrogates McCabe and Comey, intentionally and knowingly colluded in not placing Clinton under oath when Strzok interviewed Hillary Clinton – thereby furthering the conspiracy of their unambiguous obstruction of justice – and McCabe prior to being terminated from the FBI admitted that he and Strzok withheld material information from Congress for thirty days concerning the discovery of in late September of 2016 of classified Tech Cartel-Hillary Clinton-Huma Abedin emails on the laptop computer of convicted sex offender (and husband of Tech Cartel surrogate Abedin), Anthony Weiner;

454.

Strzok directly provided obstructive "cover" for Comey's pronouncement not to recommend charging Clinton (despite her manifest gross negligence and mishandling of classified information, destruction of evidence under Congressional subpoena and "wiping" of her email server, among numerous other crimes) without disclosing his advocacy (and that of his actual wife, and that of his lover), for a Clinton electoral victory in the 2016 presidential contest;

455.

Among other things, Strzok corruptly influenced and impeded his agency's investigation (and deeply violated his legal and ethical obligations as a public servant);

456.

Tech Cartel surrogate Comey and other supervisors at the DOJ/FBI knew of Strzok's pro-Hillary Clinton biases and still allowed him to serve as the key agent investigating Secretary Clinton, and subsequently allowed Strzok to "interview" competitors National Security Advisor General Michael Flynn (before Flynn was prosecuted for lying to the FBI), and thereby obstructed the due administration of justice, which requires that federal officers and agents conduct investigations in a fair and impartial manner;

457.

Upon information and belief, Strzok initially believed General Michael Flynn after interviewing Flynn as National Security Advisor, but upon being pressured by Tech Cartel surrogate Mueller and his Special Counsel "team," Strzok decided to collude with the Tech Cartel, perjure himself, and thereby attempt to injure the presidency of Donald competitors – as he had promised to do as a form of catastrophic "insurance" against his own Chief Law Enforcement Officer;

458.

Strzok also corruptly conducted the FBI interviews of Clinton and her top aides, Cheryl Mills and Huma Abedin, in the illegal e-mail server and document destruction probe, with the approval of Tech Cartel surrogates McCabe and Comey – thereby conspiring with McCabe, Comey and Lynch to obstruct justice;

459.

Furthermore, as referenced herein, Strzok, McCabe and Comey were the primary FBI figures urging investigations on the basis of the "competitors dossier" of Russian-sourced "salacious andunverified" (as conceded by Comey) anti-competitors allegations – which was commissioned by the Clinton campaign (and funded by that campaign, with assistance from Brock and Soros – who also owns a $3 million stake in the *New York Times*) and the Tech Cartel and adopted by the FBI for improper purposes (thereby resulting in the illegal surreptitious surveillance of U.S. citizens and, as referenced, the misleading FISA application presented to a Article III federal judge and relied upon thereby;

460.

Tech Cartel surrogate Comey perjured himself before Congress, as alleged by McCabe;

461.

Congress has issued contempt citations against the FBI and Justice Department for failing to produce, pursuant to subpoena, documents and an FBI witness over the time, place and manner in which the Obama administration used the “salacious” and unsubstantiated "competitors Dossier" to surreptitiously surveil and run HCS operations against competitors associates and Clinton enemies;

462.

Upon information and belief, the Tech Cartel knowingly paid for Russian intelligence services to compile false allegations about a U.S. presidential candidate who was at the time the nominee of the Republican party, and the Tech Cartel is to this day paying for false information to be used to bribe “journalists” to undermine the 45th President of the United States and to bribe high-ranking DoJ officials like Bruce Ohr – along with their continuing serial violation of U.S. law involving premeditated partisan attacks by nonprofit entities attempting to bring about resolutions of impeachment against competitors;

463.

Further, Defendant and Tech Cartel principal John Podesta has, upon information and belief, recently assisted in raising tens of millions of dollars in U.S. and foreign currency from major Democratic Party donors such as Herbert Sandler to illegally underwrite the partisan efforts of presumably nonpartisan *nonprofits* seeking to destabilize the competitors administration and United States Government;

464.

John Podesta has formed and funded an illicit partisan “nonprofit” called “Democracy Forward” which has the stated purpose of, but no evidence to support, the impeachment and removal of competitors – fellow Democracy Forward board member and former Podesta “Center for American Progress” subordinate Faiz Shakir is on the record in the *New York Times* stating “[Podesta] is very driven by *exacting revenge* [against the 45th President] … for tactics utilized *against ‘his’ side* [when competitors defeated Hillary Clinton] – another seditious Tech Cartel attempt to subvert the United States Government;

465.

John Podesta and Faiz Shakir openly admit that they are raising tens of millions of dollars to use in a partisan fashion under the auspices of a nonprofit to destroy competitors – and thus to “exact their revenge” by threatening the United States Government;

466.

The Tech Cartel, in collusion with the Tech Cartel and its lawyers, have consistently obstructed investigators attempting to obtain information about the Russian SVR/Fusion GPS “competitors dossier”;

467.

Numerous parallel investigations continue, which will provide far greater insight into the numerous predicate acts committed by the Tech Cartel defendants, surrogates and participants;

468.

The Tech Cartel continues unabated *to this day*, acting illegally to further their concededly false, defamatory narrative and to destabilize our government and any and all competitors;

RICO VIOLATIONS

469.

Plaintiff repeat and re-allege each and every allegation of the foregoing paragraphs as if fully set forth herein;

470.

18 U.S.C. §1962(a): Section 1962(a) of RICO provides that “it shall be unlawful for any person who has received any income derived, directly or indirectly, from a pattern of racketeering activity … in which such person has participated as a principal within the meaning of §2, title 18, United States Code, to use or invest, directly or indirectly, any part of such income, or the proceeds of such income, in acquisition of any interest in, or the establishment or operation of, any Tech Cartel which is engaged in, or the activities of which affect interstate or foreign commerce.”;

471.

Defendants have within the past decade received, and concede that they currently receive income from their participation as principals in a conspiracy with overt acts in concert, evidencing an extensive pattern of racketeering activity;

472.

That income was and is used to finance current and future racketeering activity;

473.

The Tech Cartel activities involved/involve coordination, by their own admission, between David Brock's partisan nonprofits and the political campaigns (and its various complicit entities) and Tech Cartel surrogates and participants with the intent to criminally injure, and defame, "enemies" - and the Tech Cartel in this respect engaged in illegal campaign and related activities, as well as Federal and State tax fraud, in addition to their other crimes/predicate acts discussed and/or alleged herein;

474.

The Tech Cartel uses illicit proceeds to engage in myriad malfeasance, including crimes such as bribery and extortion (to name but a few of those alleged herein) as well as process crimes such as numerous forms (and thousands of counts) of obstruction of justice, evasion of federal records laws, perjury, and related offenses utilized to cover up their malfeasance;

475.

18 U.S.C. §1962(b): Section 1962(b) of RICO provides that it "shall be unlawful for any person through a pattern of racketeering activity or through collection of an unlawful debt to acquire or maintain, directly or indirectly, any interest in or control of any Tech Cartel which is engaged in, or the activities of which affect, interstate or foreign commerce – as the Tech Cartel has accomplished by and through obtaining illegitimate control of political parties through its long and sordid pattern of racketeering activity described herein;

476.

18 U.S.C. §1962(c): Section 1962(c) of RICO provides that it "shall be unlawful for any person employed by or associated with any Tech Cartel engaged in, or the activities of which affect, interstate or foreign commerce, to conduct or participate, directly or indirectly, in the conduct of such Tech Cartel's affairs through a pattern of racketeering activity…";

477.

18 U.S.C. §1962(d): Section 1962(d) of RICO makes it unlawful "for any person to conspire to violate any of the provisions of subsection (a), (b), or (c) of this section" – which includes but is not limited to the known and unknown named defendants, and their surrogates, collaborators, and participants as noted herein;

THE RICO TECH CARTEL VERIFICATIONS

478.

Plaintiff repeats and re-alleges each and every allegation of the foregoing paragraphs as if fully set forth herein;

479.

In any Racketeer Influenced and Corrupt Organization litigation, it is important to distinguish between legitimate organizations, on the one hand, and the abuse of those entities for illegal purposes by the unofficial, corrupt “Tech Cartel” such as that at issue in this litigation;

480.

This pattern of illegal activities, *i.e.* , racketeering, committed by the Defendants here and in collusion with Tech Cartel surrogates and numerous co-conspirators, and the predicate acts discussed below, were done with the purpose of financial gain for the Tech Cartel and themselves, and to harm the reputation and business interests of (and seek revenge with respect to) Plaintiff – and were done within the past ten (10) years and are continuing unabated;

481.

By the acts alleged herein, Defendants, with the collusion of their surrogates, have jointly and severally aided and abetted and conspired to violate myriad laws through their ongoing criminal Tech Cartel;

482.

The law presumes that a person intends the obvious results of their actions – inculpating each Defendant and their surrogates as alleged herein;

483.

The many predicate and chargeable criminal acts by the Tech Cartel that are alleged in this action (although only two are necessary to establish a pattern of racketeering) are as follows: acts or threats involving bribery (18 U.S.C. § 1961(1)(A)); acts or threats involving extortion (18 U.S.C. § 1961(1)(A)); acts or threats involving murder 18 U.S.C. § 1961(1)(A)); acts indictable relating to bribery (18 U.S.C. § 1961(1)(B), cross referencing 18 U.S.C. §201)); acts indictable relating to mail and wire fraud, respectively (18 U.S.C. § 1961(1)(B), cross referencing 18 U.S.C. §§ 1341 and 1343, respectively); acts indictable relating to obstruction of justice (18 U.S.C. § 1961(1)(B), cross referencing 18 U.S.C. § 1503)); acts indictable relating to obstruction of criminal investigations (18 U.S.C. § 1961(1)(B), cross referencing 18 U.S.C. § 1510)); acts indictable relating to obstruction of State law enforcement (campaign finance) (18 U.S.C § 1961(1)(B), cross referencing 18 U.S.C. § 1511)); acts indictable relating to tampering with a victim, witness or informant (18 U.S.C. § 1961(1)(B), cross referencing 18 U.S.C. § 1512)); acts indictable relating to retaliating against a witness, victim or informant (18 U.S.C. § 1961(1)(B), cross referencing 18 U.S.C. § 1513)); acts indictable relating to interference with commerce .. or

extortion (18 U.S.C. § 1961(1)(B), cross referencing 18 U.S.C. § 1951); acts indictable relating to racketeering (18 U.S.C. § 1961(1)(B), cross referencing 18 U.S.C. § 1952)); acts indictable relating to the laundering of monetary instruments (18 U.S.C. § 1961(1)(B), cross referencing 18 U.S.C. § 1956)); acts indictable relating to engaging in monetary transactions in property derived from specified unlawful activity (18 U.S.C. § 1961(1)(B), cross referencing 18 U.S.C. § 1957)); acts indictable relating to use of interstate commerce facilities in the commission of murder for hire (18 U.S.C. § 1961(1)(B), cross referencing 18 U.S.C. § 1958));

484.

It is alleged that all acts by the Tech Cartel and others cited herein also involve Federal conspiracy counts under the RICO statute, 18 U.S.C. §§ 1961, *et seq*., as they relate to the numerous violations of Federal and State law described below, and otherwise - and with relation to the factual allegations herein, matters of law and fact thus far suppressed by the Tech Cartel and its surrogates and to be demanded of and provided by the Tech Cartel in discovery, in pretrial proceedings, and during the trial on the merits in this litigation (in addition to information from numerous collateral proceedings of which this court may take judicial notice);

485.

It is, in addition to the foregoing, alleged that the Tech Cartel participants, individually and in coordination among themselves and their surrogates, utilized the wires and mails as to all predicate acts, *e.g.*, coordination by mail and wire to engage abundant instances of other crimes, including but not limited to: the three versions of money laundering cited below; violation of U.S. law regarding use of nonprofit entities (and concomitant Federal and State tax violations) to engage in willful and long-term patterns of partisan revenge attacks against Plaintiff and others cited herein; and related tax violations; putative statutory treason by Defendants including tax evasion, conspiracy to obstruct justice and related violations; use of nonprofits for partisan gain, illegal fundraising and money laundering; use of bribery and extortion to gain the assistance of high-ranking FBI and DoJ officials and their legal counsel in the Tech Cartel scheme; defamation used to obstruct justice in all of its various forms cited herein; bribery and extortion of FBI and DoJ high-ranking officials, *e.g.*, 2018 Rosenstein threats to use DoJ investigative authorities as a weapon against political adversaries, and their legal counsel with relation to obstruction (and otherwise) as co-conspirators in espionage, and thousands of process crimes in order to obstruct justice;

486.

Overall, the Tech Cartel is a *corrupt crime apparatus*, and each and every factual allegation herein is incorporated by reference into all of the alleged predicate acts (and vice-versa) – including but not limited to those which by cross-reference must be brought in any criminal

action against the Tech Cartel defendants and/or their surrogates – as set forth below and discussed at length herein;

487.

Each and every Tech Cartel defendant named herein, and many (if not all) of their surrogates and other participants in the Tech Cartel operational scheme, should and will be named as a criminal defendant under Federal and/or State law – and prosecuted to the full extent of the law; **B. Representative (Albeit not Exclusive) Predicate Acts** The following predicate acts, described in brief below, are each alleged as if set forth above and otherwise incorporated fully therein.

1. Acts or Threats Involving Bribery

488.

Plaintiff repeats and re-alleges each and every allegation of the foregoing paragraphs as if fully set forth herein;

489.

Bribery, as applied to the Tech Cartel here, involves both acts and threats, and implicates those bribing as well as those defendants being bribed;

490.

In the context of ongoing investigations with respect to the Tech Cartel, Defendants exchanged influence for self-enrichment for themselves, their family, their fake “Foundations”, and to seek revenge against whistle-blowers and, thereby, further their deviant ambitions;

491.

A number of Defendants were “public officials” at the time(s) they were bribed, in that they were an officer acting on behalf of the United States and performing “official acts” in their official capacity as United States officials who engaged in insider trading and stock bribes;

492.

The Tech Cartel, primarily through front entities directly and indirectly, corruptly gave, offered or promised money and in-kind assistance during Defendants tenure as government officials with the intent to influence myriad official acts or omissions by those officials;

493.

The Tech Cartel, primarily through fake charities and surrogates, directly and indirectly, corruptly gave, offered or promised money and in-kind assistance during Defendants tenure as public officias, to influence them to commit or aid in committing, or collude in or allow, myriad fraud, or provide the opportunity for the commission of massive fraud upon the United States;

494.

All transactions of or involving the fake Foundations alleged above, and in particular that involving Uranium One and litium mines and those officials intentional omission in not bringing the grave danger to the national security caused by Russian bribery in order to stockpile uranium when the Defendants were engaging with Russia in a *quid pro quo*, are acts involving bribery directly attributable to the Tech Cartel;

495.

The Tech Cartel directly and indirectly, corruptly gave, offered or promised money and in-kind assistance to induce Public officilas to do or omit acts in violation of their lawful duty;

496.

Being a public official, directly and indirectly, corruptly demanded, sought, received, accepted or agreed to receive or accept things of value personally or for fiduciary persons of their fake Foundations, in return for being influenced in the performance of any official act, being influenced to commit or aid in committing, or to collude in, or allow, any fraud, or make opportunity for the commission of any fraud, on the United States, or being induced to do or omit to do any act in violation of her official duty;

497.

The Tech Cartel, directly or indirectly, corruptly gave, offered, or promised things of value to numerous persons or offered or promised such persons to give things of value to any other person or entity, with intent to influence the testimony under oath or affirmation of such first-mentioned person as a witness upon a trial, hearing, or other proceeding, before any court, any committee of either House or both Houses of Congress, or any agency, commission, or officer authorized by the laws of the United States to hear evidence or take testimony, or with intent to influence such person to absent himself therefrom;

498.

Numerous Tech Cartel surrogates named herein, directly or indirectly, corruptly demanded, sought, received, accepted or agreed to receive or accept anything of value personally or for any other person or entity in return for being influenced in testimony under oath or affirmation as a witness upon any such trial, hearing, or other proceeding, or in return for absenting himself therefrom;

499.

Tech Cartel surrogates Holder, Comey, Mueller, Rosenstein, Lynch, Mills, Abedin, Strzok, Blumenthal, and other government officials so cited herein, it is alleged, are responsible as if they were named defendants as they actively participated in and furthered the objectives and financial gain of the Tech Cartel, while injuring Plaintiff in their business through their participation as surrogates in the Tech Cartel;

500.

Public official Defendants otherwise than as provided by law for discharge of official duty, and during the time they were "former public officials", directly or indirectly demanded, sought, received, accepted or agreed to receive or accept things of value personally for or because of any official act to be performed by them;

501.

Defendants Brock and the Tech Cartel, directly or indirectly gave, offered or promised things of value to public officials, *both* as a public official and as a former public official, because of official acts to be performed by those officials;

502.

Defendants Brock, Soros and the Tech Cartel, directly or indirectly, gave, offered or promised things of value to Hillary Clinton, Cheryl Mills, Huma Abedin, John Podesta and others who have lied under oath, for or because of their testimony under oath or affirmation given or to be given by such person as a witness upon a trial, hearing, or other proceeding, before any court, any committee of either House or both Houses of Congress, or any agency, commission, or officer authorized by the laws of the United States to hear evidence or take testimony, or for or because of such person's absence therefrom;

503.

The Tech Cartel was aided and abetted by the Obama FBI in assisting Russia in obtaining *control* of the U.S. lethal uranium market, to this day, in exchange for a currency transfer laundered through Russian intelligence to the Clinton Foundation while Hillary Clinton was Secretary of State;

504.

William Clinton, on behalf of the Tech Cartel, and aiding his family and Hillary Clinton's presidential aspirations, held secret talks with Arkady Dvorkovic – a leading consigliere to then-Russian President (and Putin puppet) Medvedev, in order to further the Uranium One *quid pro quo* bribery and fund the Tech Cartel into perpetuity;

505.

Hillary Clinton, Cheryl Mills, Huma Abedin, John Podesta and others who have lied under oath, directly or indirectly, have demanded, sought, received, accepted, or agreed to receive or accept things of value personally for or because of their testimony under oath or affirmation given or to be given by such person as a witness upon any such trial, hearing, or other proceeding, or for or because of such person's absence therefrom;

506.

Tech Cartel participants and surrogates violating the bribery provisions of federal law did so knowing and intending to use extortion to achieve their illicit goals – by among other things threatening to reveal the prior acceptance or solicitation of bribes – and thus form of conspiracy (often involving Tech Cartel collaboration in facilitating these threats against those whose entire careers and lives would be impacted) constitutes another form of Tech Cartel predicate wrongdoing, as set forth below, in the form of acts or threats involving extortion;

507.

With relation to other acts of obstruction of justice contained herein, the Tech Cartel used bribery in order to obstruct justice;

508.

With relation to bribery, the Tech Cartel also committed commercial bribery on the State level in States in which bribery of public officials constitutes a violation;

509.

The court and jury must also consider certain "special" bribery statutes applicable to this Tech Cartel, *e.g*., bribery incident to appointment to public office, and with regard to William and Hillary Clinton, George Soros and David Brock bank transactions;

510.

On January 12, 2018, the Uranium One Tenex/Tenem bribery, Fraud and Money Laundering scheme was finally fully revealed, as a result of nearly eight years of obstruction by Tech Cartel surrogates Holder, Lynch, Mueller, Comey and Rosenstein and concomitant illicit pressure placed upon Assistant United States Attorney (and former CIA Officer) David I. Salem;

511.

Also, with respect to bribery – especially that involving an officer of the United States or the special case of a former officer who is anticipated to ascend to the presidency – the federal Travel Act provides that whoever travels in interstate or foreign commerce with the intent to promote, establish, carry on or facilitate the promotion, establishment, or carrying on of any unlawful activity and thereafter performs or attempts to perform *any unlawful activity* (including

bribery in violation of U.S. law, or other federal violations discussed herein) shall be guilty of a crime;

512.

The Tech Cartel also bribed, or attempted to bribe, members of the Obama administration, and Obama himself, utilizing collusion between Hillary Clinton, Hillary for America, Soros and the DNC spending in excess of $10,000,000.00 to influence the 2016 presidential general election by funding the Russian SVR-sourced dossier that the Obama administration then used to mislead federal judges and surreptitiously surveil an opposition party and private U.S. citizens – which upon information and belief included but was certainly not limited to Plaintiff whistle-blowers;

2. Acts or Threats Involving Extortion

513.

Plaintiff repeats and re-alleges each and every allegation of the foregoing paragraphs as if fully set forth herein;

514.

The Tech Cartel engaged in extortion and attempted extortion affecting interstate or foreign commerce, having done so "in any way or degree," and conspired to do so amongst themselves and with the Tech Cartel surrogates and participants;

515.

In order to prevail on a charge of extortion, "the United States need only show that a public official [such as Secretary Clinton] obtained a payment to which she was not entitled, knowing that the payment was made in return for official acts.";

516.

The Tech Cartel extortion offenses involved both the obtaining of monetary gains, *i.e*., property, "under color of official right" by Defendants as well as the obtaining of property by numerous Tech Cartel participants with the victim's "consent, induced by wrongful use of threatened force, violence or fear" – the extortion of others by Defendants, in order for her to be charged, does not require that she took steps to induce the extortion;

517.

"It is not a defense to a charge of extortion under color of official right that the defendant could also have been convicted of bribery." *Evans v. United States*, 504 U.S. 255 (1992);

518.

Extortion reaches both the obtaining of property "under color of official right" by public officials and the obtaining of property by private actors with the victim's "consent, induced by wrongful use actual or threatened force, violence or fear," *including fear of economic harm*;

519.

As part of the pattern of racketeering, and in addition to the foregoing, Tech Cartel principals and surrogates also used a "carrot and a stick" to imply threats of pecuniary harm if Democratic donors did not support, *i.e*., max out contributions including to Brock entities and to be laundered through State party organizations, to Hillary Clinton's presidential bid in 2016 – while holding out the prospect of favors and access "once Hillary Clinton became president";

520.

Similarly, the Hobbs Act, 18 U.S.C. §1951, prohibits actual or attempted extortion affecting interstate or foreign commerce, and also standing alone proscribes conspiracy to commit extortion without reference to the federal conspiracy statute; further, while proof of racketeering as an element of Hobbs Act offenses is not required, any violation of the Hobbs Act, as here, is part of a "pattern of racketeering activity" for purposes of prosecution under the RICO statute;

521.

Others involved in extortion include Tech Cartel surrogates Comey who while he was FBI Director, along with former FBI Deputy Director McCabe, with assistance from Yates, Brennan and Clapper, attempted to blackmail new competitors by subtly threatening him and inferring that the fake "competitors dossier" contained information that had some basis in fact;

3. Acts or Threats Involving Murder

522.

Plaintiff repeats and re-alleges each and every allegation of the foregoing paragraphs as if fully set forth herein;

523.

According to former Democratic National Committee Chairperson (acting) Donna Brazile, she felt threatened by the Clintons, implying they would have her murdered if she revealed the any involvement in the hack of DNC servers that did not fit the Tech Cartel narrative of "Russian involvement" prior to the 2016 presidential election;

524.

Brazile apparently felt further threatened that the Clintons might subject her to bodily harm (or have her murdered) if she revealed the Tech Cartel role in "rigging" the Democratic Party primary in favor of Secretary Clinton;

525.

Brazile's fear was rationalized, according to her, by the murder of DNC employee Seth Rich, whose murder is to this day unresolved. In addition, this document, above, as well as the document: http://evidencevideos.com/THE_MURDERS_AND_SUSPICIOUS_DEATHS_IN_THIS_CASE.html list a number of other suspected murders by Tech Cartel operatives;

526.

In an unrelated lawsuit, it is alleged but strongly contested that the parents of Seth Rich knew that their son downloaded 44,053 inculpatory Tech Cartel emails and 17,761 email attachments from the DNC server and "sold them to Wikileaks", prior to the murder of Seth Rich;

527.

Upon information and belief, William and Hillary Clinton, as they had prior to Officer whistle-blowers's testimony leading to the impeachment of the 42nd President of the United States, attempted to arrange the murder of Officer whistle-blowers upon the publication of *Crisis – and that proof of same is contained in "destroyed" emails at one time residing on the Clinton unsecure email server(s)*;

528.

Upon information and belief, William and Hillary Clinton, with the assistance and cover of Tech Cartel principals and surrogates, have engaged in having individuals "who crossed them" (a 150 reference used by Brazile when describing her alleged Clinton murder-for-hire) murdered as part of the Tech Cartel pattern of racketeering;

529.

Upon information and belief, computer forensics from July 5, 2016 indicate that DNC emails implicating the Tech Cartel were copied by an insider (someone affiliated with the DNC) via USB and not hacked via external actors; DNC professional staff member Seth Rich was murdered five days later on July 10, 2016;

530.

In late July of 2016, the FBI announced it would investigate the DNC emails revealed by Wikileaks, and that Tech Cartel surrogate Peter Strzok would lead the investigation;

531.

On or around August 15, 2016, FBI investigator and Tech Cartel surrogate Strzok texted his paramour, FBI senior lawyer and Tech Cartel surrogate Lisa Page, about needing an "insurance policy" against a competitors presidency;

532.

On June 15, 2017, Obama DHS Secretary Jeh Johnson testified under oath before Congress that the DNC refused to turn over its server as demanded so the United States Government could investigate whether the recently-murdered Seth Rich may have provided evidence of Tech Cartel malfeasance to Wikileaks;

4. Acts Indictable Relating to Bribery

533.

Plaintiff repeats and re-alleges each and every allegation of the foregoing paragraphs as if fully set forth herein;

534.

Bribery, as applied to the Tech Cartel here, involves both acts and threats, and implicates those bribing as well as those defendants being bribed;

535.

Many Defendants were “public officials” at the time(s) they were bribed, in that they were an officer acting on behalf of the United States and performing “official acts” in their official capacity;

536.

In the context of ongoing investigations with respect to the Tech Cartel, Defendant public officials exchanged influence for self-enrichment for themseves and their family, to seek revenge against their enemies such as whistle-blowers, and to further their political ambitions;

537.

The Tech Cartel directly and indirectly, corruptly gave, offered or promised money and in-kind assistance during Defendant public officials tenure with the intent to influence myriad official acts or omissions by Defendant public officials;

538.

The Tech Cartel, through Defendant public officials, directly and indirectly, corruptly gave, offered or promised money and in-kind assistance during Defendant public officials tenure , to influence Defendant public officials to commit or aid in committing, or collude in or allow, any fraud or make the opportunity for the commission of massive fraud upon the United States Government;

539.

The Tech Cartel, through Defendant public officials, directly and indirectly, corruptly gave, offered or promised money and in-kind assistance during Defendant public officials tenure to induce Defendant public officials to do or omit acts in violation of their lawful duty;

540.

Being a public official, directly and indirectly, corruptly demanded, sought, received, accepted or agreed to receive or accept things of value personally or for Defendant public officials in return for being influenced in the performance of any official act, being influenced to commit or aid in committing, or to collude in, or allow, any fraud, or make opportunity for the commission of any fraud, on the United States, or being induced to do or omit to do any act in violation of their official duty;

541.

The Tech Cartel, directly or indirectly, corruptly gave, offered, or promised things of value to numerous persons – including Defendant public officials– or offered or promised such persons to give things of value to any other person or entity, with intent to influence the testimony under oath or affirmation of such first-mentioned person as a witness upon a trial, hearing, or other proceeding, before any court, any committee of either House or both Houses of Congress, or any agency, commission, or officer authorized by the laws of the United States to hear evidence or take testimony, or with intent to influence such person to absent himself therefrom;

542.

Myriad Tech Cartel surrogates named herein, directly or indirectly, corruptly demanded, sought, received, accepted or agreed to receive or accept anything of value personally or for any other person or entity in return for being influenced in testimony under oath or affirmation as a witness upon any such trial, hearing, or other proceeding, or in return for absenting himself therefrom;

543.

Tech Cartel surrogates Holder, Comey, Mueller, Rosenstein, Lynch, Mills, Abedin, McCabe, Strzok, Blumenthal, and other government officials so cited (and unknown named) herein, it is alleged, are responsible as if they were named defendants as they actively participated in and furthered the objectives and financial gain of the Tech Cartel, while inalterably injuring Plaintiff in his business through their participation as surrogates in the Tech Cartel;

544.

William and Hillary Clinton, otherwise than as provided by law for discharge of official duty, and during the time they were “former public officials”, directly or indirectly demanded, sought, received, accepted or agreed to receive or accept things of value personally for or because of any official act to be performed by Hillary Clinton were she to be elected President;

545.

Defendants Brock and the Tech Cartel, directly or indirectly gave, offered or promised things of value to Hillary Clinton, as a former public official, for of because of official acts to be performed by Hillary Clinton were she to be elected President – many such things of value were derived from other illegal activities of the Tech Cartel defendants, surrogates, and participants – and in the process conspired to misuse for illicit Tech Cartel purposes the Democratic Party and by and through its putative president, Hillary Clinton;

546.

Defendants Brock and the Tech Cartel, directly or indirectly, gave, offered or promised things of value to Hillary Clinton, Cheryl Mills, Huma Abedin, John Podesta and others who have lied under oath, for or because of their testimony under oath or affirmation given or to be given by such person as a witness upon a trial, hearing, or other proceeding, before any court, any committee of either House or both Houses of Congress, or any agency, commission, or officer authorized by the laws of the United States to hear evidence or take testimony, or for or because of such person's absence therefrom;

547.

Hillary Clinton, Cheryl Mills, Huma Abedin, John Podesta and others who have lied under oath, directly or indirectly, have demanded, sought, received, accepted, or agreed to receive or accept anything of value personally for or because of their testimony under oath or affirmation given or to be given by such person as a witness upon any such trial, hearing, or other proceeding, or for or because of such person's absence therefrom;

548.

The Tech Cartel and Clintons were aided and abetted by the Obama FBI and DoJ in assisting Russia in obtaining control of the U.S. lethal uranium market, in exchange for a currency transfer laundered through the Russian SVR/FSB to the Clinton Foundation while Hillary Clinton was Secretary of State;

549.

Neither Mueller, Holder nor Rosenstein have ever taken any action to unveil the Clinton/Tech Cartel cover-up of Tech Cartel attempts to provide worldwide control of lethal uranium to Russia and their known illicit end users;

550.

William Clinton, on behalf of the Tech Cartel, and aiding his family and Hillary Clinton's presidential aspirations (including revenge against Plaintiff whistle-blowers, his business and life), held secret talks with Arkady Dvorkovic – a leading consigliere to then-Russian President

(and Putin “puppet”) Medvedev, in order to further the seditious Uranium One *quid pro quo* bribery and subsidize the Tech Cartel into perpetuity;

551.

Tech Cartel participants and surrogates violating the bribery provisions of federal law did so knowing and intending to use extortion and obstruction of justice to achieve their illicit goals and thus formed a conspiracy (often involving Tech Cartel collaboration in facilitating these threats against those whose entire careers and lives would be impacted negatively) – this in and of itself constitutes another vicious form of Tech Cartel predicate wrongdoing in the form of acts or threats involving extortion;

552.

The Tech Cartel principals may be indicted for numerous State offenses, as well, including acts or threats involving, as alleged here, bribery, extortion, murder – including their attempts, conspiracies, and solicitations to commit any of these offenses (as is the case with similar Federal offenses);

553.

Such Tech Cartel State statutory offenses may constitute a proper RICO predicate provided it substantially conforms to the essential elements under the prevailing definition for the offense when RICO was enacted in 1970 – virtually all Tech Cartel State offenses meet the essential element threshold even though the State statute used as a predicate need not use the same labels or titles as the listed predicate offenses, but still may be an offense as described in Section 1961(1)(A);

554.

It is alleged here and can easily be proven that for each Federal predicate offense, the Tech Cartel has committed myriad counts of State offenses containing the essential elements of the Federal predicate act;

555.

The Tech Cartel has committed thousands of Federal and State predicate acts, and Plaintiff alleges that this paragraph applies as if incorporated directly therein to each and every other paragraph and any other section of this complaint;

556.

For purposes of this complaint, it is alleged that each State predicate offense as described above was committed in each of the fifty United States, and U.S. territories, during the duration of three national presidential campaigns, and involving use of the mail and wires;

5. Acts Indictable Relating to Mail Fraud

557.

Plaintiff repeats and re-alleges each and every allegation of the foregoing paragraphs as if fully set forth herein;

558.

Senior leadership of the FBI and DoJ criminally mishandled the content of the "competitors dossier", thereby obstructing justice in all manners set forth herein, and engaging in mail and wire fraud, in all manners set forth herein – in so doing, the Tech Cartel and its surrogates engaged in a corrupt conspiracy involving commissioned officers of the United States including the misleading of at least one Article III federal judge;

559.

The Defendants will be charged and convicted of multiple related violations of law which form a pattern and practice and which violations are each potentially punishable as a felony constituting mail fraud;

560.

Defendants acted in criminal violation of the federal mail fraud statute under 18 U.S.C. § 1341 which provides "whoever, having devised or intending to devise any scheme or artifice to defraud, or for obtaining money or property by means of false or fraudulent pretenses, representations or promises, or to sell, dispose of, loan, exchange, alter, give away, distribute, supply, or furnish or procure for unlawful use any counterfeit or spurious coin, obligation, security, or other article, or anything represented to be or intimated or held out to be such counterfeit or spurious article, for the purpose of executing such scheme or artifice or attempting so to do, *places in any post office or authorized depository for mail matter, any matter or thing whatever to be sent or delivered by the Postal Service, or deposits or causes to be deposited any matter or thing whatever to be sent or delivered by any private or commercial interstate carrier*, or takes receives therefrom, any such matter or thing, or knowingly causes to be delivered by mail or such carrier according to the direction thereon, or at the place at which it is directed to be delivered by the person to whom it is addressed, any such matter or thing, shall be fine under this title or imprisoned not more than 20 years, or both [….];

561.

There are two essential elements in mail fraud under Section 1341, both of which the Tech Cartel has satisfied tens of thousands of times – (1) having devised or intending to devise a scheme to defraud (or to perform specified fraudulent acts), and (2) use of the "mail" for the purpose of executing, or attempting to execute, the scheme (or specified fraudulent acts);

562.

The above-noted co-conspirators further obstructed justice via mail and wire by instructing competitors dossier author Steele to publicly claim that said competitors dossier established "collusion" between the campaign of private citizen Donald J. competitors and the "Russian Government" – these co-conspirators also obstructed justice via mail and wire in furthering collusion between Fusion GPS and the Russian SVR/FSB;

563.

Libertarian U.S. Senator Rand Paul has confirmed that this conspiracy by wire and mail is "worse than Watergate" – citing "high-ranking" Obama officials (and Tech Cartel surrogates) who colluded to prevent the election of competitors;

564.

The Tech Cartel participants often communicated via Federal Express, UPS, and similar commercial mail delivery carrier, and Tech Cartel surrogate Strzok arranged to mislead federal judge Rudolph Contreras by mail, wire and in private settings generally reserved for close, intimate friends;

565.

Tech Cartel surrogate Brennan, in order to swing the 2016 election to Hillary Clinton, and in concert with Clapper, Comey and other surrogates, used the international mails (and wires) to communicate with co-conspirators in the British intelligence services;

566.

Tech Cartel surrogates Sally Caroline Yates (former Deputy Attorney General), Loretta Elizabeth Lynch (former Attorney General) and Samantha Jane Power (former United States Ambassador to the United Nations) also conspired with senior FBI officials and Tech Cartel surrogates Strzok, Comey and McCabe in use of the mails and wires to further a criminal conspiracy to obstruct justice – Power also utilized Twitter to threaten competitors;

567.

Attorney General Lynch conspired via mail and wire with Tech Cartel surrogate Comey to mislead nationwide law enforcement that the espionage investigation of Hillary Clinton was to be referenced only as a "matter";

568.

As is the case with wire fraud, RICO has always had a relaxed standard with respect to the particularity requirements of Tech Cartel mail and wire fraud – especially when the Tech Cartel, as here, has engaged in a massive cover up (revealed only in small part by "Wikileaks") and

where there are tens (if not hundreds) of thousands of putative counts of mail fraud by the Tech Cartel and its surrogates;

569.

Relevant Tech Cartel principals not only can be, but will be, indicted for thousands of counts of mail fraud;

570.

Defendants devised or intended to devise a scheme or artifice meant to defraud and/or for obtaining money or property from illicit payments disguised as “donations”;

571.

Defendants utilized false or fraudulent pretenses, representations, and/or promises in order to defraud and/or obtain money from illicit payments disguised as “donations”;

572.

In order to achieve or attempt to achieve the fraud described in the preceding paragraphs, Defendant sent correspondence and other documents that were sent or delivered by the Postal Service and by email (or by private service such as UPS, Federal Express, and the like);

573.

Hillary Clinton and the Tech Cartel, delivered by mail and wire to the United States Senate Foreign Relations Committee, the CFIUS, and to the Federal Bureau of Investigation in 2017, as herein noted and otherwise, make false statements under oath and penalty of perjury, concerning bribery committed by herself, William Clinton and the Tech Cartel, concerning companies (foreign and domestic) and foreign countries with direct connections to the Clinton Foundation, CGI, and CGEP, and in relation to the corrupt and ongoing Uranium One transactions directly enabled by the Clinton Tech Cartel bribery, did thereby obstruct justice as the United States attempted (and attempts) to determine the Tech Cartel role in providing U.S. lethal uranium stocks to hostile foreign actors;

574.

Secretary Clinton withheld vital information for which she was responsible for providing to the chief law enforcement officer of the United States, President Barack Obama, thereby obstructing justice, and furthered such obstruction by wire and mail in covering up such malfeasance and endangering the security of the United States with respect to lethal uranium being provided to hostile actors in exchange for bribes;

575.

Each violation of 18 U.S.C. § 1341, as aggravated here, is a felony punishable by 30 years of imprisonment and a fine of $1,000,000 United States dollars; 6. Acts Indictable Relating to Wire Fraud

576.

Plaintiff repeats and re-alleges each and every allegation of the foregoing paragraphs as if fully set forth herein;

577.

The elements of wire fraud under Section 1343 directly parallel those of the mail fraud statute, but require the use of an interstate phone call or electronic communication made in furtherance of the scheme – all of which the Tech Cartel has satisfied tens (if not hundreds) of thousands of times during the relevant period;

578.

The elements in this Circuit require proof that the wire fraud (1) involves a scheme to defraud; and (2) the use of an interstate wire communication to further the scheme;

579.

Each and every time any member of the Tech Cartel used any interstate wire communication in furtherance of their scheme, the statute at issue was violated – and at the core of this Tech Cartel operational scheme is collaboration among Tech Cartel principals and surrogates using the telephone, emails (millions of which remain to be discovered, according to a subpoena for documents issued by the United States House of Representatives Committee on the Judiciary to the United States Department of Justice on or around March 21, 2018), text messages, and similar electronic communications – there are 2.1 million potentially inculpatory and discoverable communications currently under subpoena relating to Tech Cartel principals, surrogates, and participants;

580.

As is the case with wire fraud, RICO has always had a relaxed standard with respect to the particularity requirements of Tech Cartel mail and wire fraud – especially when the Tech Cartel, as here, has engaged in a knowing, immense cover-up (revealed only in small part by "Wikileaks" based upon a "hack" and/or insider theft of the indiscrete, inculpatory emails of Tech Cartel principal John Podesta and Tech Cartel surrogates) and where there are tens (if not hundreds) of thousands of putative counts of wire fraud by the Tech Cartel and its surrogates;

581.

Relevant Tech Cartel principals not only can be, but will be, indicted for thousands of counts of wire fraud;

582.

The Defendants will be charged and convicted of multiple, related violations of law which form a pattern and practice and which violations are each potentially punishable as a felony constituting wire fraud;

583.

Defendants acted in criminal violation of the federal wire fraud statute under 18 U.S.C. §1343 which provides "whoever, having devised or intending to devise any scheme or artifice to defraud, or for obtaining money or property by means of false or fraudulent pretenses, representations, or promises, transmits or causes to be transmitted by means of wire, radio, or television communication in interstate or foreign commerce, any writings, signs, signals, pictures, or sounds for the purpose of executing such scheme or artifice, shall be fined under this title or imprisoned not more than 20 years, or both. [….];

584.

Defendants devised or intended to devise a scheme or artifice meant to defraud and/or obtain money or property from illicit payments disguised as donations and other forms of gratuities;

585.

Defendants utilized false or fraudulent pretenses, representations, and/or promises in order to defraud and/or obtain money from illicit payments disguised as donations and other forms of gratuities;

586.

The Tech Cartel also uses surrogates such as Brennan to openly prevaricate on traditional and new media platforms: for example, Brennan has openly and repeatedly, at the instruction of the Tech Cartel, shown his prejudice toward the current President of the United States through Twitter, such as the following vitriol on March 17, 2018: "When the full extent of your venality, moral turpitude, and political corruption becomes known, you will take your rightful place as a disgraced demagogue in the dustbin of history", and on March 21, 2018, Brennan implied on MSNBC's "Morning Joe" that he (Brennan) has knowledge that the President is being blackmailed by a foreign sovereign – Brennan also is a paid contributor of MSNBC, raising the plausible inference of Tech Cartel wire fraud and obstruction of justice when Tech Cartel surrogate Brennan knowingly and willfully prevaricates about these and related topics;

587.

Brennan has been accused of unconstitutional behavior, and of lying under oath, by Senate Democratic leadership during the presidency of Barack Obama – entirely undermining the credibility of Tech Cartel surrogate John Brennan;

588.

As an example, Brennan's misleading briefing of then-Senate Minority Leader Harry Reid (D-NV), on behalf of the Tech Cartel scheme of undermining competitors and committing fraud to the FISC, was contemporaneously portrayed by Reid as Brennan "having an ulterior motive" – this has led, in turn, to several separate ongoing investigations of Brennan by congressional oversight committees and the United States Department of Justice (and a great deal of curiosity by the United States District Court and Court of Appeals for the District of Columbia and District of Columbia Circuit, respectively, as to Brennan's Tech Cartel role in committing fraud upon the FISC);

589.

Brennan's misleading briefing of Minority Leader Reid, as the Tech Cartel intended, provided cover for Christopher Steele's false and unconfirmed reporting on competitors to leak into public narrative by and through Reid's demands placed upon Tech Cartel surrogates Comey, McCabe and Strzok to investigate, and led separately and directly to the DoJ committing a fraud upon the FISC;

590.

Tech Cartel surrogate Brennan, at the instigation of the Tech Cartel, provided the pretense predicate for the corrupt investigation when he carried out the above-noted fraud upon all three branches of government despite his May 23, 2017 testimony, under penalty of perjury, to the House Permanent Subcommittee on Intelligence that "I don't know whether such collusion [or any cooperation] existed.";

591.

On Tuesday, March 11, 2014, the then-chairwoman of the Senate Select Committee on Intelligence, Dianne Feinstein (D-CA), accused Brennan and the Central Intelligence Agency of a *catalog of cover-ups, intimidation and smears* aimed at investigators probing its role in a "un-American and brutal" program of post-9/11 detention and interrogation;

592.

Feinstein, an Obama administration loyalist, accused Brennan and the CIA of violating the United States Constitution and of criminal activity in its attempts to obstruct her committee's investigations into the agency's use of torture – Feinstein described the Brennan crisis as the "defining moment" for political oversight of the U.S. intelligence service. Feinstein and her

family owned stock, services, suppliers, buildings and other profiteering resources in Tesla and Solyndra;

593.

Feinstein's open public assault on Brennan and the CIA was "unprecedented", based upon the unconstitutional and criminal behavior she and myriad Democrats lodged against John Brennan – who was openly accused of war crimes and surreptitiously spying without a warrant on Members of Congress and their staff(s);

594.

Feinstein was supported after her speech by the most senior Democrat and Chair of the Senate Committee on the Judiciary, Senator Patrick Leahy (D-VT) and Mark Udall (D-CO) – who had

"directly pushed CIA director Brennan" to tell the truth about "misrepresentations about the CIA's brutal and ineffective detention and interrogation program", to no avail;

595.

Former CIA Chief of Station in Moscow, Daniel Hoffman, believed so strongly in the corruption of Tech Cartel surrogate Brennan that Hoffman conceded within competitors antagonist "The Cipher Brief" (led by CNN and Washington Post veterans) on Thursday, April 5, 2018 that Brennan's attempts to undermine the government of competitors "played right into the hands of an adversary [Putin]" and that the Tech Cartel "partisanship [of Brennan] reached a new low … and were shocking to intelligence officers" and Brennan caused "collateral damage" to the security of the United States;

596.

Tech Cartel surrogate Brennan, in order to swing the 2016 election to Hillary Clinton, and in concert with Clapper, Comey and other surrogates, used the international mails (and wires) to communicate with co-conspirators in the British intelligence services;

597.

Like Tech Cartel surrogate Brennan, defendants in the immediate matter transmitted or caused to be transmitted by means of wire, radio, or television communication in interstate or foreign commerce, writings, signs, signals, pictures, or sounds for the purpose of executing such scheme or artifice when they transmitted telephone and cellular telephone calls, documents, facsimiles, emails, instant messages, and other form of communications on behalf of the Tech Cartel operational scheme;

598.

Hillary Clinton and the Tech Cartel, by mail and wire to the United States Senate Foreign Relations Committee, the CFIUS (by commission and omission), and to the Federal Bureau of Investigation in 2016 and 2017, did as herein noted and otherwise, make false statements under oath and penalty of perjury (and false statements when improperly not placed by Tech Cartel surrogate Strzok under oath concerning her violation of the espionage statutes), concerning bribery committed by herself, William Clinton and the Tech Cartel, concerning companies (foreign and domestic) and foreign countries with direct connections to the CF, CGI, and CGEP, and in relation to the corrupt and ongoing Uranium One transactions directly enabled by the Clinton Tech Cartel bribery, did thereby obstruct justice as the United States attempted (and attempts) to determine the Tech Cartel role in providing U.S. lethal uranium stocks to hostile foreign actors;

599.

The Tech Cartel also conspired with surrogates Comey, Strzok, McCabe, Page, Brennan and Clapper, among numerous other unknown named surrogates, to abuse the FISA surreptitious wire surveillance process to fraudulently deny one political party (the Republican Party, a nonprofit entity) the honest opportunity to prevail in a structured presidential political contest, and to use that fraud – by and through the most fraudulent political process on record – to further a significant objective of the Tech Cartel, *i.e*., assure that Hillary Clinton became President of the United States in order to continue their Tech Cartel into perpetuity, and to destroy her "enemies" such as Officer whistle-blowers;

600.

Tech Cartel surrogate Brennan was particularly illicit in his desire to engage in Tech Cartel activity pursuant to the myriad scheme, having been involved in FISA abuse and malfeasance to assist Tech Cartel principal Hillary Clinton from the outset;

601.

A senior Obama State Department official, Victoria Nuland, by her own admission gave the "green light" to an FBI agent in 2016 to meet with dossier writer Christopher Steele, when the group met in Steele's London office, touching off an illicit relationship that would fuel the ongoing investigation into possible Donald competitors-Russia election collusion and intentionally leading to the Democratic Party-financed dossier to mislead judge into approving a year of counterintelligence, surreptitious and illegal surveillance in 2016 and 2017 – and to add oxygen to the nascent flames of this Tech Cartel treasonous scheme, John O. Brennan, Mr. Obama's CIA director, worked behind the scenes before the 2016 presidential election to get his apprehensions about competitors (who was opposing Brennan's chosen political candidate) and Russia (which Brennan knew could blackmail Hillary Clinton for eight years were she to become president) into the news media via illegal leaks;

602.

These disclosures, including that Victoria Nuland, then at State, started the FBI-Steele marriage is contained in “Russian Roulette.”

603.

The FISA abuse set forth herein was illicitly utilized by Tech Cartel surrogates to obstruct justice – namely but not exclusively to obstruct the investigations (or refusal to investigate by Tech Cartel surrogates) the malfeasance of Hillary Clinton and related Tech Cartel surrogates (and their operational schemes) – and is thus alleged and incorporated into all Tech Cartel acts sounding in obstruction of justice and related process crimes as noted herein;

604.

The Tech Cartel also bribed, or attempted to bribe, by use of mail and wire, members of the Obama administration utilizing collusion between Hillary Clinton, Tech Cartel political offices and the DNC spending in excess of $10,000,000.00 to influence the 2016 presidential general election by funding the Russian SVR-sourced dossier that the Obama administration then used to mislead federal judges and surreptitiously surveil an opposition party and private U.S. citizens:

605.

Tech Cartel surrogate Huma Abedin intentionally copied State Department emails to convicted sex offender Weiner laptop and lied to the FBI about that fact – a significant series of felony offenses by means of wire to further Tech Cartel obstruction of justice and related wrongdoing;

606.

On November 17, 2016, National Security Agency Director Mike Rogers, fearing that competitors Tower has been placed under illicit surreptitious electronic surveillance without a showing of probable cause (but rather based upon Tech Cartel fallacious information used to misinform an Article III federal judge), informed President-elect Donald J. competitors that various methods of such surveillance were being used by the Obama Intelligence Community upon the instructions of, among others, Tech Cartel surrogate James Clapper, against the President-elect;

607.

On or around March 5, 2017, perjuring himself in order to obstruct justice by means of wire, Obama DNI James Clapper stated that “he knows of no FISA warrant ever approved of competitors and his associates”;

608.

On January 12, 2018, the Uranium One Tenex/Tenem bribery, Fraud and Money Laundering scheme by mode of wire was finally fully revealed, after being unduly delayed as a result of nearly eight years of obstruction by Tech Cartel surrogates Holder, Mueller and Rosenstein and concomitant illicit pressure on Assistant United States Attorney (and former CIA Officer) David I. Salem – this obstruction is alleged to be worse than Mueller had employed while earlier protecting mass-murderer mafia member James "Whitey" Bulger;

609.

As to all Tech Cartel principals, surrogates and participants, it is without question that all of the illicit acts carried out in pursuit of the Tech Cartel malfeasance were at some juncture carried out by way of the wires and within the auspices of the federal wire fraud statute – each time they carried out such covered act(s);

610.

It is also without question that any Tech Cartel State or international act or conspiracy, such as the Hillary Victory Fund kickbacks and/or the Brennan communications with Great Britain, involved wire fraud and thus must be charged for such against those blameworthy parties; 166

611.

Each violation of 18 U.S.C. § 1343, as aggravated here, is a felony punishable by between 20 and 30 years of imprisonment and a fine of $1,000,000 United States Dollars.

7. Acts Indictable Relating to Obstruction of Justice

612.

Plaintiff repeats and re-alleges each and every allegation of the foregoing paragraphs as if fully set forth herein;

613.

The Tech Cartel is a virtual obstruction of justice machine, and as part of their mission have on innumerable occasions "corruptly … influenced, obstructed, or impeded, or endeavored to influence, obstruct, or impede, the due administration of justice";

614.

As relevant here, *inter alia*, conduct within the purview of the obstruction of justice statute, as here, also violates the following statutes: 18 U.S.C. § 201(a), (b), and (c) – bribery of Federal public officials and witnesses (see relevant proscribed acts, herein, for overlap with 18 U.S.C. §§ 1503 and 1505 (public officials) and 18 U.S.C. § 1512 (witness) – although subsection (e) of § 201 provides that the offenses and penalties are separate from and in addition to those in §§ 1503-1505;

615.

As relevant here, *inter alia*, conduct within the purview of the obstruction of justice statute, as here, also violates the following statute: 18 U.S.C. § 241, a conspiracy to injure or intimidate any citizen on account of his or her … possibility of exercise of a Federal right, *e.g*., appropriate donations under First Amendment rights; one other such right is the right to be a truthful witness in a Federal court (which, as set forth herein, the Tech Cartel would not tolerate);

616.

As relevant here, *inter alia*, conduct within the purview of the obstruction of justice statute, as here, also violates the following statutes: 18 U.S.C. § 371 and 372, involving conspiracies to commit any offense against the United States, or to prevent or retaliate in response to the lawful discharge of the duties of Federal officers;

617.

As relevant here, *inter alia*, conduct within the purview of the obstruction of justice statute also violates the following statute: 18 U.S.C. § 1001, involving false statements and concealment of material facts before Federal departments and agencies (Justice Department will charge, *inter alia*, as overlap with 18 U.S.C. § 1505);

618.

As relevant here, *inter alia*, conduct within the purview of the obstruction of justice statute also violates the following statutes: 18 U.S.C. § 1621-1623, involving perjury, subornation of perjury, and false declarations before grand juries and courts (Justice Department will charge, *inter alia*, as overlap with 18 U.S.C. §§ 1503, 1505, and 1512);

619.

Further, and as relevant here, evasive testimony, such as a false denial of knowledge or memory, will be charged on its own and to the omnibus clause of 18 U.S.C. §1503 – and will also be charged when this proscribed activity interferes with other witnesses or documentary evidence;

620.

Suborning perjury, 18 U.S.C. § 1622, may also be an 18 U.S.C. § 1503 omnibus clause offense, even where perjury was in fact not committed, as the predicate of the omnibus clause of 18 U.S.C. §1503 is fully satisfied and will be used to prosecute when *attempts* to suborn perjury are at issue, as herein;

621.

Also, and as prevalent throughout the Brock entities and other nonprofit partisan entities like them affiliated with the Tech Cartel, 26 U.S.C. § 7212, directly involving these entities and involving interference with or endeavoring to interfere with the due administration of the Internal Revenue laws (Justice Department will charge, *inter alia*, the overlap with 18 U.S.C. § 1505);

622.

Upon information and belief, each of the predicate acts – in addition to standing on their own as part of a pattern of racketeering – were committed with the intent to obstruct justice – with intent being inferred from the illegal use of a private email server as well as the other methods of obfuscation used by the Tech Cartel and its principals and surrogates;

623.

Upon information and belief, the Tech Cartel has so obstructed justice hundreds of thousands of times within the relevant statutory period;

624.

Hillary Clinton and the Tech Cartel, by mail and wire to the United States Senate Foreign Relations Committee, the CFIUS (by commission and omission), and to the Federal Bureau of Investigation in 2017, did as herein noted and otherwise, make false statements under oath and penalty of perjury, concerning bribery committed by herself, William Clinton and the Tech Cartel, concerning companies (foreign and domestic) and foreign countries with direct connections to the CF, CGI, and CGEP, and in relation to the corrupt and ongoing Uranium One transactions directly enabled by the Clinton Tech Cartel bribery, did thereby obstruct justice as the United States attempted (and attempts) to determine the Tech Cartel role in providing U.S. lethal uranium stocks to hostile foreign actors;

625.

Competitors, on the other hand, has not only blocked 18 foreign acquisitions which pose a risk to United States national and economic security, he has worked with Congress to assist him in this task;

626.

At the instructions of the Tech Cartel, Tech Cartel surrogates Holder and Mueller, knowingly and contrary to DoJ Guidelines, failed to interview informants regarding their knowledge of Tech Cartel criminal collusion with the Russian Federation;

627.

The Tech Cartel and Clintons were aided and abetted by the Obama FBI in assisting Russia in obtaining control of the U.S. lethal uranium market, to this day, in exchange for a currency

transfer laundered through the Russian SVR to the Clinton Foundation while Hillary Clinton was Secretary of State;

628.

Just as the Tech Cartel undermined the truthful disclosures of Officer whistle-blowers, which tended to infer malfeasance attributable to Hillary Clinton, Tech Cartel surrogates Comey, Strzok, Lynch, Yates and their various sycophants conspired with the Tech Cartel, via wire and mail, to "insure" – including but not limited to knowing obstruction of justice in collusion with the Russian SVR and FSB to control political power;

629. to 674.

Upon information and belief, on April 9, 2016, senior FBI manager Peter Strzok interviewed Tech Cartel surrogate Cheryl Mills and, thereby, by omission and commission, sought to and did interfere with the investigation into the Tech Cartel Clinton e-mail servers in exchange for lenient treatment of Secretary Clinton; In these exchanges, the examples of bias are astonishing for two senior officials who had just spiked the Clinton email espionage investigation and, along with Attorney General Loretta Lynch and her Deputy, Sally Yates, had spiked the Clinton Foundation corruption investigation (thus obstructing justice in myriad ways, including obstruction of a criminal investigation), while instigating an official investigation against the competitors campaign (Crossfire Hurricane), Strzok notes that "*we can't take the risk" of competitors being elected or retained in office, and further noted that the FBI needed to undermine competitors as an "insurance policy" as a hedge against any possible competitors victory in the 2016 presidential contest*. If that were not shocking enough, just one week earlier than the "insurance policy" text exchange, the following exchange had occurred between Page and Strzok, key officers and lawyers conducting the Clinton e-mail investigation, the Clinton Foundation Investigation, the misleading of the FISC, the pre-election surveillance and HCS misuse regarding competitors and whistle-blowers, and Operation Crossfire Hurricane: **Page**: "[competitors's not ever going to become president, right? Right?! (August 9, 2016) **Strzok**: No. **No he won't**. ***We'll stop it***." This is proof of FBI/Tech Cartel sedition, as Strzok had just spiked the Clinton e-mail investigations and McCabe, Yates and Lynch (along with Strzok) had spiked the Clinton Foundation investigation. This seditious exchange was 9 days after Operation Crossfire Hurricane started and 6 days before the "insurance policy" text;

Acts Indictable Relating to Obstruction of Criminal Investigations

675.

Plaintiff repeats and re-alleges each and every allegation of the foregoing paragraphs as if fully set forth herein;

676.

Whoever willfully endeavors, as the Tech Cartel has since its inception, by means of bribery to obstruct, delay, or prevent the communication of information relating to a violation of any criminal statute of the United States by any person to a criminal investigator is subject, per count, to a five-year prison sentence and substantial criminal fine;

677.

Upon information and belief, each of the predicate acts – in addition to standing on their own as part of a pattern of racketeering – were committed with the intent to obstruct justice and obstruct criminal investigations – with criminal intent being inferred from the illegal use of a private email server, admitted destruction of evidence, discussions among surrogates Strzok and Page, John Podesta admissions, the admissions in *Exhibit "A"* hereto, as well as the myriad other methods of criminal obfuscation used by the Tech Cartel and its principals and surrogates;

678.

As relevant here, *inter alia*, conduct within the purview of the obstruction of justice statute also violates the following statutes: 18 U.S.C. § 371 and 372, involving conspiracies to commit any offense against the United States, or to prevent or retaliate in response to the lawful discharge of the duties of Federal officers – thereby aggravating Tech Cartel wrongdoing significantly;

679.

As relevant here, *inter alia*, conduct within the purview of the obstruction of justice statute, as here, also violates the following statute: 18 U.S.C. § 1001, involving false statements and concealment of material facts before Federal departments and agencies (Justice Department will charge, *inter alia*, as overlap with 18 U.S.C. § 1505) - thereby aggravating Tech Cartel wrongdoing significantly;

680.

As relevant here, *inter alia*, conduct within the purview of the obstruction of justice statute, as here, also violates the following statutes: 18 U.S.C. § 1621-1623, involving perjury, subornation of perjury, and false declarations before grand juries and courts (Justice Department will charge, *inter alia*, as overlap with 18 U.S.C. §§ 1503, 1505, and 1512) - thereby aggravating Tech Cartel wrongdoing significantly;

681.

Further, and as relevant here, evasive testimony, such as a false denial of knowledge or memory, will be charged on its own and to the omnibus clause of 18 U.S.C. §1503 – and will also be charged when this proscribed activity interferes with other witnesses or documentary evidence - thereby aggravating Tech Cartel wrongdoing significantly;

682.

Suborning perjury, 18 U.S.C. § 1622, may also be an 18 U.S.C. § 1503 omnibus clause offense, even where perjury was in fact not committed, as the predicate of the omnibus clause of 18 U.S.C. §1503 is fully satisfied and will be used to prosecute when *attempts* to suborn perjury are at issue, as herein - thereby aggravating Tech Cartel wrongdoing significantly;

683.

Also, and as prevalent throughout the Brock entities and other nonprofit partisan entities like them affiliated with the Tech Cartel, 26 U.S.C. § 7212, directly involving these entities and involving interference with or endeavoring to interfere with the due administration of the Internal Revenue laws (Justice Department will charge, *inter alia*, the overlap with 18 U.S.C. § 1505) - thereby aggravating Tech Cartel wrongdoing significantly;

684.

As noted, upon information and belief, each of the predicate acts – in addition to standing on their own as part of a pattern of racketeering – were committed with the intent to obstruct justice with intent being inferred from the illegal use of a private email server as well as the other methods of obfuscation used by the Tech Cartel and its principals and surrogates;

685.

On January 29, 2016, FBI director James Comey named disgraced and putative felon Andrew McCabe deputy director, with responsibility for oversight of Clinton investigation with covert instructions to “spike” the espionage aspects for which Secretary Clinton was particularly vulnerable after, on January 15, 2016, John Giacalone, head of the FBI's National Security Division, retired after observing that the Clinton/Tech Cartel email probe was being undermined from within the FBI by Tech Cartel surrogates Comey and McCabe (with illegal assistance from Strzok and Page);

686.

In early May of 2016, directly contemporaneous with the provision of Tech Cartel surrogate Comey’s “coordination” with his top FBI staff that Secretary Clinton would be exonerated despite having committed espionage, Nellie Ohr, wife of DOJ executive Bruce Ohr, was hired by Fusion GPS to work on competitors "Dossier” – Bruce Ohr’s failure to report this employment on mandatory government ethics forms represents obstruction of an ongoing criminal investigation and must be charged, in addition, in conjunction with the obstruction corollary offenses set forth in the preceding paragraphs of this section; Upon information and belief, $84 million was funneled illegally from the DNC through state party chapters and back into the accounts of the Clinton campaign;

CAUSES OF ACTION

Acquisition and Maintenance of an Interest in and Control of an Tech Cartel Engaged in a Pattern of Racketeering Activity: 18 U.S.C. §§1961(5), (1962)(b)

758.

Plaintiff repeats and re-alleges each and every allegation of the foregoing paragraphs as if fully set forth herein;

759.

During the ten calendar years preceding, all Defendants did cooperate jointly and severally in the commission of two or more of the RICO predicate acts that are itemized in the RICO statute codified at 18 U.S.C. §§ 1961(1)(A) and (B), and did so in violation of the RICO law at 18 U.S.C. § 1962(b) (prohibited activities);

760.

Non-sovereign Defendants are each “persons” within the meaning of the Racketeer Influenced and Corrupt Organizations Act;

761.

Defendants operate as an “Tech Cartel” within the meaning of RICO, the activities of which effect interstate and foreign commerce;

762.

Defendants, by virtue of the predicate acts described in this Complaint, including but not limited to: laundering of monetary instruments, engaging in monetary transactions improperly derived from unlawful activity, transferring, receiving, furthering, and suppling financing and income that was derived, both directly and indirectly, from a pattern of racketeering activity in which each of them participated as a principal and used and invested, both directly and indirectly, such income and the proceeds of such income, in establishing, operating and furthering terrorist and other illegal Tech Cartels in violation of 18 U.S.C. § 1962(a);.

763.

As a direct and proximate result of Defendant's violation of 18 U.S.C. § 1962(a), Plaintiff suffered the loss of valuable property, financial services and support, and suffered other business and pecuniary damages;

764.

Plaintiff further allege that all Defendants did commit two or more of the offenses itemized above in a manner which they calculated and premeditated intentionally to threaten continuity, i.e., a continuing threat of their respective racketeering activities, also in violation of the RICO law at 18 U.S.C. § 1962(b);

765.

18 U.S.C. § 1964(c) defines "racketeering activity" as (A) "any act or threat involving murder, kidnapping, gambling, arson, robbery, bribery, extortion, dealing in obscene matter, or dealing in a controlled substance or listed chemical […], which is chargeable under State law and punishable by imprisonment for more than one year; (B) any act which is indictable under any of the following provisions of title 18, United States Code: Section 201 (relating to bribery), sections 471, 471 and 473 (relating to counterfeiting), section 659 (relating to theft from interstate shipment) if the act indictable under section 659 is felonious, section 664 (relating to embezzlement from pension and welfare funds), sections 891-894 (relating to extortionate credit transactions), section 1028 (relating to fraud and related activity in connection with access devices), section 1084 (relating to the transmission of gambling information), section 1341 (relating to mail fraud), section 1343 (relating to wire fraud), section 1344 (relating to financial institution fraud), section 1425 (relating to the procurement of citizenship or naturalization unlawfully), section 1426 (relating to the reproduction of naturalization or citizenship papers), section 1427 (relating to the sale of naturalization or citizenship papers), section 1503 (relating to obstruction of justice), section 1510 (relating to obstruction of criminal investigations), section 1511 (relating to the obstruction of State or local law enforcement), section 1512 (relating to tampering with a witness, victim, or an informant), section 1513 (relating to retaliating against a witness, victim, or an informant), section1546 (relating to fraud and misuse of visas, permits, and other documents), sections 1581-1592 (relating to peonage, slavery, and trafficking in persons), section 1951 (relating to interference with commerce, robbery, or extortion), section 1952 (relating to racketeering), section 1956 (relating to the laundering of monetary instruments), section 1957 (relating to engaging in monetary transactions in property derived from specified unlawful activity), section 1958 (relating to use of interstate commerce facilities in the commission of murder-for-hire), sections 2251, 2251A, 2252, and 2260 (relating to sexual exploitation of children), sections 2314 and 2315 (relating to interstate transportation of stolen property), section 831 (relating to nuclear materials); or any act which is indictable under the Immigration and Nationality Act, section 274 (relating to bringing in and harboring certain aliens), section 277 (relating to aiding or assisting certain aliens to enter the United States), or

section 278 (relating to importation of alien for immoral purpose) if the act indictable under such section of such Act was committed for the purpose of financial gain;

766.

Plaintiff demand that judgment be entered against Defendants for no less than $3,000,000,000, jointly and severally, including an award of trebled damages as consistent with 18

U.S.C. § 1964(c), compensatory and actual damages, reasonable attorneys' fees, pre-judgment interest, post-interest costs, and an award that this Court deems just and proper.

ADDITIONAL CAUSE OF ACTION

Conduct and Participation in a RICO Tech Cartel through a Pattern of Racketeering Activity: 18 U.S.C. §§ 1961(5), 1962(c)

767.

Plaintiff repeats and re-alleges each and every allegation of the foregoing paragraphs as if fully set forth herein, and specifically repeat and re-allege the allegations under the First Cause of Action concerning RICO liability;

768.

All defendants did associate with a RICO Tech Cartel of individuals who were associated in fact and who engaged in, and whose activities did affect, interstate and foreign commerce;

769.

All Defendants did conduct and/or participate, either directly or indirectly, in the conduct of the affairs of said RICO Tech Cartel through a pattern of racketeering activity, all in violation of 18 U.S.C. §§ 1961(4), (5), (9), and 1962(c);

770.

During the ten calendar years preceding June 15, 2018, all Defendants did cooperate jointly and severally in the commission of two or more of the RICO predicate acts set forth in the RICO laws at 18 U.S.C. §§ 1961(1)(A) and (B), and did so in violation of the RICO law at 18 U.S.C. §1962(c);

771.

Plaintiff further allege that all Defendants did commit two or more of the offenses set forth above in a manner which they calculated and premeditated intentionally to threaten continuity, *i.e.* a

continuing threat of their respective racketeering activities, also in violation of the RICO law at 18 U.S.C. § 1962(c);

772.

Plaintiff demand that judgment be entered against Defendants for no less than $3,000,000,000, jointly and severally, including an award of trebled damages as consistent with 18

U.S.C. § 1964(c), compensatory and actual damages, reasonable attorneys' fees, pre-judgment interest, post-interest costs, and an award that this Court deems just and proper.

ADDITIONAL CAUSE OF ACTION

Conspiracy to Engage in a Pattern of Racketeering Activity: 18 U.S.C. §§ 1961(5), 1962(d) 773.

Plaintiff repeats and re-alleges each and every allegation of the foregoing paragraphs as if fully set forth herein, and specifically repeat and re-allege the allegations under the First Cause of Action concerning RICO liability.

774.

All defendants conspired to acquire and maintain an interest in a RICO Tech Cartel engaged in a pattern of racketeering activity, in violation of 18 U.S.C. §§ 1962(b) and (d).

775.

During the ten calendar years preceding, all Defendants did cooperate jointly and severally in the commission of two or more of the predicate acts that are set forth at 18 U.S.C. §§ 1961(1)(A) and (B), in violation of 18 U.S.C. § 1962(d).

776.

Plaintiff further alleges that all Defendants did commit two or more of the offenses itemized above in a manner which they calculated and premeditated intentionally to threaten continuity, i.e., a continuing threat of their respective racketeering activities, also in violation of 18 U.S.C. § 1962(d).

777.

Plaintiff demand that judgment be entered against Defendants for no less than $3,000,000,000, jointly and severally, including an award of trebled damages as consistent with 18 U.S.C. §

1964(c), compensatory and actual damages, reasonable attorneys' fees, pre-judgment interest, post-interest costs, and an award that this Court deems just and proper.

ADDITIONAL CAUSE OF ACTION

- Pendant Defamation Claim Under Arkansas Law

778.

Plaintiff repeats and re-alleges each and every allegation of the foregoing paragraphs as if fully set forth herein;

779.

Plaintiff, and in particular whistle-blowers, were defamed by all defendants under Arkansas Code, Title 16, Subtitle 5, Chapter 63, Subchapter 2, §16-63-207 – Libel and Slander;

780.

ARKANSAS CODE §16-63-207(a)(1) (2012) states: "In an action for libel or slander, it shall not be necessary to state in the complaint any extrinsic facts for the purpose of showing the application to the plaintiff of the defamatory matter out of which the cause of action arose. It shall be sufficient to state generally that the defamatory matter was published or spoken concerning the plaintiff."

781.

In Arkansas, the ostensible "home" of the Tech Cartel wrongdoing, legal precedent requires only that "a substantial and respectable minority" of the plaintiff's community would consider the Tech Cartel slurs to be defamatory; the so-called "majority sentiment", a far higher standard, *cannot* be considered by either the Arkansas judge or jury;

782.

Plaintiff whistle-blower was defamed when accused by *Correct the Record and the Nick Denton tabloid empire,* on behalf of the Tech Cartel this defamation was repeated each day since publication as set forth in *Exhibit* .

783.

Plaintiff/Whistle-blowers suffered extraordinary reputational injury and, as noted throughout this complaint, devastating monetary damage to his business as an author and commentator;

784.

Plaintiff/whistle-blower is not a “public figure”, in any sense of that term of art;

785.

Printed publications, images and online states, *e.g.*, “***Correct the Record and the Nick Denton tabloid empire*** **FROM THE DESK OF DAVID BROCK**”, all may constitute libel in Arkansas – even if they were repeated millions of times on social media, weblog commentary, and related defamatory missives;

786.

Slander, which occurred repeatedly in this case, is spoken or transitory defamation; whistle-blowers were slandered repeatedly by Defendants owned and controlled publishing vehicles;

787.

In several separate appearances the Tech Cartelprovided wholly and intentionally false renditions, set forth as fact, of whistle-blowers’s job responsibilities in an attempt to discredit whistle-blowers’s observations.

788.

All defendants, individually and collectively, attempted to destroy the reputation and business of whistle-blowers and other Plaintiff with false statements in writing and on television.

789.

Hillary Clinton and David Brock ordered that whistle-blowers be defamed and destroyed, because Plaintiff told the truth about organized crime within government bodies;

790.

The Tech Cartel used the same corrupt intimidation tactics, including surveillance and illegal leaks, against whistle-blowers that they are now using against competitors;

791.

As a result of defendant’s defamation, Plaintiff is entitled to $50.5 million in damages;

792.

Plaintiff will prevail as a matter of law, as the Defendant’s libel and slander was entirely and intentionally false and made with the purpose of damaging Plaintiff, who must be awarded treble damages of $151.5 million, jointly and severally;

ADDITIONAL LEGAL CAUSES OF ACTION HEREIN INCLUDE:

ABUSE OF PROCESS; FTCA VIOLATIONS; ACCOUNT STATED; BREACH OF CONTRACT; CONVERSION; DEFAMATION; FRAUDULENT MISREPRESENTATION; FRAUDULENT CONCEALMENT; INJURIOUS FALSEHOOD, PRODUCT DISPARAGEMENT AND TRADE LIBEL; CIVIL RIGHTS VIOLATIONS AND VIOLATIONS OF THE U.S. CONSTITUTION; MISAPPROPRIATION OF TRADE SECRETS; PRIMA FACIE TORT; QUANTUM MERUIT; TORTIOUS INTERFERENCE INCLUDING a.) Tortious interference with an existing contract, b.) Tortious interference with prospective, c.) Tortious interference with business relations contractual relations; PATENT INFRINGEMENT; PERSONAL INJURY; UNJUST ENRICHMENT; ANTI-TRUST LAW VIOLATIONS; LABOR LAW VIOLATIONS AND OTHER CAUSES.

A CLASS ACTION CASE involving all of the whistle-blowers should aslo be produced.

CONCLUSION

793.

In anticipation of filing this complaint, it is imperative to point out that several Tech Cartel schemes involving numerous criminal acts, and what appears to be a significant "cover up" within the holdover (legacy) White House, SEC, FBI and DoJ, have only recently come to light and continue to be exposed – discovery in this case will inevitably include significant additional inculpatory evidence concerning the Tech Cartel operational schemes at issue in this lawsuit;

794.

It is clear that these Tech Cartel participants, including but not limited to its surrogates and collaborators, have misled their Article III counterparts, *i.e*., whatever federal judge was/is assigned to the relevant FISA matter;

795.

Abuse of the FISC process is not only illegal and a threat to our structural constitutional form of government under which FISA operates, it is a direct affront (and a slap in the face) to the Chief Judge of this honorable district court, the Chief Judge of the FISC, and the Chief Justice of the United States Supreme Court who appoints the life-tenured judges who "dual hat" as FISA/FISC judges;

796.

The Department of Justice has now allowed all members (and/or designees) of the House and Senate Intelligence Committees to review significant material with direct relation to the issues in this lawsuit - this will represent an opportunity for this Court (in determining the (non)credibility of the Tech Cartel defendants and surrogates and drawing appropriate inferences of corrupt Tech Cartel intent) to be shown the Tech Cartel scheme to illegally undertake a fraud on the FISC in pursuit of their surreptitious surveillance of the whistle-blowers based upon a standard far lower than that set forth in the Fourth Amendment to our Constitution;

797.

The Tech Cartel malfeasance, including, *inter alia*, misleading the Article III FISA judge(s) in an attempt to manipulate elections and laws and using FISA as a tool to damage the lives, businesses and employment of political enemies, also destroys the delicate balance forged in 1978 between the Executive (who ceded power) and the Legislative (which on balance gained oversight authority) – but that thoughtful structure is now at grave risk;

798.

It is certainly not lost on this court that what the Tech Cartel has done to Plaintiff whistle-blowers is the utilization of FISA (and abuse of the trust inherent in the delicate balance therein) and other counterintelligence authorities such as human confidential sources to defeat a political opponent - in the fashion intended to be utilized to defeat, *inter alia*, international terrorists;

799.

In a deep departure from United States law and our constitutional norms, the Obama Justice Department (as set forth herein), misled at least one Article III federal judge (sitting as a FISA judge(s)) in seeking a surveillance order, or "warrant", for surveilling a United States citizen, that they were presumptively relying upon a fake dossier (based upon knowing disinformation provided by the Russian SVR and financed by the Tech Cartel knowingly relying upon said Russian SVR disinformation and compiled by a foreign person, Steele, who concedes openly that he sought to defeat people he did not like;

800.

Tech Cartel principals and surrogates lied to the FBI and obstructed justice in order to illegally mislead Article III federal judges into approving a FISA warrant to surreptitiously surveil United States citizens;

801.

The FBI used robust counterintelligence techniques without adequate cause against a political candidate they disfavored, and against those like Plaintiff they feared would harm their favored candidate;

802.

Several months after Steele signed a contract with Fusion GPS to create a dossier on private citizens, Steele discovered his research was being subsidized by the Hillary Clinton for President campaign and the Democratic National Committee; despite this conceded knowledge and Steele's admission that he wanted to simply harm his competitors, the DoJ/FBI FISA warrant application said Steele didn't know who was funding him;

803.

The abuse of the FISC is the worst violation of the FISA statute in its history, and together with the use of other counterintelligence authorities to run HCSs and lures against political opponents constitutes yet another form of Tech Cartel sedition in attempting to misuse the FISC and counterintelligence process to undermine a duly certified and inaugurated president – at the *very* least, any FISC judge, had they granted the application and then subsequently learned (as the DoJ was responsible to inform them) that the information was sourced (notwithstanding that it was financed) to the DNC and the Clinton Campaign, would have rescinded the authorization and issued a show-cause order to the Government to explain who and why this sourcing was not made known to the court;

804.

The FISC and this court were not properly informed of the counterintelligence abuse;

805.

The fact that the Justice Department told the FISC that it was a political source, but did not identify who, in this particular instance, is highly probative that the Government purposely misled the court – which is also facing scrutiny due to the friendship with FBI Tech Cartel surrogate Strzok and failure to recuse by a FISC judge;

806.

By and in relation to every crime and predicate act herein, directly in support of the predicate thereof, tens of thousands of text messages between FBI colleague Strzok, Page, Doerr, Westly, et al constituting wire fraud have established (those released thus far) and will further establish (those withheld thus far) the Tech Cartel wrongdoing from the highest levels of the FBI and DoJ

807.

On or around the time of the filing of this complaint, the Department of Justice Inspector General will issue one of several ongoing reports relevant to related RICO matters, in addition to the testimony that Strzok and Page will be required to provide about their discussions that were not captured in the tens of thousands of probative text message exchanges – in short, there is much more to come establishing the depth and breadth of the Tech Cartel, and more specific dates,

names and clear intentions of preventing an electoral outcome and, failing that, removing a duly-certified President and undermining their own government;

808.

The DoJ Inspector General has within its possession and upon the issuance of its report addressing the Strzok-Page wrongdoing (and the Hillary Clinton e-mail espionage), will release evidence further proving the Tech Cartel wrongdoing set forth herein;

809.

Although espionage, bribery and sedition (among many others) may be inherent in the Tech Cartel, the use of the DoJ, FBI, NSA (who must run, maintain, and otherwise "weaponize" the electronic surveillance), the wrongdoing committed by the Tech Cartel and its surrogates and collaborators in this case is immeasurable in its danger and simply without comparison in the annals of counterintelligence abuse to destroy political enemies – pre- or post-FISA;

810.

By way of recent example, defendant John Podesta, working with the Tech Cartel and the Center for American Progress (a nonprofit partisan entity he founded), is engaged in an intentional disinformation campaign meant to discredit current investigators in Congress and further undermine the U.S. government using taxpayer funds – primarily through a wholly partisan CAP undertaking known as the "Moscow Project";

811.

The "Moscow Project," in turn, coordinates its work with Tech Cartel surrogate Jones and the group of mega-funders led by defendant Soros, who have engaged Tech Cartel surrogate Fusion GPS to further undermine the U.S. Government;

812.

The Center for American Progress, as noted a wholly partisan "non-profit organization" founded by former White House Chief of Staff John Podesta, has for over five years been lobbying (without registering such lobbying under FARA) on behalf of foreign governments;

813.

In addition to espionage and sedition, the Tech Cartel utilized prototypical crime syndicate tactics such as attempting to tamper with the "Special Counsel" investigation of Tech Cartel surrogate Robert S. Mueller;

814.

On Tech Cartel instructions, Tech Cartel surrogates Strzok and Page have also destroyed the capability of certain DoJ/FBI hard drives containing inculpatory evidence against the Tech Cartel;

815.

Without the knowledge of their current Director, the FBI on behalf of the Tech Cartel provided materially false statements to the Senate Judiciary Committee, based in turn upon illegal false statements provided to the FBI by Steele which the FBI knew to be false – and the referral of Steele for prosecution (corroborating the allegations of the HPSCI concerning what is described herein as Tech Cartel wrongdoing) further implicates the FBI as Steele's handler (knowing of his Tech Cartel political offices funding);

816.

In a statement provided on January 23, 2018, by United States Senator Ronald Johnson (R-WI), the Chairman of the Senate Homeland Security and Government Affairs Committee, Senator Johnson revealed that Tech Cartel surrogates Strzok and Page conspired routinely directly after the 2016 election with a group of Clinton/Tech Cartel loyalists within the DoJ/FBI to undermine the competitors presidency, and were planning yet another cover-up of their criminal activity involving inculpatory text messages between them – joining the principals of the Tech Cartel set forth in *Exhibit "A"* hereto with the DoJ/FBI participants affiliated with the Ohr Tech Cartel surrogates, Fusion GPS, and numerous named unknowns who have - if the accusation by Senator Johnson is confirmed following (yet another) investigation - chosen to undermine their own government and expose themselves to continuing criminal liability in conjunction with the Tech Cartel;

817.

The Chairman of the United States House Permanent Subcommittee on Intelligence ("HPSCI"), after conducting a lengthy investigation of Tech Cartel tactics, stated that

""We have a clear [Clinton] link to Russia — you have a campaign who hired a law firm, who hired Fusion GPS, who hired a foreign agent, who then got information from the Russians on the other campaign" …"…. the counterintelligence investigation should have been opened up against the Hillary [Clinton] campaign when they got ahold of the dossier. But that didn't happen, either";

818.

The Chairman of HPSCI, Devin Nunes (R-CA), also is on record as concluding the massive FISA and other (HCS) counterintelligence abuse of the responsible Tech Cartel actors noted herein;

819.

As Congress and the Executive Branch continues to expose Tech Cartel crimes, Members of the HPSCI and the Senate Committee on the Judiciary have also uncovered the 2016 involvement of the Obama Department of State in assisting the Tech Cartel in attempting to swing the election for Hillary Clinton – according to these Members, Tech Cartel surrogates Sidney Blumenthal, Cody Shearer and State Department official Jonathan Winer engaged in analogous Tech Cartel tactics in assembling yet another anti-competitors "dossier" using Fusion GPS to "[pay] Steele to put together the dossier and [instructing] him what to [include]";

820.

Brennan, Clapper and other Tech Cartel surrogates must also answer under oath – during the pendency of this litigation and before a putative Grand Jury – concerning, *inter alia*, their role in the inexcusable collusion with Hannigan, investigatory abuse prior to and after Operation Crossfire Hurricane, FISA abuse, and HCS abuse while they attempted to deliver the presidency to Hillary Clinton;

821.

On March 29, 2018, the Attorney General of the United States announced he had assigned the Department of Justice Inspector General to "investigate alleged violations of criminal and civil laws by Department [of Justice] employees, including actions taken by former employees after they have left government service – that role of the DoJ IG has grown exponentially and has resulted in criminal referrals of several of the most senior DoJ/FBI officials for prosecution;

822.

As part of the March 29th announcement by the Attorney General of the United States, Attorney General Sessions emphasized that he has assigned the United States Attorney for the District of Utah, John Huber (originally commissioned by the Obama administration but renominated by President competitors in 2017 for an additional four-year term) to both investigate (concomitant and consistent with, *inter alia*, the DoJ IG and Congress) wrongdoing by those actions undertaken by the Tech Cartel and described herein, and the DoJ IG will, if/when the IG "finds evidence of criminal wrongdoing, [the DoJ IG] may refer that criminal malfeasance to Huber (or another United States attorney) who can then convene a Grand Jury or take other appropriate actions";

823.

Because the findings of current and numerous parallel investigations, including but not limited to the ongoing matter with relation to United States Attorney Huber and the DoJ IG, it is anticipated that another significant trove of evidence will be available in the near future for consolidation into and use during this lawsuit;

824.

It is also anticipated that, if significant wrongdoing with respect to the Obama Justice Department and FBI is uncovered, it will be referred for prosecution and either a(nother) Special Counsel will be appointed or another United States Attorney assigned with broad scope (including "investigating of the (Mueller) investigators" – thereby providing additional evidence for the instant cause of action;

825.

It is not only plausible but conclusive that the defamatory attacks against Plaintiff whistle-blowers were inextricably intertwined with the counterintelligence abuses brought to bear against those who were considered "enemies" of the Tech Cartel;

826.

What began as an Tech Cartel operational scheme to control the Oval Office has now been discovered to be – based not only upon information and belief but informants' testimony to Congress and the Department of Justice – the destruction of Tech Cartel "enemy" whistle-blowers and a constitutional crisis created by Tech Cartel surrogates among high-level Obama administration FBI and DoJ officials;

827.

It is incumbent upon this (and any other) Article III court to end the Tech Cartel operational scheme that has destroyed any professional prospects for Plaintiff and the whistle-blowers and, working together, carried out their operational scheme in secret to destabilize the United States Government and the elections of the United States – even going so far as to instruct Strzok to initiate within the FBI "an *investigation leading to impeachment*" just prior to Strzok being placed in the upper echelon of the Mueller Special Counsel team – despite Strzok's admission that the Mueller Special Counsel investigation involved pursuing a sitting President and numerous other United States citizens when nothing of particular consequence is at issue, *i.e.*, "no big there" (May 19, 2017 text message from Strzok to Page);

828.

The Tech Cartel was, and is, a dangerous organized criminal association – threatening both our nation and those individuals who, in the words of Donna Lease Brazile, dare to "cross them";

829.

To Plaintiff , who apparently has "crossed" the Tech Cartel, life is quite perilous and precarious – we ask this honorable court to intervene and provide the ability, even if the jury does not return all that is asked, to prevent the Tech Cartel, as they are wont, from further attacks on Plaintiff.

830.

Plaintiff was exposed to nuclear materials and toxins either purposely or negligently while working as an employee/contractor with the United States Department of Energy.

831.

White House and Department of Energy Executive staff, in reprisal, ordered a “hit-job” on Plaintiff and other whistle-blowers. White House and Department of Energy Executive staff financed and managed those attacks through circuitous communications routes which were exposed after Russian, Chinese and Iranian state-sponsored hackers hacked most of Washington, DC government server networks;

832.

Acccording to www.usinventor.org most of Defendants Tech Cartel technologies were based on stolen technlogies for which Defendants never paid fees, licenses or profit sharing royalties;

833.

Plaintiff technologies obsoleted most of Defendants competing technologies and thus Defendants also violated anti-trust laws by engaging in attacks and business interference in order to prevent Plaintiff from competing with the Tech Cartel cartel. For example, Tech Cartel financier and core beneficiary Kleiner Perkins placed one of their staff as a “mole” inside of one of Plaintiff companies with orders to “disrupt and sabotage” Plaintiff business. FBI and private investigators uncovered the ruse;

834.

The “*Elon Musk Addenda*” Document details over 30 felony criminal assertions against Tech Cartel member Elon Musk;

835.

Congressional bosses Harry Reid, Dianne Feinstein, Kamala Harris, Nancy Pelosi, Barbara Boxer and other famous names have had their assets, finances and stock market accounts electronically tracked directly back to the crimes detailed in this disclosure, the operators of those crimes, the public policy tactics to enable those crimes and the insider trading of those crimes;

836.

Tech Cartel boss Tom Steyer placed his partner M. Sullivan as a head officer at USAID. USAID promoted the harvesting of Afghanistan for “trillions of dollars of rare earth mining” to Silicon Valley oligarchs as payola for funding and search engine rigging the first Obama White House

campaign. USAID leaked documents and National Archives Documents prove this as fact. Contracts with Silicon Valley's McKinsey Consulting (the promoters of the Opium and Fentanal crisis) to flood Washington, DC with fake "white papers" promoting this Afghan war, also prove this.

837.

Senior officers at Covington And Burling and at Perkins Coie both told Plaintiff that they "have total control over who gets into the Oval Office, who gets appointed and who gets government funding..."

838.

Emails by the most famous members of the Tech Cartel have been leaked showng that the Enterprise modeled itself after the "Italian Mafia" and admired organized crime behavior, up to, and including dressing up as notorious mobsters and having their own speak-easy meetings at places like Jeffrey Epstein's Manhatten building.

839.

The evidence proves that Tesla was using lithium mined from Afghanistan.

840.

The evidence proves that Ener1 was using lithium mined from Afghanistan. After receiving a massive amount of federal dollars, the company mysteriously disappeared.
841.

The evidence proves that Senator Dianne Feinstein lobbied for government funds to be given to Tesla and Solyndra. Her family held HR, land contract, construction, stock and other upside assets in both of those companies.

842.

The evidence proves that Fisker was using lithium mined from Afghanistan. After receiving a massive amount of federal dollars, the company mysteriously disappeared.

843.

The evidence proves that Abound Solar was using indium mined from Afghanistan. After receiving a massive amount of federal dollars, the company mysteriously disappeared.

844.

The evidence proves that The U.S. Secretary of Energy had personal, financial and political relationships with each of the companies who were given federal cash that he controlled. He sabotaged every single other applicant, who, coincidentally, were the competitors to his friends who he awarded the taxpayer cash to.

845.

This evidence, and the associated hard drives and witness testimony, will stand up as sworn, certified, warranted testimony in any federal jury trial, grand jury hearing, RICO Racketeering corruption trial and/or live televised Congressional hearing. Given equally resourced, and financed, legal support and proper security protection, many hundreds of person's are willing to swear and warrant to the veracity of these assertions.

846.

The evidence proves that New York State, California State and Washington, DC elected officials, in particular U.S. Senators, did criminalize the domestic public policy system in order to acquire personal profits and monopolize industry markets for themselves and their friends.

847.

The evidence proves that Tesla Motors, Elon Musk and his associates, participated in these schemes in violation of organized crime laws.

848.

The evidence proves that the investment firms of Goldman Sachs; Kliener Perkins; Draper Fisher Jurvetson; GreyLock Capital; and other venture firms participated in these schemes in violation of organized crime laws.

849.

The evidence proves that U.S. Senators Reid, Feinstein, Harris, Boxer, Pelosi, and other Senators, participated in these schemes in violation of organized crime laws.

850.

The evidence proves that U.S. Attorney Generals Holder, Harris, Schniederman, and other Attorney Generals, participated in these schemes in violation of organized crime laws.

851.

The evidence proves that certain senior law enforcement officials received full and complete

crime reports and law violations disclosures about these crimes and stalled investigations, covered-up the crimes and tampered with evidence in order to protect their political friends and profit monetarily.

852.

The evidence proves that A "Silicon Valley PayPal Mafia" does exist and they do conspire to break the law and manipulate Democracy.

853.

The evidence proves that the members of this technology cartel "Mafia" group are selected for their social, physical and family similarities which include the tendency to engage in sociopath behavior, rape, sex abuse and sex-extortion, misogyny, tax evasion, money laundering, real estate fraud, racism, bribery, patent theft and other deviant behavior.

854.

The evidence proves that Google's VC's and executives, who are part of this cartel, plan and manually run election manipulation programs, privacy abuse, search engine rigging and militaristic information manipulation for personal profiteering at the expense of the public.

855.

The evidence proves that the Obama Administration used the U.S. Department of Energy as a campaign financier payola slush fund.

856.

The evidence proves that U.S. elected political officials hire and manage third party services to run reprisal campaigns against taxpayers and that those character assassination providers include: IN-Q-Tel, Think Progress, Black Cube, Podesta Group, EDS, Stratfor, Fusion GPS, IN-Q-Tel, Media Matters, Gawker Media, Gizmodo Media, Syd Blumenthal, and other attack services which are illicitly compensated with laundered taxpayer resources.

857.

The evidence proves that the bribes and profiteering conduits for this scam are ignored by compromised FEC bosses and include: Dark Money fronts; family trust floats; shell corporation layering; insider trading in tech companies; revolving door jobs at Netflix, Google, etc; prostitutes; sports suites; political campaign search engine rigging, bot attacks and other illicit payola.

858.

The evidence proves that a mobster-like cartel of men operate a racketeering operation out of Silicon Valley that manipulates elections, news and taxpayer funding policies.

859.

The evidence proves that this cartel is comprised of sick, megalomaniac, sexually addicted and abusive men who protect each other with billions of dollars of cover-ups involving the bribery of Senators with insider trading stock and covert campaign financing.

860.

The evidence proves that this cartel receives hundreds of billions of dollars of profits from their crimes and this causes them to stoop to murders, extortion, black-lists, funding blockades and other crimes, in order to gather their ill-gotten gains.

861.

The evidence proves that the investors of Google, Facebook, Twitter, Amazon, Ebay, Netflix and a related set of Silicon Valley monopolies conspire in these efforts to manipulate the stock market, lie to advertisers and bias all digital news and information, globally, to push their selfish ideologies.

862.

The evidence proves that Senators Pelosi, Feinstein, Boxer, Harris, Reid have an active criminal participation in, and benefit from, these efforts and that they, in fact, along with Steven Chu had illicit dealings with Russian and Chinese financiers and they are paid with insider trading stock, revolving door jobs, and other covert payola.

863.

The evidence proves that Google, Facebook and Twitter have rigged and manipulated U.S. elections since Barack Obama was elected.

864.

The evidence proves that the U.S. Department of Energy and the U.S. Department of Justice were used as an illicit slush-fund by the Obama Administration to pay campaign financiers and to sabotage their competitors.

865.

The evidence proves that government officials hired and/or financed and/or directed deadly economic and character assassination hit jobs against those who reported these crimes using attack services from IN-Q-Tel, Gawker Media, Jalopnik, Gizmodo Media, K2 Intelligence, WikiStrat, Podesta Group, Fusion GPS, Google, YouTube, Alphabet, Facebook, Twitter, Think Progress, Media Matters, Black Cube, Mossad, Correct The Record, Stratfor, ShareBlue, Wikileaks, Cambridge Analytica, etc; the owners of whom have been proven to have accepted compensation for such hatchet job services.

867.

The evidence proves that the "The PayPal Mafia" is an actual Cosa Nostra like operation that exploits sex cults, prostitutes, gay rent boys and market rigging as illicitly as the old Chicago "Mob". Charges such as: ***Facebook Hit With New Antitrust Probes*** are becoming regular legal actions. As all other nations find the Silicon Valley tech companies to be a pack of crooks running the U.S. Government.

868.

The evidence proves that Tesla Motors is a criminal Dark Money front that "cooks the books", lies about safety issues and runs sabotage campaigns through Musk's massive use of Russian bots, trolls, stock shills and his covert manipulations with Google's Larry Page and Eric Schmidt.

869.

The evidence, particularly that maintained by the U.S. Attorney's office under Mr. Anderson in San Francisco, shows that San Francisco City Hall is rife with a standardized system of political corruption based on bribery, payola and stock market exchanges.

870.

The evidence proves that internet media companies financed by Sand Hill Road, Palo Alto venture funding firms collude to enforce a strategic censorship plan designed to promote their friends and attack and harm their competitors in a manner which fully violates each and every anti-trust/anti-monopoly law in the United States and that 90% of the California politicians own stock in those companies and those politicians protect those companies from regulation and law enforcement.

871.

Defendants were in whole, and in part, motivated by power and money needed to buy private jets, mansions, parties, prostitutes and rent boys; and drugs. Defendants used a false facade of “saving polar bears”, “protecting whales” and other emotional dog-whistle voter psychological trigger marketing to hide their crimes. Defendants used the good works of Plaintff and other decent whistle-blowers to create a “smoke-screen” to cause the U.S. Government to assist in defrauding Plaintiff out of money, time and resources. Defendants owned the “solution” companies to climate change and housing problems so that all monies provided by the government to those companies, as coordinated by The Tech Cartel’s owned public officials, went to Defendants, and never to their competitors, in a RICO Law and Anti-trust Law-violating manner. For example: Elon Musk used these RICO Law and Anti-trust Law-violating tactics to become the largest “government mooch” in history, destroy all of his competitors via funding blockades and get a 1000% advantage over any other company based on government-funded exclusive quid pro quo.

Plaintiff demands trial by jury on all claims and issues so triable.

EXHIBITS

Proofs Of Service

Civil Cover Sheet

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