

1 RODNEY F. STICH  
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3 Plaintiffs in pro se  
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7 UNITED STATES DISTRICT COURT  
8 xxxxxxxxxxxxxxxx OF CALIFORNIA  
9

10 RODNEY F. STICH,

11 Plaintiff,

12 vs.

13 JOHN D. GUERRINI; GUERRINI LAW  
14 FIRM, PC; STEVE GRATZER, DAVID  
15 COLLINS, TROY GUERARD KNIGHT;  
16 SMITH AND COLLINS, PC; PATRICK R.  
17 WATTS; JEROME M. YALON; IRWIN J.  
18 ESKANOS; BARRY ADLER; JEFF  
19 DANIEL; JEROME M. YALON; JACKSON  
20 V. GREGORY; ESKANOS & ADLER, PC,

21 Defendants

Case No.

COMPLAINT FOR  
DAMAGES ARISING FROM  
VIOLATION OF CIVIL RIGHTS  
AND RICO VIOLATIONS PERPETRATED  
IN SCHEME TO PREVENT EXPOSING  
DEADLY CRIMINAL ACTIVITIES  
(Title 42 U.S.C. §§ 1983-1986);  
RICO (42 U.S.C. §§ 1961-1966);

DEMAND FOR JURY TRIAL

22 This lawsuit addresses the role played by participants in the latest in a series of related  
23 conspiracies that knowingly—and intentionally—blocked a former federal agent, Rodney Stich,  
24 from exposing and reporting corrupt and criminal activities in certain government offices that  
25 continue to inflict great harm upon major national interests. Some segments of the corrupt and  
26 criminal activities that were being blocked from being reported were the areas of primary blame  
27 for the conditions enabling 19 terrorists to hijack four airliners on September 11, 2001.

28 These federal offenses, and the actions to block a former federal agent, witness, and  
informant from reporting the crimes, were, and continue to be, criminal acts.

Because of the complexity of the wrongful acts, the deadly consequences, and the pleading

1 requirement to spell out the facts when conspiracy charges are made, this Complaint goes  
2 extensively into the key segments of the parallel conspiracies.

### 3 **Jurisdiction**

4 Jurisdiction for this lawsuit arises under Title 28 U.S.C. §§ 1331, 1343; 42 U.S.C. §§  
5 1983-1986, 1961-1966, and under the Constitution and laws of the United States. This lawsuit  
6 seeks damages limited to offenses constituting federal causes of action. Offenses constituting  
7 causes of action for the state courts are a separate action.

### 8 **Venue**

9 Venue is based upon (a) the wrongful acts and harm inflicted upon Plaintiff Rodney Stich  
10 while he was a resident of the Northern District of California; and (b) where the greatest harm  
11 was inflicted upon him. The indirect harm to major national interests occurred throughout the  
12 United States.

### 13 **Plaintiff**

14 Plaintiff Rodney F. Stich (“Stich”) has resided in California for the past 40 years. He is a  
15 former federal air safety inspector and investigator for the Federal Aviation Administration  
16 (FAA), who discovered, as a part of his professional and official government duties deep-  
17 seated corruption that was preventing the federal government from carrying out its official air  
18 safety duties. That corruption, which still exists, enabled numerous airline crashes and airline  
19 disasters to occur, killing many people in the process, including people killed in airline  
20 operations for which Stich had official air safety responsibilities as an FAA inspector.

21 In addition to discovering and seeking to report, expose, and halt the corrupt activities,  
22 Stich discovered other areas of corruption implicating people in covert and overt government  
23 operations, learning of these crimes against the United States from the many other government  
24 agents and other insiders who contacted him over the period of many years.

25 It was Stich’s attempts to expose these criminal activities that caused numerous and parallel  
26 legal actions to be taken against him, seeking to halt Stich’s attempts to report the crimes. After  
27 the events of 9/11, that were made possible by three areas of corruption in government offices  
28

1 that he and a group of other government agents had discovered, that the present defendants  
2 joined the prior conspiracies.

### 3 **Defendants**

4 Defendant John D. Guerrini is a lawyer and the head of a law firm in Pasadena, California.

5 Defendant “The Guerrini Law Firm, PD” is a law firm in Pasadena, California.

6 Defendant Irwin J. Eskanos is a resident of Contra Costa County, State of California.

7 Defendant Steve Gratzner is a resident of South Carolina, whose wife prophesized that she  
8 would be murdered by her husband, a week before the murder occurred, in Ely, Nevada.

9 He was used as the plaintiff in a sham lawsuit filed in South Carolina.

10 Defendant Mike Collins is a lawyer and resident of South Carolina.

11 Defendant Troy Guerard Knight is a lawyer and resident of South Carolina.

12 Defendant Smith and Collins is a professional law firm corporation in South Carolina.

13 Defendant Patrick R. Watts is Master In Equity in Dorchester County, South Carolina.

14 Defendant Jackson V. Gregory is a state judge in the State of South Carolina.

15 Jerome M. Yalon, is a lawyer in Contra Costa County, State of California.

16 Defendant Eskanos & Adler is a professional corporation in Contra Costa County, State of  
17 California.

18  
19 Each of the defendants played various roles in the conspiracies to halt the exposure and  
20 reporting of criminal activities that made possible catastrophic and deadly consequences  
21 occurring in the United States.

### 22 **General Allegations and Summary of Lawsuit**

23 This lawsuit arises from the actions and the involvement of the defendants, and others, to halt  
24 Plaintiff, a former key federal aviation safety agent,<sup>1</sup> from exposing corruption related, initially,  
25 to a series of major airline disasters, and later, from exposing corruption<sup>2</sup> in other areas of  
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27 <sup>1</sup> As a federal aviation safety agent, Stich was given the assignment to correct the conditions resulting in the  
28 worst series of airline crashes in the nation’s history.

<sup>2</sup> Information and documentation that Stich obtained from other federal agents (FBI, CIA, ONI, DEA, FAA),  
former Mafia figures, former drug smugglers, revealed corrupt and criminal activities in the FBI and CIA, and  
various corrupt covert activities against the United States.

1 government operations discovered and conveyed to Stich by a steady stream of other government  
2 agents and insiders.

3 The actions, including the conspiracy, by the defendants played major roles in continuing the  
4 corrupt activities. Their actions made possible decades of preventable airline disasters, including  
5 airline hijackings, by blocking Stich from exposing and reporting what he had discovered in his  
6 professional and official duties as a government agent.

7 When the facts are understood, it will be seen that the ripple effects of the underlying  
8 corruption—and the actions taken by lawyers and law firms, including the defendants, continued  
9 the conditions that enabled terrorists to hijack four airliners on 9/11 (as described in the books,  
10 *9/11, Blowback, and Cover-Ups*; and *Unfriendly Skies: 20<sup>th</sup> and 21<sup>st</sup> Centuries*). These were only  
11 one-day's consequences, following a steady stream of prior consequences, and which will be  
12 followed by consequences yet to occur, all made possible by those who joined the various  
13 elements of the multiple and parallel conspiracies to obstruct justice.

14 Other people have played key roles in the continuing uninterrupted conspiracies to block  
15 Stich from exposing these serious matters. They are not named in this lawsuit and are not  
16 necessary to maintain this action against the Defendants.

17 When the facts are understood, it will be seen that the actions of the defendants, joining the  
18 prior conspiracies, played major roles in covering up for the unlawful, corrupt, criminal, and  
19 even subversive activities, that made possible the conditions that enabled the 9/11 hijackings,  
20 and other tragedies, to occur.

21 **Detailing the Complex Series of Events, the Tragedies,**  
22 **And Role Played by Defendants**

23 Because of the complexity of these acts, and to understand the nature of the multiple related  
24 and parallel conspiracies, the highlights of events are stated within this Complaint.

25 Stich<sup>3</sup> was a federal aviation safety investigator-inspector for the Federal Aviation  
26 Administration (FAA) responsible for safety activities at the airlines, between 1962 and 1967.

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27  
28 <sup>3</sup> Stich had been a Patrol Plane Commander in World War II; an international airline captain after the war; and then he became an inspector-investigator for the Federal Aviation Administration (FAA).

1 He was assigned to the Los Angeles FAA Air Carrier Operations Office, working with such  
2 airlines as TWA, American, Western, and others. This period, in the early 1960s, was part of a  
3 period from approximately 1950 to 1980 when major airline disasters—including airline  
4 hijackings—were a common occurrence. United Airlines had more major airline disasters than  
5 all the other airlines combined.  
6

7 **Stich Given the Assignment to Correct the Conditions Responsible**  
8 **For the Worst Series of Airline Disasters in the Nation's History**

9 Stich was approached by the Los Angeles office management and requested to accept the  
10 assignment to correct the conditions responsible for the worst series of airline crashes in the  
11 nation's history. Shortly after assuming the hands-on responsibility for the most senior program  
12 at the world's largest airline, Stich discovered the cause of the steady stream of major airline  
13 disasters occurring at United Airlines. The problems were due to corrupt actions by certain key  
14 management at the airline, and key management throughout the FAA. The FAA problems played  
15 key roles in certain crashes at other airlines, but not to the extent as they influenced safety at  
16 United Airlines. An element of corruption at United Airlines made conditions worst at that air  
17 carrier.  
18

19  
20 Stich discovered, and reported, major safety problems, major safety violations, and major  
21 criminal activities arising from the falsification of government-required reports that falsely  
22 indicated that important safety requirements had been completed, when they had not been.

23 Stich's reports and attempts to correct the problems resulted in official records being  
24 destroyed, suffering retaliation, removal, and other acts, all of which were intended to continue  
25 the deep-seated corrupt, unsafe, and illegal practices. Stich's attempts to report these matters to  
26 higher FAA management resulted in further cover-ups and retaliation.  
27  
28

1       **Number of Deaths and Threat to the Nation’s Aviation Safety Environment**  
2       **Motivated Stich to Take Unusual and Unprecedented Actions**

3       The deaths and injuries arising from the arrogance and corruption motivated Stich to take an  
4 unusual and unprecedented action seeking to halt the deadly corruption. He acted similar to an  
5 independent counsel, while an FAA inspector, seeking to correct the deep-seated corruption in  
6 that section of the government’s aviation safety offices that made possible numerous airline  
7 disasters. He accused certain FAA management personnel of blocking the federal government  
8 from performing its aviation safety responsibilities through corrupt acts, and associated their  
9 misconduct with specific crashes and specific deaths. (These are described in his book,  
10 *Unfriendly Skies: 20<sup>th</sup> and 21<sup>st</sup> Centuries.*, which he wrote seeking to circumvent the standard  
11 cover-ups that occur when major corruption in government offices are about to be exposed.  
12

13       **Initial Corruption Discovered at United Airlines**

14       This corruption included (a) denying to the pilots and engineers the legally required and  
15 industry-accepted periodic training and competency checks; (b) allowing unsafe pilots to  
16 continue flying without the necessary corrective training; (c) depriving the pilots and engineers  
17 of the legally required emergency evacuation training; (d) criminally falsifying government-  
18 required records to fraudulently indicate that the training, competency checks, and other  
19 government-required safety measures were performed; (e) threatening government safety  
20 inspectors who sought to carry out the government-safety requirements; (f) causing inspectors to  
21 be suspended, removed, or transferred, so as to continue the deadly, unlawful, and criminal  
22 activities. All of these air safety and criminal violations were reported into the official records of  
23 the federal government—and withheld from the numerous related airline disasters.  
24

25       **Corruption Discovered of FAA Officials**

26       Stich discovered, and reported, that key FAA management personnel were involved in  
27 blocking the federal government from carrying out its aviation safety responsibilities.

28       Among the problems that Stich discovered of FAA management, and reported, were the  
following: (a) Covering up for the many safety and criminal violations at United Airlines, despite

1 the continuing airline disasters made possible by the misconduct; (b) instructing inspectors not to  
2 report the safety problems and criminal violations, as they would make the office, and FAA  
3 management, look bad after a crash resulting from the problems; (c) feloniously destroyed  
4 official records of these safety problems made by federal safety inspectors; (d) various forms of  
5 retaliation against those few inspectors capable and willing to report the safety problems; (e)  
6 suspending federal safety inspectors who continue to report the safety problems and criminal  
7 violations; and many other tactics.

8 The continuing frequent airline crashes of United Airlines aircraft (and of other airlines due  
9 to safety problems that were system-wide in the FAA), out of concern for the brutal loss of life  
10 that would continue to occur, Stich used the law in such a manner that he acted as an  
11 independent prosecutor. He conducted hearings over a period of approximately four months,  
12 during which testimony and evidence provided further evidence of the existence of the  
13 corruption and the related airline disasters.

14 These hearings were before an FAA hearing officer, William Jennings, who was a lawyer on  
15 the FAA administrator's staff. During the hearings, Jennings admitted to Stich that his job was  
16 predicated on pleasing the FAA Administrator, who in turn had an interest in preventing the  
17 alarming information from reaching the public.

### 18 **Three Additional Fatal Airline Crashes Occurring *During* the Hearings**

19 During the hearings, three more major airline disasters occurred, each one due to the very  
20 same safety problems that Stich had repeatedly reported, for which FAA management had  
21 blocked the required preventative measures, along with inflicting harm upon the federal safety  
22 agents, including Stich, who had reported them. No changes were made in the underlying FAA  
23 problems after these crashes.  
24

### 25 **Standard Retaliation After Exposing Corruption of Government Officials**

26 As is customary when government agents report serious misconduct in government offices,  
27 FAA management subjected Stich to additional retaliation. Eventually, Stich left government  
28 service, refusing to work under such corrupt conditions.

1           **Using Federal Remedies Seeking to Halt the Aviation Carnage**

2           The airline crashes made possible by the deep-seated misconduct in the FAA (and for many  
3 years at United Airlines) continued to occur. Since Stich was the only one with the evidence of  
4 the misconduct and the willingness to engage in the David versus Goliath battle to halt the  
5 corruption and related tragedies, Stich filed several actions<sup>4</sup> in the federal courts under the  
6 federal crime reporting statute<sup>5</sup> and the statute<sup>6</sup> permitting any citizen to seek a court order  
7 requiring a federal official to perform a legal duty and to halt unlawful conduct. These measures  
8 were necessary to circumvent the standard practice of cover-ups that Stich encountered from  
9 people in government who had a duty to receive the evidence and act to prevent the continuation  
10 of the federal offenses and the great harm arising from them.

11           **Initially Admitting the Gravity of the Charges**

12           Initially, federal judges and an assistant U.S. attorney admitted the seriousness of the  
13 charges, but then blocked Stich from (a) presenting the evidence of the federal crimes and (b)  
14 blocking a hearing on the request for a judicial order. The block to reporting the federal crimes  
15 violated the mandatory duty under the judge’s administrative (not judicial) duty to receive the  
16 information of a crime. This refusal resulted in a continuation of the corruption, the resulting  
17 airline crashes and deaths, and made the judges complicit in these matters.  
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21           <sup>4</sup> *Stich v. United States, et al.*, 554 F.2d 1070 (9th Cir.) (table), *cert. denied*, 434 U.S. 920 (1977)(addressed  
22 hard-core air safety misconduct, violations of federal air safety laws, threats against government inspectors not to  
23 report safety violations and misconduct); *Stich v. National Transportation Safety Board*, 685 F.2d 446 (9th  
24 Cir.)(table), *cert. denied*, 459 U.S. 861 (1982))(addressed repeated criminal falsification of official airline accident  
25 reports, omitting highly sensitive air safety misconduct, making possible repeated crashes from the same sequestered  
26 problems); Amicus curiae brief filed on July 17, 1975, in the Paris DC-10 multi-district litigation, *Flanagan v.*  
*McDonnell Douglas Corporation and United States of America*, Civil Action 74-808-PH, MDL 172, Central District  
California.)(addressing the long standing FAA misconduct, of which the cover-up of the DC-10 cargo door problem  
was one of repeated instances of tragedy related misconduct); *U.S. v. Department of Justice, District of Columbia*,  
Nos. 86-2523, 87-2214, and other actions filed by Stich seeking to expose and correct the powerful and covert air  
disaster misconduct.

27           <sup>5</sup> Title 18 U.S.C. § 4. Misprision of felony. Whoever, having knowledge of the actual commission of a felony cognizable by  
a court of the United States, conceals and does not as soon as possible make known the same to some judge or other person in  
civil or military authority under the United States, shall be fined under this title or imprisoned not more than three years, or both.

28           <sup>6</sup> Title 28 U.S.C. § 1361. Action to compel an officer of the United States to perform his duty. The district courts  
shall have original jurisdiction of any action in the nature of mandamus to compel an officer or employee of the  
United States or any agency thereof to perform a duty owed to the plaintiff.

1 The gravity of the consequences caused Stich to circumvent the blocks by publishing the  
2 first of several books in 1978. He then started appearing as guest and expert on hundreds of radio  
3 and television shows throughout the United States. His second edition of *Unfriendly Skies* named  
4 the federal judges who blocked the reporting of the criminal activities—and listed some of the  
5 airline crashes and deaths that were closely related to the corruption that they had blocked from  
6 being reported.

7 **The Start of the Multiple Parallel Legal and Judicial Tactics**  
8 **To Stop Stich From Reporting the Corrupt Activities**

9 Shortly after the second edition of *Unfriendly Skies* was released, showing judges and Justice  
10 Department lawyers blocking the reports of corrupt activities, and the tragic consequences that  
11 such cover-ups enabled to occur, the first in a series of sham lawsuits was filed by the CIA-front  
12 law firm of Friedman, Sloan and Ross in San Francisco and their lawyers.<sup>7</sup> That lawsuit focused  
13 on the assets that funded Stich's efforts to expose the corruption that he had initially discovered  
14 that were related to a series of major airline disasters and affecting all of the government's  
15 aviation safety functions.

16 The lawsuit was filed under the California Family Law Act,<sup>8</sup> claiming that their Texas client  
17 wanted a termination of an existing marriage, and claimed half of all the \$10 million in real  
18 estate owned by Stich and his corporations. By filing in this manner, the Friedman law firm was  
19 able to put lis pendens on all of Stich's assets, separating him from access to them to continue his  
20 attempts to expose the widespread corruption that he discovered in government offices.

21 There were major factual and legal blocks to the lawsuit. These included:

- 22 (a) The Texas client had been declaring herself divorced from Stich since 1966, when  
23 she participated in a bilateral consent divorce proceeding that ended with a  
24 divorce judgment; and neither party had seen each other during the subsequent 16  
25 years. Neither party was a resident of California at that time. During the Friedman  
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27 <sup>7</sup> Lawyers in the Friedman law firm that were directly involved included Jeffrey S. Ross; Lawrence A. Gibbs,  
28 Friedman.

<sup>8</sup> There is no personal or subject matter jurisdiction under the California Family Law Act if there exists a prior  
divorce judgment (or of separate properties).

1 lawsuit where Friedman claimed she wanted a divorce, she continued to claim she  
2 was divorced in 1966, including documents to the Social Security Administration  
3 seeking social security benefits on the basis of that 1966 divorce judgment. That  
4 judgment was then recognized by the Social Security Administration.

- 5 (b) That 1966 divorce judgment was entered as a local judgment in the state of  
6 Oklahoma, Texas, Nevada, and California.
- 7 (c) California law required that any of those divorce judgments must be recognized as  
8 final.<sup>9</sup>
- 9 (d) Federal law requires that a prior divorce judgment be recognized by all state court  
10 judges.<sup>10</sup>
- 11 (e) California law deprives California judges of personal and subject matter  
12 jurisdiction under the Family Law Act when there is a prior divorce judgment.
- 13 (f) California law deprives California judges of jurisdiction over property that is  
14 separate property. All of Stich's assets were separate, on the basis of being  
15 acquired (a) after the 1964 separation in Colorado; (b) the 1966 divorce judgment  
16 that held there were no community properties; (c) all properties were acquired  
17 after the 1966 divorce.  
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21 <sup>9</sup> California CC §§ 4351, 4554, 5004, 5102, 5103, 5108, 5110.720, 5118, 5164; California CCP §§1699(b),  
22 1713.1, 1713.3, 1908, 1910, 1913, 915; California Rules of court Rules 1201(c); 1211, 1212, 1215, 1222, 1229(a),  
23 1230(a)(2), 1234, 1239(a)(2), 1281, and Rule 1282; absence of personal jurisdiction arising from Rule 1230 Motion  
24 to quash, 1230(a)(2), 1234, and 1239(a)(2); absence of personal and subject matter jurisdiction under the California  
25 Family Law Act: Rules 1201(c), 1211, 1212, 1281, 1282, 1215, 1222, 1229, 1230(a)(2), 1234, 1239(a)(2); Civil  
26 Code §§ 4351, 4503; California Supreme Court Decisions, including *Rediker v. Rediker* (1950) 35 Cal.2d 796.; *Scott*  
27 *v. Scott* (1958) 51 C.2d 249]; *Spellens v. Spellens* (1957) 498 C.2d 210; *Whealton v. Whealton* (1967) 67 C.2d 656;  
28 Res judicata and collateral estoppel doctrines.; Title 28 U.S.C. § 1738, full faith and credit statute; Article IV, § 1,  
providing for full faith and credit; Article IV, § 2, against taking of previously adjudicated and previously acquired  
personal and property rights upon changing residence to another state; Fourteenth Amendment due process clause;  
Fourteenth Amendment equal protection clause; Fourteenth Amendment privileges and immunities clause;  
Fourteenth Amendment equal protection; Fourteenth Amendment property rights; Fourteenth Amendment liberty  
interests; landmark U.S. Supreme Court decisions: *Williams v. North Carolina* (1945) 325 US 226, 65 S Ct 1092, 89  
L ed 1577; *Coe v. Coe* (1948) 334 U.S. 378; *Sherrer v. Sherrer* (1948) 334 U.S. 43; *Vanderbilt v. Vanderbilt* (1957)  
354 U.S. 416; *Estin v. Estin* (1948) 334 U.S. 541; *Perrin v. Perrin*, 408 F.2d 107 (3rd Cir. 1969).

<sup>10</sup> Declaratory Judgment Act; Federal Rule of Civil Procedure 57; Right to have federal questions litigated in  
federal court; Civil Rights Act.

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2 **Start of Complicity by California Judges**

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4 Despite the absence of a marriage to be terminated, despite the absence of community  
5 properties, despite the repeated claims by Friedman's Texas client that she was divorced in 1966,  
6 and despite the large numbers of California and state laws and constitutional rights that barred  
7 the lawsuit, a series of California judges (a) acted to protect the CIA-front law firm; (b)  
8 repeatedly act without personal and subject matter jurisdiction; (c) repeated enter orders violating  
9 blocks of state and federal laws; (d) repeatedly blocked every procedural defense exercised by  
10 Stich; (e) repeatedly retaliated against Stich for even trying to exercise procedural due process  
11 defenses. Hundreds of thousands of dollars in sanctions were ordered to be paid to the Friedman  
12 law firm, committing the violations, for exercising due process procedural defenses. It is a  
13 criminal act to retaliate against a person for having exercised due process remedies.\*

14 The lis pendens blocked Stich from refinancing valuable properties that came due. Rather  
15 than Friedman allowing the loans to be turned over by releasing the lis pendens, they allowed the  
16 properties to be lost, resulting in the loss of hundreds of thousands of dollars. IF they were truly  
17 representing their Texas client, and if there were a valid marriage and lawsuit, they would be  
18 financially liable to their Texas client for the loss of the alleged community properties. Friedman  
19 simply used the Texas client to destroy the assets that funded Stich's exposure activities. They  
20 obviously knew they were preventing criminal activities from being addressed, and that they  
21 were complicit in the resulting personal tragedies and those affecting aviation safety.

22 Judges at every level of the California courts blocked Stich from exercising the many specific  
23 defenses that existed in law and supported the actions by the CIA-front law firm and California  
24 judges that had become complicit in the sham lawsuit. This suggested that a powerful force in  
25 the federal government was manipulating events in the California courts.

26 The standard actions of the appellate judges were to label Stich a vexatious litigant for  
27 exercising state defenses to halt the massive violations of state and federal laws that were  
28

1 inflicting catastrophic personal and financial harm. This tactic would be extended to the federal  
2 courts by federal judges.

3 **Exercising Federal Defenses That Were Specific For the Multiple and**  
4 **Repeated Violations of Federally Protected Rights: Encountering Another Block**

5 Federal remedies existed for the massive and repeated violations of the federally protected  
6 rights. These remedies and defenses existed under:

7 (a) Declaratory Judgment Act,<sup>11</sup> which provides for any citizen to file a federal action  
8 seeking a determination of his legal rights and obligations under prior judgments. This  
9 remedy would be especially pertinent to a person who exercised the constitutional right to  
10 change residence to another state, and find that a state judge (often times a short-time  
11 judge) refuses to recognize a prior judgment; refuses to recognize a person's divorced  
12 status resulting from a prior divorce judgment; refused to recognized property rights  
13 established by a prior judgment, or property rights acquired as a divorce person. Further,  
14 Federal Rule of Civil Procedure Rule 57<sup>12</sup> requires that a federal judge give priority to  
15 such lawsuits.

16 (b) Civil Rights Act,<sup>13</sup> which provides that anyone who suffers a violation of any state or  
17 federal law, or constitutional right, in the state courts, can seek an order from a federal  
18 judge—who is under a duty to provide a meaningful hearing—to halt the violations and  
19 obtain financial damages.

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21 <sup>11</sup> Title 28 U.S.C. § 2201. Creation of remedy. In a case of actual controversy within its jurisdiction, any court of the  
22 United States, upon the filing of an appropriate pleading, may declare the rights and other legal relations of any interested  
23 party seeking such declaration, whether or not further relief is or could be sought. Any such declaration shall have the  
24 force and effect of a final judgment or decree and shall be reviewable as such.

24 Title 28 U.S.C. § 2202. Further relief. Further necessary or proper relief based on a declaratory judgment or decree  
25 may be granted, after reasonable notice and hearing, against any adverse party whose rights have been determined by  
26 such judgment.

25 <sup>12</sup> **Rule 57. Declaratory judgment.** The procedure for obtaining a declaratory judgment pursuant to Title 28 U.S.C.  
26 § 2201, shall be in accordance with these rules, and the right to trial by jury may be demanded under the circumstances  
27 and in the manner provided in Rules 38 and 39. The existence of another adequate remedy does not preclude a judgment  
28 for declaratory relief in cases where it is appropriate. The court may order a speedy hearing of an action for a declaratory  
judgment and may advance it on the calendar.

28 <sup>13</sup> Title 42 U.S.C. § 1983. Every person who, under color or any statute, ordinance, regulation, custom or usage, of  
any State of Territory, subjects ... any citizen of the United States ... to the deprivation of any rights, privileges or  
immunities secured by the Constitution and laws, shall be liable to the party injured in an action at law, suit in equity, or  
other proper proceeding for redress.

1 It required only the violation of a single law or constitutional right. In Stich's case, the  
2 violations were massive, and repeated.

3 Instead of providing the relief, the first federal judge protected the CIA-front law firm and  
4 lawyers, approved the massive violations of federally protected rights, and dismissed the lawsuit,  
5 encouraging the violations in the California courts to escalate.

### 6 **Discovering Corruption Inflicting Great Harm Upon** 7 **National Interests Extending Far Beyond the Aviation Arena**

8 While the sham lawsuit by the CIA law firm was proceeding, along with California and  
9 federal judges assisting in the scheme that was halting Stich's exposure activities, Stich was  
10 discovering corrupt activities in other government offices. The publicity from Stich's books and  
11 hundreds of radio and television appearances caused numerous other former, and present,  
12 government agents\* to contact Stich with information and evidence of corruption that were  
13 inflicting great harm upon major national interests, including national security.

### 14 **Combining Federal Defenses with** 15 **Requirement to Report Federal Crimes to a Federal Judge**

16 The criminal activities that Stich had discovered that were continuing to inflict deadly harm  
17 among the nation's airlines were being augmented by discovering criminal activities\* in other  
18 areas of covert and overt government operations. He discovered this from the many present and  
19 former government agents, and others, who contacted Stich after learning after his activities  
20 through his books and radio and TV appearances. These criminal activities were inflicting great  
21 harm upon major national interests, including national security. Under the federal crime  
22 reporting statute, Stich had a mandatory duty to report the criminal activities to a federal judge.  
23 (They could have been reported to Department of Justice employees or members of Congress,  
24 but both of these groups had been covering up for the corrupt activities in the aviation area and  
25 continued to do so when Stich again attempted to report to them what he was discovering.

26 Stich filed in 1986 in the federal courts at Sacramento, the first of a number of lawsuits  
27 that combined an attempt to report the criminal activities that he had discovered from  
28 government insiders and professionals, combining these attempts with exercising federal  
defenses against the massive violations of federally protected rights that were parallel legal  
efforts to block the exposure of the criminal activities.

1           The same federal courts that had blocked Stich from reporting the criminal activities in  
2 the government's aviation safety offices some years earlier, that had protected the CIA-front law  
3 firm whose sham action was blocking Stich's efforts to publicize the corruption, now continued  
4 to block the reporting of the additional criminal activities.

5           Simultaneously, federal judges aided and abetted the attacks by the CIA-front law firm  
6 whose sham lawsuit knowingly blocked Stich's exposure activities. An examination of the long  
7 documented record meets the legal definition of one or more related conspiracies, all knowing—  
8 and surely intending—to prevent Stich from exposing the deadly corruption that continued to  
9 result in otherwise preventable airline disasters—including airline hijackings.

10          As Stich discovered additional areas of corruption from the many government and other  
11 insiders, and sought to report these to federal courts as required by the federal crime reporting  
12 statute, federal judges again blocked Stich from making these reports, and additional legal tactics  
13 were taken by lawyers and law firms—including the CIA-front Friedman, Sloan and Ross of San  
14 Francisco.

15          From 1982 to the present date, there was a constant series of sham legal actions and judicial  
16 acts knowingly blocking Stich from reporting the criminal activities that he and a group of other  
17 former government agents had discovered. These were parallel activities that knowingly blocked  
18 the reporting of the criminal activities that were inflicting great harm upon major national  
19 interests, and resulting in many deaths. The latest of these was the sham lawsuit filed by the  
20 South Carolina law firm of Smith and Collins. It is their involvement in the conspiracy that  
21 involved violations of civil rights and RICO violations that is the subject of this lawsuit.

### 22           **Exercising Responsibilities As A Citizen**

23          Stich sought to provide information to the people, and to petition government, for the  
24 purpose of reporting corrupt, criminal and subversive activities implicating people in key  
25 government positions. Plaintiff and his group of other former and present government agents had  
26 discovered these criminal activities during their official duties and insider contacts.  
27

28          Plaintiff's efforts to report these matters to government personnel who had a duty to receive

1 and act upon the federal crimes have been repeatedly blocked through sham legal processes and  
2 record-setting violations of substantive and procedural due process by people involved in the  
3 judicial process. The defendants named in this action engaged in the latest misuse of legal  
4 process to block the reporting of these corrupt, criminal and subversive activities.  
5

6 As a result of the underlying corrupt, criminal, and subversive activities, the documented  
7 efforts to block Plaintiffs' activities, including the latest misuse of legal process by the  
8 defendants, great harm has been inflicted upon major national interests, including national  
9 security. The events of September 11, 2001, that killed 3,000 people, are merely the latest déjà  
10 vu consequences of these documented acts.  
11

12 Over a period of many years plaintiff ("Stich") discovered and documented patterns of  
13 corrupt and criminal activities<sup>14</sup> implicated in a series of fatal airline crashes. Stich discovered  
14 and sought to report other areas of criminal and treasonous activities<sup>15</sup> as a result of information  
15 and documentation obtained from other government agents.<sup>16</sup>  
16

17 Several corrupt schemes using legal process by members of the legal community were  
18 perpetrated against Stich during the past two decades in attempts to block his reporting of these  
19 criminal activities. These schemes, using legal processes, were accompanied by record-setting  
20

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21  
22 <sup>14</sup> The criminal activities within the FAA, detailed in the third edition of *Unfriendly Skies*, included, for  
23 instance: (a) repeated refusal by FAA management to order legally required corrective actions for major air safety  
24 problems and air safety violations despite the continuing crashes resulting from the documented matters; (b) warning  
25 federal agents not to report crash-causing air safety problems; (c) removing and destroying official air safety reports  
26 filed by federal air safety inspectors; (d) retaliating against inspectors who continue to make such reports; (e)  
removing inspectors from air safety duties, including suspension, for reporting or taking legally required and  
authorized actions within the inspector's area of responsibilities; (f) protecting airlines falsifying major air safety  
requirements and harassing and threatening inspectors who report the problems; (g) falsifying office reports during  
accident investigations.

27 <sup>15</sup> Other areas of criminal and treasonous activities included drug smuggling into the United States by people  
28 acting under cover of government positions; massive corruption in the bankruptcy courts implicating federal judges,  
trustees, lawyers; secret bank accounts for prominent national figures through CIA-front companies; and other  
crimes, as detailed in the third editions of *Defrauding America* and *Unfriendly Skies*, and in *Drugging America*.

<sup>16</sup> Government agents who provided Stich with information of federal crimes included agents of the FBI, DEA,  
Customs, INS, the CIA—including former heads of secret CIA airlines and secret CIA financial operations.

1 violations of substantive and procedural state and federal laws. The documented combination  
2 civil and constitutional violations were combined with criminal obstruction of justice and  
3 criminal retaliation against Plaintiff, seeking to halt his exposure activities and to inflict great  
4 personal and financial harm upon him as part of the scheme.

#### 6 **Latest Attempt Using Legal Process To Halt Plaintiff's Public Spirited activities**

7 The latest attempt to halt Plaintiffs' efforts to report the criminal activities, involving the  
8 defendants' misuse of legal facilities, is the basis for this lawsuit against the defendants. That  
9 scheme commenced, as in the past, using legal process and cooperating judges.

10 Plaintiffs were served, in February 2002, with a lawsuit filed in the South Carolina courts  
11 on July 5, 2000. That lawsuit was a thinly disguised defamation action seeking to halt  
12 Plaintiffs' exposure activities. That lawsuit falsely claimed that Plaintiff's writings in the book,  
13 *Drugging America*, libeled and slandered a South Carolina resident named Steve Gratzer.

#### 14 **Actual Intent of the Lawsuit: Block Reporting of Criminal and Treasonous Activities**

15 The facts support the premise that the disguised defamation action, also known as a SLAPP  
16 lawsuit, was actually an attempt to halt Plaintiff's constitutional right to inform the public of the  
17 corrupt activities in key government offices and to cause federal officials to perform their  
18 mandatory duty to receive the evidence of the criminal activities that Plaintiff and his group of  
19 other government agents had discovered:  
20

- 21 • The blatant contradictions between what the South Carolina lawsuit charged as  
22 defamation and what was actually stated in the book used as the basis for the  
23 allegations.
- 24 • Filing the lawsuit knowing that neither Stich nor Diablo had any assets to be seized, had  
25 no income, and had no insurance to pay any legal judgment.
- 26 • Filing the lawsuit knowing that a default judgment could be easily obtained since  
27 neither Stich nor Diablo had funds to mount a legal defense in distant South Carolina.  
28

- 1 • Blatant false statements made by defendant Jackson Gregory in his default order that  
2 Stich and Diablo pay \$4 million, which paralleled the pattern of false statements made  
3 by other defendants residing in South Carolina.

4 **The Plaintiff in the Sham South Carolina Lawsuit an Unindicted Murderer?**

- 5 • Claiming a South Carolina residence, Steve Gratzner, was libeled, when no reference  
6 was made to the South Carolina person in the book or on the Internet site. However, the  
7 wife of that plaintiff had told a doctor in Ely, Nevada, a week before she was found  
8 murdered, that if she was murdered, her husband will have done it.
- 9 • Knowing the history of prior blocks in the courts that blocked the reporting of these  
10 criminal activities and the pattern of total and record-setting violations of every relevant  
11 substantive and procedural law and constitutional protection in Ninth Circuit courts.
- 12 • Knowing that their false statements and scheme would not encounter any opposition  
13 because of the prior obstruction of justice in the courts and the termination of Plaintiff's  
14 legal rights, legal protections, and legal defenses in Ninth Circuit courts.
- 15 • Knowing that the lawsuit and judgment would hinder or halt the exposure and  
16 government action involving corrupt, criminal, and subversive activities that continue to  
17 inflict great harm upon major national interests and the lives of many people, and  
18 contributed to felony obstruction of justice. The events of September 11, 2001, again  
19 showed the defendants the consequences of blocking the exposure of these federal  
20 crimes.  
21

22 **Gravity Of Federal Offenses Associated With Defendants' Conduct**

23 In addition to the harm that their conduct would inflict upon Plaintiffs, the defendants knew  
24 that their actions would hinder or halt the exposure of the corrupt and criminal acts that  
25 Plaintiff and his group of other government agents sought to report. They knew that they would  
26 be obstructing justice and inflicting harm upon a former federal agent and witness. They knew  
27 the role played by the corruption upon important national interests. And they knew the effects  
28 upon the lives of people adversely affected by the corruption. The 3,000 deaths on September

1 11 were simply the latest examples of how tragedies arise and are made possible by the effects  
2 of the criminal activities, the cover-ups, and the documented wrongful acts taken to block and  
3 silence Plaintiffs' constitutionally protected activities.

4 Defendants knew that the great harm inflicted upon major national interests would continue  
5 as that their sham version of a SLAPP lawsuit and collection efforts would block Stich and his  
6 sources from making known to the public and to public officials the crimes that continue to  
7 inflict great harm upon many people and upon vital U.S. interests.

8 The success of the terrorist hijackers on September 11, 2001, was insured by the corrupt  
9 conditions existing in the federal air safety agencies that blocked the preventative actions that  
10 were known for decades and which Plaintiff himself had reported as urgently needed. Even  
11 after the 3,000 deaths occurring on September 11, in which the success of the four groups of  
12 terrorists was made possible by the corruption Plaintiff sought to expose, the Defendants and  
13 their conspiracy continued, as they sought to have the \$4 million default judgment, entered  
14 without personal jurisdiction and under corrupt conditions, entered as local judgments in  
15 California and Nevada.

#### 16 **Orders Lacking Personal Jurisdiction, As Part Of the Conspiracy To Obstruct Justice**

17 The defendants knew that the South Carolina courts, where they filed the SLAPP lawsuit  
18 lacked personal jurisdiction over Plaintiffs. They knew that the orders rendered by that court  
19 were based on absence of jurisdiction and fraud.

#### 20 **Pro Se Appearance In South Carolina Court**

21 Plaintiffs made a *pro se* special appearance in the South Carolina court on the basis that the  
22 South Carolina judge had no personal jurisdiction over them. Defendant Watts then entered an  
23 order claiming he did have personal jurisdiction.

#### 24 **Aiding and Abetting Scheme by South Carolina Master-In-Equity**

25 Defendant Jackson V. Gregory, Master-In-Equity, then entered a default judgment that  
26 Plaintiff pay \$4 million to Gratzner, seeking to support the order with numerous false statements.  
27 He and the other defendants knew that Plaintiff had no assets, had no income other than modest  
28

1 Social Security payments, and that there was no insurance to pay for any judgment. Knowing  
2 these conditions, two law firms and over half a dozen lawyers became involved in pursuing  
3 Plaintiff. Their goal was to halt Plaintiffs' exposure activities, which constituted federal crimes.

#### 4 **Seeking To Have Default Judgment Entered As Local Judgment In California**

5 After obtaining the \$4 million default judgment in South Carolina, the defendants and  
6 conspirators then sought to have it entered as a local judgment in the state of California in  
7 January 2002, which would then be followed by the same efforts in the state of Nevada. The  
8 history of legal efforts to obstruct justice provided the defendants assurance that they would  
9 succeed in the California courts.

10 The California courts were where the initial sham legal process was initiated to silence  
11 Plaintiff. During this process, over half a dozen California judges, most of whom occupied their  
12 judicial positions for a short time before returning to law practice, repeatedly acted without  
13 personal and subject matter jurisdiction, repeatedly violated over 36 California statutes and  
14 rules of court, violated federal statutes, landmark U.S. Supreme Court decisions, and  
15 constitutional protections. Defendants could assume that these record-setting violations of state  
16 and federal laws would continue when they sought to enter the South Carolina judgment as a  
17 local judgment.

18 Defendants again acted under color of state law, this time in California, knowing that the  
19 South Carolina default judgment met the definition of a void judgment based upon fraud and  
20 absence of personal jurisdiction.

#### 21 **Conduct Met Criteria For Conspiracy**

22 Reasonable people, including a jury, could conclude that the defendants acted in a  
23 conspiracy, and that the sole purpose of the conspiracy was to halt Plaintiffs attempts to make  
24 known the information of criminal activities and to block Plaintiffs attempts to petition  
25 government relating to these crimes.

26 The facts indicate that all defendants acted in a conspiracy among themselves, and with  
27 persons unknown who are directly or indirectly threatened by Plaintiffs' exposure activities.  
28

1 They engaged in multiple predicate acts as part of a conspiracy, inflicting great harm upon  
2 Plaintiff and inflicting harm upon interstate and international commerce.

### 3 **Combining Civil Rights and Due Process Violations With Obstruction Of Justice**

4 The actions by the defendants and the conspiracy combined civil and constitutional  
5 violations, and fraud, with criminal activities. The criminal activities included obstruction of  
6 justice, misprision of felonies, and inflicted great harm upon a former federal agent and witness  
7 to halt his exposure of these crimes against the United States. Their conduct violated numerous  
8 criminal statutes<sup>17</sup> involving offenses associated with obstruction of justice and inflicting harm  
9 upon a former federal agent and witness.

### 10 **Relationship Of Defendants' Conduct To the September 11, 2001, Tragedies**

11 Plaintiffs' efforts to expose and halt the criminal activities were hindered by the defendants'  
12 sham SLAPP lawsuit. Among the corrupt and criminal activities Plaintiffs sought to expose  
13 were those that he initially discovered within the Federal Aviation Administration and which  
14 played a key role in the success of the terrorist hijackers that killed 3,000 people on September  
15 11, 2001.

### 16 **Violating Plaintiff's Civil and Constitutional Rights Under Color Of State Law**

17 The defendants violated Plaintiff's civil and constitutional rights under color of state law, in  
18 South Carolina, California, and Nevada, while acting in a conspiracy that involved criminal  
19 activities against the United States.  
20

### 21 **Relationship between the September 11, 2001, Terrorist Acts 22 And the Criminal Activities That Plaintiff Sought To Report**

23 Collateral effects of the corruption that Plaintiff and his group of other former and present  
24 government agents discovered played a key role in the successful hijackings of four airliners on  
25 September 11, 2001. The required preventative measures, which were known to federal air safety  
26 personnel for years, were not taken because of the collateral effects of the deep-seated and  
27 documented corruption that Plaintiff had discovered while holding a highly sensitive position as

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28 <sup>17</sup> Title 18 U.S.C. §§ 2, 3, 4, 35, 111, 153, 241, 242, 245(b)(1)(B), 246, 371, 1341, 1343, 1503, 1505, 1512, 1513(b), 1515(a).

1 a federal air safety inspector-investigator.

2 **Deadly Effects In the Aviation Arena Are Only One of Many Areas**  
3 **Affected by the Documented Corruption and Its Cover-up**

4 The consequences of the corruption that Plaintiff and his group of other former government  
5 agents sought to expose, and the actions by the defendants in seeking to halt Plaintiff' exposure  
6 activities, enabled the conditions to exist that made possible the hijackings of four airliners by 19  
7 terrorists on September 11, 2001. Despite this knowledge, defendants continue their prior tactics,  
8 insuring that the corruption will continue, along with the deadly consequences.

9 In their thinly veiled misuse of legal process to halt Plaintiffs exposure activities, Defendants  
10 have engaged in a conspiracy inflicting harm upon Plaintiff. Defendants' acts violated civil and  
11 constitutional rights, under color of state law, violating federally protected rights. These  
12 violations create a cause of action under the Civil Rights Act (Title 18 U.S.C. §§ 1983-1988);  
13 under RICO (Title 18 U.S.C. §§ 1961-1965).

14 **Predicate acts affecting interstate and foreign commerce and particularly aviation**

15 Each of the defendants knew that their actions impeded Plaintiffs' public-spirited  
16 attempts to expose and halt the corrupt and criminal activities that he and other former and  
17 present government agents had discovered. They knew that their actions would block, directly  
18 and indirectly, Plaintiff's reporting of corrupt and criminal acts associated with a long line of  
19 aviation disasters and would aid and abet the continuation of the misconduct resulting in airline  
20 crashes and that their actions affected interstate and international aviation.

21  
22 Defendants violated Plaintiff's constitutional rights under the Petition Clause to petition  
23 government on matters relating to the corrupt, criminal, and treasonous conduct that he and other  
24 former and present government agents discovered.

25  
26 Defendants sought to block Plaintiff's exposure of crimes against the United States  
27 through violations of federally protected rights: Defendants' conduct:

- 28
- Blocked the reporting of these criminal activities through what is known as a greatly

1 enlarged version of a SLAPP lawsuit.

- 2 • Violated Plaintiff's right to the First Amendment petition clause by attacking his exercise
- 3 of this right through a sham and thinly disguised defamation lawsuit filed in a distant
- 4 location knowing that Plaintiff would be unable to fund a defense.
- 5
- 6 • Violated federal criminal statutes relating to blocking or inflicting harm upon a former
- 7 federal agent and witness.
- 8
- 9 • Violated federal criminal statutes by acting to block Plaintiffs reporting of criminal
- 10 activities.
- 11
- 12 • Violated federal criminal statutes by not reporting to federal officials the criminal
- 13 activities they discovered from Plaintiff's writings.

### 14 **Guaranteed Protection Against Consequences Of Their Unlawful Corrupt Activities**

15 Defendants knew that Plaintiff's legal rights, protections, and defenses have been terminated  
16 by every level of the California judicial system and that these due process violations were  
17 expanded by Ninth Circuit judges. This termination by federal judges was through (a) direct acts  
18 consisting of orders barring Plaintiff the right to federal court access as guaranteed to all other  
19 citizens, including murders, terrorists, and other felons; and (b) through documented violations  
20 of large numbers of relevant substantive protections "guaranteed" by the laws and Constitution  
21 of the United States; and (c) denial of every relevant procedural due process right, protection and  
22 defense. In this way, the defendants felt confident that their civil and constitutional violations,  
23 and felony obstruction of justice and felony retaliation against a former federal agent and witness  
24 would be protected in the courts.  
25

26 Although Stich was the direct target of these wrongful acts, and suffered severe personal  
27 and financial losses, the actions by these defendants enabled to be inflicted far greater harm upon  
28 the United States, its internal and external security, and the lives of many people.

1 Under law, the defendants' actions constituted a series of predicate acts, adversely  
2 affecting interstate and international matters, in a continuing conspiracy, that included massive  
3 violations of state and federal laws and constitutional protections, and predicate acts under the  
4 RICO statutes.

5 **COUNT ONE**

6 **(Violation of Civil Rights: Title 42 U.S.C. § 1983-1985)**

7 Plaintiff repeats and realleges all preceding paragraphs by reference, as if fully stated in  
8 this Count.

9 All defendants directly and indirectly violated, and aided and abetted the violations, of  
10 plaintiff's civil and constitutional rights under color of state law occurring in the states of South  
11 Carolina, California, and Nevada. By these acts they violated Title 42 U.S.C. Sections 1983-  
12 1985.  
13

14 **COUNT TWO**

15 **(Conspiracy To Interfere With Civil Rights, Title 42 U.S.C. §§ 1985,)**

16 Plaintiff repeats and realleges all preceding paragraphs by reference, as if stated fully in this  
17 Count.  
18

19 All defendants violated Title 42 U.S.C. Section 1985, by entering into a conspiracy to  
20 violate plaintiff's civil rights.

21 **COUNT THREE**

22 **(Civil RICO Violations, Title 18 USC §§ 1961-1965)**

23 Plaintiff repeats and realleges all preceding paragraphs by reference, as if stated fully in this  
24 Count.

25 Each defendant engaged in a pattern of predicate acts and racketeering activities affecting  
26 interstate and foreign commerce, as defined in the RICO statutes, Title 18 U.S.C. § 1961(1)(5),  
27 and as stated in this complaint. Defendants' predicate acts consisting of the racketeering  
28

1 activities, continued without interruption from July 5, 2000, or earlier, and involved multiple  
2 predicate acts that gravely affected interstate and foreign commerce, as described in this  
3 complaint.

4 Each defendant directly and indirectly played direct and indirect roles in obstructing justice  
5 by their actions that would knowingly prevent Plaintiff from reporting the criminal activities  
6 detailed in plaintiff's third editions of *Defrauding America* and *Unfriendly Skies* and the first  
7 edition of *Drugging America*.

8 Each defendant named in this action is a "person" within the meaning of Title 18 U.S.C. §  
9 1961(3).

10 Each defendant, by their words and their actions, showed that they had agreed to  
11 participate, directly and indirectly, in the affairs of the enterprise through the perpetration of  
12 multiple predicate acts.

13 Each defendant acted within the scope of the enterprise. Defendants combined to form an  
14 "association-in-fact" enterprise under RICO for the common purpose of engaging in a course of  
15 conduct that defrauded plaintiff, that inflicted great harm upon interstate and foreign  
16 commerce, that adversely affected national interests, and defrauded the United States. This  
17 misconduct played a role in the 3,000 deaths occurring on September 11, 2001.

18 Each defendant, persons within the meaning of RICO, in violation of Title 18 U.S.C. §  
19 1962(a) and §1962(b), through their predicate activities, acquired and maintained an interest in  
20 the enterprise, continuing their acts in the conspiracy, and furthering the cause of the enterprise.  
21 The proceeds of their predicate acts came from their sham lawsuit and attempt to file it as a  
22 local judgment in other states, and to seize Plaintiffs' assets. These predicate acts, and the  
23 proceeds from them, affected interstate and foreign commerce.

24 Each defendant participated directly and indirectly in the conduct of the enterprise, and  
25 violated Title 18 U.S.C. § 1962(c), which provides that "it shall be unlawful for any person  
26 employed by or associated with any enterprise engaged in, or the activities of which affect  
27  
28

1 interstate or foreign commerce, to conduct or participate, directly or indirectly, in the conduct  
2 of such enterprise's affairs through a pattern of racketeering activity ....”

3 **COUNT FOUR**

4 **(Intentional Violation and Deprivation of Common Law Torts)**

5 Plaintiff repeats and realleges all preceding paragraphs by reference, as if stated fully in this  
6 Count.

7 All defendants intentionally perpetrated torts and other wrongful acts against plaintiff, and  
8 aided and abetted such wrongful acts, knowingly inflicting great harm upon plaintiff.  
9

10 **COUNT FIVE**

11 **(Violation of Constitutional Rights and Protections)**

12 Plaintiff repeats and realleges all preceding paragraphs by reference, as if stated fully in this  
13 Count.

14 All defendants, directly and indirectly, violated plaintiff's rights and protections under the  
15 First and Fifth Amendments to the U.S. Constitution, including the right to petition  
16 government, to free speech, to report criminal and treasonous acts in government offices, and  
17 the protections against being deprived of liberty and property without and in violation of due  
18 process.  
19

20 **COUNT SIX**

21 **(Fraud Against Plaintiffs)**

22 Plaintiff repeats and realleges all preceding paragraphs by reference, as if stated fully in this  
23 Count.

24 All defendants engaged in a pattern of fraud against plaintiffs, and entered a conspiracy to  
25 do so, which inflicted great and irreparable harm upon them. The fraud was perpetrated through  
26 a sham lawsuit filed in South Carolina stating as facts what they knew to be false, and then  
27 seeking to have it enforced in other states.  
28

**COUNT SEVEN**



1 As a result of the above acts, plaintiff Stich suffered negligent infliction of emotional  
2 distress during the time frame covered by this Complaint.

3 **COUNT TWELVE**

4 **(Violation of Constitutional Due Process)**

5 Plaintiff repeats and realleges all preceding paragraphs by reference, as if stated fully in this  
6 Count.

7 All defendants knowingly and repeatedly violated plaintiffs' right to procedural and  
8 substantive due process.

9 **COUNT THIRTEEN**

10 **(Invasion Of Privacy)**

11 Plaintiff repeats and realleges all preceding paragraphs by reference, as if stated fully in this  
12 Count.

13 All defendants repeatedly engaged in acts violating Plaintiffs' privacy.

14 **COUNT FOURTEEN**

15 **Malicious Prosecution**

16 Plaintiff repeats and realleges all preceding paragraphs by reference, as if stated fully in  
17 this Count.

18 Defendants engaged, directly and indirectly, in malicious prosecution, by filing a lawsuit for  
19 improper and ulterior purposes. The purpose halt Plaintiff's exposure of corrupt and criminal  
20 activities, halt his petitioning via books and the public to government officials, seeking to force  
21 them to perform the duty of addressing and halting the corrupt, criminal, and treasonous acts.

22 **COUNT FIFTEEN**

23 **Abuse Of Process**

24 Plaintiff repeats and realleges all preceding paragraphs by reference, as if stated fully in  
25 this Count.

26 Abuse of process, using court processes for the improper and ulterior motive of halting  
27 Plaintiff's reporting of corrupt and criminal acts, with the knowledge that important national  
28

1 interests would be adversely affected, and which assisted in insuring the success of the  
2 September 11, 2001, terrorist hijackers.

3 **COUNT SIXTEEN**

4 **Conspiracy**

5 Plaintiff repeats and realleges all preceding paragraphs by reference, as if stated fully in this  
6 Count.

7 All defendants engaged in a conspiracy with each other and people unknown to inflict harm  
8 upon Plaintiff for the purpose of halting the exposure of corrupt and criminal activities.

9 **DAMAGES DEMANDED FROM DEFENDANTS**

10 Plaintiff demands from defendants, damages, punitive damages, costs, and attorney fees,  
11 and whatever other relief is provided by a jury and the court.

12 As to Count One, Violation of Civil Rights, judgment in an amount not less than \$30  
13 million, individually and collectively against all defendants.

14 As to Count Two, Conspiracy to Interfere with Civil Rights, judgment in an amount not less  
15 than \$30 million, individually and collectively, against all defendants.

16 As to Count Three, Civil RICO Violations, judgment in the amount of not less than \$30  
17 million, and triple damages, individually and collectively against all defendants.

18 As to Count Four, Intentional Violation and Deprivation of Common Law Torts, judgment  
19 in the amount of not less than \$10 million, individually and collectively, against all defendants..

20 As to Count Five, Violation of Constitutional Rights and Protections, judgment in the  
21 amount of not less than \$10 million, individually and collectively against all defendants.

22 As to Count Six, Fraud Against Plaintiff, judgment in the amount of not less than \$10  
23 million, individually and collectively, against all defendants.

24 As to Count Seven, Violation of Right To Petition Government, judgment in the amount of  
25 not less than \$10 million, individually and collectively against all defendants.

26 As to Count Eight, Fraudulent and Intentional Interference with Prospective Economic  
27 Advantage, in the amount of not less than \$10 million, individually and collectively against all  
28

1 defendants.

2 As to Count Nine, Negligent Interference with Prospective Economic Advantage, judgment  
3 in the amount of not less than \$5 million, individually and collectively against all defendants.

4 As to Count Ten, Intentional Infliction of Emotional Distress, judgment in the amount of  
5 not less than \$5 million, individually and collectively against all defendants.

6 As to Count Eleven, Negligent Infliction of Emotional Distress, judgment in the amount of  
7 not less than \$5 million, individually and collectively against all defendants.

8 As to Count Twelve, Violation of Constitutional Due Process, judgment in the amount of  
9 not less than \$10 million, individually and collectively against all defendants.

10 As to Count Thirteen, Invasion of Privacy, judgment in the amount of not less than \$10  
11 million.

12 As to Count Fourteen, Malicious Prosecution, judgment in the amount of not less than \$10  
13 million.

14 As to Count Fifteen, Abuse of Process, judgment in the amount of not less than \$10 million.

15 A jury trial is demanded.

16 Dated: \_\_\_\_\_  
17

18  
19  
20 \_\_\_\_\_  
21 Rodney F. Stich  
22 Plaintiff in pro se  
23  
24  
25  
26  
27  
28