

1 RODNEY F. STICH
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5 Plaintiffs in pro se

6
7 SUPERIOR COURT OF THE STATE OF CALIFORNIA
8 FOR THE COUNTY OF CONTRA COSTA
9 725 Court Street, Martinez, California

10
11 RODNEY F. STICH,

12 Plaintiff,

13 vs.

14 JOHN D. GUERRINI; GUERRINI LAW
15 FIRM, PC; STEVE GRATZER; DAVID
16 COLLINS; TROY GUERARD KNIGHT;
17 SMITH AND COLLINS, PC; PATRICK R.
18 WATTS; JEROME M. YALON; IRWIN J.
19 ESKANOS; BARRY ADLER; JEFF
20 DANIEL; JEROME M. YALON; JACKSON
21 V. GREGORY; ESKANOS & ADLER, PC,
22 DOES 1 THROUGH 100.

23 Defendants

Case No.

COMPLAINT FOR
FRAUD, CONSPIRACY, INVASION OF
PRIVACY, WITH THE INTENT TO
PREVENT FORMER FEDERAL AGENT
FROM EXPOSING HIGH-LEVEL
CORRUPTION IN GOVERNMENT
OFFICES, SOME RELATED TO 9/11

DEMAND FOR JURY TRIAL

24 Plaintiff alleges:

25 1. This lawsuit addresses the role played by the defendants in a series of tortuous acts,
26 fraud, and conspiracy, that knowingly—and intentionally—acted to block Plaintiff Rodney
27 Stich (“Stich”), a former federal agent, from exposing and reporting corrupt and criminal
28 activities in certain government offices. The defendants misused the legal process to
knowingly and deliberately harm plaintiff as part of ongoing schemes to block the exposure
of these crimes against the United States. Some segments of the corrupt activities resulted in

1 a series of airline disasters, including the hijackings of four airliners on September 11, 2001.
2 The actions perpetrated by the defendants (a) occurred in the State of California; and (b)
3 were part of one or more related conspiracies to prevent Stich and his group of other former
4 government agents from reporting the corrupt and criminal activities that implicated key
5 people in certain government offices and at United Airlines.

6 2. Plaintiff Rodney Stich is a resident of the State of California, County of Contra Costa and
7 was a resident of the state during most of the time the events involving defendants occurred.

8 **Brief History of Events Relating to the Defendants and the Conspiracy**

9 3. During plaintiff's professional and official duties as a Federal Aviation Administration
10 (FAA) inspector-investigator, and after being given the assignment to correct the conditions
11 resulting in the worst series of airline disasters in the nation's history (at that time), Stich
12 discovered and reported into the official government records deep-seated corruption¹ that was
13 causing and enabling to occur a series of airline crashes, one of which was the world's worst.
14 This deep-seated culture continued to September 11, 2001, and beyond.

15 4. Plaintiff used various means to circumvent the cover-up in government offices, as he
16 sought to halt the resulting airline crashes. These steps included (a) making numerous reports
17 into government records as part of his professional and official duties; (b) acting similar to an
18 independent counsel, conducting several months of hearings, during which he further proved the
19 relationship between corrupt activities and specific airline disasters; (c) filing federal actions
20 under title 18 U.S.C. § 4² to report the criminal activities to a federal court (only to be repeatedly
21 blocked, despite the admission by federal judges that the charges were serious); (d) writing

22
23 ¹ The criminal activities within the FAA, detailed in the third edition of *Unfriendly Skies*, included, for instance:
24 (a) repeated refusal by FAA management to order legally required corrective actions for major air safety problems
25 and air safety violations despite the continuing crashes resulting from the documented matters; (b) warning federal
26 agents not to report crash-causing air safety problems; (c) removing and destroying official air safety reports filed by
27 federal air safety inspectors; (d) retaliating against inspectors who continue to make such reports; (e) removing
28 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.

² 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 not more than \$500 or
imprisoned not more than three years, or both."

1 books³ and appearing as guest and expert on hundreds of radio and television shows in an attempt
2 to make the public aware of the criminal activities and the resulting tragedies.

3 5. In addition to the corrupt activities that continued to result in airline disasters (though at a
4 much lower rate than when he was a federal agent), plaintiff learned of corruption⁴ in other areas
5 of covert and overt government operations. Much of this information and evidence was obtained
6 from former and present government agents⁵ who discovered the corruption as part of their
7 professional and official duties and provided this information to Stich. Many of these additional
8 areas of corrupt activities are described in books that plaintiff wrote in an attempt to make the
9 public aware of the threat to them and to the United States.

10 **Role Similar to That of Independent Counsel**

11 6. While Stich acted similar to that of an independent counsel, he enabled testimony and
12 additional evidence to be placed into the hearing record that further proved the relationship
13 between deep-seated corruption in the FAA and a series of specific fatal airline disasters, some
14 of which occurred in Stich's immediate area of federal safety responsibilities.

15 7. During the hearings, three additional fatal airline disasters⁶ occurred. Each of these were
16 caused by the very same safety problems and violations, and criminal falsification of
17 government-required records, that Stich had repeatedly reported. FAA management had refused
18 to act on these reports, destroyed official records, and retaliated against Stich for attempting to
19 carry out the government's aviation safety responsibilities. Many other related airline disasters
20 occurred after the hearings.

21
22 ³ Books including multiple editions of *Unfriendly Skies: Defrauding America; Drugging America; Blowback,*
23 *9/11, and Cover-Ups*, plus others.

24 ⁴ Other areas of criminal and treasonous activities included drug smuggling into the United States by people
25 acting under cover of government positions; massive corruption in the bankruptcy courts implicating federal judges,
26 trustees, lawyers; secret bank accounts for prominent national figures through CIA-front companies; and other
27 crimes, as detailed in the third editions of *Defrauding America* and *Unfriendly Skies*, and in *Drugging America*.

28 ⁵ Other insiders who provided Stich with information and evidence of corruption by people in various covert
and government operations were agents of the FBI, DEA, CIA, ONI, FAA; state investigators; former drug
smugglers carrying out assignments for governments agents; and former Mafia figures, including a former member
of the New York Colombo Mafia family who, with his father, was involved in multiple murders and other crimes
with FBI supervisory agent Lindley DeVecchio.

⁶ The most classic example of the relationship between the corruption, the people who blocked the federal
government from exercising its aviation safety responsibilities, was a crash at Salt Lake City in which 43 people
were cremated alive.

1 8. Refusing to work under such corrupt conditions, Stich left government service. The
2 continuing airline disasters arising from the corrupt culture caused Stich to reactivate his attempt
3 to expose and bring a halt to the corrupt conditions. These additional measures included:

4 a. Filing actions in the federal courts under Title 18 U.S.C. § 4, which requires anyone
5 knowing of a federal crime to report it to a federal judge (or other federal official). The
6 charges were admitted as serious by federal judges and a Department of Justice Assistant
7 District Attorney, but in every case they blocked the reports being made. Under criminal
8 statutes, they had a mandatory duty under the judges' administrative duties (not judicial
9 duties) to receive the information. Their block enabled the federal crimes to continue, along
10 with the tragic consequences.

11 b. Writing highly detailed and documented books seeking to inform the public to the
12 harm and threats that existed to their lives and to national security.

13 c. Appearing as guest and expert on radio and television shows, starting in 1978, and
14 exceeding the 3,000–appearance mark at this time.

15 d. Preparing Internet sites⁷ to provide details about the corruption, the steps taken to
16 block the reports, the names of people implicated, and the tragedies resulting from this
17 combination of wrongful actions.

18 **Start of Continual Sham and Unlawful Legal Filings**
19 **To Block Stich's Reporting of the Criminal Activities**

20 9. Starting in 1982, with the filing of a lawsuit⁸ by the CIA-front law firm of Friedman,
21

22 ⁷ Internet site describing the corruption: www.defraudingamerica.com.

23 ⁸ That sham lawsuit was filed by the CIA-front law firm of Friedman, Sloan and Ross, San Francisco. It targeted
24 the \$10 million in assets that funded Stich's attempts to expose the corruption. The lawsuit claimed that Stich was
25 married to a Texas resident and that she wanted a termination of the marriage and claimed all assets were
26 community. The filing of that lawsuit permitted filing lis pendens and separating Stich from the assets. Preventing
27 that action were the following: (a) There was no marriage to enable the court to have jurisdiction; the parties had
28 been divorced for the preceding two decades, as shown by a 1966 divorce judgment and the filing of that judgment
as a local judgment in the states of California, Nevada, Oklahoma, and Texas; (b) the Texas party used by the CIA-
front law firm had repeatedly declared in official documents that she had been divorced in 1966, and continued to do
so while the lawyers filing the California lawsuit claimed she was not divorced; (c) Over two dozen California
statutes barred the lawsuit, deprived the California judges of personal and subject matter jurisdiction, and violated
major federal statutes, Supreme Court decisions, and constitutional protections. Ironically, every attempt by Stich to
exercise the specific California statutory and other legal defenses were blocked by renegade California judges, who
claimed Stich was a vexatious litigant for *defending* against the sham lawsuit. Renegade California judges then
joined the parallel schemes that included obstruction of justice, retaliation against a witness, and other crimes.

1 Sloan and Ross in San Francisco,⁹ lawyers and law firms commenced a continuing pattern of
2 sham lawsuits and legal actions that knowingly sought to halt plaintiff's exposure activities by
3 attacking the assets that funded his exposure of the corruption.

4 10. Numerous legal and judicial actions were taken over a period of years, each by people
5 who (a) *knew* Stich had very sensitive information on tragedy-related corruption in key
6 government offices; (b) *knew* that Stich was attempting to report this corruption using his assets
7 to fund the efforts; (c) *knew* that certain renegade California judges, and then federal judges, had
8 become heavily involved in the original efforts fronted by the CIA-front law firm; (d) knew of
9 the deaths in fraud-related airline crashes had occurred and would continue to occur; and (e)
10 knew of the relationship of such corruption with the conditions that occurred on September 11,
11 2001.

12 **Present and Latest Legal Scheme Commenced Shortly Before 9/11**

13 11. The latest in the legal schemes seeking to halt Stich's exposure of the corrupt and
14 criminal activities started shortly before the September 11, 2001, hijackings of four airliners.
15 Those catastrophic events were the latest in a series of airline disasters made possible by the
16 corruption Stich sought to report. The actions by the defendants, which continued the ongoing
17 series of legal schemes, helped prevent information from surfacing that would result in 3,000
18 deaths on 9/11 as a result of the airline hijackings. By their wrongful acts, the defendants played
19 key roles in blocking the exposure of the corrupt activities¹⁰ that made possible the events of
20 9/11.

21 **Was the Plaintiff Used by Lawyers in the South Carolina Court a Murderer?**

22 12. The action filed in South Carolina by Smith and Collins¹¹ used as the Plaintiff the
23 husband of a woman who had confided to her physician a week before she was murdered that if
24 she was found murdered, it would be her husband, Steve Gratzer.

26 ⁹ Lawyers in the Friedman law firm that were directly involved included Jeffrey S. Ross; Lawrence A. Gibbs,
27 Friedman.

28 ¹⁰ These areas responsible for the conditions that enabled 19 terrorists to carry out their scheme, and that
enabled four airliners to be hijacked, were the government's aviation safety offices (responsible for preventing
airliners from being hijacked), and the CIA and FBI for failure to act on the evidence of the hijacking scheme.

¹¹ Information reaching Plaintiff indicates that Smith and Collins law firm has connections to the government.

1 13. That action against Stich and Diablo Western Press was joined by numerous lawyers and
2 law firms who knew that they could never receive any amount of money to justify the time and
3 expense associated with the filing. They knew that Stich had been financially impoverished by
4 earlier legal actions seeking to halt his exposure actions; that neither he nor the one-man
5 corporation, a mom-and-pop operation, that published the books, had no insurance. They knew
6 that the only assets were the books exposing the corruption and the deadly consequences, and
7 these would be worthless upon seizure. Their goal was to seize the books that exposed the
8 corruption that they became involved in covering up.

9 14. All of these defendants knew of the one-day's consequences in the aviation area, and
10 especially the hijackings of four airliners on 9/11 that obviously reflected upon some type of
11 problem within the government's aviation safety offices (which have been carefully covered up
12 by every government hearing).

13 15. That lawsuit, filed in 2000, was filed in a court in South Carolina, knowing that Stich had
14 no funds to hire legal counsel 3,000 miles away, and that he would be unable to circumvent the
15 bias of small-town judges. That lawsuit claimed that their client, Steve Gratzner, a South Carolina
16 prison guard, was libeled by what plaintiff wrote in his book, *Drugging America*.

17 **Pro Se Appearance In South Carolina Court**

18 16. The judge in the South Carolina court sought to exercise personal jurisdiction on the
19 basis that the book, *Drugging America*, was advertised on the Internet, even though plaintiff had
20 never solicited any business or had contacts with the state of South Carolina. On that basis, the
21 Taliban in Afghanistan could get legal jurisdiction over a California resident because his name
22 appeared on the Internet!

23 17. Stich and Diablo Western Press made a *pro se special appearance* in the South Carolina
24 court, objecting to the judge's absence of personal jurisdiction. The judge in that action then
25 entered an order claiming he had personal jurisdiction.

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

27 Jackson V. Gregory, a South Carolina Master-In-Equity, then entered a default
28 judgment, ordering that Stich pay \$3 million to Gratzner, the person whose wife predicted that

1 her husband would kill her—a week before she was murdered. In his default judgment the judge
2 made derogatory remarks against Stich, for which there was no basis in the record, further
3 reflecting his role in the conspiracy.

4 18. The statements made in the book, *Drugging America*, clearly were not libelous, and did
5 not even mention the name of the Steve Gratzer. The entire text consisted of the following:

6 *Imprisoning A Doctor On Perjured Testimony*

7 *In 1997, I started receiving information from a physician who had been targeted in a similar*
8 *gun-charge. Dr. Jed Cserna was an MD with a private practice in Ely, Nevada, and a Lt.*
9 *Colonel in the Idaho National Guard, with 16 years of military service behind him. His*
10 *problems started in Ely, Nevada, where he was a physician. Cserna told me how it appeared*
11 *to start. While he was treating a patient, Doris Gratzner, she told him, "If I'm ever shot, Steve*
12 *[her husband] did it." Dr. Cserna told this to the hospital staff and they said that she always*
13 *had problems, and this occasion was no different than others. A week later, she was found*
14 *dead, killed by a bullet wound to the head.*

15 *Cserna said her husband, Steve Gratzner, was influential in the town, especially with the*
16 *sheriff, who was responsible for conducting an investigation into his wife's killing. Cserna*
17 *was now a danger to Gratzner. According to Cserna, false statements were made by a*
18 *government informant, seeking to justify his position and pay, that resulted in a raid by ATF*
19 *agent Doreen on his doctor's office. His home was broken into and possessions disappeared.*
20 *Participating in the ATF raid was the sheriff who he referred to as Burnie (Ronero), who*
21 *would soon participate in sham charges filed against the doctor.*

22 *Government agents arrested Cserna a short time later and charged him with possession*
23 *of a machine gun and a short-barreled rifle. The guns in question were an AR-15 that was*
24 *not an automatic, and a Uzi 9 mm that had been sold to him with a folding stock and various*
25 *barrels. He had used both guns two and three times a week at the local police firing range*
26 *and was never questioned about their legality.*

27 19. Gratzner and his team of lawyers and law firms than filed in the California courts a request
28 to have the South Carolina judgment entered as a local judgment. Stich filed objections, but these
were ignored, just like the massive violations of substantive and procedural due process by
renegade judges in the Superior Courts in Solano County in the first action filed by the CIA-front
law firm. They also played a role in continuing the corruption that continued the long series of
tragic consequences, including the catastrophic airline hijackings of 9/11.

20. All legal defenses were ignored. The California judge entering the sham South Carolina
default judgment as a local judgment knew that (a) the lawsuit was an obvious attempt to halt

1 Stich's exposure of the deadly corrupt activities; (b) that a defense existed under the California
2 Anti-Slapp doctrine;¹² (c) that the South Carolina judge had no jurisdiction over Stich and Diablo
3 Western Press; (d) that the entry as a California judgment would continue to block Stich from
4 reporting the criminal activities that had already played a role in the 9/11 calamities; and (e) that
5 Steve Gratzner, the plaintiff in the South Carolina lawsuit, was a prime suspect in the murder of
6 his wife in Elko, Nevada.

7 **Action and Conspiracy by Defendants Inflict Harm Directly Upon Stich,**
8 **And Indirectly, Upon National Security and the United States**

9 21. Although the actions of the defendants are targeted directly at plaintiff, the major injuries
10 were inflicted upon those who were victims of the corruption and the cover-ups, including the
11 victims of the 911 airline hijackings, and upon the consequences that will occur in the future.

12 22. The facts support the argument that the scheme, the conspiracy, the actions, by the
13 defendants constitutes felonies¹³ under several federal statutes pertaining to actions taken to
14 prevent a witness, informant, or former federal agent, from reporting federal crimes; and (c) the
15 long series of tragedies and attacks upon major national interests, including national security.

16 **Conduct Meets Legal Criteria for a Conspiracy**

17 23. The defendants joined the conspiracy of prior lawyers, law firms, renegade judges, and
18 others, whose wrongful acts meet the legal definition of a conspiracy, the existence of which,
19 under law, is to be determined by a jury. Reasonable people, including a jury, could conclude
20 that the defendants acted in a conspiracy, and that the sole purpose of the conspiracy was to halt
21 Stich from reporting corrupt and criminal activities against the United States, and they succeeded
22 in continuing the conditions that resulted in airline disasters, deaths, and other tragedies.

23 _____
24 ¹² The anti-SLAPP statute, CCP § 425.16, bars claims arising from a person's exercise of the constitutional right
25 of free speech. Considerable law relating to this was cited in opposing the filing of the South Carolina default
26 judgment as a California judgment. As with every exercise of clear-cut legal defenses with the initial filing by the
27 CIA-front law firm, these protections were ignored by renegade California judges. A publication's statements made
28 by a licensed physician and air national guard doctor was an exercise of the First Amendment right to free speech,
which was simply ignored by the California judge entering the South Carolina default judgment as a local judgment.
The judge also approved the obvious intent to halt plaintiff's exposure of corrupt and criminal activities that have
resulted in a trail of tragedies upon the citizens of the United States.

¹³ Felonies associated with obstruction of justice, with actions to prevent from testifying a former federal agent,
witness, and informant; and retaliation for seeking to make such reports arise from the following: Title 18 U.S.C. §§
2, 3, 4, 35, 111, 153, 241, 242, 245w(b)(1)(B), 26, 371, 1503, 1505, 1512, 1513(b), 1515(a).

1 **II**

2 **SECOND CAUSE OF ACTION**

3 **(INVASION OF PRIVACY)**

4 31. Plaintiff repeats and realleges all preceding paragraphs by reference, as if fully stated in
5 this Cause of Action.

6 32. All defendants directly and indirectly acted to invade the privacy of the former federal
7 agent, Rodney Stich.

8 33. As a proximate result of the invasion of privacy by the defendants, plaintiff suffered great
9 and irreparable personal and financial harm.

10 **III**

11 **THIRD CAUSE OF ACTION**

12 **(INTENTIONAL INFLICTION OF EMOTIONAL STRESS)**

13 34. Plaintiff repeats and realleges all preceding paragraphs by reference, as if fully stated in
14 this Cause of Action.

15 35. All defendants directly and indirectly acted in such a way that they intentionally inflicted
16 emotional stress upon Stich as part of a conspiracy to halt his exposure of corrupt and criminal
17 activities.

18 36. As a proximate result of these actions by the defendants, plaintiff suffered great and
19 irreparable personal and financial harm.

20 **IV**

21 **FOURTH CAUSE OF ACTION**

22 **(NEGLIGENT INFLICTION OF EMOTIONAL STRESS)**

23 37. Plaintiff repeats and realleges all preceding paragraphs by reference, as if fully stated in
24 this Cause of Action.

25 38. All defendants directly and indirectly acted in such a way that they negligently inflicted
26 emotional stress upon Stich as part of a conspiracy to halt his exposure of corrupt and criminal
27 activities.

28 39. As a proximate result of these actions by the defendants, plaintiff suffered great and

1 irreparable personal and financial harm.

2 **V**

3 **FIFTH CAUSE OF ACTION**

4 **(DESTRUCTION OF QUALITY OF LIFE)**

5 40. Plaintiff repeats and realleges all preceding paragraphs by reference, as if fully stated in
6 this Cause of Action.

7 41. All defendants directly and indirectly acted in such a way that they inflicted great harm
8 upon Stich's quality of life.

9 42. As a proximate result of these actions by the defendants, Stich suffered great and
10 irreparable personal and financial harm.

11 **VI**

12 **SIXTH CAUSE OF ACTION**

13 **(DESTRUCTION OF PLAINTIFF'S CREDIT WORTHINESS)**

14 43. Plaintiff repeats and realleges all preceding paragraphs by reference, as if fully stated in
15 this Cause of Action.

16 44. All defendants directly and indirectly acted in such a way that they intentionally
17 destroyed Plaintiff's credit worthiness.

18 45. As a proximate result of these actions by the defendants, plaintiff suffered great and
19 irreparable personal and financial harm.

20 **VII**

21 **SEVENTH CAUSE OF ACTION**

22 **(Interference With Professional and Business Relations)**

23 46. Plaintiff repeats and realleges all preceding paragraphs by reference, as if fully stated in
24 this Cause of Action.

25 47. All defendants directly and indirectly acted in such a way that they interfered with Stich's
26 professional and business relations.

27 48. As a proximate result of these actions by the defendants, plaintiff suffered great and
28 irreparable personal and financial harm.

1 **VIII**

2 **EIGHT CAUSE OF ACTION**

3 **(Interfering With Earning Capability)**

4 49. Plaintiff repeats and realleges all preceding paragraphs by reference, as if fully stated in
5 this Cause of Action.

6 50. All defendants directly and indirectly interfered with Stich's earning capability.

7 51. As a proximate result of the misconduct by the defendants, plaintiff suffered great and
8 irreparable personal and financial harm.

9 **IX**

10 **NINTH CAUSE OF ACTION**

11 **(Interfering With Earning Capability)**

12 52. Plaintiff repeats and realleges all preceding paragraphs by reference, as if fully stated in
13 this Cause of Action.

14 53. All defendants directly and indirectly interfered with Stich's earning capability.

15 As a proximate result of the misconduct by the defendants, plaintiff suffered great and
16 irreparable personal and financial harm.

17 **X**

18 **TENTH CAUSE OF ACTION**

19 **(Fraudulent and Intentional Interference with Prospective Economic Advantage)**

20 54. Plaintiff repeats and realleges all preceding paragraphs by reference, as if fully stated in
21 this Cause of Action.

22 55. All defendants directly and indirectly interfered with Stich's prospective economic
23 advantage.

24 As a proximate result of the misconduct by the defendants, plaintiff suffered great and
25 irreparable personal and financial harm.

26 **XI**

27 **ELEVENTH CAUSE OF ACTION**

28 **(Inflicting Harm to Prevent Witness, Informant, Former Federal Agent
From Reporting Criminal Activities)**

1
2 56. x Plaintiff repeats and realleges all preceding paragraphs by reference, as if fully stated in
3 this Cause of Action.

4 57. All defendants directly and indirectly inflicted harm upon Stich as part of the ongoing
5 schemes and conspiracy to prevent him from reporting and exposing corrupt and criminal
6 activities,.

7 58. As a proximate result of the misconduct by the defendants, plaintiff suffered great and
8 irreparable personal and financial harm.

9 **XII**

10 **TWELFTH CAUSE OF ACTION**
11 **(Retaliation for *Reporting Crimes Against United States*)**

12 59. Plaintiff repeats and realleges all preceding paragraphs by reference, as if fully stated in
13 this Cause of Action.

14 60. All defendants directly and indirectly acted to retaliate against Stich for attempting to
15 report corrupt and criminal activities against the United States.

16 61. As a proximate result of the misconduct by the defendants, plaintiff suffered great and
17 irreparable personal and financial harm.

18 **XIII**

19 **THIRTEENTH CAUSE OF ACTION**
20 **(Inflicting Harm to *Prevent Stich from Reporting Crimes Against the United States*)**

21 62. x Plaintiff repeats and realleges all preceding paragraphs by reference, as if fully stated in
22 this Cause of Action.

23 63. All defendants directly and indirectly acted to prevent Stich from continuing to report and
24 expose corrupt and criminal activities that were crimes against the United States.

25 64. As a proximate result of the misconduct by the defendants, plaintiff suffered great and
26 irreparable personal and financial harm.

27 **XIV**

28 **FOURTEENTH CAUSE OF ACTION**
(Conspiracy to Violated Rights and Protections under State of California Law)

1 65. Plaintiff repeats and realleges all preceding paragraphs by reference, as if fully stated in
2 this Cause of Action.

3 66. All defendants, directly and indirectly, acted to violate Stich's rights and protections
4 under the laws of the State of California.

5 67. As a proximate result of these acts by defendants and the conspiracy that they joined,
6 plaintiff suffered great and irreparable personal and financial harm.

7 **XV**

8 **FIFTEENTH CAUSE OF ACTION**
9 **(Intentional Violation of Common Law Torts)**

10 68. Plaintiff repeats and realleges all preceding paragraphs by reference, as if fully stated in
11 this Cause of Action.

12 69. All defendants, directly and indirectly, acted and violated common law torts under the
13 laws of the State of California.

14 As a proximate result of these acts by defendants and the conspiracy that they joined, plaintiff
15 suffered great and irreparable personal and financial harm.

16 **DAMAGES DEMANDED FROM DEFENDANTS**

17 70. Plaintiff demands from defendants, individually and severally, punitive damages in an
18 amount to be awarded by a jury.

19 71. Plaintiff demands from defendants, individually and severally, as to the first cause of
20 action, judgment in an amount not less than \$20 million.

21 72. Plaintiff demands from defendants, individually and severally, as to the second cause of
22 action, judgment in an amount not less than \$20 million.

23 73. Plaintiff demands from defendants, individually and severally, as to the third cause of
24 action, judgment in an amount not less than \$20 million.

25 74. Plaintiff demands from defendants, individually and severally, as to the fourth cause of
26 action, judgment in an amount not less than \$20 million.

27 75. Plaintiff demands from defendants, individually and severally, as to the fifth cause of
28 action, judgment in an amount not less than \$20 million.

76. Plaintiff demands from defendants, individually and severally, as to the sixth cause of

1 action, judgment in an amount not less than \$20 million.

2 77. Plaintiff demands from defendants, individually and severally, as to the seventh cause of
3 action, judgment in an amount not less than \$20 million.

4 78. Plaintiff demands from defendants, individually and severally, as to the eight cause of
5 action, judgment in an amount not less than \$20 million.

6 79. Plaintiff demands from defendants, individually and severally, as to the ninth cause of
7 action, judgment in an amount not less than \$20 million.

8 80. Plaintiff demands from defendants, individually and severally, as to the tenth cause of
9 action, judgment in an amount not less than \$20 million.

10 81. Plaintiff demands from defendants, individually and severally, as to the eleventh cause of
11 action, judgment in an amount not less than \$20 million.

12 82. Plaintiff demands from defendants, individually and severally, as to the twelfth cause of
13 action, judgment in an amount not less than \$20 million.

14 83. Plaintiff demands from defendants, individually and severally, as to the thirteenth cause
15 of action, judgment in an amount not less than \$20 million.

16 84. Plaintiff demands from defendants, individually and severally, as to the fourteenth cause
17 of action, judgment in an amount not less than \$20 million.

18 85. Plaintiff demands from defendants, individually and severally, as to the fifteenth cause of
19 action, judgment in an amount not less than \$20 million.

20 86. Plaintiff demands a jury trial on all claims for which a jury trial is a right, and the rights
21 to substantive and procedural due process.

22 DATED: September 6, 2006.

23
24 _____
25 RODNEY F. STICH
26 Plaintiff in pro se
27
28

VERIFICATION

I, Rodney Stich, declare that the facts stated in this complaint are known to me personally and for those few that I do not know personally, are stated here on the basis of information and belief. Executed this sixth day of September 2006.

RODNEY STICH

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