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5 Plaintiffs in pro se

6
7 UNITED STATES DISTRICT COURT
8 NORTHERN DISTRICT OF NEVADA
9

10 RODNEY F. STICH, DIABLO WESTERN)
11 PRESS, Inc.,)

12 Plaintiffs,)

13 vs.)

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

21 Defendants

Case No. CV-N-02-0039-LRH-RAM

AMENDED COMPLAINT FOR
DAMAGES ARISING FROM
VIOLATION OF CIVIL RIGHTS
(Title 42 U.S.C. §§ 1983-1986);
RICO (42 U.S.C. §§ 1961-1966);
CONSPIRACY; FRAUD

DEMAND FOR JURY TRIAL

22 **Jurisdiction**

23 Jurisdiction for this lawsuit arises under Title 28 U.S.C. §§ 1331, 1343; 42 U.S.C. §§ 1983-
24 1986, 1961-1966, and under the Constitution and laws of the United States.

25 **General Allegations and Summary Of Lawsuit**

26 This lawsuit arises from the actions and the conspiracy of the defendants in the latest attempt,
27 using legal processes, to halt Plaintiffs' exposure of corrupt, criminal, and subversive activities in
28 key government offices. These federal offenses continue to inflict great harm upon major
national interests, including national security. The consequences of these offenses, and the cover-
ups, and the actions by the defendants in seeking to halt Plaintiff' exposure activities, include in

1 one instance the conditions that insured the success of the September 11, 2001, terrorist
2 hijackers. Defendants' actions combined civil and constitutional violations with felonies,
3 including obstruction of justice and inflicting harm against Plaintiff Rodney Stich, a former
4 federal agent and witness, in an attempt to prevent him from revealing crimes against the United
5 States.

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

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

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

19 **Tragic Effect On the Aviation Arena Is Only One Of Many Areas**
20 **Affected by the Documented Corruption and Its Cover-up**

21 Plaintiff and his group of other former and present government agents have sought to make
22 information known to the people as part of their constitutional rights and responsibilities, in an
23 effort to cause federal personnel to perform their legally required duties relating to such criminal
24 activities.

25 **Venue**

26 Venue is based upon (a) the wrongful acts and harm inflicted upon Plaintiff Rodney Stich
27 while he was a resident of the Northern District of Nevada; (b) Nevada being the place of
28 incorporation of Diablo Western Press; and (c) harm occurring to interests located in Nevada.

1 Diablo Western Press is a small Nevada corporation, with no paid employees, organized for the
2 purpose of distributing books on national issues. The defendants caused actions to occur which
3 affect matters in Nevada, and exercised and intend to exercise resources of the state of
4 California and Nevada.

5 **Plaintiffs**

6 Plaintiff Rodney F. Stich (“Stich”) has resided in Nevada and California for the past 20
7 years and considers Nevada his domicile. He is a former federal air safety inspector and
8 investigator. Plaintiff has sought to make known to the people information on corrupt and
9 criminal activities implicating people holding key government positions, and which are
10 inflicting great harm upon major national interests and upon the lives, and the deaths, of many
11 people.

12 Diablo Western Press, Inc., (“Diablo”) is a corporation in Nevada that operates as a no-
13 profit operation and organized for the sole purpose of providing information to government for
14 the purpose of influencing government action related to major national issues.

16 **Defendants**

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

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

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

21 Defendant Barry Adler is a resident of Contra Costa County, State of California.

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

23 Defendant Steve Gratzner is a resident of South Carolina.

24 Defendant Mike Collins is a resident of South Carolina.

25 Defendant Troy Guerard Knight is a resident of South Carolina.

26 Defendant Smith and Collins is a professional corporation in South Carolina.

27 Defendant Patrick R. Watts is Master In Equity in Dorchester County, South Carolina.
28

1 **Preliminary Statement**

2 Plaintiff Rodney Stich (“Stich”) has sought to provide information to the people, and to
3 petition government, for the purpose of reporting corrupt, criminal and subversive activities
4 implicating people in key government positions. Plaintiff and his group of other former and
5 present government agents had discovered these criminal activities during their official duties
6 and insider contacts.
7

8 Plaintiff’s efforts to report these matters to government personnel who had a duty to receive
9 and act upon the federal crimes have been repeatedly blocked through sham legal processes and
10 record-setting violations of substantive and procedural due process by people involved in the
11 judicial process. The defendants named in this action engaged in the latest misuse of legal
12 process to block the reporting of these corrupt, criminal and subversive activities.
13

14 As a result of the underlying corrupt, criminal, and subversive activities, the documented
15 efforts to block Plaintiffs’ activities, including the latest misuse of legal process by the
16 defendants, great harm has been inflicted upon major national interests, including national
17 security. The events of September 11, 2001, that killed 3,000 people, are merely the latest déjà
18 vu consequences of these documented acts.
19

20 Over a period of many years plaintiff (“Stich”) discovered and documented patterns of
21 corrupt and criminal activities¹ implicated in a series of fatal airline crashes. Stich discovered
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¹ The criminal activities within the FAA, detailed in the third edition of Unfriendly Skies, included, for
26 instance: (a) repeated refusal by FAA management to order legally required corrective actions for major air safety
27 problems and air safety violations despite the continuing crashes resulting from the documented matters; (b) warning
28 federal agents not to report crash-causing air safety problems; (c) removing and destroying official air safety reports
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.

1 and sought to report other areas of criminal and treasonous activities² as a result of information
2 and documentation obtained from other government agents.³

3 Several corrupt schemes using legal process by members of the legal community were
4 perpetrated against Stich during the past two decades in attempts to block his reporting of these
5 criminal activities. These schemes, using legal processes, were accompanied by record-setting
6 violations of substantive and procedural state and federal laws. The documented combination
7 civil and constitutional violations were combined with criminal obstruction of justice and
8 criminal retaliation against Plaintiff, seeking to halt his exposure activities and to inflict great
9 personal and financial harm upon him as part of the scheme.
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12 **Latest Attempt Using Legal Process To Halt Plaintiff's Public Spirited activities**

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

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

20 **Actual Intent Of the Lawsuit: Block Reporting Of Criminal and Treasonous Activities**

21 The facts support the premise that the disguised defamation action, also known as a SLAPP
22 lawsuit, was actually an attempt to halt Plaintiff's constitutional right to inform the public of the
23 corrupt activities in key government offices and to cause federal officials to perform their
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27 ² 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*.

³ 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 mandatory duty to receive the evidence of the criminal activities that Plaintiff and his group of
2 other government agents had discovered:

- 3 • The blatant contradictions between what the South Carolina lawsuit charged as
4 defamation and what was actually stated in the book used as the basis for the
5 allegations.
- 6 • Filing the lawsuit knowing that neither Stich nor Diablo had any assets to be seized, had
7 no income, and had no insurance to pay any legal judgment.
- 8 • Filing the lawsuit knowing that a default judgment could be easily obtained since
9 neither Stich nor Diablo had funds to mount a legal defense in distant South Carolina.
- 10 • Blatant false statements made by defendant Jackson Gregory in his default order that
11 Stich and Diablo pay \$4 million, which paralleled the pattern of false statements made
12 by other defendants residing in South Carolina.
- 13 • Claiming a South Carolina residence was libeled when no reference was made to the
14 South Carolina person in the book or on the Internet site.
- 15 • Knowing the history of prior blocks in the courts that blocked the reporting of these
16 criminal activities and the pattern of total and record-setting violations of every relevant
17 substantive and procedural law and constitutional protection in Ninth Circuit courts.
- 18 • Knowing that their false statements and scheme would not encounter any opposition
19 because of the prior obstruction of justice in the courts and the termination of Plaintiff's
20 legal rights, legal protections, and legal defenses in Ninth Circuit courts.
- 21 • Knowing that the lawsuit and judgment would hinder or halt the exposure and
22 government action involving corrupt, criminal, and subversive activities that continue to
23 inflict great harm upon major national interests and the lives of many people, and
24 contributed to felony obstruction of justice. The events of September 11, 2001, again
25 showed the defendants the consequences of blocking the exposure of these federal
26 crimes.
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1 **Gravity Of Federal Offenses Associated With Defendants' Conduct**

2 In addition to the harm that their conduct would inflict upon Plaintiffs, the defendants knew
3 that their actions would hinder or halt the exposure of the corrupt and criminal acts that
4 Plaintiff and his group of other government agents sought to report. They knew that they would
5 be obstructing justice and inflicting harm upon a former federal agent and witness. They knew
6 the role played by the corruption upon important national interests. And they knew the effects
7 upon the lives of people adversely affected by the corruption. The 3,000 deaths on September
8 11 were simply the latest examples of how tragedies arise and are made possible by the effects
9 of the criminal activities, the cover-ups, and the documented wrongful acts taken to block and
10 silence Plaintiffs' constitutionally protected activities.

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

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

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

24 The defendants knew that the South Carolina courts, where they filed the SLAPP lawsuit
25 lacked personal jurisdiction over Plaintiffs. They knew that the orders rendered by that court
26 were based on absence of jurisdiction and fraud.
27
28

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

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

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

6 Defendant Jackson V. Gregory, Master-In-Equity, then entered a default judgment that
7 Plaintiff pay \$4 million to Gratzner, seeking to support the order with numerous false statements.
8 He and the other defendants knew that Plaintiff had no assets, had no income other than modest
9 Social Security payments, and that there was no insurance to pay for any judgment. Knowing
10 these conditions, two law firms and over half a dozen lawyers became involved in pursuing
11 Plaintiff. Their goal was to halt Plaintiffs' exposure activities, which constituted federal crimes.

12 **Seeking To Have Default Judgment Entered As Local Judgment In California**

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

18 The California courts were where the initial sham legal process was initiated to silence
19 Plaintiff. During this process, over half a dozen California judges, most of whom occupied their
20 judicial positions for a short time before returning to law practice, repeatedly acted without
21 personal and subject matter jurisdiction, repeatedly violated over 36 California statutes and
22 rules of court, violated federal statutes, landmark U.S. Supreme Court decisions, and
23 constitutional protections. Defendants could assume that these record-setting violations of state
24 and federal laws would continue when they sought to enter the South Carolina judgment as a
25 local judgment.
26

27 Defendants again acted under color of state law, this time in California, knowing that the
28 South Carolina default judgment met the definition of a void judgment based upon fraud and

1 absence of personal jurisdiction.

2 **Conduct Met Criteria For Conspiracy**

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

7 The facts indicate that all defendants acted in a conspiracy among themselves, and with
8 persons unknown who are directly or indirectly threatened by Plaintiffs' exposure activities.
9 They engaged in multiple predicate acts as part of a conspiracy, inflicting great harm upon
10 Plaintiff and inflicting harm upon interstate and international commerce.

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

12 The actions by the defendants and the conspiracy combined civil and constitutional
13 violations, and fraud, with criminal activities. The criminal activities included obstruction of
14 justice, misprision of felonies, and inflicted great harm upon a former federal agent and witness
15 to halt his exposure of these crimes against the United States. Their conduct violated numerous
16 criminal statutes⁴ involving offenses associated with obstruction of justice and inflicting harm
17 upon a former federal agent and witness.

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

19 Plaintiffs' efforts to expose and halt the criminal activities were hindered by the defendants'
20 sham SLAPP lawsuit. Among the corrupt and criminal activities Plaintiffs sought to expose
21 were those that he initially discovered within the Federal Aviation Administration and which
22 played a key role in the success of the terrorist hijackers that killed 3,000 people on September
23 11, 2001.

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

25 The defendants violated Plaintiff's civil and constitutional rights under color of state law, in
26
27

28 ⁴ 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 South Carolina, California, and Nevada, while acting in a conspiracy that involved criminal
2 activities against the United States.

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

4 Each of the defendants knew that their actions impeded Plaintiffs' public-spirited attempts to
5 expose and halt the corrupt and criminal activities that he and other former and present
6 government agents had discovered. They knew that their actions would block, directly and
7 indirectly, Plaintiff=s reporting of corrupt and criminal acts associated with a long line of
8 aviation disasters and would aid and abet the continuation of the misconduct resulting in airline
9 crashes and that their actions affected interstate and international aviation.
10

11 Defendants violated Plaintiff's constitutional rights under the Petition Clause to petition
12 government on matters relating to the corrupt, criminal, and treasonous conduct that he and other
13 former and present government agents discovered.
14

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

- 17 • Blocked the reporting of these criminal activities through what is known as a greatly
18 enlarged version of a SLAPP lawsuit.
- 19 • Violated Plaintiff's right to the First Amendment petition clause by attacking his exercise
20 of this right through a sham and thinly disguised defamation lawsuit filed in a distant
21 location knowing that Plaintiff would be unable to fund a defense.
- 22 • Violated federal criminal statutes relating to blocking or inflicting harm upon a former
23 federal agent and witness.
- 24 • Violated federal criminal statutes by acting to block Plaintiffs reporting of criminal
25 activities.
- 26 • Violated federal criminal statutes by not reporting to federal officials the criminal
27 activities.
- 28 • Violated federal criminal statutes by not reporting to federal officials the criminal

1 activities they discovered from Plaintiff's writings.

2 **Guaranteed Protection Against Consequences Of Their Unlawful Corrupt Activities**

3 Defendants knew that Plaintiff's legal rights, protections, and defenses have been terminated
4 by every level of the California judicial system and that these due process violations were
5 expanded by Ninth Circuit judges. This termination by federal judges was through (a) direct acts
6 consisting of orders barring Plaintiff the right to federal court access as guaranteed to all other
7 citizens, including murders, terrorists, and other felons; and (b) through documented violations
8 of large numbers of relevant substantive protections "guaranteed" by the laws and Constitution
9 of the United States; and (c) denial of every relevant procedural due process right, protection and
10 defense. In this way, the defendants felt confident that their civil and constitutional violations,
11 and felony obstruction of justice and felony retaliation against a former federal agent and witness
12 would be protected in the courts.
13
14

15 **COUNT ONE**

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

17 Plaintiff repeats and realleges all preceding paragraphs by reference, as if fully stated in this
18 Count.
19

20 All defendants directly and indirectly violated, and aided and abetted the violations, of
21 plaintiff's civil and constitutional rights under color of state law occurring in the states of South
22 Carolina, California, and Nevada. By these acts they violated Title 42 U.S.C. Sections 1983-
23 1985.
24

25 **COUNT TWO**

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

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

1 All defendants violated Title 42 U.S.C. Section 1985, by entering into a conspiracy to
2 violate plaintiff=s civil rights.

3 **COUNT THREE**

4 **(Civil RICO Violations, Title 18 USC ' ' 1961-1965)**

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

7
8 Each defendant engaged in a pattern of predicate acts and racketeering activities affecting
9 interstate and foreign commerce, as defined in the RICO statutes, Title 18 U.S.C. ' 1961(1)(5),
10 and as stated in this complaint. Defendants= predicate acts consisting of the racketeering
11 activities, continued without interruption from July 5, 2000, or earlier, and involved multiple
12 predicate acts that gravely affected interstate and foreign commerce, as described in this
13 complaint.
14

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

19
20 Each defendant named in this action is a Aperson@ within the meaning of Title 18 U.S.C. '
21 1961(3).

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

25 Each defendant acted within the scope of the enterprise. Defendants combined to form an
26 Association-in-fact@ enterprise under RICO for the common purpose of engaging in a course
27 of conduct that defrauded plaintiff, that inflicted great harm upon interstate and foreign
28 commerce, adversely affected national interests, and defrauded the United States. This

1 misconduct played a role in the 3,000 deaths occurring on September 11, 2001.

2 Each defendant, persons within the meaning of RICO, in violation of Title 18 U.S.C. ' 1962(a) and ' 1962(b), through their predicate activities, acquired and maintained an interest in
3 the enterprise, continuing their acts in the conspiracy, and furthering the cause of the enterprise.
4 The proceeds of their predicate acts came from their sham lawsuit and attempt to file it as a
5 local judgment in other states, and to seize Plaintiffs' assets. These predicate acts, and the
6 proceeds from them, affected interstate and foreign commerce.
7

8 Each defendant participated directly and indirectly in the conduct of the enterprise, and
9 violated Title 18 U.S.C. ' 1962(c), which provides that Ait shall be unlawful for any person
10 employed by or associated with any enterprise engaged in, or the activities of which affect
11 interstate or foreign commerce, to conduct or participate, directly or indirectly, in the conduct
12 of such enterprise=s affairs through a pattern of racketeering activity”

13
14 **COUNT FOUR**

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

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

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

20 **COUNT FIVE**

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

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

24 All defendants, directly and indirectly, violated plaintiff=s rights and protections under the
25 First and Fifth Amendments to the U.S. Constitution, including the right to petition
26 government, to free speech, to report criminal and treasonous acts in government offices, and
27 the protections against being deprived of liberty and property without and in violation of due
28

1 process.

2 **COUNT SIX**
3 **(Fraud Against Plaintiffs)**

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

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

10 **COUNT SEVEN**
11 **(Interfering With Plaintiff's Right To Petition Government)**

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

14 Defendants violated Plaintiff's first amendment right to petition government, as Plaintiff
15 sought to report the criminal activities to government officials and agencies.

16 **COUNT EIGHT**
17 **(Fraudulent and Intentional Interference with Prospective Economic Advantage)**

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

20 All defendants directly and indirectly interfered with plaintiff=s prospective economic
21 advantage.

22 **COUNT NINE**
23 **(Negligent Interference with Prospective Economic Advantage)**

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

26 All defendants negligently interfered with plaintiff=s prospective economic advantage.
27
28

1 **COUNT TEN**

2 **(Intentional Infliction of Emotional Distress)**

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

5 All defendants intentionally inflicted upon plaintiff Stich emotional distress through fraud,
6 conspiracy, and violation of civil and constitutional rights.

7 **COUNT ELEVEN**

8 **(Negligent Infliction of Emotional Distress)**

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

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

13 **COUNT TWELVE**

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

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

17 All defendants knowingly and repeatedly violated plaintiffs’ right to procedural and
18 substantive due process.

19 **COUNT THIRTEEN**

20 **(Invasion Of Privacy)**

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

23 All defendants repeatedly engaged in acts violating Plaintiffs’ privacy.

24 **COUNT FOURTEEN**

25 **Malicious Prosecution**

26 Plaintiff repeats and realleges all preceding paragraphs by reference, as if stated fully in
27 this Count.
28

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

5 **COUNT FIFTEEN**

6 **Abuse Of Process**

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

9 Abuse of process, using court processes for the improper and ulterior motive of halting
10 Plaintiff's reporting of corrupt and criminal acts, with the knowledge that important national
11 interests would be adversely affected, and which assisted in insuring the success of the
12 September 11, 2001, terrorist hijackers.

13 **COUNT SIXTEEN**

14 **Conspiracy**

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

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

19 **DAMAGES DEMANDED FROM DEFENDANTS**

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

22 As to Count One, Violation of Civil Rights, judgment in an amount not less than \$10
23 million, individually and collectively against all defendants.

24 As to Count Two, Conspiracy to Interfere with Civil Rights, judgment in an amount not less
25 than \$10 million, individually and collectively, against all defendants.

26 As to Count Three, Civil RICO Violations, judgment in the amount of not less than \$10
27 million, and triple damages, individually and collectively against all defendants.

28 As to Count Four, Intentional Violation and Deprivation of Common Law Torts, judgment

1 in the amount of not less than \$10 million, individually and collectively, against all defendants..

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

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

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

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

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

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

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

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

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

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

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

24 A jury trial is demanded.

25 Dated: March 28, 2002.

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Rodney F. Stich
Plaintiff in pro se