

A. That Plaintiffs state on information and belief, Iviewit Companies patent counsel neglected legal matters entrusted to them by Iviewit Companies and inventors.

801. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; § 10.78 Limiting liability to client.

A. That Plaintiffs state on information and belief, a practitioner shall not attempt to exonerate himself or herself from, or limit his or her liability to, a client for his or her personal malpractice which attorney defendants licensed with the USPTO did.

802. That Plaintiffs state on information and belief, defendants licensed to practice before the USPTO, all failed their duties to protect client IP under section; §10.79 - 10.82 [Reserved] §10.83 Canon 7.

A. That Plaintiffs state on information and belief, Iviewit Companies IP counsel failed to represent Iviewit Companies and inventors as a client zealously and within the bounds of the law.

803. That Plaintiffs state on information and belief, defendants licensed to practice before the USPTO, all failed their duties to protect client IP under section; § 10.84 Representing a client zealously.

A. That Plaintiffs state on information and belief, with malice and intent did the Iviewit Companies patent practitioners fail to seek the lawful objectives of Iviewit Companies and inventors through reasonable available means permitted by law and the Disciplinary Rules. They have failed to carry out a contracts of employment entered into with Iviewit Companies for professional services. They have prejudiced and damaged Iviewit Companies during the course of the professional relationships.

804. That Plaintiffs state on information and belief, defendants licensed to practice before the USPTO, all failed their duties to protect client IP under section; §10.85 Representing a client within the bounds of the law.

A. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to delay proceedings on behalf of Iviewit

Companies and inventors patent applications before the Office and took other actions on behalf of the Iviewit Companies, when the practitioners knew and it is now obvious such actions served merely to harass and maliciously injure Iviewit Companies and inventors. Iviewit Companies patent practitioners concealed and knowingly failed to disclose that which the practitioner is required by law to reveal.

B. That Plaintiffs state on information and belief, Iviewit Companies patent practitioners knowingly used perjured testimony and false evidence to tribunals such as the USPTO, USPTO OED and the US Supreme Court Bar Associations and knowingly made false statements of law and fact. Iviewit Companies patent practitioners participated in the creation and preservation of evidence when the practitioners knew the evidence was false and presented such false evidence to not only the USPTO but numerous other private and public agencies as discussed herein.

C. That Plaintiffs state on information and belief, Iviewit Companies patent practitioners knowingly engaged in other illegal conduct and conduct contrary to many disciplinary rules as well as a variety of state, federal and international crimes. Further, Iviewit Companies subsequent patent practitioners received information clearly establishing other attorneys had perpetrated a fraud upon tribunals and failed to reveal such frauds to the tribunals. Rubenstein was to correct Joao errors and then Dick came in to file and fix and did nothing but further the fraud, and when discovered BSTZ was brought in to correct and fix the patents and failed to carry out these tasks and further failed to report the fraud. Even after BSTZ informed Iviewit Companies they had made corrections and notification they then further falsified documents and patent portfolios with materially false and misleading information.

805. That Plaintiffs state on information and belief, the conspiratorial and coordinated efforts at both using the legal system to attempt theft of patents, which endangers constitutionally protected rights by the very institution created by congress to uphold such rights for the citizens as ARTICLE 1, SECTION 8, CLAUSE 8 OF THE UNITED STATES OF AMERICA CONSTITUTION provides and which the USPTO acts as the agency to provide such rights, has been wholly violated to usurp Plaintiffs rights' to the IP.

806. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; §10.94 - 10.99 [Reserved] §10.100 Canon 8.

A. That Plaintiffs state on information and belief, Iviewit Companies patent practitioners have failed to assist in improving the legal system and perhaps may have catastrophically created harm to the general public's confidence in such system which could lead to a failure to trust patent attorneys, a further harm to legal profession.

807. That Plaintiffs state on information and belief, the actions of Iviewit Companies patent practitioners taken alone or together are of such high crimes against the USPTO, Iviewit Companies and other government agencies described herein, as to constitute further a violation of section; §10.104 - 10.109 [Reserved] §10.110 Canon 9.

A. That Plaintiffs state on information and belief, Iviewit Companies patent practitioners have not avoided even the appearance of professional impropriety and have in fact committed multitudes of professional improprieties in the commission of such crimes as described herein.

808. That Plaintiffs state on information and belief, defendants licensed to practice before the USPTO, all failed their duties to protect client Iviewit Companies and inventors IP under section; §10.112 Preserving identity of funds and property of client.

A. That Plaintiffs state on information and belief, Iviewit Companies patent practitioners failed to maintain the IP files of the Company which all prior patent practitioners claim that all original materials were transferred to BSTZ and BSTZ upon learning OED and international agencies had been alerted to the crimes, attempted to claim a transfer of the patent materials to Iviewit Companies with no accounting for such claimed transfer. There were no proper or formal written requests to transfer such files and there was no written receipt for transfer of such properties. Records were lost whereby such properties have not been identified and labeled properly and the practitioners failed to maintain complete records of all properties of Iviewit Companies coming into the possession of the practitioner and there was no accounting to the client regarding the properties and now BSTZ claims to have no accounting for all such properties. Iviewit Companies had requested BSTZ

to promptly deliver to several investigatory agencies the necessary files for investigation and BSTZ then suddenly claimed they had transferred such proprietary and highly confidential and pertinent patent document to Iviewit Companies with no notice or receipt of such transfer and such parcels never were transferred.

809. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; PATENT RULES PART 10 INDEX - PART 15.

810. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate multiplicity of rules in the CONSOLIDATED PATENT RULES Title 37 - Code of Federal Regulations Patents, Trademarks, and Copyrights and Title 35.

811. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to commit VIOLATIONS OF PROTECTION OF TRADE SECRETS.

812. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; TITLE 18 PART I CH 90 Sec 1831 Economic espionage.


A. That Plaintiffs state on information and belief, defendants have committed economic espionage intending and knowing the offenses will benefit a foreign agent and knowingly stole, and without authorization appropriated, took, carried away, and concealed, and by fraud, artifice, and deception obtained trade secrets; further and without authorization copied, duplicated, sketched, drew, photographed, downloaded, uploaded, altered, destroyed, photocopied, replicated, transmitted, delivered, sent, mailed, communicated, and conveyed trade secrets; and received, bought and possess

trade secrets, knowing the same to have been stolen and appropriated, obtained, and converted without authorization; and attempted to commit offenses described in paragraphs (1) through (3); and (5) and conspired with one or more other persons and committed offenses described in paragraphs (1) through (3), and one or more of such persons did acts to effect the object of the conspiracy.

813. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; TITLE 18 PART I CH 90 Sec 1832 Theft of trade secrets.

A. That Plaintiffs state on information and belief, defendants have committed theft of trade secrets with intent to convert trade secrets, related to and included in products produced for and placed in interstate and foreign commerce, to the economic benefit of others than the owner thereof, and intended and knowing the offenses would, injure the owners of trade secrets, knowingly steals, and without authorization appropriated, took, carried away, and concealed, and/or by fraud, artifice, and deception obtained such information; and without authorization copied, duplicated, sketched, drew, photographed, downloaded, uploaded, altered, destroyed, photocopied, replicated, transmitted, delivered, sent, mailed, communicated, and conveyed such information; and received, bought, possesses such information, knowing the same to have been stolen and appropriated, obtained, or converted without authorization; and attempted to commit offenses described in paragraphs (1) through (3); or (5) and conspired with one or more other persons to commit any offense described in paragraphs (1) through (3), and one or more of such persons in acts to effect the object of the conspiracy.

814. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to commit FRAUD UPON THE UNITED STATES COPYRIGHT OFFICES.


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815. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to commit fraud upon the United States Copyright Offices by failing to secure copyright protection and other acts under, including but not limited to: TITLE 17 – COPYRIGHTS.

816. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate VIOLATIONS OF FEDERAL BANKRUPTCY LAW.

817. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; TITLE 18 PART I CHAPTER 9 BANKRUPTCY Sec. 152 CONCEALMENT OF ASSETS; FALSE OATHS AND CLAIMS; BRIBERY.

A. That Plaintiffs state on information and belief, by Definition and Sec.152 defendants have concealed assets and falsified oaths and claims and further caused embezzlement against estate and under Sec. § 154 defendants had adverse interests and conduct unbecoming officers and under Sec. §155 Fee agreements in cases under title 11 and receiverships and under Sec. § 156 had knowing disregard of bankruptcy law or rule and under Sec. § 157 have committed bankruptcy fraud and defendants concealed assets and made false oaths and claims and who knowingly and fraudulently concealed from a custodian, trustee, marshal, or other officer of the court charged with the control or custody of property, or, in connection with a case under title 11, from creditors or the United States Trustee, properties belonging to the estate of a debtor; knowingly and fraudulently made false oaths or accounts in and in relation to a case under title 11; knowingly and fraudulently made false declarations, certificates, verifications, and statements under penalty of perjury under section 1746 of title 28, in and in relation to a case under title 11; knowingly and fraudulently presented false claims for proof against the estate of a debtor, and uses any such claim

in a case under title 11, in a personal capacity or as or through an agent, proxy, or attorney; knowingly and fraudulently received any material amount of property from a debtor after the filing of a case under title 11, with intent to defeat the provisions of title 11; knowingly and fraudulently gave, offered, received, and attempted to obtain any money or property, remuneration, compensation, reward, advantage, or promise thereof by acting and forbearing to act in a case under title 11; in a personal capacity or as an agent or officer of a person and corporation, in contemplation of a case under title 11 by or against the person or any other person or corporation, or with intent to defeat the provisions of title 11, knowingly and fraudulently transferred and concealed property or the property of such other person or corporation; after the filing of a case under title 11 and in contemplation thereof, knowingly and fraudulently concealed, destroyed, mutilated, falsified, and made false entries in recorded information (including books, documents, records, and papers) relating to the property or financial affairs of a debtor; or after the filing of a case under title 11, knowingly and fraudulently withholds from a custodian, trustee, marshal, or other officer of the court or a United States Trustee entitled to its possession, any recorded information (including books, documents, records, and papers) relating to the property or financial affairs of a debtor.

818. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; TITLE 18 PART I CHAPTER 9 Sec 156 - Knowing disregard of bankruptcy law or rule and TITLE 18 PART I CHAPTER 9 Sec 157 - Bankruptcy fraud.

A. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate Sec. 157 and through bankruptcy fraud defendants described herein devised and intended to devise a scheme and artifice to defraud and for the purpose of executing and concealing such a scheme and artifice and attempting to do so and filed a petition under title 11; and filed documents

in a proceeding under title 11; and makes a false or fraudulent representation, claim, or promise concerning or in relation to a proceeding under title 11, at any time before or after the filing of the petition, or in relation to a proceeding falsely asserted to be pending under such title.

819. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate COUNTERFEITING AND FORGERY.

820. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; TITLE 18 PART I CH 25 SEC 470 COUNTERFEITING AND FORGERY counterfeit acts committed outside the United States.

A. That Plaintiffs state on information and belief, by committing counterfeit acts committed outside the United; and Sec. 471. - in regard to obligations and securities of United States defendants, with intent to defraud, falsely made, forged, counterfeited, and altered an obligation or other security of the United States.

821. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; TITLE 18 PART I CH 25 Sec 473 - Dealing in counterfeit obligations or securities.

A. That Plaintiffs state on information and belief, by dealing in counterfeit obligations or securities and defendants bought\buy, sold\sell, received\receive, and \delivered\deliver false, forged, counterfeited, and altered obligations and other securities of the United States, with the intent that the same be passed, published, or used as true and genuine.

822. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown,

participate in a conspiracy to violate; TITLE 18 PART I CH 25 Sec 494 - Contractors' bonds, bids, and public records in regard to Contractors' bonds, bids, and public records.

A. That Plaintiffs state on information and belief, defendants falsely made, altered, forged, and counterfeited security, public record, affidavit, or other writing for the purpose of defrauding the United States; and defendants uttered and published as true and possessed with intent to utter or publish as true, false, forged, altered, and counterfeited writing, knowing the same to be false, forged, altered, or counterfeited; and defendants transmitted to, and presented at offices and officers of the United States, false, forged, altered, or counterfeited writing, knowing the same to be false, forged, altered, or counterfeited.

823. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; TITLE 18 PART I CH 25 Sec 495 - Contracts, deeds, and powers of attorney in regards to contracts, deeds, and powers of attorney and falsely made, altered, forged, and counterfeited deeds, power of attorneys, orders, certificates, receipts, contracts, and other writings, for the purpose of obtaining and receiving, and of enabling other persons, directly and/or indirectly, in obtaining and receiving from the United States and/or officers and agents thereof, any sum of money; defendants have uttered and published as true false, forged, altered, or counterfeited writings, with intent to defraud the United States, knowing the same to be false, altered, forged, or counterfeited; and defendants have transmitted to, and presented at offices and officers of the United States, writings in support of, and in relation to, any account or claim, with intent to defraud the United States, knowing the same to be false, altered, forged, or counterfeited.

824. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate Sec. 513. - Securities of the States and private entities.



825. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate Sec. 514. - Fictitious obligations.

826. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate FRAUD AND FALSE STATEMENTS. In the commission of certain crimes against the USPTO and state corporate laws, documents were falsified for; patent applications, corporate formation and other corporate documents; billing statements, foreign patent applications, investment documents and other documents currently under investigations as outlined herein.

827. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; TITLE 18 PART I CH 47 FRAUD AND FALSE STATEMENTS Sec 1001.

A. That Plaintiffs state on information and belief, defendants made statements or entries generally and in matters within the jurisdiction of the executive, legislative, or judicial branch of the Government of the United States, knowingly and willfully falsified, concealed, and covered up by trick, scheme, and device material facts; and made materially false, fictitious, and fraudulent statements and representations; and made and used false writings and documents knowing the same to contain materially false, fictitious, and fraudulent statements and entries.

828. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; TITLE 18 PART I CH 47 Sec 1031 - Major fraud against the United States.

A. That Plaintiffs state on information and belief, defendants have committed major fraud against the United States and knowingly executed, and attempted to execute,



schemes and artifices with the intent to defraud the United States; and obtained money and property by means of false and fraudulent pretenses, representations, and promises, in the procurement of property and services as a prime contractor with the United States or as a subcontractor or supplier on a contract in which there is a prime contract with the United States.

829. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate MALICIOUS MISCHIEF VIOLATION.

830. That Plaintiffs state on information and belief, defendants have violated; TITLE 18 PART I CH 65 Sec 1361 - Government property or contracts.

A. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate Government property and contracts and that defendants willfully injured and committed depredation against properties of the United States, and departments and agencies thereof, and property which has been or is being manufactured or constructed for the United States, or any department or agency thereof, and attempted to commit the foregoing offenses.

831. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate ROBBERY AND BURGLARY.

832. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; TITLE 18 PART I CH 103 Sec 2112 - Personal property of United States.

A. That Plaintiffs state on information and belief, defendants have robbed and attempted to rob Iviewit Companies of properties belonging to the United States.

833. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; TITLE 18 PART I CH 103 Sec 2114 - Mail, money, or other property of United States.

A. That Plaintiffs state on information and belief, defendants through mail, money, and other property of United States and are in receipt, possession, concealment, and disposal of Property. Defendants have received, possess, conceal, and dispose of money and other property obtained in violation of this section, knowing the same to have been unlawfully obtained.

834. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate STOLEN PROPERTY.

835. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; TITLE 18 PART I CH 113 STOLEN PROPERTY Sec 2311.

A. That Plaintiffs state on information and belief, through illegal actions and defined, "Money" means the legal tender of the United States or of any foreign country, or any counterfeit thereof; "Securities" includes any note, stock certificate, bond, debenture, check, draft, warrant, traveler's check, letter of credit, warehouse receipt, negotiable bill of lading, evidence of indebtedness, certificate of interest or participation in any profit-sharing agreement, collateral-trust certificate, preorganization certificate or subscription, transferable share, investment contract, voting-trust certificate; certificate of interest in property, tangible or intangible; instrument or document or writing evidencing ownership of goods, wares, and merchandise, or transferring or assigning any right, title, or interest in or to goods, wares, and merchandise; or, in general, any instrument commonly known as a "security", or any certificate of interest or participation in, temporary or interim certificate for, receipt for, warrant, or right to

subscribe to or purchase any of the foregoing, or any forged, counterfeited, or spurious representation of any of the foregoing; "Tax stamp" includes any tax stamp, tax token, tax meter imprint, or any other form of evidence of an obligation running to a State, or evidence of the discharge thereof; "Value" means the face, par, or market value, whichever is the greatest, and the aggregate value of all goods, wares, and merchandise, securities, and money referred to in a single indictment shall constitute the value thereof.

836. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; TITLE 18 PART I CH 113 Sec 2314 - Transportation of stolen goods, securities, moneys, fraudulent State tax stamps, or articles used in counterfeiting.

A. That Plaintiffs state on information and belief, defendants have participated in the transportation of stolen goods, securities, moneys, or articles used in counterfeiting and defendants have transported, transmitted, and made transfers in interstate and foreign commerce of goods, wares, merchandise, securities or money, of the value of \$5,000 or more, knowing the same to have been stolen, converted and taken by fraud; and having devised and intended to devise schemes and artifices to defraud, and for obtaining money or property by means of false or fraudulent pretenses, representations, and promises, transported and caused to be transported, and induced persons to travel in, and to be transported in interstate and foreign commerce in the execution and concealment of schemes and artifices to defraud that person or those persons of money or property having a value of \$5,000 or more; and, with unlawful or fraudulent intent, transported in interstate and foreign commerce falsely made, forged, altered, and counterfeited securities, knowing the same to have been falsely made, forged, altered, and counterfeited; and, with unlawful and fraudulent intent.

837. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown,

participate in a conspiracy to violate; TITLE 18 PART I CH 113 Sec 2315 - Sale or receipt of stolen goods, securities, moneys, or fraudulent State tax stamps.

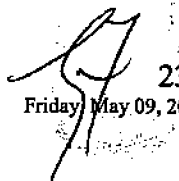
838. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; TITLE 18 PART I CH 113 Sec 2318 - Trafficking in counterfeit labels for phonorecords, copies of computer programs or computer program documentation or packaging, and copies of motion pictures or other audio visual works, and trafficking in counterfeit computer program documentation or packaging.

A. That Plaintiffs state on information and belief, while trafficking in counterfeit labels for phonorecords, copies of computer programs or computer program documentation or packaging, and copies of motion pictures or other audio visual works, and trafficking in counterfeit computer program documentation or packaging and knowingly traffic in counterfeit label affixed or designed to be affixed to a phonorecord, or a copy of a computer program or documentation or packaging for a computer program, or a copy of a motion picture or other audiovisual work, and whoever, in any of the circumstances described in subsection (c) of this section, knowingly traffics in counterfeit documentation or packaging for a computer program.

839. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; TITLE 18 PART I CH 113 Sec 2319 - Criminal infringement of a copyright.

840. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; TITLE 18 PART I CH 113 Sec 2320 - Trafficking in counterfeit goods or services.

841. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with



each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate SECURITIES LAWS of Title 15 Chap 2. That Plaintiffs state on information and belief, state defendants violated multiple securities laws through fraud to achieve the IP thefts and corporate formations.

A. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate BRIBERY, GRAFT, AND CONFLICTS OF INTEREST.

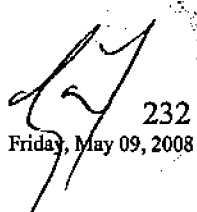
842. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; TITLE 18 PART I CH 11 Sec. 201. Bribery of public officials and witnesses.

843. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate Sec. 225. - Continuing financial crimes enterprise.

844. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate Sec. 205. - Activities of officers and employees in claims against and other matters affecting the Government.

845. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate Sec. 208. - Acts affecting a personal financial interest.

846. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with



each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate Sec. 210. - Offer to procure appointive public office.

847. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate PERJURY.

848. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; TITLE 18 PART I CH 79 Sec 1621 - Perjury generally.

A. That Plaintiffs state on information and belief, By committing acts of perjury generally and further having taken an oath before a competent tribunal, officer, or person, in cases in which laws of the United States authorize oaths to be administered, that defendants testify, declare, depose, and certify truly, that written testimonies, declarations, depositions, and certificates subscribed, is true, and defendants willfully and contrary to such oaths stated and subscribed material matters which they did not believe to be true; and in declarations, certificates, verifications, and statements under penalty of perjury as permitted under section 1746 of title 28, United States Code, willfully subscribed as true material matters which they do not believe to be true; and is therefore guilty of perjury.

849. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; TITLE 18 PART I CH 79 Sec 1622 by subornation of perjury.

A. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to procure others to commit perjury and therefore are guilty of subornation of perjury.

850. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; TITLE 18 PART I CH 79 Sec 1623 - False declarations before grand jury or court.

A. That Plaintiffs state on information and belief, defendants have made false declarations before a court and under oath (and in declarations, certificates, verifications, and statements under penalty of perjury as permitted under section 1746 of title 28, United States Code) in proceedings before or ancillary to any court of the United States and knowingly made false material declarations and made and use other information, including books, papers, documents, records, recordings, and other materials, knowing the same to contain false material declarations.

851. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate perjury in depositions to state supreme court agencies, state supreme courts, civil court and a federal bankruptcy court.

852. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; TITLE 18 PART I CH 63 Sec 1341 - Frauds and swindles.

A. That Plaintiffs state on information and belief, defendants have devised and intended to devise schemes and artifices to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, and/or to sell, dispose of, loan, exchange, alter, give away, distribute, supply, furnish and/or procure for unlawful uses counterfeit or spurious obligation, security, and other articles, and represented to be and intimated and held out to be counterfeit or spurious article, for the purpose of executing such schemes and artifices and attempting so to do, places in any post office or authorized depository for mail matter, matters or things sent and delivered by the Postal Service, and deposited and caused

to be deposited matters and things to be sent and delivered by private and commercial interstate carriers, and took and received therefrom, such matters and things, and knowingly caused to be delivered by mail and such carrier according to the direction thereon, and at the place at which it is directed to be delivered by the person to whom it is addressed, any such matters or things.

853. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; TITLE 18 PART I CH 63 Sec 1342 Fictitious name or address.

A. That Plaintiffs state on information and belief, In the use of fictitious names and addresses, defendants for the purpose of conducting, promoting, and carrying on by means of the Postal Service, schemes and devices mentioned in section 1341 of this title and other unlawful business, used and assumed, and requested to be addressed by, any fictitious, false, or assumed title, name, and address and name other than his own proper name, or takes or receives from any post office or authorized depository of mail matter, any letter, postal card, package, and other mail matter addressed to any such fictitious, false, or assumed title, name, address, name other than his own proper name.

854. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; TITLE 18 PART I CH 63 Sec 1343 - Fraud by wire, radio, or television.

A. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to commit fraud by wire, radio, or television and defendants have devised and intended to devise schemes and artifices to defraud, and for obtaining money and property by means of false or fraudulent pretenses, representations, and promises, transmitted and caused to be transmitted by means of

wire, radio, or television communication in interstate or foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such schemes and artifices.

855. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; TITLE 18 PART I CH 63 Sec 1344 - Bank fraud.


A. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to commit bank fraud by knowingly executing, and attempting to execute, schemes and artifices to defraud a financial institution; and to obtain any of the moneys, funds, credits, assets, securities, or other property owned by, or under the custody or control of, a financial institution, by means of false or fraudulent pretenses, representations, or promises.

856. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; TITLE 18 PART I CH 63 Sec 1346 - Definition of "scheme or artifice to defraud".

A. That Plaintiffs state on information and belief, defendants meet the definition of "scheme or artifice to defraud" including schemes and artifices to deprive another of the intangible right of honest services.

857. That That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate VIOLATIONS OF POSTAL SERVICE.

858. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown,

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participate in a conspiracy to violate; TITLE 18 PART I CH 83 Sec 1701 - Obstruction of mails generally.

A. That Plaintiffs state on information and belief, defendants have obstructed mails generally, knowingly and willfully obstructing and retarding the passage of the mail, and carrier and conveyance carrying the mail.

859. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; TITLE 18 PART I CH 83 Sec 1702 - Obstruction of correspondence.

A. That Plaintiffs state on information and belief, defendants have obstructed correspondences and taken letters, postal cards, and packages out of a post office and a authorized depository for mail matters, and from any letter or mail carrier, or which has been in any post office or authorized depository, or in the custody of any letter or mail carrier, before it has been delivered to the person to whom it was directed, had designs to obstruct the correspondences, and to pry into the businesses and secrets of others, and opened, secreted, embezzled, and destroyed the same.

860. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate numerous codes of the INTERNAL REVENUE SERVICE CODE by actions described herein.

A. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate numerous federal and state tax codes including; TITLE 26 INTERNAL REVENUE CODE.

B. That Plaintiffs state on information and belief, defendants engaged in illegal activities in reporting taxes and preparing statements.

861. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with



each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate EMBEZZLEMENT AND THEFT.

862. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; TITLE 18 PART I CH 31 Sec 641 - Public money, property or records.

A. That Plaintiffs state on information and belief, in regard to public money, property or records, defendants have embezzled, stolen, purloined, and knowingly converted to their use and the uses of others, and without authority, sell, convey and disposed of records, vouchers, moneys, and things of value of the United States or of any department or agency thereof, and in property made and being made under contract for the United States or any department or agency thereof; and defendants have received, concealed, and retained the same with intent to convert it to their use and gain, knowing it to have been embezzled, stolen, purloined or converted.

863. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate Sec 654 - Officer or employee of United States converting property of another.

864. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate TITLE 15 CH 22 SUBCH IV SUBCHAPTER IV - THE MADRID PROTOCOL.

865. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate CONTEMPT.

866. That Plaintiffs state on information and belief, defendants have violated the following in the abuse of, including but not limited to, Supreme Court disciplinary agencies and a Florida civil circuit court.

867. That Plaintiffs state on information and belief, defendants have violated Sec. 401. - Power of court.

868. That Plaintiffs state on information and belief, defendants have violated Sec. 201. - Bribery of public officials and witnesses.

869. That Plaintiffs state on information and belief, defendants have violated Sec. 205. - Activities of officers and employees in claims against and other matters affecting the Government.

870. That Plaintiffs state on information and belief, defendants have violated Sec. 208. - Acts affecting a personal financial interest.

871. That Plaintiffs state on information and belief, defendants have violated Sec. 210. - Offer to procure appointive public office.

872. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate OBSTRUCTION OF JUSTICE.

873. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; TITLE 18 PART I CH 73 Sec 1511 - Obstruction of State or local law enforcement.

NEW YORK STATE CRIMES

874. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate New York Conspiracy laws. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to

commit a conspiracy within the state of New York and under; New York State Consolidated Laws Penal ARTICLE 105 CONSPIRACY as described herein.

875. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate: Section 105.00 Conspiracy in the sixth degree.

876. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate 105.05 Conspiracy in the fifth degree.

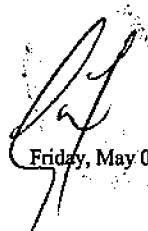
877. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate 105.10 Conspiracy in the fourth degree.

878. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate 105.13 Conspiracy in the third degree.

879. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate 105.15 Conspiracy in the second degree.

880. That That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate 105.17 Conspiracy in the first degree.

881. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate 105.20 Conspiracy; pleading and proof; necessity of overt act.

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882. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate 105.30 Conspiracy; no defense.

883. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate 05.35 Conspiracy; enterprise corruption: applicability.

884. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate S 105.00 Conspiracy in the sixth degree.

885. That That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate VIOLATIONS OF PUBLIC OFFICES, INCLUDING BUT NOT LIMITED TO, First Department Court, 1st DDC, Second Department Court, 2nd DDC.

886. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; New York State Consolidated Laws Penal ARTICLE 200 BRIBERY INVOLVING PUBLIC SERVANTS AND RELATED OFFENSES, and these claims are further endorsed by the statements in *Anderson*.

887. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; S 200.03 Bribery in the second degree.

A. That Plaintiffs state on information and belief, defendants are guilty of bribery in the second degree they conferred, or offered or agreed to confer, any benefit valued in

excess of ten thousand dollars upon a public servant upon an agreement or understanding that such public servant's vote, opinion, judgment, action, decision or exercise of discretion as a public servant will thereby be influenced. Bribery in the second degree is a class C felony.

888. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; S 200.04 Bribery in the first degree.

A. That Plaintiffs state on information and belief, defendants are guilty of bribery in the first degree when they conferred, or offered or agreed to confer, any benefit upon a public servant upon an agreement or understanding that such public servant's vote, opinion, judgment, action, decision or exercise of discretion as a public servant will thereby be influenced in the investigation, arrest, detention, prosecution or incarceration of any person for the commission or alleged commission of a class A felony defined in article two hundred twenty of the penal law or an attempt to commit any such class A felony. Bribery in the first degree is a class B felony.

889. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; S 200.10 Bribe receiving in the third degree.

A. That Plaintiffs state on information and belief, a public servant is guilty of bribe receiving in the third degree when he solicits, accepts or agrees to accept any benefit from another person upon an agreement or understanding that his vote, opinion, judgment, action, decision or exercise of discretion as a public servant will thereby be influenced. Bribe receiving in the third degree is a class D felony.

890. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; S 200.11 Bribe receiving in the second degree.

A. That Plaintiffs state on information and belief, a public servant is guilty of bribe receiving in the second degree when they solicit, accept or agree to accept any benefit

valued in excess of ten thousand dollars from another person upon an agreement or understanding that his vote, opinion, judgment, action, decision or exercise of discretion as a public servant will thereby be influenced. Bribe receiving in the second degree is a class C felony.

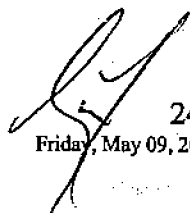
891. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; S 200.12 Bribe receiving in the first degree.

A. That Plaintiffs state on information and belief, a public servant is guilty of bribe receiving in the first degree when he solicits, accepts or agrees to accept any benefit from another person upon an agreement or understanding that his vote, opinion, judgment, action, decision or exercise of discretion as a public servant will thereby be influenced in the investigation, arrest, detention, prosecution or incarceration of any person for the commission or alleged commission of a class A felony defined in article two hundred twenty of the penal law or an attempt to commit any such class A felony. Bribe receiving in the first degree is a class B felony.

892. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; S 200.20 Rewarding official misconduct in the second degree.

A. That Plaintiffs state on information and belief, defendants are guilty of rewarding official misconduct in the second degree when he knowingly confers, or offers or agrees to confer, any benefit upon a public servant for having violated his duty as a public servant. Rewarding official misconduct in the second degree is a class E felony.

893. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; S 200.22 Rewarding official misconduct in the first degree.



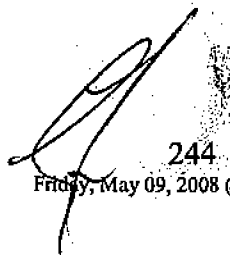
A. That Plaintiffs state on information and belief, defendants are guilty of rewarding official misconduct in the first degree when they knowingly conferred, or offered or agreed to confer, any benefit upon a public servant for having violated his duty as a public servant in the investigation, arrest, detention, prosecution, or incarceration of any person for the commission or alleged commission of a class A felony defined in article two hundred twenty of the penal law or the attempt to commit any such class A felony. Rewarding official misconduct in the first degree is a class C felony.

894. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; S 200.25 Receiving reward for official misconduct in the second degree.

A. That Plaintiffs state on information and belief, a public servant is guilty of receiving reward for official misconduct in the second degree when he solicits, accepts or agrees to accept any benefit from another person for having violated his duty as a public servant. Receiving reward for official misconduct in the second degree is a class E felony.

895. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; S 200.27 Receiving reward for official misconduct in the first degree.

A. That Plaintiffs state on information and belief, a public servant is guilty of receiving reward for official misconduct in the first degree when he solicits, accepts or agrees to accept any benefit from another person for having violated his duty as a public servant in the investigation, arrest, detention, prosecution, or incarceration of any person for the commission or alleged commission of a class A felony defined in article two hundred twenty of the penal law or the attempt to commit any such class A felony. Receiving reward for official misconduct in the first degree is a class C felony.



896. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; S 200.30 Giving unlawful gratuities.

A. That Plaintiffs state on information and belief, defendants are guilty of giving unlawful gratuities when they knowingly conferred, or offered or agreed to confer, any benefit upon a public servant for having engaged in official conduct which he was required or authorized to perform, and for which he was not entitled to any special or additional compensation. Giving unlawful gratuities is a class A misdemeanor.

897. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; S 200.35 Receiving unlawful gratuities.

A. That Plaintiffs state on information and belief, a public servant is guilty of receiving unlawful gratuities when he solicits, accepts or agrees to accept any benefit for having engaged in official conduct which he was required or authorized to perform, and for which he was not entitled to any special or additional compensation. Receiving unlawful gratuities is a class A misdemeanor.

898. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; S 200.45 Bribe giving for public office.

A. That Plaintiffs state on information and belief, defendants are guilty of bribe giving for public office when he confers, or offers or agrees to confer, any money or other property upon a public servant or a party officer upon an agreement or understanding that some person will or may be appointed to a public office or designated or nominated as a candidate for public office. Bribe giving for public office is a class D felony.

899. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with

each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; ARTICLE 175 OFFENSES INVOLVING FALSE WRITTEN STATEMENTS.

900. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; S 175.05 Falsifying business records in the second degree.

A. That Plaintiffs state on information and belief, defendants are guilty of falsifying business records in the second degree when, with intent to defraud, they:

1. Makes or causes a false entry in the business records of an enterprise; or
2. Alters, erases, obliterates, deletes, removes or destroys a true entry in the business records of an enterprise; or
3. Omits to make a true entry in the business records of an enterprise in violation of a duty to do so which he knows to be imposed upon him by law or by the nature of his position; or
4. Prevents the making of a true entry or causes the omission thereof in the business records of an enterprise. Falsifying business records in the second degree is a class A misdemeanor.

901. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; S 175.10 Falsifying business records in the first degree.

A. That Plaintiffs state on information and belief, defendants are guilty of falsifying business records in the first degree when he commits the crime of falsifying business records in the second degree, and when his intent to defraud includes an intent to commit another crime or to aid or conceal the commission thereof. Falsifying business records in the first degree is a class E felony.

902. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with

each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; S 175.20 Tampering with public records in the second degree.

A. That Plaintiffs state on information and belief, defendants are guilty of tampering with public records in the second degree when, knowing that he does not have the authority of anyone entitled to grant it, he knowingly removes, mutilates, destroys, conceals, makes a false entry in or falsely alters any record or other written instrument filed with, deposited in, or otherwise constituting a record of a public office or public servant. Tampering with public records in the second degree is a Class A misdemeanor.

903. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; S 175.25 Tampering with public records in the first degree.

A. That Plaintiffs state on information and belief, defendants are guilty of tampering with public records in the first degree when, knowing that he does not have the authority of anyone entitled to grant it, and with intent to defraud, he knowingly removes, mutilates, destroys, conceals, makes a false entry in or falsely alters any record or other written instrument filed with, deposited in, or otherwise constituting a record of a public office or public servant. Tampering with public records in the first degree is a class D felony.

904. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; S 175.30 Offering a false instrument for filing in the second degree.

A. That Plaintiffs state on information and belief, defendants are guilty of offering a false instrument for filing in the second degree when, knowing that a written instrument contains a false statement or false information, he offers or presents it to a public office or public servant with the knowledge or belief that it will be filed with,



registered or recorded in or otherwise become a part of the records of such public office or public servant. Offering a false instrument for filing in the second degree is a class A misdemeanor.

905. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; S 175.35 Offering a false instrument for filing in the first degree.

A. That Plaintiffs state on information and belief, defendants are guilty of offering a false instrument for filing in the first degree when, knowing that a written instrument contains a false statement or false information, and with intent to defraud the state or any political subdivision, public authority or public benefit corporation of the state, he offers or presents it to a public office, public servant, public authority or public benefit corporation with the knowledge or belief that it will be filed with, registered or recorded in or otherwise become a part of the records of such public office, public servant, public authority or public benefit corporation. Offering a false instrument for filing in the first degree is a class E felony.

906. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; S 175.40 Issuing a false certificate.

A. That Plaintiffs state on information and belief, defendants are guilty of issuing a false certificate when, being a public servant authorized by law to make or issue official certificates or other official written instruments, and with intent to defraud, deceive or injure another person, he issues such an instrument, or makes the same with intent that it be issued, knowing that it contains a false statement or false information. Issuing a false certificate is a class E felony.

907. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; S 175.45 Issuing a false financial statement.

A. That Plaintiffs state on information and belief, defendants are guilty of issuing a false financial statement when, with intent to defraud:

1. He knowingly makes or utters a written instrument which purports to describe the financial condition or ability to pay of some person and which is inaccurate in some material respect; or

2. He represents in writing that a written instrument purporting to describe a person's financial condition or ability to pay as of a prior date is accurate with respect to such person's current financial condition or ability to pay, whereas he knows it is materially inaccurate in that respect. Issuing a false financial statement is a class A misdemeanor.

908. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; NY Constitution ARTICLE XIII Public Officers Section 1. Members of the legislature, and all officers, executive and judicial, except such inferior officers as shall be by law exempted, shall, before they enter on the duties of their respective offices, take and subscribe the following oath or affirmation: "I do solemnly swear (or affirm) that I will support the Constitution of the United States, and the Constitution of the State of New York, and that I will faithfully discharge the duties of the office of, according to the best of my ability;" and have in multitude violated such oath and to faithfully discharge duties.

909. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate Public Officers - Public Officers ARTICLE 1 S 2.

910. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; ARTICLE 2 Appointment and Qualification of Public Officers - ARTICLE 15 ATTORNEYS AND COUNSELORS.



911. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate S 476-a. Action for unlawful practice of the law.

A. Whereby:

1. The attorney-general may maintain an action upon his own information or upon the complaint of a private person or of a bar association organized and existing under the laws of this state against any person, partnership, corporation, or association, and any employee, agent, director, or officer thereof who commits any act or engages in any conduct prohibited by law as constituting the unlawful practice of the law.
2. Such an action may also be maintained by a bar association organized and existing under the laws of the state of New York, upon an application to the supreme court of the state of New York, or a justice thereof, for leave to bring the same by such bar association on good cause shown therefor and proof that a written request was made upon the attorney-general to bring such an action and that more than twenty days have elapsed since the making of such request and he has failed or refused to bring such an action.

912. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; S 487. Misconduct by attorneys.

A. Whereby:

That Plaintiffs state on information and belief, attorneys and counselors:

1. are guilty of deceit and collusion, and consented to deceit and collusion, with intent to deceive the court or any party; or,
2. and have willfully delayed his client's suit with a view to his own gain. And in addition to the punishment prescribed therefore by the penal law, he forfeits to the party injured treble damages, to be recovered in a civil action.

913. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown,

participate in a conspiracy to violate Public Officers Law §73 Restrictions on the Activities Of Current and Former State Officers and Employees. Section 73. Business or professional activities by state officers and employees and party officers.

914. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; Public Officers Law §74 Code of Ethics Sec. 74. Code of ethics.

2. Rule with respect to conflicts of interest. No officer or employee of a state agency, member of the legislature or legislative employee should have any interest, financial or otherwise, direct or indirect, or engage in any business or transaction or professional activity or incur any obligation of any nature, which is in substantial conflict with the proper discharge of his duties in the public interest.

3. Standards.

a. No officer or employee of a state agency, member of the legislature or legislative employee should accept other employment which will impair his independence of judgment in the exercise of his official duties.

b. No officer or employee of a state agency, member of the legislature or legislative employee should accept employment or engage in any business or professional activity which will require him to disclose confidential information which he has gained by reason of his official position or authority.

c. No officer or employee of a state agency, member of the legislature or legislative employee should disclose confidential information acquired by him in the course of his official duties nor use such information to further his personal interests.

d. No officer or employee of a state agency, member of the legislature or legislative employee should use or attempt to use his official position to secure unwarranted privileges or exemptions for himself or others.

e. No officer or employee of a state agency, member of the legislature or legislative employee should engage in any transaction as representative or agent of the state with any business entity in which he has a direct or indirect financial interest that might reasonably tend to conflict with the proper discharge of his official duties.



f. An officer or employee of a state agency, member of the legislature or legislative employee should not by his conduct give reasonable basis for the impression that any person can improperly influence him or unduly enjoy his favor in the performance of his official duties, or that he is affected by the kinship, rank, position or influence of any party or person.

g. An officer or employee of a state agency should abstain from making personal investments in enterprises which he has reason to believe may be directly involved in decisions to be made by him or which will otherwise create substantial conflict between his duty in the public interest and his private interest.

h. An officer or employee of a state agency, member of the legislature or legislative employee should endeavor to pursue a course of conduct which will not raise suspicion among the public that he is likely to be engaged in acts that are in violation of his trust.

j. If any officer or employee of a state agency shall have a financial interest, direct or indirect, having a value of ten thousand dollars or more in any activity which is subject to the jurisdiction of a regulatory agency, he should file with the secretary of state a written statement that he has such a financial interest in such activity which statement shall be open to public inspection.

4. Violations. In addition to any penalty contained in any other provision of law any such officer, member or employee who shall knowingly and intentionally violate any of the provisions of this section may be fined, suspended or removed from office or employment in the manner provided by law.

915. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate NEW YORK STATE CONSOLIDATED LAWS TITLE X ORGANIZED CRIME CONTROL ACT ARTICLE 460 ENTERPRISE CORRUPTION.

916. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; S 460.20 Enterprise corruption.

A. Whereby:

1. That Plaintiffs state on information and belief, defendants are guilty of enterprise corruption when, having knowledge of the existence of a criminal enterprise and the nature of its activities, and being employed by or associated with such enterprise, he:

- (a) intentionally conducts or participates in the affairs of an enterprise by participating in a pattern of criminal activity; or
- (b) intentionally acquires or maintains any interest in or control of an enterprise by participating in a pattern of criminal activity; or
- (c) participates in a pattern of criminal activity and knowingly invests any proceeds derived from that conduct, or any proceeds derived from the investment or use of those proceeds, in an enterprise.

2. For purposes of this section, a person participates in a pattern of criminal activity when, with intent to participate in or advance the affairs of the criminal enterprise, he engages in conduct constituting, or, is criminally liable for pursuant to section 20.00 of this chapter, at least three of the criminal acts included in the pattern, provided that:

- (a) Two of his acts are felonies other than conspiracy;
- (b) Two of his acts, one of which is a felony, occurred within five years of the commencement of the criminal action; and
- (c) Each of his acts occurred within three years of a prior act.

1. For purposes of this section, the enterprise corrupted in violation of subdivision one of this section need not be the criminal enterprise by which the person is employed or with which he is associated, and may be a legitimate enterprise.

Enterprise corruption is a class B felony.

917. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; S 460.30 Enterprise corruption.

918. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with



each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violated; S 460.40 Enterprise corruption; jurisdiction.

A. Whereby:

That Plaintiffs state on information and belief, a person may be prosecuted for enterprise corruption:

1. in any county in which the principal place of business, if any, of the enterprise was located at the time of the offense, and, if the enterprise had a principal place or business located in more than one county, then in any such county in which any conduct occurred constituting or requisite to the completion of the offense of enterprise corruption; or

2. in any county in which any act included in the pattern of criminal activity could have been prosecuted pursuant to article twenty of the criminal procedure law; provided, however, that such person may not be prosecuted for enterprise corruption in such county based on this subdivision if the jurisdiction of such county is based solely on section 20.60 of the criminal procedure law; or

3. in any county in which he:

(a) conducts or participates in the affairs of the enterprise in violation of subdivision one of section 460.20 of this article, (b) acquires or maintains an interest in or control of the enterprise in violation of subdivision one of section 460.20 of this article, (c) invests proceeds in an enterprise in violation of subdivision one of section 460.20 of this article; or

4. in any county in which the conduct of the actor had or was likely to have a particular effect upon such county or a political subdivision or part thereof, and was performed with intent that it would, or with knowledge that it was likely to, have such particular effect therein.

919. That Plaintiffs cite on information and belief; S 460.50 Enterprise corruption; prosecution.

A. Whereby:

1. Subject to the provisions of section 460.60 of this article, a charge of enterprise corruption may be prosecuted by: (a) the district attorney of any county with jurisdiction over the offense pursuant to section 460.40 of this article; (b) the deputy



attorney general in charge of the statewide organized crime task force when authorized by subdivision seven of section seventy-a of the executive law; or (c) the attorney general when he is otherwise authorized by law to prosecute each of the criminal acts specifically included in the pattern of criminal activity alleged in the enterprise corruption charge.

2. For purposes of paragraph (c) of subdivision one of this section, a criminal act or an offense is specifically included in a pattern of criminal activity when the count of the accusatory instrument charging a person with enterprise corruption alleges a pattern of criminal activity and the act is alleged to be a criminal act within the pattern of criminal activity.

920. That Plaintiffs cite on information and belief, S 460.60 Enterprise corruption; consent to prosecute.

A. Whereby:

1. For purposes of this section, when a grand jury proceeding concerns a possible charge of enterprise corruption, or when an accusatory instrument includes a count charging a person with enterprise corruption, the affected district attorneys are the district attorneys otherwise empowered to prosecute any of the underlying acts of criminal activity in a county with jurisdiction over the offense of enterprise corruption pursuant to section 460.40 of this article.

921. That Plaintiffs state on information and belief, defendants have violated State of New York Trademark Laws.

A. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate New York laws; General Business Article 24 - TRADE-MARKS, SERVICE-MARKS AND BUSINESS REPUTATION.

922. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; §360-j. Fraudulent registration.

A. That Plaintiffs state on information and belief, whereby, any person who shall for himself or herself, or on behalf of any other person, procure the filing or registration of any mark in the office of the secretary under the provisions hereof, by knowingly making any false or fraudulent representation or declaration, orally or in writing, or by any other fraudulent means, shall be liable to pay all damages sustained in consequence of such filing or registration, to be recovered by or on behalf of the party injured thereby in any court of competent jurisdiction.

923. That Plaintiffs state on information and belief, defendants have violated; § 360-k. Infringement.

924. That Plaintiffs state on information and belief, defendants have violated; § 360-l. Injury to business reputation; dilution.

A. That Plaintiffs state on information and belief, whereby, likelihood of injury to business reputation or of dilution of the distinctive quality of a mark or trade name shall be a ground for injunctive relief in cases of infringement of a mark registered or not registered or in cases of unfair competition, notwithstanding the absence of competition between the parties or the absence of confusion as to the source of goods or services.

925. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; NEW YORK STATE CONSOLIDATED LAWS ARTICLE 210 - PERJURY AND RELATED OFFENSES.

926. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; S 210.05 Perjury in the third degree.

A. That Plaintiffs state on information and belief, defendants are guilty of perjury in the third degree when he swears falsely. Perjury in the third degree is a class A misdemeanor.

927. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with



each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; S 210.10 Perjury in the second degree.

A. That Plaintiffs state on information and belief, defendants are guilty of perjury in the second degree when he swears falsely and when his false statement is (a) made in a subscribed written instrument for which an oath is required by law, and (b) made with intent to mislead a public servant in the performance of his official functions, and (c) material to the action, proceeding or matter involved. Perjury in the second degree is a class E felony.

928. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; S 210.15 Perjury in the first degree.

A. That Plaintiffs state on information and belief, defendants are guilty of perjury in the first degree when he swears falsely and when his false statement (a) consists of testimony, and (b) is material to the action, proceeding or matter in which it is made. Perjury in the first degree is a class D felony.

929. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; S 210.20 Perjury; pleading and proof whereinconsistent statements involved.

A. That Plaintiffs state on information and belief, where a person has made two statements under oath which are inconsistent to the degree that one of them is necessarily false, where the circumstances are such that each statement, if false, is perjuriously so, and where each statement was made within the jurisdiction of this state and within the period of the statute of limitations for the crime charged, the inability of the people to establish specifically which of the two statements is the false one does not preclude a prosecution for perjury, and such prosecution may be conducted as follows:

1. The indictment or information may set forth the two statements and, without designating either, charge that one of them is false and perjuriously made.

2. The falsity of one or the other of the two statements may be established by proof or a showing of their irreconcilable inconsistency.

3. The highest degree of perjury of which the defendant may be convicted is determined by hypothetically assuming each statement to be false and perjurious. If under such circumstances perjury of the same degree would be established by the making of each statement, the defendant may be convicted of that degree at most. If perjury of different degrees would be established by the making of the two statements, the defendant may be convicted of the lesser degree at most.

930. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; S 210.35 Making an apparently sworn false statement in the second degree.

A. That Plaintiffs state on information and belief, defendants are guilty of making an apparently sworn false statement in the second degree when (a) he subscribes a written instrument knowing that it contains a statement which is in fact false and which he does not believe to be true, and (b) he intends or believes that such instrument will be uttered or delivered with a jurat affixed thereto, and (c) such instrument is uttered or delivered with a jurat affixed thereto. Making an apparently sworn false statement in the second degree is a class A misdemeanor.

931. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; S 210.40 Making an apparently sworn false statement in the first degree.

A. That Plaintiffs state on information and belief, defendants are guilty of making an apparently sworn false statement in the first degree when he commits the crime of making an apparently sworn false statement in the second degree, and when (a) the written instrument involved is one for which an oath is required by law, and (b) the false statement contained therein is made with intent to mislead a public servant in the performance of his official functions, and (c) such false statement is material to the

action, proceeding or matter involved. Making an apparently sworn false statement in the first degree is a class E felony.

932. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; S 210.45 Making a punishable false written statement.

A. That Plaintiffs state on information and belief, defendants are guilty of making a punishable false written statement when he knowingly makes a false statement, which he does not believe to be true, in a written instrument bearing a legally authorized form notice to the effect that false statements made therein are punishable. Making a punishable false written statement is a class A misdemeanor.

FLORIDA STATE CRIMES

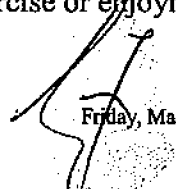
933. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate FLORIDA CONSPIRACY.

934. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate inventors' constitutional rights under; TITLE XLIV - CIVIL RIGHTS Ch 760-765-760.01 the Florida Civil Rights Act of 1992.

935. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; 760.51 Violation of constitutional rights, civil action by the Attorney General; civil penalty.

A. Whereby,

(1) Whenever any person, whether or not acting under color of law, interferes by threats, intimidation, or coercion, or attempts to interfere by threats, intimidation, or coercion, with the exercise or enjoyment by any other person of rights secured by the



State Constitution or laws of this state, the Attorney General may bring a civil or administrative action for damages, and for injunctive or other appropriate relief for violations of the rights secured. Any damages recovered under this section shall accrue to the injured person. The civil action shall be brought in the name of the state and may be brought on behalf of the injured person. The Attorney General is entitled to an award of reasonable attorney's fees and costs if the Department of Legal Affairs prevails in an action brought under this section.

(2) Any person who interferes by threats, intimidation, or coercion, or attempts to interfere by threats, intimidation, or coercion, with the exercise or enjoyment by any other person of rights secured by the State Constitution or laws of this state is liable for a civil penalty of not more than \$10,000 for each violation. This penalty may be recovered in any action brought under this section by the Attorney General. A civil penalty so collected shall accrue to the state and shall be deposited as received into the General Revenue Fund unallocated.

936. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; Title XLV - TORTS - Ch 772 CIVIL REMEDIES FOR CRIMINAL PRACTICES.

937. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate 772.103 Prohibited activities

A. Whereby:

a. It is unlawful for any person:

(1) Who has with criminal intent received any proceeds derived, directly or indirectly, from a pattern of criminal activity or through the collection of an unlawful debt to use or invest, whether directly or indirectly, any part of such proceeds, or the proceeds derived from the investment or use thereof, in the acquisition of any title to, or any right, interest, or equity in, real property or in the establishment or operation of any enterprise.



(2) Through a pattern of criminal activity or through the collection of an unlawful debt, to acquire or maintain, directly or indirectly, any interest in or control of any enterprise or real property.

(3) Employed by, or associated with, any enterprise to conduct or participate, directly or indirectly, in such enterprise through a pattern of criminal activity or the collection of an unlawful debt.

(4) To conspire or endeavor to violate any of the provisions of subsection (1), subsection (2), or subsection (3). History.--s. 3, ch. 86-277.

938. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; Title XLV TORTS.

939. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violated FLORIDA RICO (RACKETEER INFLUENCED AND CORRUPT ORGANIZATION) ACT.

A. Past history of crimes Utley, Dick & Wheeler

B. Prior patent misappropriations

940. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; CH 895 - OFFENSES CONCERNING RACKETEERING AND ILLEGAL DEBTS 895.01 "Florida RICO (Racketeer influenced and Corrupt Organization) Act.

A. ATTEMPTING TO BRIBE Employees TO STEAL EQUIPMENT AND THEN STEALING EQUIPMENT.

941. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; Section 414.39, relating to public assistance fraud.

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942. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate Chapter 517, relating to sale of securities and investor protection.

943. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate Section 810.02(2)(c), relating to specified burglary of a dwelling or structure.

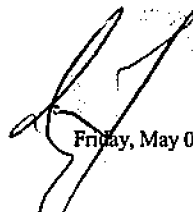
944. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate Chapter 812, relating to theft, robbery, and related crimes.

945. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate Chapter 815, relating to computer-related crimes.

946. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate Chapter 817, relating to fraudulent practices, false pretenses, fraud generally, and credit card crimes.

947. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate Chapter 831, relating to forgery and counterfeiting.

948. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with



each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate Section 836.05, relating to extortion.

949. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate Chapter 837, relating to perjury.

950. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate Chapter 838, relating to bribery and misuse of public office.

951. T That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate Chapter 843, relating to obstruction of justice.

952. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; Chapter 896, relating to offenses related to financial transactions.

953. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate Sections 918.12 and 918.13, relating to tampering with jurors and evidence.

(b) conduct defined as "racketeering activity" under 18 U.S.C. s. 1961(1).

954. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; 895.03 Prohibited activities and defense

A. Whereby, Plaintiffs state on information and belief,

(1) That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to with criminal intent received proceeds derived, directly or indirectly, from a pattern of racketeering activity or through the collection of an unlawful debt to use or invest, whether directly or indirectly, any part of such proceeds, or the proceeds derived from the investment or use thereof, in the acquisition of any title to, or any right, interest, or equity in, real property or in the establishment or operation of any enterprise.

(2) That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to, through a pattern of racketeering activity or through the collection of an unlawful debt, to acquire or maintain, directly or indirectly, any interest in or control of any enterprise or real property.

(3) That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy and were employed by, and associated with, enterprises to conduct or participate, directly or indirectly, in such enterprise through a pattern of racketeering activity or the collection of an unlawful debt.

(4) It is unlawful for any person to conspire or endeavor to violate any of the provisions of subsection (1), subsection (2), or subsection (3).

955. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; CH 896 - OFFENSES RELATED TO FINANCIAL TRANSACTIONS 896.101 FLORIDA MONEY LAUNDERING ACT.



956. That Plaintiffs state on information and belief, defendants have violated; 896.102 Currency more than \$10,000 received in trade or business; report required; noncompliance penalties.

957. That Plaintiffs state on information and belief, defendants have violated; 896.103 Transaction which constitutes separate offense.

A. Notwithstanding any other provision of law, for purposes of this section and ss. 896.101 and 896.102, each individual currency transaction exceeding \$10,000 which is made in violation of the provisions of s. 896.102(1) or each financial transaction in violation of the provisions of s. 896.101(3) which involves the movement of funds in excess of \$10,000 shall constitute a separate, punishable offense.

958. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; 896.104 Structuring transactions to evade reporting or registration requirements prohibited

959. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; VIOLATION OF PUBLIC OFFICES FLORIDA.

A. TFB COMPLAINTS AGAINST TRIGGS, Wheeler AND TURNER

960. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; PART III - CODE OF ETHICS FOR PUBLIC OFFICERS AND Employees.

A. TRIGGS, Wheeler, TURNER, JOHNSON & HOFFMAN

B. TRIGGS CONFLICTS

C. TRIGGS CONFLICTS OVERLOOKED

D. FAILURE TO FILE COMPLAINTS AGAINST TURNER, TRIGGS, Wheeler II

E. SUPREME COURT FAILURE TO PROSECUTE OR ADMIT COMPLAINTS PROVING CONFLICT - FIVE MEMBERS

F. Whereby:

(1) It is essential to the proper conduct and operation of government that public officials be independent and impartial and that public office not be used for private gain other than the remuneration provided by law. The public interest, therefore, requires that the law protect against any conflict of interest and establish standards for the conduct of elected officials and government employees in situations where conflicts may exist.

(2) It is also essential that government attract those citizens best qualified to serve. Thus, the law against conflict of interest must be so designed as not to impede unreasonably or unnecessarily the recruitment and retention by government of those best qualified to serve. Public officials should not be denied the opportunity, available to all other citizens, to acquire and retain private economic interests except when conflicts with the responsibility of such officials to the public cannot be avoided.

(5) It is hereby declared to be the policy of the state that no officer or employee of a state agency or of a county, city, or other political subdivision of the state, and no member of the Legislature or legislative employee, shall have any interest, financial or otherwise, direct or indirect; engage in any business transaction or professional activity; or incur any obligation of any nature which is in substantial conflict with the proper discharge of his or her duties in the public interest. To implement this policy and strengthen the faith and confidence of the people of the state in their government, there is enacted a code of ethics setting forth standards of conduct required of state, county, and city officers and employees, and of officers and employees of other political subdivisions of the state, in the performance of their official duties. It is the intent of the Legislature that this code shall serve not only as a guide for the official conduct of public servants in this state, but also as a basis for discipline of those who violate the provisions of this part.

(6) It is declared to be the policy of the state that public officers and employees, state and local, are agents of the people and hold their positions for the benefit of the public. They are bound to uphold the Constitution of the United States and the State Constitution and to perform efficiently and faithfully their duties under the laws of the federal, state, and local governments. Such officers and employees are bound to



observe, in their official acts, the highest standards of ethics consistent with this code and the advisory opinions rendered with respect hereto regardless of personal considerations, recognizing that promoting the public interest and maintaining the respect of the people in their government must be of foremost concern.

961. That Plaintiffs state on information and belief, defendants have violated;112.313 Standards of conduct for public officers, employees of agencies, and local government attorneys

A. Flechaus and Boca PD - Flechaus misleads Iviewit with SEC and other nonsense and derails investigation - Can Boca PD investigate or are they now conflicted? Have they instituted an internal affairs investigation?

B. That Plaintiffs state on information and belief, whereby they have engaged in the: (6) MISUSE OF PUBLIC POSITION.--No public officer, employee of an agency, or local government attorney shall corruptly use or attempt to use his or her official position or any property or resource which may be within his or her trust, or perform his or her official duties, to secure a special privilege, benefit, or exemption for himself, herself, or others. This section shall not be construed to conflict with s. 104.31.

(7) CONFLICTING EMPLOYMENT OR CONTRACTUAL RELATIONSHIP

(a) No public officer or employee of an agency shall have or hold any employment or contractual relationship with any business entity or any agency which is subject to the regulation of, or is doing business with, an agency of which he or she is an officer or employee, excluding those organizations and their officers who, when acting in their official capacities, enter into or negotiate a collective bargaining contract with the state or any municipality, county, or other political subdivision of the state; nor shall an officer or employee of an agency have or hold any employment or contractual relationship that will create a continuing or frequently recurring conflict between his or her private interests and the performance of his or her public duties or that would impede the full and faithful discharge of his or her public duties.

(8) DISCLOSURE OR USE OF CERTAIN INFORMATION

No public officer, employee of an agency, or local government attorney shall disclose or use information not available to members of the general public and gained by

reason of his or her official position for his or her personal gain or benefit or for the personal gain or benefit of any other person or business entity.

(VI) Any person having the power normally conferred upon the positions referenced in this sub-subparagraph.

b. "Appointed state officer" means any member of an appointive board, commission, committee, council, or authority of the executive or legislative branch of state government whose powers, jurisdiction, and authority are not solely advisory and include the final determination or adjudication of any personal or property rights, duties, or obligations, other than those relative to its internal operations.

c. "State agency" means an entity of the legislative, executive, or judicial branch of state government over which the Legislature exercises plenary budgetary and statutory control.

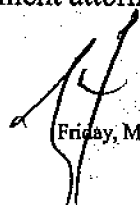
3. No member of the Legislature, appointed state officer, or statewide elected officer shall personally represent another person or entity for compensation before the government body or agency of which the individual was an officer or member for a period of 2 years following vacation of office. No member of the Legislature shall personally represent another person or entity for compensation during his or her term of office before any state agency other than judicial tribunals or in settlement negotiations after the filing of a lawsuit.

4. No agency employee shall personally represent another person or entity for compensation before the agency with which he or she was employed for a period of 2 years following vacation of position, unless employed by another agency of state government.

5. Any person violating this paragraph shall be subject to the penalties provided in s. 112.317 and a civil penalty of an amount equal to the compensation which the person receives for the prohibited conduct.

(16) LOCAL GOVERNMENT ATTORNEYS

(c) No local government attorney or law firm in which the local government attorney is a member, partner, or employee shall represent a private individual or entity before the unit of local government to which the local government attorney provides legal services. A local government attorney whose contract with the unit of local



government does not include provisions that authorize or mandate the use of the law firm of the local government attorney to complete legal services for the unit of local government shall not recommend or otherwise refer legal work to that attorney's law firm to be completed for the unit of local government.

962. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; 112.3173 Felonies involving breach of public trust and other specified offenses by public officers and employees; forfeiture of retirement benefits.

3. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate Bribery in connection with the employment of a public officer or employee;

4. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate felony specified in chapter 838, except ss. 838.15 and 838.16;

5. That That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate the committing of an impeachable offense; and

6. That That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate the committing of any felony by a public officer or employee who, willfully and with intent to defraud the public or the public agency for which the public officer or employee acts or in which he or she is

employed of the right to receive the faithful performance of his or her duty as a public officer or employee, realizes or obtains, or attempts to realize or obtain, a profit, gain, or advantage for himself or herself or for some other person through the use or attempted use of the power, rights, privileges, duties, or position of his or her public office or employment position.

963. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; Title X PUBLIC OFFICERS, Employees, AND RECORDS.

964. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; Ch 112 PUBLIC OFFICERS AND EMPLOYEES: GENERAL PROVISIONS.

965. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; CH 838 - BRIBERY; MISUSE OF PUBLIC OFFICE.

966. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; sec 838.022 Official misconduct.

A. TRIGGS - Wheeler - Proskauer

B. Whereby:

(1) It is unlawful for a public servant, with corrupt intent to obtain a benefit for any person or to cause harm to another, to:

(a) Falsify, or cause another person to falsify, any official record or official document;



- (b) Conceal, cover up, destroy, mutilate, or alter any official record or official document or cause another person to perform such an act; or
- (c) Obstruct, delay, or prevent the communication of information relating to the commission of a felony that directly involves or affects the public agency or public entity served by the public servant.

967. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; CH 839 - OFFENSES BY PUBLIC OFFICERS AND Employees.

968. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; sec 839.13 Falsifying records.

969. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; 839.26 Misuse of confidential information.

970. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; title XLVI Ch 777 PRINCIPAL; ACCESSORY; ATTEMPT; SOLICITATION; CONSPIRACY.

971. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; sec 777.011 Principal in first degree.

A. Whereby, whoever commits any criminal offense against the state, whether felony or misdemeanor, or aids, abets, counsels, hires, or otherwise procures such offense to be committed, and such offense is committed or is attempted to be committed, is a principal in the first degree and may be charged, convicted, and punished as such,

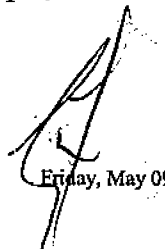
whether he or she is or is not actually or constructively present at the commission of such offense.

972. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; Title XLVI Ch 777 sec 777.03 Accessory after the fact.

A. Whereby:

(1)(a) Any person not standing in the relation of husband or wife, parent or grandparent, child or grandchild, brother or sister, by consanguinity or affinity to the offender, who maintains or assists the principal or accessory before the fact, or gives the offender any other aid, knowing that the offender had committed a felony or been accessory thereto before the fact, with intent that the offender avoids or escapes detection, arrest, trial or punishment, is an accessory after the fact.

If the felony offense committed is a capital felony, the offense of accessory after the fact is a felony of the first degree, punishable as provided in s. 775.082, s. 775.083, or s. 775.084. (b) If the felony offense committed is a life felony or a felony of the first degree, the offense of accessory after the fact is a felony of the second degree, punishable as provided in s. 775.082, s. 775.083, or s. 775.084. (c) If the felony offense committed is a felony of the second degree or a felony of the third degree ranked in level 3, 4, 5, 6, 7, 8, 9, or 10 under s. 921.0022 or s. 921.0023, the offense of accessory after the fact is a felony of the third degree, punishable as provided in s. 775.082, s. 775.083, or s. 775.084. (d) If the felony offense committed is a felony of the third degree ranked in level 1 or level 2 under s. 921.0022 or s. 921.0023, the offense of accessory after the fact is a misdemeanor of the first degree, punishable as provided in s. 775.082, s. 775.083, or s. 775.084. (3) Except as otherwise provided in s. 921.0022, for purposes of sentencing under chapter 921 and determining incentive gain-time eligibility under chapter 944, the offense of accessory after the fact is ranked two levels below the ranking under s. 921.0022 or s. 921.0023 of the felony offense committed. Attempts, solicitation, and conspiracy.



- (1) A person who attempts to commit an offense prohibited by law and in such attempt does any act toward the commission of such offense, but fails in the perpetration or is intercepted or prevented in the execution thereof, commits the offense of criminal attempt, ranked for purposes of sentencing as provided in subsection (4).
- (2) A person who solicits another to commit an offense prohibited by law and in the course of such solicitation commands, encourages, hires, or requests another person to engage in specific conduct which would constitute such offense or an attempt to commit such offense commits the offense of criminal solicitation, ranked for purposes of sentencing as provided in subsection (4).
- (3) A person who agrees, conspires, combines, or confederates with another person or persons to commit any offense commits the offense of criminal conspiracy, ranked for purposes of sentencing as provided in subsection (4).
- (4)(a) Except as otherwise provided in ss. 104.091(2), 370.12(1), 828.125(2), 849.25(4), 893.135(5), and 921.0022, the offense of criminal attempt, criminal solicitation, or criminal conspiracy is ranked for purposes of sentencing under chapter 921 and determining incentive gain-time eligibility under chapter 944 one level below the ranking under s. 921.0022 or s. 921.0023 of the offense attempted, solicited, or conspired to. If the criminal attempt, criminal solicitation, or criminal conspiracy is of an offense ranked in level 1 or level 2 under s. 921.0022 or s. 921.0023, such offense is a misdemeanor of the first degree, punishable as provided in s. 775.082 or s. 775.083.
- (c) Except as otherwise provided in s. 893.135(5), if the offense attempted, solicited, or conspired to is a life felony or a felony of the first degree, the offense of criminal attempt, criminal solicitation, or criminal conspiracy is a felony of the second degree, punishable as provided in s. 775.082, s. 775.083, or s. 775.084.
- (d) Except as otherwise provided in s. 104.091(2), s. 370.12(1), s. 828.125(2), or s. 849.25(4), if the offense attempted, solicited, or conspired to is a:
1. Felony of the second degree;
 2. Burglary that is a felony of the third degree; or

3. Felony of the third degree ranked in level 3, 4, 5, 6, 7, 8, 9, or 10 under s. 921.0022 or s. 921.0023, the offense of criminal attempt, criminal solicitation, or criminal conspiracy is a felony of the third degree, punishable as provided in s. 775.082, s. 775.083, or s. 775.084.

(e) Except as otherwise provided in s. 104.091(2), s. 370.12(1), s. 849.25(4), or paragraph (d), if the offense attempted, solicited, or conspired to is a felony of the third degree, the offense of criminal attempt, criminal solicitation, or criminal conspiracy is a misdemeanor of the first degree, punishable as provided in s. 775.082 or s. 775.083.

(f) Except as otherwise provided in s. 104.091(2), if the offense attempted, solicited, or conspired to is a misdemeanor of the first or second degree, the offense of criminal attempt, criminal solicitation, or criminal conspiracy is a misdemeanor of the second degree, punishable as provided in s. 775.082 or s. 775.083.

(5) It is a defense to a charge of criminal attempt, criminal solicitation, or criminal conspiracy that, under circumstances manifesting a complete and voluntary renunciation of his or her criminal purpose, the defendant:

(a) Abandoned his or her attempt to commit the offense or otherwise prevented its commission;

(b) After soliciting another person to commit an offense, persuaded such other person not to do so or otherwise prevented commission of the offense; or

(c) After conspiring with one or more persons to commit an offense, persuaded such persons not to do so or otherwise prevented commission of the offense.

973. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate FLORIDA TRADE SECRETS ACT.

974. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; Title XXXIX COMMERCIAL RELATIONS Ch 688 UNIFORM TRADE SECRETS ACT.

975. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; FLORIDA TITLE XXXIII REGULATION OF TRADE, COMMERCE, INVESTMENTS, AND SOLICITATIONS.

976. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; Ch 495 REGISTRATION OF TRADEMARKS AND SERVICE MARKS.

977. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; sec 495.121 Fraudulent registration.

978. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate ; Title XXXIII Ch 495.

979. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; sec 495.131 Infringement

980. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; Title XXXIII Ch 495 sec 495.151 Injury to business reputation; dilution.

A. Whereby, every person, association, or union of workers adopting and using a mark, trade name, label or form of advertisement may proceed by suit, and all courts having jurisdiction thereof shall grant injunctions, to enjoin subsequent use by another of the same or any similar mark, trade name, label or form of advertisement if

it appears to the court that there exists a likelihood of injury to business reputation or of dilution of the distinctive quality of the mark, trade name, label or form of advertisement of the prior user, notwithstanding the absence of competition between the parties or of confusion as to the source of goods or services.

981. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; Title XXXIII Ch 495 sec 495.161 Common-law rights

Nothing herein shall adversely affect or diminish the rights or the enforcement of rights in marks acquired in good faith at any time at common law.

982. That Plaintiffs state on information and belief, cites; 559.791 False swearing on application; penalties

A. Any license issued by the Department of Business and Professional Regulation which is issued or renewed in response to an application upon which the person signing under oath or affirmation has falsely sworn to a material statement, including, but not limited to, the names and addresses of the owners or managers of the licensee or applicant, shall be subject to denial of the application or suspension or revocation of the license, and the person falsely swearing shall be subject to any other penalties provided by law.

983. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; FLORIDA PROTECTION OF TRADE SECRETS.

984. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate sec 812.081 Trade secrets; theft, embezzlement; unlawful Copying; definitions; penalty

985. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with



each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; 812.13 Robbery.

(1) "Robbery" means the taking of money or other property which may be the subject of larceny from the person or custody of another, with intent to either permanently or temporarily deprive the person or the owner of the money or other property, when in the course of the taking there is the use of force, violence, assault, or putting in fear.

986. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; sec 812.155 Hiring, leasing, or obtaining personal property or equipment with the intent to defraud; failing to return hired or leased personal property or equipment.

987. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate (1) OBTAINING BY TRICK, FALSE REPRESENTATION, ETC.

988. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; CH 815 - COMPUTER-RELATED CRIMES.

989. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; sec 815.01 "Florida Computer Crimes Act".

990. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; sec 815.04 Offenses against intellectual property.

991. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; sec 815.045 Trade secret information.

992. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; sec 815.06 Offenses against computer users.

993. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; sec 815.07.

994. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; sec 831.03 Forging or counterfeiting private labels; possession of reproduction materials.

995. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; sec 831.04 Penalty for changing or forging certain instruments of writing.

996. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; sec 831.04 Penalty for changing or forging certain instruments of writing.

997. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate FLORIDA – FORGERY.

998. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; sec 831.01 Forgery.

- A. FORGED PATENT DOCUMENTS
- B. FORGED INSURANCE DOCUMENTS AIG & GENRE
- C. FORGED BOOKS TO SEC OF STATE OF FLORIDA & DELAWARE
- D. FORGED TRANSACTION DOCUMENTS FOR INVESTMENT MONIES
- E. FORGED SIGNATURES

999. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; sec 831.02 Uttering forged instruments.

1000. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; sec 831.03 Forging or counterfeiting private labels; possession of reproduction materials.

1001. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; sec 831.06 Fictitious signature of officer of corporation.

Including but not limited to in the execution of;

- A. INVESTMENT DOCUMENTS
- B. INSURANCE APPLICATIONS
- C. FINANCIAL DOCUMENTS, INCLUDING INCOME STATEMENTS
- D. CORPORATE SHELLS

1002. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown,

participate in a conspiracy to violate; FLORIDA CH 817 - FRAUDULENT PRACTICES
- PART I - FALSE PRETENSES AND FRAUDS.

1003. That That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; CHAPTER 817 - SEC 817.02 Obtaining property by false personation.

1004. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; 817.025 Home or private business invasion by false personation.

1005. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; sec 817.03 Making false statement to obtain property or credit.

A. FRAUDULENT INCOME STATEMENTS AND OTHER INVESTMENT DOCUMENTS

B. FALSE STATEMENTS AND RESUMES TO INVESTORS AND WACHOVIA AND SHAREHOLDERS.

C. FRAUDULENT BUSINESS PLANS AND RECORDS TRANSMITTED TO SBA TO SECURE FUNDS AND COMPLIANCE

D. ALL INVESTORS WERE GIVEN FALSE STATEMENTS REGARDING RUBENSTEIN WHICH CAUSED INVESTMENT BASED ON SUCH FALSE STATEMENTS. TRANSFERRED FALSE INFORMATION TO ALL INVESTORS, SBA AND FINANCIAL INSTITUTIONS TO SCORE CREDIT AND FINANCE.

1006. That Plaintiffs cite on information and belief, sec 817.031 Making false statements.


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1007. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; sec 817.034 Florida Communications Fraud Act.

1008. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; sec 817.05 False statements to merchants as to financial condition.


1009. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; sec 817.06 Misleading advertisements prohibited.

1010. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; sec 817.061 Misleading solicitation of payments prohibited.

1011. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; sec 817.15 Making false entries, etc., on books of corporation.

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1012. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; sec 817.155 Matters within jurisdiction of Department of State; false, fictitious, or fraudulent acts, statements, and representations prohibited; penalty; statute of limitations.


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1013. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; sec 817.19 Fraudulent issue of certificate of stock of corporation.

1014. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; sec 817.20 Issuing stock or obligation of corporation beyond authorized amount.

1015. That Plaintiffs cite on information and belief, sec 817.21 Books to be evidence in such cases.

A. On the trial of any person under ss. 817.19 and 817.20 the books of any corporation to which such person has access or the right of access shall be admissible in evidence.

1016. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; sec 817.234 False and fraudulent insurance claims.

1017. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; sec 817.562 Fraud involving a security interest.

A. CROSSBOW & DISTREAM - SECURED CREDIT - ATTEMPTED TRANSFER.

B. TRANSACTIONS WITH IVIEWIT COMPANIES

C. TRANSACTIONS WITH THE SBA

1018. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown,

participate in a conspiracy to violate; sec 817.566 Misrepresentation of association with, or academic standing at, post secondary educational institution.

1019. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; sec 817.567 Making false claims of academic degree or title.

1020. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; FLORIDA PERJURY. CHAPTER 837 – PERJURY.

1021. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; sec 837.02 Perjury in official proceedings.

In Florida the following perjuries have occurred, including but not limited to,

- A. Labarga court depositions
- B. Rubenstein deposition perjury & Rubenstein Sworn Statements to Judge Jorge Labarga, conflict and constitute perjury
- C. Wheeler perjured deposition and/or perjured statements to the TFB that contradicts sworn statements to the TFB.
- D. Triggs perjured statements made on behalf and in defense of Wheeler to the TFB - Conflict of interest - Aiding and abetting Wheeler.
- E. Utley Perjury & Contradictions of other testimony of Wheeler and Dick.
- F. Lewin - Borderline perjury - “erasing memory” comment by Lewin in deposition is remarkable.

1022. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; sec 837.021 Perjury by contradictory statements.

A. Wheeler, Rubenstein & Utley variety of statements in deposition are all false and contradictory to evidence. For example Utley deposition contradicts his own resume submitted to financial institutions, Wheeler and Triggs admit contradiction of statements in response to bar inquiry. Rubenstein has serious problems. The Rubenstein deposition was conducted via telephone in a FL court proceeding with him in NY. Tapes available upon request.

1023. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; sec 837.05 False reports to law enforcement authorities.

1024. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; sec 837.06 False official statements

- A. Triggs & Wheeler make false statements to the TFB
- B. Rubenstein makes false statements to Labarga and 1st DDC
- C. SB make false statement with Selz regarding representation of Iviewit Companies in Labarga court.
- D. False statements are tendered to Labarga with intent on suing shadow companies.
- E. Utley, Reale, Intel/R3D, Hersch - Make false statements to Florida Bankruptcy Court.

1025. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; FLORIDA STATE TAX LAW.

1026. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; CHAPTER 220 - INCOME TAX CODE.

- A. Falsified tax records,

- B. Lost tax records,
- C. Hijacked records,
- D. Transaction in stealing investment funds and monies is believed to not have been reported properly.

1027. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; 220.21 Returns and records; regulations.

1028. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate 220.211 Penalties; incomplete return.

1029. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; 220.22 Returns; filing requirement.

1030. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate 220.221 Returns; signing and verification.

1031. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; 220.23 Federal returns.

1032. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; PART X TAX CRIMES 220.901 Willful and fraudulent acts.

- A. Any taxpayer who is subject to the provisions of this chapter and who willfully fails to file a return or keep required books and records, files a fraudulent return,

willfully violates any rule or regulation of the department, or willfully attempts in any other manner to evade or defeat any tax imposed by this chapter or the payment thereof, is, in addition to other penalties, guilty of a misdemeanor of the first degree, punishable as provided in s. 775.082 or s. 775.083.

1033. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; sec 220.905 Aiding and abetting.

A. Any person who aids, abets, counsels, or conspires to commit any of the acts described in s. 220.901 or s. 220.903 shall be subject to fine or imprisonment to the same extent as the perpetrator of such act.

1034. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; THEFT, ROBBERY AND MISAPPROPRIATION AND CONVERSION OF FUNDS.

1035. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; FLORIDA LAW SEC 812.081 TRADE SECRETS; THEFT, EMBEZZLEMENT; UNLAWFUL COPYING; DEFINITIONS; PENALTY.

1036. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate 812.172 Intent.

1037. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; 812.175 Enforcement; civil fine.

1038. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with

each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; 812.014 Theft.

1039. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; 812.016 Possession of altered property.

1040. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; 812.019 Dealing in stolen property.

1041. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; FRAUD.

1042. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; FLORIDA LAW - Title XXXVI BUSINESS ORGANIZATIONS.

1043. That Plaintiffs state on information and belief, defendants have violated Ch 607 Corporations sec 607.0129 Penalty for signing false document.

1044. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; 607.1402 Dissolution by board of directors and shareholders; dissolution by written consent of shareholders.

A. Board of Directors Implicated: including but not limited to, Proskauer, Wheeler, Rubenstein, Joao, MLG, Dick, Foley, Boehm, Becker, Lewin, Kane, Powell, Buchsbaum, Warner, Shaw, Utey, Miller, Prolow, & Shewmaker.

B. Not implicated Board members: Epstein, Plaintiff Bernstein, S. Bernstein, Anderson, Colter, and Thagard.

1045. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; sec 607.0129 Penalty for signing false document.

A. A person who signs a document she or he knows is false in any material respect with intent that the document be delivered to the Department of State for filing is personally liable to any person who to her or his detriment reasonably relied on the document or information contained therein and is guilty of a misdemeanor of the second degree, punishable as provided in s. 775.083.

1046. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; sec 607.830 General standards for directors.

1047. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; sec 607.830 Director conflicts of interest.

1048. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; sec 607.0834 Liability for unlawful distributions.

1049. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; sec 607.0841 Duties of officers.

A. Whereby, each officer has the authority and shall perform the duties set forth in the bylaws or, to the extent consistent with the bylaws, the duties prescribed by the board of directors or by direction of any officer authorized by the bylaws or the board of directors to prescribe the duties of other officers.

1050. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with

each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; sec 607.0901 Affiliated transactions.

DELAWARE STATE CRIMES

1051. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; DELAWARE §521 CONSPIRACY.

1052. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; CH 5 SPECIFIC OFFENSES Subch I Inchoate Crimes §521 Conspiracy § 531 Attempt to commit a crime.

1053. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; § 871 Falsifying business records.

1054. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; §891 Defrauding secured creditors.

1055. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; 909 Securing execution of documents by deception.

1056. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; VIOLATIONS OF DELAWARE CORPORATE LAWS.

1057. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with

each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; 102. Contents of certificate of incorporation § Amendment effective Aug. 1, 2004, included; see 74 Del. Laws, c. 32.

1058. That Plaintiffs state on information and belief, cites; 224. Form of records
A. Any records maintained by a corporation in the regular course of its business, including its stock ledger, books of account, and minute books, may be kept on, or by means of, or be in the form of, any information storage device, or method provided that the records so kept can be converted into clearly legible paper form within a reasonable time. Any corporation shall so convert any records so kept upon the request of any person entitled to inspect such records pursuant to any provision of this chapter. When records are kept in such manner, a clearly legible paper form produced from or by means of the information storage device or method shall be admissible in evidence, and accepted for all other purposes, to the same extent as an original paper record of the same information would have been, provided the paper form accurately portrays the record. (8 Del. C. 1953, § 224; 56 Del. Laws, c. 50; 57 Del. Laws, c. 148, § 15; 72 Del. Laws, c. 343, § 14.)

1059. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; Merger or consolidation of domestic corporations and limited liability company.

1060. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; 253. Merger of parent corporation and subsidiary or subsidiaries.

1061. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; 257 Merger or consolidation of domestic stock and nonstock corporations.

1062. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; 372 Additional requirements in case of change of name, change of business purpose or merger or consolidation.

INTERNATIONAL CRIMES

1063. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate international laws and trade treaties in the commissioning of the IP crimes.

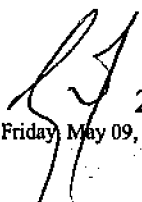
1064. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; FRAUD UPON THE JAPANESE PATENT OFFICES (JPO).

1065. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; FRAUD UPON THE EUROPEAN PATENT OFFICES (EPO).

1066. That Plaintiffs state on information and belief, defendants, did knowingly, unlawfully, and intentionally combine, confederate, conspire and agree together with each other, and with other co-conspirators whose names are both known and unknown, participate in a conspiracy to violate; ECONOMIC ESPIONAGE ACT TITLE 18 - PART I - CHAPTER 90 § 1831 Economic espionage.

COUNT ONE
ARTICLE 1, SECTION 8, CLAUSE 8 OF THE CONSTITUTION OF THE
UNITED STATES, FIFTH AMENDMENT TO THE CONSTITUTION OF THE
UNITED STATES, AND FOURTEENTH AMENDMENT TO THE
CONSTITUTION OF THE UNITED STATES

1067. This is an action for violations of Constitutional rights within the jurisdiction of this Court.


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Friday, May 09, 2008 @ 2:04:17 PM

1068. Plaintiffs repeat and reallege each and every allegation contained in paragraph "1" through "¹⁰⁶⁶___", as though fully set forth herein.

1069. The conspiratorial actions of the defendants in sabotaging IP applications through fraud and theft, and the ensuing white washing of attorney complaints by the defendants and other culpable parties both known and unknown with scienter, thereby continuing the violation of Plaintiffs inventive rights is contrary to the inventor clause of the Constitution of the United States as stated in Article 1, Section 8, Clause 8, and the due process clauses of the Fifth Amendment to the Constitution of the United States, and Fourteenth Amendment to the Constitution of the United States. These acts also were done, including but not limited to, as illustrated in the filing of false federal and international patent oaths and stand as crimes against the United States and its agencies including the USPTO and crimes against foreign patent offices through violations of trade treaties.

1070. As a result of the defendants' acts, Plaintiffs now suffer and will continue to suffer irreparable injury and monetary damages, and that Plaintiffs are entitled to damages sustained to date and continuing in excess of at least ONE TRILLION DOLLARS (\$1,000,000,000,000) as well as punitive damages, costs and attorney's fees.

COUNT TWO
15 U.S.C.A. §§ 1 AND 2

1071. This is an action for violations of antitrust laws within the jurisdiction of this Court.

1072. Plaintiffs repeat and reallege each and every allegation contained in paragraph "1" through "¹⁰⁶⁶___", as though fully set forth herein.


1073. The conspiratorial actions of the defendants in sabotaging IP applications through fraud, and the ensuing white washing of attorney complaints by defendants and other culpable parties both known and unknown with scienter, thereby continuing the violation of Plaintiffs proprietary IP rights creates an illegal monopoly and restraint of trade in the market for video and imaging encoding, compression, transmission, and decoding by, including but not limited to, the IP pools of MPEGLA LLC, upon information and belief, a Colorado limited liability company and sponsor of multimedia IP pools, Intel, NDA, other contract violators and others.

1074. As a result of the defendants' acts, Plaintiffs now suffer and will continue to suffer irreparable injury and monetary damages, and that Plaintiffs are entitled to damages sustained to date and continuing in excess of at least ONE TRILLION DOLLARS (\$1,000,000,000,000) as well as punitive damages, costs and attorney's fees.

COUNT THREE

TITLE VII OF THE CIVIL RIGHTS ACT OF 1964 (AS AMENDED)

1075. This is an action for violations of civil rights within the jurisdiction of this Court.

 1076. Plaintiffs repeat and reallege each and every allegation contained in paragraph "1" through 1066, as though fully set forth herein.


1077. The conspiratorial actions of the defendants in sabotaging IP applications through fraud, denying property rights of the IP, the ensuing white washing of attorney complaints by the defendants and other culpable parties both known and unknown with scienter, creating an illegal monopoly and restraint of trade, thereby denies Plaintiffs' the opportunity to make and enforce contracts, to sue, be parties, give evidence, and the entitlement to the full and equal benefit of all laws and proceedings for the security of persons violates Title VII of the Civil Rights Act of 1964 (as amended).

1078. As a result of the defendants' acts, Plaintiffs now suffer and will continue to suffer irreparable injury and monetary damages, and that Plaintiffs are entitled to damages sustained to date and continuing in excess of at least ONE TRILLION DOLLARS (\$1,000,000,000,000) as well as punitive damages, costs and attorney's fees.

COUNT FOUR

RACKETEERING AND CORRUPT ORGANIZATIONS ACT
18 U.S.C. § 1961 THROUGH 18 U.S.C. § 1968

1079. This is an action for violations of the Racketeering and Corrupt Organizations Act within the jurisdiction of this Court.

 1080. Plaintiffs repeat and reallege each and every allegation contained in paragraph "1" through 1066, as though fully set forth herein.

1081. The conspiratorial actions of the defendants in sabotaging IP applications through fraud, the ensuing white washing of attorney complaints by defendants and other culpable parties with scienter, allowing an illegal monopoly and restraint of trade, and denying Plaintiffs' the opportunity to make and enforce contracts, to sue, be parties, give evidence, and to the full and equal benefit of all laws and proceedings for the security of

persons, the actions of defendants constitute a criminal enterprise comprising various combinations that provided for the receipt of unwarranted income from this pattern of racketeering, perhaps the collection of an unlawful debt in this pattern of racketeering, and that the defendants and other culpable parties both known and unknown conspired to do so with scienter.

1082. As a result of the defendants' acts, Plaintiffs now suffer and will continue to suffer irreparable injury and monetary damages, and that Plaintiffs are entitled to damages sustained to date and continuing in excess of at least ONE TRILLION DOLLARS (\$1,000,000,000,000) as well as punitive damages, costs and attorney's fees.

COUNT FIVE
LEGAL MALPRACTICE & NEGLIGENCE

1083. This is a supplemental action for other civil claims pursuant legal malpractice and negligence to the state laws of New York, Florida, and Delaware and other regions unknown at this time.

1084. Plaintiffs repeat and reallege each and every allegation contained in paragraph "1" through ¹⁰⁸⁶ , as though fully set forth herein.

1085. The conspiratorial actions of defendants and other culpable parties both known and unknown that are licensed to practice law and acted as lawyers or law firms for the Iviewit Companies for purposes of representing Iviewit Companies or Plaintiffs named herein have through the crimes committed herein caused massive liabilities to Iviewit Companies and Plaintiffs.

1086. That pursuant to such employment, the defendants and other culpable parties both known and unknown who are licensed to practice law or law firms owed duties to ensure that the rights and interests of Plaintiffs were protected.

1087. The defendants and other culpable parties both known and unknown neglected that reasonable duty of care in the performance of legal services and accounting services with scienter in that they, including but not limited to:

- A. Failed to take reasonable steps to ensure that the IP of Plaintiffs was protected; and,
- B. Failed to complete work regarding copyrights and trademarks; and,

C. Engaged in unnecessary and duplicate corporate and other work resulting in billing for unnecessary legal and accounting services believed to be in excess of One Million Dollars (\$1,000,000.00); and,

D. By redacting information from the billing statements regarding services provided so to as to give the appearance that the services provided by defendants in general and Proskauer in particular were limited in nature, when in fact they involved various aspects of IP protection; and,

E. By knowingly representing and agreeing to accept representation of clients in conflict with the interests of Plaintiffs with scienter, without either consent or waiver by Plaintiffs.

F. By engaging in a series of crimes that violated local, state, federal and international law, as well as, an almost entirety of ethical violations of their respective professions to succeed in converting their clients properties to the benefit of themselves and loss to client Plaintiffs.

G. That the negligent actions of defendants and other culpable parties with scienter resulted in, and was, the proximate cause of loss to Plaintiffs.

1088. As a result of the defendants' acts, Plaintiffs now suffer and will continue to suffer irreparable injury and monetary damages, and that Plaintiffs are entitled to damages sustained to date and continuing in excess of at least ONE TRILLION DOLLARS (\$1,000,000,000,000) as well as punitive damages, costs and attorney's fees.

COUNT SIX
BREACH OF CONTRACTS

1089. This is a supplemental action for other civil claims of breach of contract pursuant to the state laws of New York, Florida, and Delaware and other regions unknown at this time.

1090. Plaintiffs repeat and reallege each and every allegation contained in paragraph "1" through 1066, as though fully set forth herein.

1091. The defendants and other culpable parties both known and unknown with scienter breached their contracts with Plaintiffs, by failing to uphold their contracts and other binding agreements, including but not limited to, NDA's, legal retainers, contracts, accounting service arrangements, letter of understandings, investment documents and any

other form of binding contract by and between defendants and Iviewit Companies both known and unknown that have damaged the Iviewit Companies and Plaintiffs.

1092. That such action on the part of the defendants and other culpable parties with scienter constitute breaches of contracts by and between Plaintiffs and the defendants and other culpable parties both known and unknown.

1093. That as a direct and proximate result of such conduct on the part of the defendants and other culpable parties both known and unknown with scienter, Plaintiffs have been damaged by defendants and other culpable parties both known and unknown failure to perform the contracted for services.

1094. As a result of the defendants' acts, Plaintiffs now suffer and will continue to suffer irreparable injury and monetary damages, and that Plaintiffs are entitled to damages sustained to date and continuing in excess of at least ONE TRILLION DOLLARS (\$1,000,000,000,000) as well as punitive damages, costs and attorney's fees.

COUNT SEVEN
TORTUOUS INTERFERENCE WITH ADVANTAGEOUS BUSINESS
RELATIONSHIPS

1095. This is a supplemental action for civil claims of Tortuous Interference with Advantageous Business Relationships pursuant to the state laws of New York, Florida, and Delaware and other regions unknown at this time.

1096. Plaintiffs repeat and reallege each and every allegation contained in paragraph "1" through ¹⁰⁹⁶___, as though fully set forth herein.

1097. That as a direct and proximate result of such conspiratorial conduct on the part of the defendants and other culpable parties both known and unknown with scienter, Plaintiffs who were engaged in technology licensing and other business contracts when the above mentioned events described in the Factual Allegations section caused a total loss of business relationships both with current and prospective investors and clients and all those other business contracts of Plaintiffs, as without knowledge as to the fate of the IP it became impossible to license or secure investment based on the IP, damaging Iviewit Companies and Plaintiffs.

1098. As a result of the defendants' acts, Plaintiffs now suffer and will continue to suffer irreparable injury and monetary damages, and that Plaintiffs are entitled to

damages sustained to date and continuing in excess of at least ONE TRILLION DOLLARS (\$1,000,000,000,000) as well as punitive damages, costs and attorney's fees.

COUNT EIGHT

NEGLIGENT INTERFERENCE WITH CONTRACTUAL RIGHTS

1099. This is a supplemental action for other civil claims of negligent interference with contractual rights pursuant to the state laws of New York, Florida, and Delaware and other regions unknown at this time.

1100. Plaintiffs repeat and reallege each and every allegation contained in paragraph "1" through ¹⁰⁶⁶ "___", as though fully set forth herein.

1101. As a result of the defendants' conspiratorial acts, Plaintiffs now suffer and will continue to suffer irreparable injury and monetary damages, due to Negligent Interference with Contractual Rights and that Plaintiffs are entitled to damages sustained to date and continuing in excess of at least ONE TRILLION DOLLARS (\$1,000,000,000,000) as well as punitive damages, costs and attorney's fees.

COUNT NINE

FRAUD

1102. This is an action for fraud within the jurisdiction of this Court. This is also a supplemental action for other civil claims of fraud pursuant to the state laws of New York, Florida, and Delaware and other regions unknown at this time.

1103. Plaintiffs repeat and reallege each and every allegation contained in paragraph "1" through "___", as though fully set forth herein.

1104. The defendants and other culpable parties both known and unknown with scienter committed fraud on Plaintiffs, by participating in fraud to steal Iviewit Companies IP, damaging both Iviewit Companies and Plaintiffs.

1105. That the defendants and other culpable parties with scienter committed fraud not only Plaintiffs but on local, federal, state and international authorities in their scheme to steal Plaintiffs technologies and deprive the Iviewit Companies shareholders of their royalties and stock interests.

1106. That such conspiratorial action and many other conspiratorial actions enacted in the efforts to steal Plaintiffs IP, on the part of the defendants and other culpable parties both known and unknown with scienter constitute fraud defendants and

other culpable parties both known and unknown to deprive shareholders and inventors of their rights.

1107. That as a direct and proximate result of such conduct on the part of the defendants and other culpable parties both known and unknown with scienter, Plaintiffs have been damaged by massive fraud committed by the conspiratorial actions of the defendants and other culpable parties.

1108. That, similarly, Plaintiffs have executed NDA's, referenced herein through url's, with some five hundred (500) persons and strategic alliance partners who benefited from disclosures of Plaintiffs IP including disclosures of how to make, use, and vend such IP, all of whom now conduct the unauthorized use of such IP in violation of the NDA's and or the confidentiality clauses of their strategic alliance contracts and other binding contracts, damaging the Plaintiffs and Iviewit Companies.

1109. As a result of the defendants' acts, Plaintiffs now suffer and will continue to suffer irreparable injury and monetary damages, and that Plaintiffs are entitled to damages sustained to date and continuing in excess of at least ONE TRILLION DOLLARS (\$1,000,000,000,000) as well as punitive damages, costs and attorney's fees.

COUNT TEN

BREACH OF FIDUCIARY DUTIES AS DIRECTORS AND OFFICERS

1110. This is a supplemental action for other civil claims of breach of fiduciary duties as directors and officers pursuant to the state laws of New York, Florida, and Delaware and other regions unknown at this time.

1111. Plaintiffs repeat and reallege each and every allegation contained in paragraph "1" through "106", as though fully set forth herein.

1112. Defendants that served as either Directors and/or Officers of the Iviewit Companies have violated, including but not limited to, the following state laws: Delaware, Florida and California in their obligations as Directors and Officers of Iviewit Companies and have damaged the Iviewit Companies and Plaintiffs from such actions.

1113. That defendants, including but not limited to, Utley, Wheeler, Rubenstein, Joao, Hersch, Buchsbaum, Miller, Kasser, Warner, Powell, Prolow, and Proskauer, conspired to deprive, and in fact did deprive, Iviewit Companies and Plaintiffs of their rights to the technologies developed by Iviewit Companies as described herein above.

1114. Plaintiffs allege through the conspiratorial actions of defendants that were Officers and/or Directors both known and unknown, misappropriated and converted funds and properties of others for themselves as described herein and damaging the Ivieuit Companies and Plaintiffs.

1115. Plaintiffs allege through the conspiratorial actions of defendants that were Officers and/or Directors both known and unknown, concocted a disingenuous scheme to inflate Ivieuit Companies revenues, outside the bounds of generally accepted accounting principles, and in an effort to defraud Ivieuit Companies investors and Plaintiffs.

1116. As a result of the defendants' acts, Plaintiffs now suffer and will continue to suffer irreparable injury and monetary damages, and that Plaintiffs are entitled to damages sustained to date and continuing in excess of at least ONE TRILLION DOLLARS (\$1,000,000,000,000) as well as punitive damages, costs and attorney's fees.

COUNT ELEVEN
OTHER CIVIL STATE OF NEW YORK, STATE OF FLORIDA, AND STATE OF
DELAWARE CLAIMS OF PAR. 1 TO PAR. 1066

1117. This is a supplemental action for other civil claims pursuant to the state laws of New York, Florida, and Delaware and other regions unknown at this time.

1118. Plaintiffs repeat and reallege each and every allegation contained in paragraph "1" through ¹⁰⁶⁶__, as though fully set forth herein.

1119. Certain defendants described herein were employed by Ivieuit Companies for purposes of representing Ivieuit Companies to obtain multiple patents and oversee foreign filings for the inventions including the provisional filings for the technologies as described herein and failed intentionally causing damages to Ivieuit Companies and Plaintiffs.

1120. Defendants owed a duty under the state laws of New York, Florida, and Delaware to ensure that the rights and interests of Ivieuit Companies and inventors were protected, and protected to the extent that such experts in the field would undertake such engagement according to the requisite standard of care in the states of New York, Florida, and Delaware and further at the USPTO.

1121. Defendants failed to take reasonable steps to ensure that the inventions of Ivieuit Companies and inventors were protected damaging the Ivieuit Companies and Plaintiffs.



1122. Defendants knowingly and willfully failed to complete work regarding copyrights, patents, trade secrets and trademarks causing damage to the Iviewit Companies and Plaintiffs.

1123. Defendants engaged in unnecessary and duplicate corporate and other work resulting in billing for unnecessary legal services believed to be in excess of Four Hundred Thousand Dollars (\$400,000.00).

1124. Defendants, including but not limited to, Proskauer, Rubenstein, Joao, Foley, Dick, Boehm, Becker and MLG by redacting and replacing information from the billing statements regarding services provided, giving the appearance that the services provided by Proskauer, Foley, BSTZ, MLG were limited in nature, when in fact they involved various aspects of invention protection.

1125. Defendants, including but not limited to, Proskauer, Rubenstein, Joao, Foley, Dick, Boehm, Becker and MLG by knowingly representing and agreeing to accept representation of clients in conflict with the interests of Iviewit Companies and inventors, without either consent or waiver by Iviewit Companies or inventors.

1126. The negligent actions of defendants respectively resulted in the proximate cause of loss to Plaintiffs through loss of Iviewit Companies and inventions and subsequent royalties.

1127. As a result of the defendants' acts, Plaintiffs now suffer and will continue to suffer irreparable injury and monetary damages, and that Plaintiffs are entitled to damages sustained to date and continuing in excess of at least ONE TRILLION DOLLARS (\$1,000,000,000,000) as well as punitive damages, costs and attorney's fees.

COUNT TWELVE

MISAPPROPRIATION AND CONVERSION OF FUNDS

1128. This is a supplemental action for misappropriation and conversion of Iviewit Companies funds in violation to the state laws of Florida, Delaware and New York.

1129. Plaintiffs repeat and reallege each and every allegation contained in paragraph "1" through ^{10th} , as though fully set forth herein.

1130. That through the actions of defendants, investment funds were absconded with and other funds due, such as royalties for the inventions which have all been misappropriated and converted as described herein.

1131. As a result of the defendants' acts, Plaintiffs now suffer and will continue to suffer irreparable injury and monetary damages, and that Plaintiffs are entitled to damages sustained to date and continuing in excess of at least ONE TRILLION DOLLARS (\$1,000,000,000,000) as well as punitive damages, costs and attorney's fees.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs respectfully requests that the Court enter judgment and an Order:

I. First Cause of Action: At least ONE TRILLION DOLLARS (\$1,000,000,000,000) as well as punitive damages, costs and attorney's fees; Interest and prejudgment interest on the amount described above, calculated at the prevailing rate; and

II. Second Cause of Action: At least ONE TRILLION DOLLARS (\$1,000,000,000,000) as well as punitive damages, costs and attorney's fees; Interest and prejudgment interest on the amount described above, calculated at the prevailing rate; and

III. Third Cause of Action: At least ONE TRILLION DOLLARS (\$1,000,000,000,000) as well as punitive damages, costs and attorney's fees; Interest and prejudgment interest on the amount described above, calculated at the prevailing rate; and

IV. Fourth Cause of Action: At least ONE TRILLION DOLLARS (\$1,000,000,000,000) as well as punitive damages, costs and attorney's fees; Interest and prejudgment interest on the amount described above, calculated at the prevailing rate; and

V. Fifth Cause of Action: At least ONE TRILLION DOLLARS (\$1,000,000,000,000) as well as punitive damages, costs and attorney's fees; Interest and prejudgment interest on the amount described above, calculated at the prevailing rate; and

VI. Sixth Cause of Action: At least ONE TRILLION DOLLARS (\$1,000,000,000,000) as well as punitive damages, costs and attorney's fees; Interest and prejudgment interest on the amount described above, calculated at the prevailing rate; and

VII. Seventh Cause of Action: At least ONE TRILLION DOLLARS (\$1,000,000,000,000) as well as punitive damages, costs and attorney's fees; Interest and prejudgment interest on the amount described above, calculated at the prevailing rate; and

VIII. Eighth Cause of Action: At least ONE TRILLION DOLLARS (\$1,000,000,000,000) as well as punitive damages, costs and attorney's fees; Interest and prejudgment interest on the amount described above, calculated at the prevailing rate; and



IX. Ninth Cause of Action: At least ONE TRILLION DOLLARS (\$1,000,000,000,000) as well as punitive damages, costs and attorney's fees; Interest and prejudgment interest on the amount described above, calculated at the prevailing rate; and

X. Tenth Cause of Action: At least ONE TRILLION DOLLARS (\$1,000,000,000,000) as well as punitive damages, costs and attorney's fees; Interest and prejudgment interest on the amount described above, calculated at the prevailing rate; and

XI. Eleventh Cause of Action: At least ONE TRILLION DOLLARS (\$1,000,000,000,000) as well as punitive damages, costs and attorney's fees; Interest and prejudgment interest on the amount described above, calculated at the prevailing rate; and

XII. Twelfth Cause of Action: At least ONE TRILLION DOLLARS (\$1,000,000,000,000) as well as punitive damages, costs and attorney's fees; Interest and prejudgment interest on the amount described above, calculated at the prevailing rate.

OTHER RELIEFS

XIII. Plaintiffs pray for injunctive relief to prevent the unauthorized use of the video scaling techniques and image scaling techniques as depicted in the graphical description submitted according to proof at trial, the image overlay system as depicted in the graphical description submitted according to proof at trial, the combination of video scaling and image overlay system as depicted in the graphical description submitted according to proof at trial, and the remote control of video cameras through communications networks as depicted in the graphical description submitted according to proof at trial by all those, including but not limited to: (i) decoding and display devices including but not limited to decoders, chipsets, and microprocessors; (ii) transmission networks, including but not limited to cable head-ends, satellite head-ends, and IPTV head-ends; and (iii) encoding schemes, or, alternatively, an assignment of all such contracts and license agreements by the offending parties to Plaintiffs. To summarize, Plaintiffs advise the Court that the granting of this prayer for relief, effectively, halts the transmission of and viewing of video as we know it, or alternatively, assign all such contracts to Plaintiffs.

XIV. Plaintiffs pray for this Court to appoint a federal monitor to oversee the day-to-day operations of the 1st DDC, 2nd DDC, TFB, USPTO, FBI, U.S. Attorney, etc. and VBA for an indefinite period of time; and

XV. Plaintiffs pray for attorney's fees and costs, pursuant to 42 U.S.C. § 1988 and 42 U.S.C. 2000e-5; and

XVI. Plaintiffs pray for a declaratory judgment stating that defendants willfully violated Plaintiffs rights with scienter secured by federal, state laws, and international treaties as alleged herein; and

XVII. Plaintiffs pray for further injunctive relief: an injunction requiring defendants to correct all present and past violations of federal and state law as alleged herein; to allow the Plaintiffs to continue in the position from which the defendants, including Cover Up Participants and other culpable parties illegally white washed their complaints with scienter; to enjoin the defendants from continuing to act in violation of federal and state law as alleged herein; and to order such other injunctive relief as may be appropriate to prevent any future violations of said federal and state laws; and awarding Plaintiffs damages in the amount of all royalties, professional services revenues, and any and all other compensation denied or lost to Plaintiffs by reason of the foregoing; and

XVIII. Plaintiffs pray for an Order granting such other legal and equitable relief as the Court deems just and proper that includes, but is not limited to an Order to bring representation for the U.S. Federal agencies including but not limited to the USPTO, the SBA; mandamus for the aforementioned Federal agencies to join this complaint.

XIX. That Plaintiffs' pray for civil remedies and requests this Court to request the Attorney General to institute proceedings under the RICO claims. In the interim, and pending final determination thereof, Plaintiffs pray that this Court may at any time enter such restraining orders or prohibitions, or take such other actions, including the acceptance of satisfactory performance bonds, as it shall deem proper. Plaintiffs, shareholders and patent interest holders of Iviewit Companies have been injured in business and property by reason of a violation of section 18 U.S.C. 1962 and prays for recovery of treble damages, costs of the suit, and reasonable attorney's fee.

XX. Plaintiffs pray this Court grant maximum relief under Sec. 1966 to expedite actions in the civil action instituted herein in the United States in this Court, and asks the Attorney General to file with the clerk of this Court a certificate stating that in his opinion the case is of general public importance. A copy of that certificate be furnished immediately by such clerk to the chief judge or in his absence to the presiding

district judge of the district in which such action is pending. Further, upon receipt of such copy, such judge shall designate immediately a judge of that district to hear and determine action.

XXI. That Plaintiffs' pray for relief under TITLE 18 PART I CH 96 Sec 1968 RICO CIVIL INVESTIGATIVE DEMAND, WHEREFORE, under Sec 1968. Plaintiffs pray for this Court to begin civil investigative demand whereby asking the Attorney General to see reason to believe defendants are in possession, custody, or control of documentary materials relevant to this racketeering investigation, and prior to the institution of a civil or criminal proceeding thereon, issue in writing, and cause to be served upon all such defendants a civil investigative demand requiring all such persons and entities produce such materials for examination stating the nature of the conduct constituting the alleged racketeering violation which is under investigation and the provision of law applicable thereto; and describing the class or classes of documentary material produced thereunder with such definiteness and certainty as to permit such material to be fairly identified; and state that the demand is returnable forthwith or prescribe a return date which will provide a reasonable period of time within which the material so demanded may be assembled and made available for inspection and copying or reproduction; and identify the custodian to whom such material shall be made available; require the production of any/all documentary evidence which would be privileged from disclosure if demanded by a subpoena duces tecum issued by a court of the United States in aid of a grand jury investigation of such alleged racketeering violation.

XXII. Plaintiffs pray for this Court to further prevent and restrain violations of Ivievit Companies and Plaintiffs inventions of 18 U.S.C. 1962 by issuing appropriate immediate orders including but not limited to ordering any person to divest himself of any interest, directly and indirectly in any enterprise, imposing reasonable restrictions on the future activities of or interests of any persons, including but not limited to prohibiting any person from engaging in the same type of endeavor as the enterprise engaged in, the activities of which effect interstate and foreign commerce and ordering dissolution and reorganization of any enterprise making the provision for the rights of innocent persons.

XXIII. Plaintiffs pray for maximum relief under TITLE 18 PART I CH 96 Sec 1964 RICO Civil remedies.

XXIV. Plaintiffs pray for the Need for Preliminary Relief. In the absence of preliminary relief, consumers will be deprived of their choice of technologies and consumers and the public will be deprived of the benefits of competition during the pendency of this action. Relief at the conclusion of this case cannot remedy the damage done to consumers and the public during the interim. In addition, the damage to competitors and competition during the pendency of this case that would occur in the absence of preliminary relief cannot practically be reversed later.

XXV. Plaintiffs pray for claim for relief: Unlawful Exclusive Dealing and Other Exclusionary Agreements in Violation of §1 of the Sherman Act.

XXVI. Plaintiffs pray for claim for relief: Unlawful Tying and Bundling in Violation of § 1 of the Sherman Act Third Claim for Relief: Monopolization of the Pools.

XXVII. Plaintiffs pray for relief for Systems Market in Violation of § 2 of the Sherman Act. Claim for Relief: Attempted Monopolization of the video and imaging technologies of Iviewit Companies.

XXVIII. Plaintiffs pray for maximum relief from this Court under TITLE 15 CH 1 Sec 26 INJUNCTIVE RELIEF FOR PRIVATE PARTIES.

XXIX. Plaintiffs pray of this Court for maximum relief under TITLE 17 CH 5 SEC 503 Remedies for infringement: Impounding and disposition of infringing articles.

XXX. Plaintiffs pray of this Court for maximum relief under Title 17 CH 5 Sec 504 Remedies for infringement.

XXXI. Plaintiffs pray of this Court for maximum relief under Title 17 CH 5 Sec 505 Remedies for infringement.

XXXII. Plaintiffs pray this Court for maximum civil remedies and criminal penalties which under this section Laws not in Title 35, United States Code 18 U.S.C. 1001.

XXXIII. Plaintiffs pray of this Court for maximum relief under Title 17 CH 13 Sec 1329 Relation to design patent law.

XXXIV. Plaintiffs pray of this Court for maximum relief under Title 17 CH 13 Sec 1330 Common law and other rights unaffected.

XXXV. Plaintiffs pray of this Court for maximum civil remedies and criminal penalties, which under this section Laws not in Title 35, United States Code 18 U.S.C. 2071.

XXXVI. Plaintiffs pray of this Court for maximum relief in addition under Title 18 PART I CH 90 Sec 1837 Applicability to conduct outside the United States.

XXXVII. Plaintiffs pray of this Court for maximum civil relief and additional relief under Title 15 CH 22 Trademarks Sec 1116 Injunctive relief.

XXXVIII. Plaintiffs pray of this Court for maximum relief under TITLE 15 CH 22 SUBCH III Sec 1117 - Recovery for violation of rights.

XXXIX. Plaintiffs pray of this Court for maximum relief under Title 15 CH 22 SubCH III Sec 1120 Civil Liability for False or Fraudulent Registration.

XL. Plaintiffs pray this Court grant maximum relief under Title 15 CH 22 SubCH III Sec 1125 False Designations of Origin, False Descriptions, and Dilution Forbidden.

XLI. Plaintiffs pray of this Court for maximum relief under Title 15 CH 22 SubCH III Sec 1126 False designations of origin, false descriptions, and dilution forbidden.

XLII. Plaintiffs pray this Court grant maximum relief under Title 18 Part I CH 63 Sec 1345 - Injunctions against fraud.

XLIII. Plaintiffs pray this Court grant an expedited hearing due to the delays caused by conflicts and the urgency required in the matters before the USPTO and that this Court issue injunctions or other equitable relief to prevent further loss of IP rights inapposite the constitutional protection afforded inventors.

XLIV. Plaintiffs pray for this Court to award Plaintiffs, shareholders and patent interest holders of Iviewit Companies monetary damages.

XLV. Plaintiffs pray for this Court to award Plaintiffs, shareholders and patent interest holders attorney fees and other litigation costs,

XLVI. Plaintiffs pray for this Court to award Plaintiffs, shareholders and patent interest holders punitive damages.

XLVII. Plaintiffs pray for this Court to grant a jury trial for issues so triable in this Court.



XLVIII. Plaintiffs pray for this Court to grant compensatory damages from the defendants.

XLIX. Plaintiffs pray for this Court to grant permanent injunctive relief barring the unauthorized use by any third parties of the Iviewit Companies inventions or, alternatively, assign all such contracts to Plaintiffs, until all criminal investigations have concluded and freeze any actions on all Iviewit Companies inventions both in the United States and abroad through international treaties to prevent further violation of Article 1, Section 8, Clause 8 of The Constitution of the United States and any other state, federal and international laws.

STATE PRAYERS FOR RELIEF

L. Plaintiffs pray this Court grant maximum relief under S 460.70 Provisional remedies.

LI. Plaintiffs pray this Court grant maximum relief under S 460.80 Court ordered disclosure.

LII. Plaintiffs pray this Court grant maximum relief under Ch 772 Civil Remedies for Criminal Practices 772.104 Civil cause of action.

LIII. Plaintiffs pray this Court grant maximum relief under Title XLV Torts - Ch 772 Civil Remedies for Criminal Practices 772.11.

LIV. Plaintiffs pray this Court grant maximum relief under Title XLV Torts - Ch 772 Civil Remedies for Criminal Practices - 772.185 Attorney's fees taxed as costs.

LV. Plaintiffs pray this Court grant maximum relief under 895.05 Civil remedies Florida.

LVI. Plaintiffs pray this Court grant maximum relief under 895.06 Civil investigative subpoenas.

LVII. Plaintiffs pray this Court grant maximum relief under 895.07 RICO lien notice Florida.

LVIII. Plaintiffs pray this Court grant maximum relief under 895.08 Term of RICO lien notice.

LIX. Plaintiffs pray this Court order injunctive relief under; Title XXXIX Commercial Relations Ch 688 Uniform Trade Secrets Act 688.003 Injunctive relief.

LX. Plaintiffs pray this Court grant maximum relief under Title XXXIX.

LXI. Plaintiffs pray this Court grant maximum relief under Commercial Relations Ch 688 Uniform Trade Secrets Act 688.004 Damages.

LXII. Plaintiffs pray this Court grant maximum relief under sec 812.035 Civil remedies.

LXIII. Plaintiffs pray this Court order specific performance of SB under their breached binding LOU which acted as a legal service agreement, so as to prevent further damages from occurring from these breaches, whereby all parties involved, including representative insurance carriers and state agencies affected may all suffer increased damages without such patent counsel services and perhaps the costs for representation before this Court, as SB should have provided such counsel as necessary to prosecute or provided such legal service funds under their LOU. Whereby this relief can be instituted immediately saving the Plaintiffs and this Court attorney costs. Further, this Court, the EPO, the JPO, the USPTO, Moatz and the Commissioner of Patents would be greatly served by patent counsel being instituted in place of the current inventors acting as Pro Se patent counsel, where Moatz has urged Plaintiff Bernstein to attempt to secure counsel, before such highly specialized tribunal whereby Inventors are not knowledgeable or proficiently versed in such law so as to adequately represent Ivieuit Companies and inventors, perhaps additional reason for Pro Bono counsel by this Court or to enforce the SB LOU.

LXIV. Plaintiffs pray for this Court to Order defendants that have professional titles in any capacity to follow strict adherence to insurance reporting laws, including but not limited to, malpractice reporting and liability and contingent liability reporting. That these matters have tremendous liability if proven true and insurance fraud would only endanger the Plaintiffs and the public at large if liabilities and compliance in insurance laws are not adhered too by defendants.

LXV. Plaintiffs pray this Court grant maximum relief under Title 18 Part I CH 90 Sec 1834 Criminal forfeiture.

LXVI. Plaintiffs pray this Court grant maximum relief under Title 18 Part I CH 79 Sec 1623 - False declarations before grand jury or court.

LXVII. Plaintiffs pray this Court grant maximum relief under Title 17 CH 5 Sec 508.

LXVIII. Plaintiffs pray this Court grant maximum relief under Title 17 CH 5 Sec 509 Seizure and forfeiture.

LXIX. Plaintiffs pray this Court grant maximum relief under Title 17 CH 5 Sec 512 Limitations on liability relating to material online.

LXX. Plaintiffs pray this Court grant maximum relief under Title 18 Part I CH 95 Racketeering SEC 1956 Laundering of monetary instruments Plaintiffs pray for maximum liability for civil penalties.

LXXI. Plaintiffs pray this Court grant maximum relief under Title 15 Chapter 1 Sec 6a - Conduct involving trade or commerce with foreign nations.

LXXII. Plaintiffs pray this Court grant maximum relief under Title 15 Chapter 1 Sec. 14 - Sale, etc., on agreement not to use goods of competitor.

LXXIII. Plaintiffs pray this Court grant maximum relief under S 468-b. Clients' security fund of the state of New York.

LXXIV. Plaintiffs pray this Court grant maximum relief under New York's S 476-b. Injunction to restrain defendant from unlawful practice of the law.

LXXV. Plaintiffs pray this Court grant maximum relief under 360-m. Remedies.

LXXVI. Plaintiffs pray this Court grant maximum relief under Florida Title XXXIII Ch 495 sec 495.141 Remedies.

JURY TRIAL IS DEMANDED

Plaintiffs demand a trial by jury on all claims so triable.

Attorney for Petitioners

Eliot I. Bernstein, Pro se

39 Little Avenue

Red Bluff, Cal. 96080

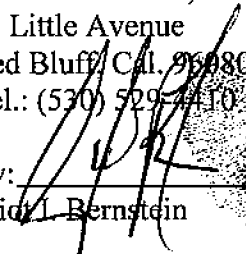
Tel.: (530) 529-4410

By: 


Eliot I. Bernstein

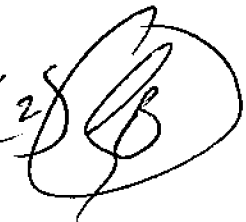
Attorney for Petitioners

Eliot I. Bernstein, Pro se
39 Little Avenue
Red Bluff, Cal. 96080
Tel.: (530) 529-7410

By: 
Eliot I. Bernstein

P. Stephen Lamont, Pro se
35 Locust Avenue
Rye, N.Y. 10580
Tel.: (914) 217-0038

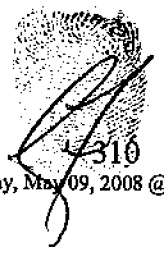
By: 
P. Stephen Lamont

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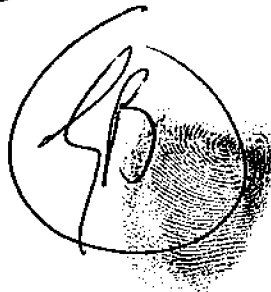
P. Stephen Lamont, Pro se
35 Locust Avenue
Rye, N.Y. 10580
Tel.: (914) 217-0038

*Infracted
Assigned*
RB

By: _____
P. Stephen Lamont



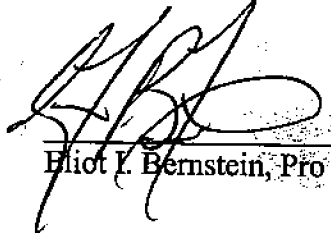
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AFFIDAVIT OF SERVICE

I hereby certify that a true and correct copy of the foregoing will be served per this Courts Order by the United States Marshall in due course by delivery of the foregoing to Pro Se desk of this Court, to the aforementioned defendants.

P. Stephen Lamont, Pro se



Eliot Y. Bernstein, Pro se

AFFIDAVIT OF SERVICE

I hereby certify that a true and correct copy of the foregoing was furnished by facsimile
this th day of May 2008, to the aforementioned defendants.


R/ Stephen Lamont, Pro se

Eliot I. Bernstein, Pro se

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APPENDIX A – IP INTEREST HOLDERS

Shareholder/Patent Interest Holder Patent Unit


Interests

Eliot I. and Candice Bernstein and Children
Caroline Prochotska Rogers, Esq. and
Geoffrey Rogers and Children
Silent Owners
Simon L. and Shirley Bernstein
Kenneth Anderson
Small Business Administration
Joshua Ennio Zander Bernstein formerly
The Joshua Bernstein 1999 Trust
Jacob Noah Archie Bernstein formerly The Jacob Bernstein
1999 Trust
Daniel Elijsha Abe Ottomo Bernstein
James Osterling
James Armstrong
Guy Iantoni
Jill Iantoni
Andrew Dietz
Ed Butler
Kevin Roach
Barry & Stacey Becker
David & Annika Bernstein
Tony Chirino
Alan McKittrick
Daniel Preston
Joseph Ryan
Beverly Billotti
Donna Dietz
Patricia Daniels
Bettie Stanger
Lisa Friedstein
Zakirul Shirajee
Jude Rosario
Mitchell Welsch
Joan Stark
Jeffrey and Lisa Friedstein and Children
Brett Howard
Anthony Frenden
Anthony Giordano
Jack Scanlan
Misty Morgan
Ginger Stanger
Joel Gonsalves

Gregory Gonsalves
Thaddeus and Judy Gonsalves and Children
Bettie Stanger
Robert Feigenbaum
Joseph Fischman
Sherri Frazier & Children
Lorna and Christopher Grote
Molly and Todd Hale
Rafeal Hollywood
Karen & Kevin Kiley
Beth and Frederick Klein
Amanda Leavitt
Daniel Preston
David and Pamela Simon and Children
Theodore Bernstein and Children
Matthew Simpson
Crystal and Lucas Simpson
William and Michelle Slaby
Michael and Nikki Stomp
Jane Valence
Robert and Kari Veneer and Children
Dorothy Winters
Mitch Zamarin
Rocket Cargo Employee Pool
Air Apparent Employee Pool
Anderson Howard Employee Pool
Mark W. Gaffney, Esq.
James Jackoway, Esq. and Michele Mulrooney Jackoway, Esq. and Children
Richard Rosman, Esq.
Anthony Lewinter, Esq.
David Colter
Kevin Lockwood
Alan Young
Tidal 4
Tidal 4
Tidal 4
Tidal 4
Steve Sklar
Alanis Morissette
Happy Feet Living Trust
Mitchell Welsch
Mitchell Welsch
Heche Trust
Lauren Lloyd Living Trust
Scott Welch
Spencer and Dana Rogers and Children

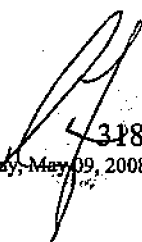
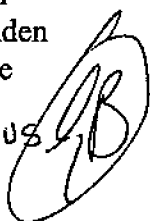
Paul Stanger
Dana Stanger
Jeffrey and Kimberly Stanger and Children
Rose Palermo and Tony Castro and Children
Debbie Washington
Lisa Deleo
Gina Moss
Stacey Ellis
Tuvia School
Douglas Chey
John & Rebecca Calkins
Chris Terri
Corri Perkiss
Brian Fritz
Paul Miller
Robert Roberman
Frank Burnham
Lyle McCullough
Christine & James Goldstein
Sherry Stomp
Harmony Rousseaux
Sal Gorge
James Cohen
Monte Freidkin
Dr. Marcel & Florence Horowitz
Severyn Ashkenazy
Flip and Leanne McCirrick
Adam Simon, Esq.
Alec B. Abbott
Amber Cordero
Barney Allison, Esq.
Beverly Milligan
Bieler @ Bieler Bros. Records
Bill Dusha
Blayne Lequeux
Blaze Benham
Bleemusic Inc.
Blue Fiddle Records
Brian Street
Bruce Warren
Buddy Morra, CPA
C. Allen Productions
Carolyn Newman
Iviewit Charitable Giving Fund (Thought Journal) 0.5897%
Charles Chavez
Charles Michael Moore

Chris & Cori Dittner
Chris Smith
Crush Music Media Management
Dale Grimes
Diversafest LLC [DFEST]
Doc McGee
Don Peake
Edward Garber
Eric Nixon
Evolution Promotions
Flecktones Tours LLC
Frank & Renee Gonzales
Fueled By Ramen Inc.
Gaillet
Gary Nathanson
Gary Nielsen
Gary Pettus & 3 Doors Down
Hard Head Management
Hassan Miah
Heidi Krauel
I Hate Kate
In DeGoot
Indivision Management
Irell & Manella
Irene Bernstein
Irving Rosen
James Cohen
Jamie Ollivier
Jeff Roe
Jenna Cowman
Jennifer Brandon
Jeremey Wall
Jeremy Yuricek
Jessica Verzaal
JMAX
Joe Garlipp
Joe Reynolds & Shiny Toy Guns
John & Edmund Campion
John & Gregg Davis (on behalf of Marvin & Barbara Davis)
John E. Cookman Jr.
John Galvin
John Simon
John Stillman
John Stuart
Jon Jacobs
Jon K. Hirschtick

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Friday, May 09, 2008 @ 2:04:17 PM

Karen & Brian Utke
Karen & Laurie Cohen
Kim Staley
Larry Holfer
LCD Soundsystem
Leah Hanes
Lesli Arbuthnot
Leslie Abbagliato
Less than Jake
Lisa DeLeo
Lisa Hagen
Lisa Hendricks
Lori Barrenneck
Lori Kennedy
Lou Supowitz
Louis Pfeffer
Lynn & Francis Stanger
Mark Bernstein
Mark Noyes
Matt and Michelle Doyle
Matt Phillips
Maxemillion Gaspari
McDonough Management
Megan Crawford
Melissa Gluzband
Merritt & Sophia Howard Charity
Michael J. Seibert
Milano Music Management
Mitchell Gorman
Mohammad Ahmed
Noble Engle
Paul Lypaczewski
Pay Up Management / Idolz Maker
Penelope Ashkenazy
Rebel Waltz
Redjem Bouhenguel
Rob Siefken
Robert and Robin Bader
Robert Guccione
Robert Krokower
Russell James
Ryan Magnussen
Sanctuary
Sara Courtney Baker
Sarah Kershaw
Seamus Lyte


Shenell Smith
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STP Employee Fund
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Susie Marino
Ted Leonsis
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Thomas Sanford
Tim Clark
Timothy Kaye
Tom Ames
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Vincent Bank
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William George
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