

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

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|---------------------------|---|--|
| |) | |
| Dennis Solomon, |) | |
| Walter Horwitz, deceased |) | |
| Dorothy Horwitz, deceased |) | |
| Plaintiff pro se |) | |
| |) | |
| v. |) | |
| |) | CIVIL ACTION NO. 2:16-cv-08216 RGK (SS) |
| Joe Ling |) | |
| Margaret Morrow |) | |
| Rose Aparicio |) | |
| Lisa Aparicio |) | |
| Hoover Louie |) | |
| et al |) | |
| Defendants |) | |
| |) | |

VERIFIED COMPLAINT AND JURY DEMAND

DEMAND FOR JURY TRIAL

Pursuant to Rule 38(b) of the Federal Rules of Civil Procedure, the Plaintiff respectfully requests a trial by jury of all issues properly triable by jury.

SHORT SUMMARY

Dorothy (b. 1930) and Walter Horwitz (b. 1925), the Aunt and Uncle of the Plaintiff, were a loving, artistic, Jewish couple who loved the Plaintiff's Mother, Frances Horwitz Solomon (b.1924) and their nephews, the Plaintiff and his brother, Murray. Their joint will and trust bequeathed their Estate to Frances. Walter passed away in 2007. Dorothy was diagnosed with terminal cancer in 2011, and in consultation with Frances, rewrote her will

as the Dorothy Horwitz Family Trust, bequeathing all of the personal items, photo albums, collectibles, rare Judaica, art and the bulk of the monetary assets to her nephews.

Dorothy was in constant telephone contact with Frances throughout her life, including during her last weeks.

In the last month of Dorothy's life, her accountant, Hoover Louie, the successor-trustee of the Dorothy Horwitz Family Trust, executed a long-developed, criminal scheme to defraud the Horwitz/Solomon family of all of the art, Judaica and other personal items of the Dorothy and Walter, as well as the monetary assets. The criminal scheme included the forgery of an purported 'adumdum', allegedly drafted and executed by Dorothy in the last week of her life which bequeathed 'anything Rose (Aparicio) wants' to a co-conspirator, fiduciary who admitted transcribing the 'adumdum' on Dorothy's computer.

When Defendants Louie and Aparicio learned that the Plaintiff was planning to visit in a few weeks, Defendants provided Dorothy access to a lethal dose of opioids, causing her death by respiratory failure.

Defendants' racketeering and corrupt organization has been engaged in corrupt defense contracting, illicit drug trafficking, money laundering, perjury, mail fraud and felony undue influence of political officials. Defendants' ties, direction and activation of the Molenbeek terrorists to target California and Tennessee citizens has placed this Court and Government, and all citizens of California in great danger.

PARTIES - PLAINTIFFS

1. Plaintiff Dennis Solomon (66) is a resident of Yarmouth, county of Barnstable, Massachusetts and a citizen of the United States. He was educated in nuclear and biophysics, computer science and management at MIT and MBL, Woods Hole. In 1989, the United States Secretary of Navy through the Tactical Warfare Office directed him to develop the state-of-the-air surveillance, defense and targeting technology through a joint DARPA program. Solomon's unclassified project was reviewed in the prestigious IEEE Journal, noting it outperformed competitors including Raytheon and Texas

Instruments by a factor of 10. He is active in Jewish and pro-Israel activities, and participated in international anti-terrorist efforts following the 1972 Munich Olympics including monitoring Aafia Siddiqui at MIT and Brandeis, and the Molenbeek Islamic rings while living in Brussels. From 1994-2000, he advised the FBI regarding the activities and ties of Yonkers-Boston affiliated WTC terrorists. He is currently developing a Neurotubule Foundation project with the Sackler Medical School, Israel related to his breakthrough work on the cloning and regeneration of human tissues, now the Bell Center for Regenerative Biology at MBL, Woods Hole.

2. Plaintiff Dorothy Horwitz (b. 1930) is Dennis Solomon's Aunt who married her husband of Walter Horwitz in 1959 in Las Vegas. She had a lifelong career as a office manager and bookkeeper for Hollywood Bra and Garment, a fashionable women's garment and swimsuit manufacturer in Hollywood, CA. She had no children. She passed away on November 25, 2013. She was born in the Bronx, NY, was Jewish and identified herself as Jewish on Garden Crest Nursing Admission interview two months before her death. As result of her lifelong activities in support of the Righteous Among Nations, she is a protected person.
3. Plaintiff Walter Horwitz, born 1925, in Boston, MA, is the natural sister of Frances Solomon, Mother of Dennis and Murray Solomon. He was a U.S. Navy WWII veteran, and a GI Bill graduate of the prestigious Massachusetts College of Art. He was a Hollywood Film Studio artist prior to founding a successful business in interior design and theatrical drapery. He also continued as a active artist and sculptor. After WWII, he participated in I activities to assist Holocaust survivors, the State of Israel, the hunt for Nazi war criminals and collaborators, and the recovery of stolen art. He held in family trust rare and heirloom Judaica, and List of Righteous Among Nations from the Horwitz family first cousin, the renowned Cantor Pierre Pinchik. He passed away in 2007. As result of his lifelong activities in support of the Righteous Among Nations, he is a protected person.

PARTIES - DEFENDANTS

4. Defendant Joe Ling is believed to be a resident of Long Beach, California, an attorney registered to practice in the State of California, and a long time, de facto partner of Margaret Morrow and Joseph Mirkovich of Long Beach. He is the sister of Ruby Ling Louie, wife of the successor-trustee Hoover Louie. He conspired, organized, planned, aided and abetted the murder of Dorothy Horwitz, the theft and conversion of valuable objects of the Horwitz Estate, interstate mail and wire fraud, and other racketeering crimes against the Plaintiffs.
5. Defendant Ruby Ling Louie is believed to be a resident of Los Angeles, CA. She is the wife of successor-trustee Hoover Louie. She conspired, organized, planned, aided and abetted the murder of Dorothy Horwitz, the theft and conversion of valuable objects of the Horwitz Estate, and other racketeering crimes against the Plaintiffs.
6. Defendant Hoover Louie is the sole successor-trustee of the Dorothy Horwitz Family Trust. He conspired, organized, planned, aided and abetted the murder of Dorothy Horwitz, the theft and conversion of valuable objects of the Horwitz Estate, interstate mail and wire fraud, and other racketeering crimes against the Plaintiffs.
7. Defendant Leigh-Ellen Louie is believed to be a resident of California and the daughter of Hoover B. and Ruby Ling Louie of Los Angeles, CA. She conspired, organized, planned, aided and abetted the murder of Dorothy Horwitz, the theft and conversion of valuable objects of the Horwitz Estate, and other racketeering crimes against the Plaintiffs.
8. Defendant Rose Aparicio is believed to be a resident of California and a former co-worker of Dorothy Horwitz. During all relevant periods, Rose had a confidential and fiduciary relationship with Dorothy, including a DPOA (durable power of attorney), a key to the Horwitz home and knowledge of the locations of the Horwitz safe deposit boxes and their keys. Rose has testified under oath that she and her daughter Lisa transcribed the 'adumdum' while alone in Dorothy's home using Dorothy's printer during the last month of Dorothy's life. Rose assumed the role of personal representative after Dorothy's death

and intentionally refused to notify any member of the Solomon family until after her theft of Estate valuables and the destruction of relevant evidence including the family albums of Dorothy and Walter Horwitz.

9. Defendant Lisa Aparicio is believed to be a resident of California and the daughter of Rose Aparicio. Lisa accompanied Rose during her testimony regarding the transcription of the 'adumdum', and participated in the theft, conversion and interstate transport of valuables from the Horwitz Estate and the destruction of evidence.
10. Defendant Andrea Ebert is believed to be a resident of California and through interstate mail fraudulently claimed to be a natural niece of Dorothy Horwitz, the daughter of her sister. Andrea Ebert claims to be an adumdum beneficiary of a unknown "Living Trust" and a residual beneficiary of Dorothy Horwitz. Andrea participated with Rose Aparicio in the theft of Estate valuables following the death of Dorothy Horwitz.
11. Defendant Margaret Morrow is believed to be a resident of Long Beach, California and a de facto, co-located law partner of Joe Ling. She conspired, organized, planned, aided and abetted the murder of Dorothy Horwitz, the theft and conversion of valuable objects of the Horwitz Estate, interstate mail and wire fraud, and other racketeering crimes against the Plaintiffs.
12. Defendant Joseph Mirkovich is believed to be a resident of Long Beach, California and a de facto, co-located law partner of Joe Ling. She conspired, organized, planned, aided and abetted the murder of Dorothy Horwitz, the theft and conversion of valuable objects of the Horwitz Estate, interstate mail and wire fraud, and other racketeering crimes against the Plaintiffs.
13. Defendant Doris Tucker is believed to be a resident and notary in the State of California. Sometime after the death of Dorothy Horwitz, she accepted a bribe from Joe Ling and Margaret Morrow to allow forgeries containing her notary stamp to be mailed interstate in the scheme to defraud the Plaintiff and thereafter conspired, aided and abetted the murder of Dorothy Horwitz, the theft and conversion of valuable objects of

the Horwitz Estate, interstate mail and wire fraud, and other racketeering crimes against the Plaintiffs.

14. Defendant Lee Fruchter is believed to be a resident and notary in the State of California. He accepted a bribe from Hoover Louie, Joe Ling and Margaret Morrow to fraudulently notarize papers providing Defendant Louie with unfettered access to Dorothy's financial accounts, at a time when she lacked testamentary capacity. He wrote himself a check from Dorothy's account and recorded the same in her checkbook. Following Dorothy's passing, he enabled and caused a fraudulent notary journal entry to be mailed interstate in the scheme to defraud the Plaintiff and other racketeering crimes against the Plaintiffs.
15. Defendant Conrad Blinker is believed to be a resident of California and an expert in desktop computers. Mr. Blinker intentionally, in conspiracy with, and under the instructions of Defendants Louie, Ling, Morrow and Mirkovich altered the Horwitz computer, removing material evidence including but not limited Dorothy's correspondence, drafts of will and trusts of Dorothy and Walter Horwitz, Family Trust Schedule B and summaries of the Family Trust assets after the death of Dorothy Horwitz as part of an interstate criminal enterprise to defraud the Plaintiffs.
16. Defendants Steven Tran and Coldwell Banker Real Estate, are believed to residents of California and in return for monies and other things of value, enabled Defendants and co-conspirators to unlawfully remove valuables or other items from the Horwitz Estate.
17. Defendant American Lebanese Syrian Associated Charities (ALSAC-St. Judes) is believed to be a Catholic-orientated, Tennessee based charity with offices in Boston, MA and Los Angeles, CA. Boston-based directors, attorneys and staff of ALSAC have a long association with the illicit drug trade and money laundering of the Atlantis cartel in Lebanon, participated in the planning and coercion of California government official related to this case, and organized threats and attempted intimidation of the Plaintiff. It is listed in the 'adumdum' as a principal new beneficiary. This is no evidence Dorothy

ever made donations to ALSAC, an unnatural principal beneficiary of Dorothy Horwitz over Hadassah.

18. Defendant USC Children's Hospital legal staff is associated with the USC legal staff responsible for USC expenditure of over \$300,000 in legal fees in an unlawful and unsuccessful challenge the US Trademark Office award of the 'HoloDeck' trademark to the Plaintiff. It is listed in the 'adumdum' as a principal new beneficiary. This is no evidence Dorothy ever made donations to USC Children's Hospital, an unnatural principal beneficiary of Dorothy Horwitz over Hadassah.
19. Defendant Tara Cooper is believed to a resident of California and an active associate of the Atlantis cartel engaged in aiding and abetting unlawful schemes to defraud, obtain trade secrets, and interfere with the business relations of the Plaintiff.
20. Defendants Alzheimer's Association, American Diabetes Association, American Heart Association, National Kidney Foundation, Muscular Dystrophy, American Lung Association are believed to a United States, tax-exempt charities with a duty to insure that their legal standing is not used in furtherance of unlawful schemes. In the present case, they have been unlawfully employed by the perpetrators of the fraudulent 'adumdum' to interfere with the business relations of the Plaintiff.
21. Defendant Superior Court of the State of California denied the Constitution and Civil Rights of an out-of-state Massachusetts citizen of the United States who did not voluntarily invoke to jurisdiction of the California courts by but not limited to taking exclusively control of property bequeathed by and to the Plaintiffs and explicitly refusing to submit related controversies in amounts over \$75,000 to a jury trial, and the Equal Protection of the Laws by erroneously characterizing a first amendment to a Petition and failing to remit overpayment of fees, and the U.S. Constitutional right to obtain justice fairly and freely by levying a fee for routine motions.
22. Defendant Maria Stratton is believed to a resident of California and an integral member of the interstate Atlantis corrupt organization as a defense attorney. Among

other unlawful acts, Defendant Stratton with full knowledge of her prejudice towards the Plaintiffs and in protection of the perpetrators of the murder of Dorothy Horwitz, unlawfully caused the probate of the Dorothy Horwitz estate to be directed to LASC Dept 5, refused to recuse herself in response to a formal first preemptory challenge, and aided and abetted the theft of Horwitz Estate valuables by denying Plaintiffs discovery of the personal address books, family photo albums, personal correspondence and the contents of the safe deposit boxes.

23. Stephen Sadowsky is believed to a resident of California, an defense attorney with the firm of Lightfoot, Steingard, and Sadowsky, and the husband of Maria Stratton. Among other unlawful acts, In concert and conspiracy with law partners Defendants Steingard and Lightfoot, Defendant Sadowsky unlawfully interfered with the proper administration of justice by aiding, abetting and causing former criminal clients and associates to intimidate the Plaintiff by threats of violence against Plaintiff Solomon and his relations.

24. Richard Steingard is believed to a resident of California, an defense attorney with the firm of Lightfoot, Steingard, and Sadowsky. Among other unlawful acts, In concert and conspiracy with law partner Sadowsk, Defendant Steinfard unlawfully interfered with the administration of justice by aiding, abetting and causing criminal clients and others to intimidate the Plaintiff and his relations by threats of violence.

25. Michael Lightfoot is believed to a resident of California, an defense attorney with the firm of Lightfoot, Steingard, and Sadowsky. Among other unlawful acts, In concert and conspiracy with law partner Sadowsk, Defendant Lightfoot unlawfully interfered with the administration of justice by aiding, abetting and causing criminal clients and associates to intimidate the Plaintiff by threats of violence against Plaintiff Solomon and his relations.

26. Stephen Sadowsky is believed to a resident of California, an defense attorney with the firm of Lightfoot, Steingard, and Sadowsky, and the husband of Maria Stratton. Among other unlawful acts, In concert and conspiracy with law partners Defendants Steingard and Lightfoot, Defendant Sadowsky unlawfully interfered with the proper administration of justice by aiding, abetting and causing former criminal clients and associates to

intimidate the Plaintiff by threats of violence against Plaintiff Solomon and his close relations.

27. Defendants John and Jane Doe (6-20) are believed to be residents of United States, Canada, China and other countries and have engaged in unlawful acts in violation of the Plaintiffs Federal Civil Rights and in furtherance of the unlawful activities of an interstate racketeering enterprise, including but not mail fraud, intimidation of a witness or party to State or Federal litigation, schemes to obtain trade secrets, grand larceny, concealment and destruction of evidence, interstate transport of stolen property, defense espionage endangering the citizens and soldiers of the United States.

JURISDICTION

28. This is a civil action arising under 42 USC 1983 for violation of Federal civil rights and deprivation of rights under the color law 18 USC 242,, 18 USC 1836, Theft of Trade Secrets; 18 USC 1964, Civil RICO Act, Grand Larceny, Interstate Transport of Stolen Goods, Mail and Wire Fraud, Intimidation, Violence and other crimes, and , the United States Constitution, 1st, 5th and 14th Amendment, and supplemental jurisdiction including but not limited to unlawful acts as a trustee to defraud a beneficiary under related State Law under 28 U.S.C. § 1367.
29. This Court has jurisdiction pursuant to 28 U.S.C. § 1331, 1332 and 1338(a) including the diversity of the parties, and a controversy in excess of \$75,000.
30. Venue is proper in this District pursuant to 28 U.S.C. §§ 1391(b), 1391(c), 1391(d), and 1400(b) where the principal and majority of the defendants reside and the majority of the property in dispute was located.

SUMMARY OF THE LEGAL CASE

31. With the immediate prospects of personal gain and ingratiating themselves to long-standing, political and economic adversaries of the Horwitz/Solomon family, Defendants Joe Ling, Margaret Morrow, Joseph Mirkovich, Ruby Ling Louie, Hoover Louie, Rose

Aparicio, Lisa Aparicio and Maria Stratton conspired to commit grand larceny and the theft of rare Judaica, art, collectibles, heirlooms, jewelry, a protected List of the Righteous Among Nations, of Dorothy and Walter Horwitz; the theft and conversion of protected trade secrets and U.S. Defense technology; to interfere with the business relation of the Plaintiff, and to defraud using interstate mail the named beneficiaries of the 2012 Dorothy Horwitz Family Trust. Defendants did so by fabricating an 'deathbed adumtum' to the Dorothy Horwitz Family Trust, which they used to provide cover for the successor-trustee Louie's, fiduciary Aparicio's and their co-conspirators exclusive access to Horwitz home and safe deposit boxes to unlawful remove and convert rare Judaica, other valuables and Petitioner's trade secrets; and destroy material evidence essential to the prosecution of these crimes. Further, fearing that the Petitioner would discover this ongoing criminal enterprise, they conspired knowingly to provide a lethal overdose of hydromorphone and benzodiazepine in Dorothy Horwitz's self-administered Ibuprofen bottle while Dorothy was confined to the nursing home.

FACTS COMMON TO ALL COUNTS

32. Dorothy Horwitz and her sister-in-law Frances Solomon had been in constant communication for over 50 years. In 2012, Dorothy Horwitz (82), diagnosed with terminal lung cancer, had her local estate attorney, Kevin Chui, draft and formally execute her Last Will and the formally named Dorothy Horwitz Family Trust (hereinafter the "Family Trust"), which bequeathed over 80% of the Horwitz Estate to 'her nephews' the Plaintiff Dennis and his brother Murray Solomon, reflecting the instructions of Frances Solomon (88), the mother of Dennis and Murray who had long been the principal beneficiary of the late Walter and Dorothy Horwitz Family Trust.
33. Dorothy's closet friends had already passed away or moved away closer to their children and she appointed her accountant Hoover Louie successor-trustee, and a former co-worker/friend Rose Aparicio representative.
34. Though living on different coasts, throughout her married life, Dorothy Horwitz had been continued her constant contact with her sister-in-law Frances Solomon, and in

frequent contact, at least monthly, with her nephew, Plaintiff Solomon. Dorothy had called Plaintiff Solomon upon being diagnosed with terminal cancer, and requested his assistance to placing her affairs in order. She enjoyed and was looking forward to Dennis's visit, rescheduled in 2013 to December due to his Mother's move.

35. On or about October 10, 2013, Dorothy entered Garden Crest Nursing Hospital in Los Angeles. She would not return home. Rose Aparicio had a confidential relationship, was given durable power of attorney and a key to Dorothy's home. At Dorothy's request, Rose would retrieve items from the Horwitz home and bring them to Garden Crest.
36. By October 31, 2013, Dorothy was no longer able to write legibly, and Rose Aparicio assumed financial responsibilities, including the writing checks and entries in Dorothy's checkbook. Rose wrote herself cash checks during Dorothy's Garden Crest period.
37. Defendants in deposition and filings assert that Rose and Lisa Aparicio transcribed the 'adumdum', alone on Dorothy's computer and printer sometime after October 10, 2013, and brought a copy to Dorothy at Garden Crest.
38. At some time in early November, 2013, Rose Aparicio learned that Plaintiff Solomon was coming to visit Dorothy in December.
39. Defendants in deposition and filings further assert that on November 18, 2013, Dorothy Horwitz signed an crude, 'adumdum' giving the Defendants exclusive access to the Horwitz home and safe deposit boxes and "anything that (they) want."
40. No witness has sworn or acknowledged signing or notarizing the 'adumdum' document dated "10/31/13" on November 18, 2013.
41. On November 20, 2013, Defendant Louie and Fruchter allege visiting Dorothy at Garden Crest to obtain Dorothy's signature to grant Louie control over her finances.
42. The day after, November 21, 2013, Dorothy complained to Garden Crest staff that her medications had been changed and she didn't like how they make her feel.

43. Dorothy Horwitz died on November 25, 2013 from respiratory failure. Her body was transferred to the mortuary for cremation. It is the Plaintiff's understanding that tissue and fluid samples point to a lethal dose of hydromorphone and benzodiazepine – a deadly and dangerous combination.
44. No one in the Solomon family was notified of Dorothy's passing.
45. After Dorothy's death on November 25, 2013, Defendants entered the home and safe deposit boxes, removed and destroyed all incriminating evidence including the personal letters and papers, photo albums, financial records, prior wills and trusts and other evidence that proved that it would be unnatural of Dorothy and Walter Horwitz, acknowledged to be Jewish, to have forgotten the Jewish and U.S. Navy Chaplain's charities most dear to their hearts.
46. Plaintiff Solomon discovered Dorothy's passing after a number of calls he made to Garden Crest
47. After discovering Dorothy's passing, Plaintiff Solomon contacted Defendants Aparicio, Louie and Ling who refused permit Plaintiff Solomon access to the Estate and refused to inform of the status of the Estate.
48. After a few months of unsuccessful discussions, Plaintiff Solomon informed successor-trustee Louie and Ling that he would retain counsel. Thereafter, on March 24, 2014, four months after the passing of Dorothy, Defendant Ling sent Plaintiff Solomon via interstate mail, a copy of the 2012 Dorothy Horwitz Family Trust and Last Will, together with a fraudulent document bearing the hand printed title "adumdum" and "10/31/13".
49. The 2012 Dorothy Horwitz Family Trust in Article 5.3 explicitly bequeathed over 80% of the Horwitz Estate to 'nephews Dennis and Murray Solomon', who are also the residual beneficiaries. There are no limitations on access to the Estate, property or personal items by the Solomon family, including Frances, Dennis and Murray, and Dorothy was in regular communication with Frances and Dennis and looking forward to his visit until her death.

50. The fraudulent crude 2013 'adumdum' explicitly excludes 'everyone except the Aparicios and Louie' from the Horwtiz home, and grants the Defendants 'anything (they) Rose wants.'" Rose was not a named beneficiary of the 2012 Family Trust.
51. The fraudulent 'adumdum' excludes all Jewish charities and adds two charities as principal beneficiaries, the American Lebanese Syrian Associated Charities (ALSAC-St. Judes hereinafter referred to as ALSAC) and USC Children's Hospital to which Dorothy never donated and which have an adverse relationship to the Horwitz/Solomon family.
52. ALSAC (American Lebanese Syrian Associated Charities) which never before received even a small donation from Dorothy and Walter Horwitz received over \$6,300,000 from the Horwitz Estate, including cash and valuable Judaica 'jewelry' – compensation and retribution for Robert Mehrabian, Teledyne and other Boston-related anti-Israel factions.. USC Medical, to whom Dorothy and Walter Horwitz never gave a donation, received \$300,000 in cash, retribution by Macedonia, McManus and Edelman.
53. The Horwitz/Solomon were Jewish and active in supporting victims of pogroms and the Holocaust, including the re-settlement of Jewish in the Israel. H. Horwitz, great uncle of the Plaintiff, was active in the Menorah Society, founded at Harvard University in 1900 by Henry Hurwitz, and visited Israel in the 1920s as part of the committee sponsored the noted jurist Louis Brandeis and attorney Louis Marshall. He was instrumental in the immigration of the noted Cantor Pierre Pinchik, Plaintiff's first cousin, twice removed. The activities are well-documented in the archive editions of the Jewish Advocate and the Koussevitchsky papers. Phillip Solomon, father of the Plaintiff, was a Boston-born, WWII U.S. Navy veteran who volunteered with Ezer Weizman and Al Schwimmer to found the Israel Air Force.
54. Dorothy and Walter Horwitz were lovingly married for over 50 years. Both identified as modern Jewish with strong historic family ties. Prior to their deaths, they donated to Hadassah, the Jewish medical charities in memory of Dorothy's Mother, the Jewish National Fund in memory of Cantor Pierre Pinchik and the Horwitz Family, Jewish War Veteran's, and the United State Navy Chaplain's Fund. Dorothy identified herself as

Jewish in medical interviews within two months of her death. No event occurred which would have alienated Dorothy from their Jewish or the U.S. Navy charities.

55. Defendants perpetrated the aforementioned criminal acts for their unlawful enrichment and as part of and to ingratiate themselves with an ongoing corrupt organization managed by restaurateur/promoter Michael Brausen of Long Beach, CA which engages in international corporate and defense espionage, corrupt U.S. Defense Department contracting, criminal industrial and defense espionage, and other unlawful, interstate acts for the benefit of factions within the United States and foreign states, who are anti-Israel, support terrorist organizations, illicit drug and money-laundering cartels.

**FACTS RELATED TO DEFENDANTS RACKETING AND CORRUPT ORGANIZATION
AND THE TRADE SECRETS OF THE PLAINTIFF**

56. Defendants Joe Ling, Hoover Louie, Ruby Ling Louie inherited a position in the Long Beach Port 'Chinese mob', including the import of illicit goods, drugs and money laundering. Long Beach was a favorite port for southwestern activities of the Atlantis cartel – one of this Nation's most sophisticated drug, arms, money laundering and influence peddling corrupt organizations over the past forty years. The Atlantis cartel evolved from the fashionable Vermont/Manhattan restaurateur/night club enterprises including "Chez Henri" of Waitsfield, VT. and the "Boston Tea Party" managed by Harvard Law fellow Roy Riepen.

57. During the presidency of Gerald Ford, when Jack was entertaining Bianca Jagger and Andy Warhol in the White House; and Maggie Trudeau was having an affair with Ron Woods in Jasmine Khan's Manhattan apartment, the Atlantis cartel was providing the elite colleges, Wall Street, D.C. and Hollywood with the best Lebanese and Moroccan hashish, and Andes cocaine. In addition to the Ford family, the Kennedys, Bushes, Breyers, Rehnquists, Lee Atwater, and the Powells were among the many famous clients.

58. Attorneys Ian Schragger, co-founder of Studio 54, and Roy Riepen, manager of the Boston Tea Party, were the archetypes. During the 1970s, the Atlantis Cartel was consolidated under the direction and schemes of attorney Michael McManus, Jr., his

business partner, Patrick Malloy, their subordinates Mark and Eileen “Buffi” Mordecai and others.

59. McManus and Malloy employed a company founded by the Plaintiff, the America’s Cup supplier Atlantis Weathergear, as a cover for some of their unlawful activities. In 1981, McManus and Malloy were appointed White House advisors under Californian Michael Deaver. They expanded their reach to the Nicaraguan, Medellin and Cali cartels, and arms-for-drugs activities with Bin Laden and the mujahidin through Atlantis associates Peter Underwood (See US v Peter Underwood, 880 F.2d 612 (1989) and US v Sidney Lewis, Case No. 3:89-cr-00223-RE Oregon).
60. These associations of the Defendants and the Atlantis cartel continued control of Lebanese hashish trade controlled by ALSAC lawyers in Boston in return for significant ‘charitable’ donations, including secret support of the terrorist organizations of Christian physicians Wadie Haddad and George Habash, masterminds of Entebbe hijacking. They including supportive ties to through the Yonkers, NY activities of Altman’s of North Carolina-educated Khalid Sheikh Mohammed (World Trade Center mastermind), his nephew Yousef (1ST WTC bombing), the Brandeis education of Aafia Siddiqui by Brandeis Prof. John Lisman (close friend of Katherine Sheetz) and murder of Brandeis graduate Rafael Teken, the education of Boston Marathon Tsarnaev brothers bombers, the Brussels based Molenbeek terrorist ring responsible for the murder of California resident Nohemi Gonzales, targeting of the California band ‘Eagles of Death Metal’, and related to the San Bernardino terrorist Tashfeen Malik (See Aafia Siddiqui, John Lisman, Pakistan).
61. From 1994-2001, Plaintiff formally met with Boston and D.C. FBI and communicated his detailed knowledge of the activities of Khalid Sheikh Mohammed in Yonkers and Brussels; and the WTC Florida-based pilots in training. Said information was correct..
62. During Iran-Contra, McManus and related counsel Robert Rachlin, schemed to cause Al Schwimmer to be indicted for assisting the U.S. government. Following the Iran-Contra scandal, McManus and Malloy returned to private life and in 1990 were active in funding the Plaintiff’s competitors. From 2000 on, McManus encouraged or funded

Defendant Leigh Ellen Louie, Scott Edelman of Los Angeles, Michael Brausen of Long Beach to scheme to obtain the Plaintiff's trade secrets.

63. Plaintiff Solomon was educated at M.I.T. including the study of computer science with retired Chief Scientist of the National Academy of Sciences and Engineering, Hebert Lin. He is actively pro-Israel. In 1985, Plaintiff Solomon was accused by White House attorney McManus of participating in the further development of French-Israeli nuclear weapons at CERN.
64. On or before January, 1988, Elle Altman of Montauk, NY, who was an internal battle for control of Altman Stage Lighting Company with her brother-in-law, together with Atlantis Weather of Sag Harbor principals, Michael A. McManus, Jr., Patrick E. Malloy III and Mark and Eileen Mordecai, and Werner Erhard, provided to MIT graduate Brian Ferren of Ferren and Associates of East Hampton, NY, Solomon's plans for an external variant of Solomon's pending patent, 4,729,081, which had been chosen as the signature lighting technology for the legendary light show of the Vermont band PHISH.
65. Ferren filed a U.S. patent application on said plans, including employing a Stock Drive right angle belt drive, which issued as U.S. Patent 4,827,387.
66. Ferren, whom had worked on the Star Trek movie series, currently heads Applied Minds, employing MIT graduate Daniel Hillis, founder of Connecting Machines, and Dmitri Negroponte, son of MIT professor Nicolas Negroponte. Defendant Louie worked closely with Ferren from 1996 to 1999.
67. On or about July, 1993, an IEEE Article authored by MITRE (founded as M.I.T. Research Engineering), and the U.S. Air Force Intelligence Directorate, published a summary of Plaintiff Solomon's 3D Virtual Reality technology noting that it outperformed competing technology from Raytheon, Texas Instruments, and other competitors by over 10 to 1. It was speculated, but not published, the Plaintiff Solomon achieved exemplary performance by means of an innovative dynamic crossbar technology applicable to massive parallel machine architectures.

68. On March 25, 1996, Volumetric Imaging, Inc., a Delaware corporation which licensed or manufactured certain trade secrets, intellectual property and technology of Plaintiff Solomon and MIT, filed a civil case, USDC Boston No. 96-cv-10613 against Teledyne and various individuals employed in their Marina Del Ray and Los Angeles, CA facilities. Volumetric Imaging, Inc. was represented by attorney Robert Lawless of Barnstable, MA. Teledyne was represented by Kazakhstan-born, Boston attorney Natasha Lisman, wife of Brandeis and Woods Hole neurobiologist John Lisman, and former neighbor of Iranian-born, Robert Mehrabian, president of Teledyne. John and Natasha Lisman are friends of pro-Hamas activist, Katherine Sheetz of Woods Hole, Ma. John Lisman was a PhD thesis advisor/panel of Aafia Siddiqui.
69. On September 17, 1998, Attorneys Lisman and Lawless would be sanctioned by USDC Judge Robert Keeton and Lawless would withdraw. Volumetric Imaging, inc. was dissolved at the request of the U.S. Department of Defense and the Plaintiff's advanced projects received further classified funding.
70. In the year 2000, Plaintiff was granted the 'HoloDeck' trademark related to said holographic displays including state-of-the-art medical systems.
71. Scott Edelman, an attorney in the Los Angeles office with Gibson, Dunn & Crutcher, acting on behalf of University of Southern California (Children's Hospital legal staff) filed a formal opposition for the benefit of the Defense Project project manager, Michael Macedonia. He also contacted Boston attorney Douglas Wolf to engage in a scheme to obtain the trade secrets of the Plaintiff. Wolf called upon his new associate attorney, Carole Boelitz, (MIT MS 1996, Harvard Law) to assist. She would later refuse to participate and resign from the Wolf firm of Wolf, Greenfield and Sacks.
72. These criminal acts were also part of an intentional scheme to unjustly enrich and 'repay' new 'adumdum' beneficiaries for their earlier unsuccessfully schemes to obtain Solomon and Horwitz personal, religious and trade secrets, including a 1992 scheme by attorney Natasha Lisman and Teledyne continued by its president, Robert Mehrabian which resulted in the USDOJ indictment and fine of over \$100 million US; a year 2000

scheme by Michael Macedonia and Scott Edelman of Los Angeles, CA which cost UCS (University of Southern California) a \$50 million US US Air Force contract, and a 2005 scheme by Michael Brausen of Long Beach, CA to obtain trade secrets related the U.S. Navy and Air Force 'drone' control (Time Critical Target Prosecution) for the benefit of Macedonia and China, resulting in LASC Case BC389984.

73. Defendants Ling and Louie came to believe that Plaintiff Solomon was using the Horwitz home in Rosemead, MA as a depository for non-public, trade secret or confidential documents to be transferred to the U.S. Navy in California.
74. Sometime after the death of Dorothy Horwitz, Defendants Ling, Louie and Aparicio drafted the 'adumtum' having the document dated of '10/31/13' to explicit exclude all other persons from the Horwitz home and safe deposit boxes for the unlawful purpose of obtaining the Plaintiff's trade secrets.

FACTS RELATED TO DEFENDANTS MORROW, SADOWSKY, ET AL

75. From the 1970s to the present, White House Attorney Michael McManus has developed a network of defense attorneys from Legal Aid, Public Defenders and private offices to protect the Atlantis cartel, including the late Barbara Salken, former Massachusetts Superior Court Judge Maria Lopez (See Judge Maria, TV pilot), Maria Stratton during her employment in the Federal Defenders Office from 1993 to 2006.
76. During this period, Defendant Stratton become intimately associated with the McManus cartel, and informed of the Plaintiff's 'Whistleblower' proceedings against Teledyne Industries of Los Angeles, CA. At the request of Teledyne attorney Natasha Lisman, Stratton and Sadowsky developed a defense strategy adverse to the Plaintiff.
77. Teledyne avoided criminal indictment for endangering the lives of United States soldiers, sailors and airpersons, but pleaded to numerous criminal acts, and in 1995 settled two US DOD contracting 'whistleblower' lawsuits for over \$100,000,000.

78. For these events, Defendant Stratton maintained a position adverse and prejudicial to the Plaintiff which continues to the day.
79. Upon learning that Dorothy Horwitz was diagnosed with terminal cancer, in 2012, Defendants, in a scheme to ingratiate themselves to attorney Scott Edelman, Robert Mehrabian, Michael McManus and others devised an unlawful scheme to defraud the Plaintiff knowingly that any probate litigation would come before Defendant Stratton.
80. Defendant Stratton in conspiracy with the other defendants intentionally and with prejudicious assumed jurisdiction over the probate of the Dorothy Horwitz Family Trust and explicitly refused to recuse herself on a first preemptory motion by the Plaintiff.
81. Defendant Stratton in conspiracy with the other defendants intentionally aided and abetted the Trustee's concealment and spoliation of essential discoverable evidence and with malicious and prejudicial intent denied Plaintiff's motion to compel the production of the photo albums, personal papers, phone and address books, art works, collectibles, Judaica and other objects of Estate.
82. Defendant Stratton in conspiracy with the other defendants intentionally aided and abetted the Trustee's theft and conversion of rare and historic Judaica by refusing to compel the production of pictures of objects found in the safe deposit boxes; acts which constitute war crimes under the United States and Hague Statutes
83. Defendant Stratton in conspiracy with the other defendants intentionally aided and abetted the Trustee's fraud, theft and conversion of the Horwitz Estate by intentionally interfering with Plaintiff's Constitutional rights for equal protection and due process by truncating the probate proceedings prior to the appearance of the Trustee or undisputed fiduciary Rose Aparicio (POLST, Exhibit 12) who undisputedly and on her own deposition transcribed the purported 'adumdum – facts summarily adjudicated on motion by the Defendants.
84. Defendant Stratton specious and irrelevant argument, sustained on reconsideration, that Aparicio was not a caretaker and therefore presumption does not shift, is conclusive

evidence of prejudice against the Plaintiff. California Probate Code 21380(a)(2) reads: “a donative transfer to any of the following persons is presumed to be the product of fraud or undue influence:(2) A person in a fiduciary relationship with the transferor who transcribed the instrument or caused it to be transcribed.”

85. Defendant Stratton specious and irrelevant arguments are reminiscent of the finding of convicted Vermont Supreme Court Justice William Hill in the Plaintiff's Atlantis 1976 case involving Michael McManus. Justice Hill and four other judicial officers were indicted shortly thereafter.

86. Defendant Stratton in conspiracy with the other Defendants had prior knowledge that Defendant's corrupt Atlantis organization included major perpetrators of the Lebanese, Syrian and Moroccan illicit drug, arms and money laundering; in particular the Molenbeek cell which Defendants would and did activate to intimidate parties in California. Had Defendant Stratton acted timely upon her knowledge, she would have prevented the murder of California resident Nahemi Gonzalez and the Paris attacks on the California Band “Eagles of Death Metal”. (See Loyola Law Prof. Karl Manheim)

87. Defendant Stratton in conspiracy with the other Defendants had prior knowledge of Tashfeen Malik's close ties to Aafia Siddiqui. Had Defendant Stratton acted timely upon her knowledge, she would have prevented the San Bernardino terrorist attack.

88. Defendant Stratton in conspiracy with the other Defendants had prior knowledge of the McManus Atlantis cartel's use of suicide drivers to intimidate witnesses including the recent spectacular deaths of the five high schoolers in Vermont and the five young people on Cape Cod. Defendant Stratton is concealing knowledge of likely future suicide attacks moving West to California, including attacks on Appellate Court judges and personnel.

CAUSES OF ACTION

COUNT I

(Civil Rights under 42 USC 1983)

**Violation Of The Plaintiffs' Civil Rights To Be Memorialized In
The Religious Community Of One's Choosing And Heritage**

89. Plaintiff incorporates by reference the aforementioned averments.
90. By the aforementioned acts, the Defendants conspired to the civil rights of deny Dorothy and Walter Horwitz to be memorialized by donations to Jewish charities including Hadassah and Jewish National Fund, natural objects of their bounty, as they instructed Plaintiff Solomon.
91. These unlawful acts have caused the Plaintiff considerable pain and suffering, and denied the preferred Jewish charities substantial funding.

COUNT II

(Civil Rights under 42 USC 1983)

**Violation Of The Plaintiffs' Civil Rights To Be Memorialized In
The Community Of One's Choosing And Heritage**

92. Plaintiff incorporates by reference the aforementioned averments.
93. By the aforementioned acts, the Defendants conspired to the civil rights of deny Dorothy and Walter Horwitz to be memorialized by donations to United States Navy charities, natural objects of their bounty, as they instructed Plaintiff Solomon.
94. These unlawful acts have caused the Plaintiff considerable pain and suffering, and denied the U.S. Navy charities substantial funding.

COUNT III

(Civil Rights under 42 USC 1983)

**Violation Of The Plaintiffs' Civil Rights To Support and Memorialized In
The Community Of One's Choosing And Heritage**

95. Plaintiff incorporates by reference the aforementioned averments.
96. By the aforementioned acts, the Defendants conspired to the civil rights of deny Dorothy and Walter Horwitz to support and be memorialized by donations to

Neurotubule Project at the Sackler Medical School, Tel Aviv, Israel, natural objects of their bounty, as they instructed Plaintiff Solomon.

97. These unlawful acts have caused the Plaintiff considerable pain and suffering, and denied the Plaintiff and Neurotubule Project substantial funding.

COUNT IV

(Civil Rights under 42 USC 1983, 18 USC 242)

Due Process, Equal Protection, Under Color of Law

98. Plaintiff incorporates by reference the aforementioned averments.

99. Defendants unlawfully and intentionally conspired to deny the Plaintiffs the discovery of the family albums, personal papers, address books, and images of the contents of the safe deposits in support of Plaintiffs' probate of the Horwitz Estate.

100. Defendants unlawfully and intentionally conspired to intimidate Plaintiff's counsel to waste his limited funds by unlawful interference and motions.

101. Defendants unlawfully and intentionally conspired to object where Defendants had no standing to Plaintiff's Petitions related to the Horwitz Estate.

102. Defendants unlawfully and intentionally conspired to coerce, bribe and unlawfully influence California State and Federal Officials including Maria Stratton.

103. Defendants unlawfully and intentionally caused, demanded, unlawfully applied and refused to erroneously charged refund funds in order to exercise the Plaintiff's Constitutional rights to obtain justice freely and fairly.

104. By these and other aforementioned acts, the Defendants including the Superior Court of the state of California conspired to deny the civil rights of the Plaintiff Solomon, Dorothy and Walter Horwitz to due process under the Laws of California and the United States.

105. These unlawful acts have caused the Plaintiffs considerable pain and suffering, severe emotional distress, monetary and other damages.

COUNT V
(Civil Rights under 42 USC 1983, 18 USC 242)
Civil Jury Trial in disputes over \$75,000

106. Plaintiff incorporates by reference the aforementioned averments.
107. Defendants unlawfully conspired to deny Plaintiff Solomon, a Massachusetts citizen, to the right to a civil jury trial in support of Plaintiffs' probate of the Horwitz Estate.
108. By these and other aforementioned acts, the Defendants including the Superior Court of the state of California conspired to deny the civil rights of the Plaintiff Solomon, Dorothy and Walter Horwitz under the Laws of United States.
109. These unlawful acts have caused the Plaintiffs considerable pain and suffering, severe emotional distress, monetary and other damages.

COUNT VI
Violation of the Trade Secrets Act 18 USC 1832)
Theft of Trade Secrets for a Foreign Entity

110. Plaintiff incorporates by reference the aforementioned averments.
111. Defendants drafted a fraudulent 'adumdum' for the unlawful purpose of gaining unfettered access to the Horwitz home to copy, destroy and convert the trade secrets of the Plaintiff, including those related to the U.S. Defense, for the benefit of foreign nationals and entities.
112. By these and other aforementioned acts, the Defendants conspired to defraud the Plaintiff by intentionally transmitting fraudulent and forged documents using interstate U.S. Mail and Wire
113. These unlawful acts have caused the Plaintiffs considerable pain and suffering, severe emotional distress, monetary and other damages.

COUNT VII
(Violation of the Civil RICO Act 18 USC 1964)
Interstate Mail Fraud

114. Plaintiff incorporates by reference the aforementioned averments.
115. By these intentional and other acts, the Defendants conspired to defraud the Plaintiff by transmitting fraudulent and forged documents using interstate U.S. Mail and Wire.
116. These unlawful acts have caused the Plaintiffs considerable pain and suffering, severe emotional distress, monetary and other damages.

COUNT VIII
(Violation of the Civil RICO Act 18 USC 1964)
Intimidation by Threats of Violence

117. Plaintiff incorporates by reference the aforementioned averments.
118. Defendants conspired and organized persons in Massachusetts and Florida to intimidate the Plaintiff by verbal threats and acts of violence including “swoop and squat” and reckless driving, and explicit threats to his children and relations.
119. By these and other acts, the Defendants conspired to intimidate the Plaintiff
120. These unlawful acts have caused the Plaintiffs considerable pain and suffering, severe emotional distress, monetary and other damages.

COUNT IX
(Conversion)
Prior to the Death of Dorothy Horwitz

121. Plaintiff incorporates by reference the aforementioned averments.
122. Upon learning that the Plaintiff would be visiting his Aunt Dorothy in December 2013, Defendants intentionally and unlawfully removed and valuable property of the Horwitz Estate which Dorothy Horwitz had bequeathed to Plaintiff.
123. These unlawful acts have caused the Plaintiffs considerable pain and suffering, severe emotional distress, monetary and other damages.

**COUNT X
(Conversion)**

After the Death of Dorothy Horwitz

124. Plaintiff incorporates by reference the aforementioned averments.
125. After the death of Dorothy Horwitz, Defendants unlawfully removed and valuable property of the Horwitz Estate which Dorothy Horwitz had bequeathed to Plaintiff.
126. These unlawful acts have caused the Plaintiffs considerable pain and suffering, severe emotional distress, monetary and other damages.

COUNT XI

(Coercion, Forgery and Suborning Perjury)

127. Plaintiff incorporates by reference the aforementioned averments.
128. Defendants intentionally and unlawfully conspired to suborn the perjury of California notary Doris Tucker in furtherance of their criminal scheme.
129. During deposition of notary Tucker in June, 2015, Defendant Morrow intentionally and knowing it to be false, pressured Tucker to testify that Orit Shapiro called her sometime between before November 25, 2013 (Death of Dorothy Horwitz) to request that she sign the notary forms purportedly presented on November 18, 2013.
130. Orit Shapiro informed Defendant Morrow that she did not do so.
131. Defendant Morrow knew at all times that sometime after March 24, 2014, Defendant Ling called notary Tucker and asked her to sign the fraudulent notary forms he had had forged. Defendants intentionally and unlawfully conspired to coerce the perjury of California notary Doris Tucker.
132. These unlawful acts have caused the Plaintiffs considerable pain and suffering, severe emotional distress, monetary and other damages.

COUNT XII

(Tortious Breach of Trustee Duty)

133. Plaintiff incorporates by reference the aforementioned averments.

134. Defendants intentionally and unlawfully conspired to cause and breach the Trustee's duty of fidelity, loyalty, impartiality, honesty, and to fully inform the Plaintiff of the circumstances and operation of the Dorothy Horwitz Family Trust.

135. These unlawful acts have caused the Plaintiffs considerable pain and suffering, severe emotional distress, monetary and other damages.

COUNT XII

(Tortious Interference with Expected Inheritance)

136. Plaintiff incorporates by reference the aforementioned averments.

137. The true intentions of Dorothy Horwitz are explicitly recorded in her 2012, duly-executed Dorothy Horwitz Family Trust.

138. Defendants intentionally and unlawfully conspired to interfere with expected inheritance of the Plaintiff by failing to inform the Plaintiff of the death of Dorothy Horwitz; drafting, transcribing and forging an 'adumtum'; destroying and concealing favorable evidence; converting and failing to inventory Estate valuables; bribing and coercing judicial officials; distributing Estate funds to unnatural persons and other acts.

139. Defendants have knowingly intentionally wasted, diverted and accepted Estate funds with the clear knowledge and understanding of the aforementioned fraud, forgery and unnatural distribution.

140. These unlawful acts have caused the Plaintiffs considerable pain and suffering, severe emotional distress, monetary and other damages.

COUNT XII

(Tortious Infliction of Severe Emotional Distress)

141. Plaintiff incorporates by reference the aforementioned averments.

142. By the aforementioned unlawful acts, and the intentional failure of the Defendants to notify the Plaintiff of the date of the scattering of Dorothy's ashes, refusal to contact the

full family and friends and hold a memorial service, to memorialize Dorothy and Walter Horwitz in their natural community, and to document and plan a retrospective of the original and collected art works of Walter Horwitz, the Defendants intentionally and maliciously inflicted severe emotional distress upon the Plaintiff.

143. By the aforementioned unlawful acts, Defendants intentionally and unlawfully conspired to and inflicted severe emotional distress upon the Plaintiff.

144. These unlawful acts have caused the Plaintiffs considerable pain and suffering, severe emotional distress, monetary and other damages.

COUNT XII

(Tortious Interference with Business Relations)

145. Plaintiff incorporates by reference the aforementioned averments.

146. Defendants intentionally and unlawfully conspired to interfere with the business relations of the Plaintiff including but not limited to research related to the regeneration of nerves and an understanding of autism, Alzheimer's and other brain related diseases with the Brain Institute at the Salk Institute, MIT, Sackler Medical School, Israel, and the Bell Center for Regenerative Medicine at MBL, Woods Hole, MA.

147. These unlawful acts have caused the Plaintiffs considerable pain and suffering, severe emotional distress, monetary and other damages.

COUNT XIII

(Wrongful Death, California CCP 377.60)

Murder of Dorothy Horwitz

148. Plaintiff incorporates by reference the aforementioned averments.

149. Upon learning that the Plaintiff would be visiting his Aunt Dorothy in December 2013, Defendants intentionally conspired to and did murder Dorothy Horwitz by making accessible to her in her personal area lethal doses of opioids, supplementing her very high levels of prescribed hydromorphone and benzodiazepine.

150. These unlawful acts have caused the Plaintiffs considerable pain and suffering, severe emotional distress, monetary and other damages.

PRAYER FOR RELIEF

WHEREFORE, the Plaintiff Dennis Solomon respectfully prays for relief as follows:

1. For a judgment declaring that Defendants unlawfully conspired to abridge the civil rights of the Plaintiffs;
2. For a judgment declaring that Defendants unlawfully conspired to defraud the Plaintiffs by threats of violence;
3. For a judgment declaring that Defendants unlawfully conspired to defraud the Plaintiffs by mail and wire fraud;
4. For a judgment declaring that Defendants unlawfully conspired to unlawfully obtain the trade secrets of the Plaintiffs;
5. For a judgment declaring that Defendants unlawfully conspired to interfere with the interstate business relations of the Plaintiffs;
6. For a judgment declaring that probate actions in the State of California where the parties is not a resident of the State of California, and the amount in controversy is in excess of \$75,000, have a right to a jury trial.
7. For a judgment declaring that Defendant unlawfully forged the 'adum dum' documents and interfered with Plaintiff's right to a fair trial;
8. For a judgment declaring that Defendant unlawfully interfered with the business relations of Plaintiff Solomon;
9. For a judgment awarding Plaintiff Solomon compensatory damages as a result of Defendants' unlawful acts in the amount of \$110,000,000.

10. For a judgment awarding Plaintiff Solomon other damages as a result of Defendants' unlawful acts as this Court finds reasonable and proper.

Verified and submitted on October 28, 2016 by:

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