

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO**

Civil Action no. _____

SUZANNE SHELL
Plaintiff

v.

AMERICAN FAMILY RIGHTS ASSOCIATION
WILLIAM O. TOWER
ANN TOWER
LEONARD HENDERSON
SUSAN ADAMS JACKSON AKA SUSAN WOLVERTON
CLETUS KIEFER
FAMILIES AT RISK DEFENSE ALLIANCE
FRANCINE RENEE CYGAN
MARK CYGAN
ILLINOIS FAMILY ADVOCACY COALITION
DOROTHY KERNAGHAN-BAEZ
GEORGIA FAMILY RIGHTS, INC.
DENNIS HINGER
NATIONAL ASSOCIATION OF FAMILY ADVOCATES
AIMEE DUTKIEWICZ
THOMAS DUTKIEWICZ
CONNECTICUT DCF WATCH
WILLIAM WISEMAN
WISEMAN STUDIOS
ANN DURAND
BRENDA SWALLOW
KATHY TILLEY
DEE CONTRERAS
RANDALL BLAIR
LLOYD PHILLIPS
RINGO KAMENS
CHERYL BARNES
CPSWATCH, INC.
DESERE' CLABO aka HOWARD
SARAH THOMPSON
Unknown defendants Doe 1-15
Defendants

COMPLAINT
and Demand for Jury Trial

PARTIES

1. Plaintiff is Suzanne Shell, an individual who is domiciled at 14053 Eastonville Rd, Elbet, Colorado, 80106.

Defendants

2. American Family Rights Association (AFRA), advertised as “a professional association” currently headquartered in California. At some times in this complaint, AFRA was previously headquartered in Oregon. AFRA consists of a Board of Directors currently presided over and owned by William O. Tower, with general membership in the 50 states, including a significant number of members who reside in Colorado. AFRA is not registered with any government entity. AFRA sponsors and owns a web site and a number of online groups to offer and deliver support services and information services and various products to the public, and for soliciting membership into AFRA and to advertise AFRA’s business activities and to conduct AFRA business. AFRA describes it’s leadership as, “Power remains spread out to individual state leaders and to the membership in the grand American tradition.”

“When you join AFRA and agree to our conditions for membership, if you desire to assume a leadership role, YOU become AFRA's official representative in your locale. You are authorized to use our Copyrighted and Trademarked name “American Family Rights Association©®” and our Logo's [sic] in your representation of AFRA. . . .And of course, we assume that you will conduct your activities in a reasonably legal manner, and with the decorum and professionalism generally expected of a representative in the public eye. . . .Because of the egregious nature of the government's mortal attack against families, we must avoid even the hint or suggestion of violence and stringently insist that our representatives conduct their speech and activities accordingly. . . .Violation of these conditions can result in the suspension of your AFRA membership by the AFRA Board of Directors, and the requirement that you cease and desist using the name “American Family Rights Association” and/or our logo's [sic] or other official identification with AFRA.” April 20, 2005

“The American Family Rights Association is a professional association of parents, grandparents, family rights advocates, former foster and adopted children, attorneys, licensed social workers, medical professionals, human rights and freedom advocates. . . .” *Mission Statement.*

3. William O. Tower (Tower), an individual domiciled at 7334 Chivalry Way, Citrus Heights CA 95621-4333, and member and President and CEO of American Family Rights Association (AFRA). The domain names, familyrightsassociation.com was registered to Tower on January 31, 2002; oregonfamilyrights.com on February 11, 2002.

- A competitor of the plaintiff, Shell. Owner and/or moderator of AFRA online groups. Also claims ownership of AFRA.
4. Ann Tower (A. Tower), wife of William O. Tower, an individual domiciled at 7334 Chivalry Way, Citrus Heights, CA, 95627, is a member and agent of AFRA and a contributor to AFRA forums.
 5. Dennis Hinger (Hinger), an individual domiciled at 5816 Shadow Creek Dr. #3, Sacramento, CA 95841, and a member of, agent of and former Executive Vice President of AFRA. He was an owner and/or moderator of some AFRA online groups during the time of the allegations in this complaint. He was summarily removed from the AFRA Board of Directors (AFRA BOD) by Tower for egregious conduct not related to this claim on or about August 25, 2007. Hinger then allied himself with certain other defendants and continued his wrongful activities in this market.
 6. Leonard Henderson (Henderson), an individual domiciled at 4773 Salmon River Hwy., Otis, OR 97368, and founder, member and current Board member and former President and/or CEO of AFRA and owner of Oregon Family Rights. Owner and/or moderator of some AFRA online groups; webmaster of the official AFRA web site.
 7. Susan Adams Jackson aka Susan Wolverton (Jackson), an individual domiciled at 40 Orlando Ave. #1A, Winthrop, MA, 02152, and agent and member and Board of Director member of AFRA, and member/moderator of JFF (Justice for Families, an AFRA affiliate). Jackson was given oversight and control over the online AFRA groups on or about April 8, 2006. Prior to that, she was a moderator of some AFRA groups
 8. Cletus Kiefer (Kiefer), an individual domiciled at 1121 Howell, Saint Charles, MO 63301, with a mailing address of PO Box 52, St. Charles, Mo. 63302. Kiefer is an agent, member and Board of Director member of AFRA, and President of Families at Risk Defense Alliance (FAR). Kiefer colluded with and enticed Wiseman dba Wiseman Studios to publish thetruthistold.com.
 9. Francine Renee Cygan (R. Cygan), an individual domiciled at 329 Cornell Ave., Apt. D, Villa Park, IL, 60181, and board member of National Association of Family Advocates, (NAFA) and founder and board member of Illinois Family Advocacy Coalition (IFAC), and agent and member of AFRA and/or AFRA owned online groups. In 2003, she owned a Yahoo! group Parents Against the System (PATS).
 10. Mark Cygan (M. Cygan), an individual domiciled 329 Cornell Ave., Apt. D, Villa Park,

- IL, 60181, and board member of National Association of Family Advocates, (NAFA) and founder and board member of Illinois Family Advocacy Coalition (IFAC), and agent and member of AFRA and/or AFRA owned online groups.
11. Illinois Family Advocacy Coalition (IFAC), a business entity advertised as “Training Advocates and Empowering parents to fight for themselves.” It was founded on or about April 16, 2006 by Renee Cygan..
 12. Dorothy Kernaghan-Baez (Baez), an individual domiciled at 2208 Highland Avenue, Suite 107, Augusta, Georgia, 30904. Baez is founder and Board member of National Association of Family Advocates, (NAFA) and board member of Illinois Family Advocacy Coalition (IFAC), owner of Georgia Family Rights, Inc., cpsabuse.org, and agent and member of AFRA and/or AFRA owned online groups and moderator of a number of online groups.
 13. Georgia Family Rights, Inc. (GAFR) is a Georgia non-profit corporation whose registered agent and incorporator is Dorothy Kernaghan-Baez, 2906 Professional Parkway, Suite 107, Augusta, GA 30907. Baez represents her conduct online as acting in the capacity of GAFR.
 14. The National Association of Family Advocates (NAFA), 2208 Highland Avenue, Suite 107, Augusta, Georgia, 30904. A business entity founded by Baez, advertised as “a professional membership organization founded to serve Family Advocates” consisting of a Board of Directors and general membership offered to anyone in the 50 states.
 15. Aimee Dutkiewicz, aka Alyn Dutkiewicz aka Amie Dutkiewicz aka Aimee Lyn Wright Dutkiewicz, (A. Dutkiewicz), an individual domiciled at 40 Landry St. #2, Bristol, CT 06010, former agent and member of AFRA beginning in 2003. Owner of New England Parent Advocacy Network (NEPAN). NEPAN is or was an online group for the purposes of offering support, advocacy and information services to child welfare consumers in New England.
 16. Thomas Dutkiewicz (T. Dutkiewicz), an individual domiciled at 40 Central, Bristol, CT 06010, with a mailing address of PO Box 3005, Bristol, CT, 06011, founder and owner of Connecticut DCF Watch. He has been a member and agent of AFRA since 2003.
 17. Connecticut DCF Watch, PO Box 9775, Forestville, CT, 06011-9775, an unincorporated business offering support services, advocacy and information services to the public, and to consumers of child welfare agencies nationwide and to professionals who administer

child welfare cases. Connecticut DCF Watch is owned and operated by Thomas Dutkiewicz.

18. William Wiseman (Wiseman), an individual domiciled at 1625 Siskiyou St., Klamath Falls, OR 97601-2012 with a mailing address of P.O. Box 693, Klamath Falls, Oregon 97601. Wiseman is a vulnerable adult, with mental disabilities, who is being exploited by the defendants to front many of their wrongful acts. He is the owner and publisher of unofficial AFRA ad hoc web site www.thetruthistold.com whose primary purpose is to malign non-AFRA providers of goods and services to the public. Wiseman is or was an agent and member of AFRA online groups, including leadership groups, at the time of the actions alleged in this complaint.
19. Wiseman Studios is an unincorporated business owned and operated by Wiseman, 1625 Siskiyou St., Klamath Falls, OR 97601-2012 with a mailing address of P.O. Box 693, Klamath Falls, Oregon 97601, which publishes web sites.
20. Ann Durand (Durand), an individual domiciled at 2142 Sabra Ct. Kissimmee, FL 34744. Durand attended Shell's training and signed a nondisclosure contract as a condition of obtaining access to Shell's trade secrets. At all times mentioned in this complaint, Durand was an agent and member of AFRA.
21. Brenda Swallow aka Brenda Mcintosh (Swallow), an individual domiciled at 4847 Steel Dust Ln., Lutz, FL 33559. Swallow attended Shell's training and signed a nondisclosure contract as a condition of obtaining access to Shell's trade secrets. At all times mentioned in this complaint, Swallow was a member and agent of AFRA.
22. Dee Contreras (Contreras) is an individual domiciled at 7020 Ash Ct., Commerce City, CO 80022. She is an agent and member of AFRA.
23. Kathy Tilley, an individual domiciled at 800 gibson Dr. #322, Roseville, CA, 95676.. An agent, member and Board member of AFRA, owner and/or moderator of various AFRA groups, web sites and organizations including but not limited to AFRA_EAGLE (changed to USA_EAGLE).
24. Randall Blair, an individual domiciled at 2500 Mann Rd, Clarkston, MI 48346. Member and agent of AFRA.
25. Lloyd Phillips (Phillips), an individual domiciled at 14220 SW 29 Court, Fort Lauderdale, Florida, 33330, registered owner of the domain name www.profane-justice.com during times of this complaint. Phillips is also the registered owner of the

- domain name of T. Dutkiewicz's web site at <http://www.connecticutdcfwatch.com>.
26. Ringo Kamens (Kamens), an individual domiciled in Centennial, Colorado, 80015, identified also as Rkamens or 2600denver@gmail.com.
 27. Cheryl Barnes (Barnes), an individual domiciled at 911 Cliff Dr., Branson, MO 65616. Founder and board member of CPS Watch, Inc., and owner of CPSWatch Yahoo! group.
 28. CPS Watch, Inc., a Missouri non-profit corporation, 911 Cliff Dr., Branson, MO 65616 which offers products nationwide and has state leadership..
 29. Desere' Clabo, aka Desere' Howard (Clabo), an individual domiciled at 4838 Se Isabelita Ave., Stuart, FL 34997, member of CPS Watch, Inc. and CPSWatch Yahoo! group and official CPS Watch representative for Florida.
 30. Sarah Thompson (Thompson), an individual domiciled at 412 W. Junge Blvd., Joplin, MO 64808, board member, moderator and member of CPS Watch and CPSWatch Yahoo! group.
 31. Fifteen unnamed defendants Doe whose identity is unknown, who participated in, contributed to or are otherwise liable for the injuries and harm included in this complaint.

JURISDICTION AND VENUE

32. The United States District Court has jurisdiction over the subject matter of this action pursuant to 28 U.S.C. § 1331 and § 1338(a), as this action arises under the copyright laws of the United States 17 U.S.C. §§ 101 et seq.
33. The United States District Court has jurisdiction over the subject matter of this action pursuant to 28 U.S.C. § 1331 and §1337 as this action also arises under §43 of the Lanham Act, 15 U.S.C. § 1125(a) and various other state statutes and common law doctrines.
34. The United States District Court has jurisdiction over the subject matter of this action pursuant to 28 U.S.C. § 1331 and §1337 as this action also arises under the Sherman Act, 15 U.S.C. §2 et. seq. and various other state statutes and common law doctrines.
35. This complaint is also brought under the federal Racketeer Influenced and Corrupt Organization ("RICO") statute, 18 U.S.C. § 1961 et seq., and various other state statutes and common law doctrines. Jurisdiction is vested in the United States District Court by virtue of 28 U.S.C. § 1331.
36. The United States District Court for the District of Colorado has jurisdiction over the subject matter of this action pursuant to 28 U.S.C. §1332 because the parties are residents

- of different states, and because the amount of claimed damages exceeds \$75,000.00, and because the plaintiff and certain defendants both reside in Colorado.
37. Because claims brought under state law, are so related to my federal claims, over which the United States District Court has original jurisdiction, that they form part of the same case or controversy under Article III of the United States Constitution, the United States District Court for the District of Colorado also has jurisdiction over my state common law and statutory claims pursuant to 28 U.S.C. § 1367.
 38. The defendants have maintained systematic and general business contacts with Colorado and a continuous presence in Colorado since on or before 2000. The defendants have pursued business relationships and other activities with Colorado. The defendants have reached out beyond their home states and created continuing relationships and obligations with citizens of Colorado and are subject to regulation and sanctions in Colorado for the consequences of their activities. The injuries claimed arise out of or relate to the defendants's activities. The defendants's conduct and connection with Colorado are such that they should reasonably anticipate being haled into court here.
 39. Pursuant to Colorado Revised Statutes § 13-1-124, the defendants purposely availed themselves of the privilege of acting in Colorado or of causing important consequences here; the cause of action arises from the consequences to me in Colorado of the defendants's activities; the activities of the defendants or the consequences of those activities have a substantial enough connection with Colorado to make the exercise of Colorado's jurisdiction over the defendants reasonable. The defendants transact business in Colorado and/or have representatives and agents situated in Colorado and/or committed tortious acts in Colorado, therefore, jurisdiction and venue is proper in Colorado.
 40. Claims also arise out of a contractual forum selection clause wherein Colorado is the agreed upon jurisdiction and venue for disputes arising out of breach of an express non-disclosure agreement by one or more of the defendants, and other torts and damages that arise out of that breach and which also arise out of the tortious interference causing that breach.
 41. Pursuant to 28 U.S.C. § 1400(a) and § 1391(b) (1) and (2), Colorado is the proper venue because the defendant and Counterclaim plaintiff and Third Party Claim plaintiff in this case is Shell, who (1) resides in Colorado, and (2) conducts her business primarily in

Colorado, and (3) that a substantial part of the events giving rise to the claims occurred in Colorado, and (4) a substantial part of the property that is the subject of this complaint was originally and is situated in Colorado.

FACTUAL BACKGROUND

42. Defendants advertise and provide goods and/or services¹ to the public and to consumers and/or professionals involved with Child Protective Services investigations and court cases nationwide.
43. Plaintiff Shell advertises and provides goods and/or services to consumers and/or professionals involved with Child Protective Services investigations and court cases nationwide.
44. These goods and services are offered in competition with, and are also offered as supplemental goods and services to the products offered and provided by state child protective services (CPS) agencies, CPS agency contractors and alternative and independent providers of goods and services to consumers of child welfare agencies and professionals who administer child welfare cases administratively or in the courts across the nation.
45. The favored medium for advertisement by independent and alternative providers in this market is on the Internet.
46. Advertising is done by and through web sites, and through ownership of and participation with and input to various online groups and forums dedicated to this issue, and on other public forums available to the general public nationwide.
47. The quality of goods and services offered in this market varies greatly, from very good to very poor and beyond into literally dangerous for consumers.

History of Plaintiff Shell's Business in this Market

48. In 1992, I determined there was a need for goods and services offered to families involved with child protection services agencies. I set out to fill the need in this market by commencing research into the exact needs and creating goods and/or services to fill that

¹ Goods and services includes, but is not limited to products offered as support services, advocacy services, information goods and services, advice, paralegal services, referral services, literature, lobbying services, and any other goods and services which help promote their expertise, qualifications and competence in the relevant markets or which promote child welfare reform or which assist families involved with child welfare agencies and the courts.

- need. I created and exploited an inventory of intellectual property which would fill the needs in this market.
49. I published my first web site in 1996. In 1997, I acquired the domain name www.profane-justice.org.
 50. My web site consists of a collection of articles, papers, and documents, each written at a discrete time, each exploring a discrete subject and each constitutes a stand-alone copyrightable work. As an article/paper/document was written, I would add it to the existing collection on my web site.
 51. By 2001, I was suffering wholesale copyright infringement, plagiarism and other intellectual property violations by individuals, online groups, web sites and organizations.
 52. Some people were taking credit for my work as their own.
 53. My attempts to reign in the infringing conduct was honored by some, and became the basis for retaliation by others, most notably, retaliation by the defendants. .
 54. Consumers in this market are particularly vulnerable to exploitation and abuse. There are unique and esoteric consumer issues associated with providing goods and services to this market.
 55. I was a co-founder of AFRA in 2002.
 56. In May 2003, I withdrew my membership from AFRA due to AFRA's unethical and questionable conduct, including but not limited to false advertising, incompetence and lack of credible oversight, copyright infringement and plagiarism, and quality assurance concerns.
 57. I expressly excluded AFRA and its membership, associates and affiliates from permissive use of any of my intellectual property and installed copy protection code on my web site content.
 58. I developed a licensing arrangement, whereby qualified leaders of approved organizations would be granted license to use my property in exchange for non-disclosure of the information and agreeing to submit to quality assurance oversight over any family advocates practicing in their organization. I withheld releasing any new intellectual property during this time.
 59. I also instituted a certification program for family advocates which included training requirements and quality assurance oversight. The training was based on my trade secrets and proprietary information. This training included extensive and unique information

which was not employed by or known to my competitors.

60. These trade secrets and proprietary information created a distinct market advantage over non-trained, non-certified, self-professed family advocates and increased market interest in my training and information products.
61. I advertised the benefits of using a certified family advocate to the public via the Internet.
62. I incorporated the new intellectual property and trade secrets into my presentations and required attendees to affirm and/or sign non-compete, non-disclosure agreements as a condition of receiving the training and materials.
63. My training programs for attorneys and judges have been accredited for Continuing Legal Education credits in five states.

Factual Background Pertaining to Defendants

64. AFRA has advertised that any online group with “AFRA” in its name speaks for AFRA and is subject to AFRA oversight and control.
65. AFRA has advertised that it sponsors/sponsored, hosts/hosted, owns/owned, endorses/endorsed or is/was affiliated with the following online groups at the time of the actions alleged in this complaint:

[http://groups.yahoo.com/group/AFRA_OHIO/;](http://groups.yahoo.com/group/AFRA_OHIO/)
[http://groups.yahoo.com/group/wa_fra/;](http://groups.yahoo.com/group/wa_fra/)
[http://groups.yahoo.com/group/Oregon_Family_Rights/;](http://groups.yahoo.com/group/Oregon_Family_Rights/)
<http://groups.yahoo.com/group/cafra;>
[http://groups.yahoo.com/group/OKFAMRA/;](http://groups.yahoo.com/group/OKFAMRA/)
[http://groups.yahoo.com/group/MNFamilyRights/;](http://groups.yahoo.com/group/MNFamilyRights/)
[http://groups.yahoo.com/group/Iowa_Family_Rights/;](http://groups.yahoo.com/group/Iowa_Family_Rights/)
<http://groups.yahoo.com/group/georgiafamilyrights;>
[http://groups.yahoo.com/group/fla_afra/;](http://groups.yahoo.com/group/fla_afra/)
<http://groups.yahoo.com/group/SCDSSComplaints;>
[http://groups.yahoo.com/group/scfamilyrightsassociation/;](http://groups.yahoo.com/group/scfamilyrightsassociation/)
[http://groups.yahoo.com/group/KFRA/;](http://groups.yahoo.com/group/KFRA/)
[http://groups.yahoo.com/group/AFRA_HelpLine/;](http://groups.yahoo.com/group/AFRA_HelpLine/)
[http://groups.yahoo.com/group/familiesatrisk/;](http://groups.yahoo.com/group/familiesatrisk/)
[http://groups.yahoo.com/group/vocalnewyork/;](http://groups.yahoo.com/group/vocalnewyork/)
[http://groups.yahoo.com/group/childprotectionreform/;](http://groups.yahoo.com/group/childprotectionreform;)
http://groups.yahoo.com/group/Justice_For_Families/ (currently moved to
<http://groups.yahoo.com/group/JFF-USA/>);
[http://groups.yahoo.com/group/AFRA_CenCom/;](http://groups.yahoo.com/group/AFRA_CenCom/)
[http://groups.yahoo.com/group/AFRA_ALERTS/;](http://groups.yahoo.com/group/AFRA_ALERTS;)
[http://groups.yahoo.com/group/AFRA_Director/;](http://groups.yahoo.com/group/AFRA_Director;)
[http://groups.yahoo.com/group/AFRA_Elders/;](http://groups.yahoo.com/group/AFRA_Elders;)
[http://groups.yahoo.com/group/AFRA_HelpLine/;](http://groups.yahoo.com/group/AFRA_HelpLine;)
[http://www.familyrightsassociation.com/departments/horror/;](http://www.familyrightsassociation.com/departments/horror/)

http://groups.yahoo.com/group/AFRA_Kids;
http://groups.yahoo.com/group/AFRA_Media;
http://groups.yahoo.com/group/AFRA_Newshawk;
http://groups.yahoo.com/group/AFRA_PN;
http://groups.yahoo.com/group/AFRA_PR;
http://groups.yahoo.com/group/AFRA_Projects;
http://groups.yahoo.com/group/AFRA_State_Leadership;
http://groups.yahoo.com/group/AFRA_SWAT;
http://groups.yahoo.com/group/AFRA_SWC;
http://groups.yahoo.com/group/AFRA_TalkLine;
http://groups.yahoo.com/group/AFRA_TechLine;
http://groups.yahoo.com/group/afra_state_chapters;
<http://groups.yahoo.com/group/TheAmericanFamilyRightsAssociation>;
http://www.groups.yahoo.com/group/AFRA_EAGLE (Later changed to USA_EAGLE)

66. AFRA has advertised the following web sites as member sites:

<http://members.aol.com/cpsassault/index.html> (Colorado site);
<http://www.cpsassault.150m.com/> (Colorado site);
<http://www.cpswatch.com/>;
<http://www.oregonfamilyrights.com/>;
<http://www.fightcps.com/>;
<http://www.the-facts.com/>;
<http://www.txcfr.org/>;
<http://www.angelfire.com/tx/tafa/>;
<http://www.txfamilyrights.150m.com/>;
<http://hometown.aol.com/flfamilyrights/>;
<http://dcfwatch.com/>;
<http://www.childrenslegalfoundation-justicecoalition.com/>;
<http://www.fcr4kids.org/>;
<http://www.citizensforparentalrights.org/>;
<http://www.parentsforchildren.net/00index.cfm>;
<http://abusewatchdog.org/>;
<http://www.indianacrc.org/>;
<http://www.headsheldhigh.org/>;
<http://www.cwop.org/>;
<http://www.syc.org/>;
<http://parentalrightscoalition.8m.com/>;
<http://www.connecticutdcfwatch.com/>;
<http://www.masskidnap.com/>;
<http://nhdcyf.info/>;

67. AFRA web site provides or provided advertising space on behalf of Wiseman's business at <http://members.familyrights.us/oklahoma/index.html>

First Cause of Action
Misappropriation/Theft of Trade Secrets

68. I repeat and re-allege the facts in the preceding paragraphs of this Complaint as if fully set forth herein.
69. This cause of action includes all defendants except Lloyd Phillips and Ringo Kamens.
70. The trade secrets or confidential information (hereinafter referred to as proprietary content) included in this claim fall within the definition of formula, patterns, business plans, compilations of information or technical knowledge which were used in my business, which were important in my business, which were treated and sought to be protected as confidential to my business for the purposes of my business, and which entitles me legitimately, by reason of my exceptional diligence, research, analysis, technology and discovery to obtain legitimate competitive advantage over competitors, including but not limited to the defendants, who did not possess such knowledge or information and were not able, legitimately and within a reasonable time frame, to obtain it otherwise.
71. The defendants improperly obtained these trade secrets by engaging in long-term and pervasive program designed to induce the breach of known obligations of authorized users of those trade secrets or to otherwise circumvent the restrictions and terms I place on the legitimate acquisition and use of that property.
72. The improper means employed by the defendants in this misappropriation include theft, misrepresentation, misappropriation, fraud, breach or inducement of a breach of duty to maintain secrecy.
73. Beginning on or about April 4, 2003, the defendants made repeated attempts to circumvent the restrictions I legitimately placed on anyone accessing or using my trade secrets and proprietary information no matter the source.

74. The defendants entreated authorized users of that proprietary content to abrogate their contractual obligations related to their possession and use of that information and to give it to the defendants.
75. The defendants were repeatedly advised that authorized users could not disseminate my proprietary information to them due to contractual non-disclosure requirements.
76. On August 26, 2004, Hinger stated on AFRA Directors that feedback from attendees at my seminars was 99.5% positive. He wanted AFRA to create online tutorials and tests based on my proprietary content to reinforce the training without seeking or obtaining my permission.
77. On or about February 17, 2005, Durand and Swallow attended a training seminar I presented in Florida.
78. As a condition of attending that seminar and remaining in the room during the presentation of the proprietary information, Durand and Swallow signed a non-disclosure agreement intended to protect the information presented at the seminar as my trade secrets and proprietary information.
79. Swallow subsequently bragged that she had stolen the signed contract from me at the presentation and had it in her possession.
80. Durand and Swallow knew they were not to disseminate this information to anyone without my permission.
81. Durand and Swallow disseminated content they were under contractual obligation not to disseminate.
82. The defendants gained access to and disseminated my proprietary content on the World Wide Web, through the U.S. Postal Service and via emails.
83. On or about April 15, 2006, I learned that Wisemen dba Wiseman Studios had published

on thetruthistold.com web site, a copy of the proprietary content I disseminated under the non-disclosure agreement at the Florida seminar in February, 2005.

84. Wiseman confessed in court documents submitted in Tower v. Shell, In the Superior Court, County of Sacramento, case no. 06AS03504, that he had obtained the proprietary documents he published on his web site from Swallow.
85. By virtue of these publications and distributions, the defendants did acquire, by unauthorized means, my trade secrets and proprietary information and subsequently used it in their business operations and disseminated it widely.
86. The defendants knew or had reason to know that I claimed ownership of the subject content.
87. Defendants knew or had reason to know that the subject trade secret and proprietary information was acquired by improper means and that they were expressly excluded from having legitimate access to it.
88. The defendants knew or had reason to know that this disclosure of my trade secrets and proprietary information was made without my express or implied consent as the owner of the trade secrets.
89. The defendants knew or had reason to know that their knowledge of this trade secret information was acquired under circumstances giving rise to another's duty to maintain its secrecy or limit its use.
90. As a proximate cause of this misappropriation and theft and subsequent dissemination and use of my trade secrets and proprietary information, defendants have usurped my hard-earned, legitimately superior market position, and have severely damaged my business. I have suffered injury and damages including damage to my business and my business reputation, loss of my professional reputation, deprivation of my intellectual

property and my rights to control the uses of that property and exploit that property, loss of stature in the business community, loss of my business and livelihood, loss of goodwill, diversion of sales, continued, ongoing and far-reaching intellectual property thefts and infringements, effectuation of new and further thefts and infringements, depreciation in the value of and ability to sell and license my work, and lost profits and/or opportunities.

Second Cause of Action
Copyright Infringement

91. I repeat and re-allege the facts in the preceding paragraphs of this Complaint as if fully set forth herein.
92. All defendants are liable for this cause of action except Lloyd Phillips.
93. For the purposes of this complaint “copy” means to reproduce, perform, print, save, store or affix in any storage device or medium, distribute, publish, display, license or to produce or license or create derivatives of the work or any of the other exclusive rights reserved solely to the copyright owner.
94. I have the following copyrights registered with the U.S. Copyright Office which are implicated in this claim (certificates of registration attached):
 - a. TXu1-364-413, June 7, 2007; Family Advocacy Consumer Advisory web site www.badadvocates.com; jointly registered to Suzanne Shell and to The Editors @badadvcoates.com
 - b. TX6-404-010; April 10, 2006; profane-justice.org
 - c. TX5-989-070, June 21, 2004; profane-justice.org
 - d. TX5-907-307, March 15, 2004, profane-justice.org
 - e. TX5-677-193; December 2, 2002; Profane Justice: A Comprehensive Guide to Asserting Your Parental Rights, Second Edition

- f. TX4-842-955; August 24, 1998; Profane Justice: A Comprehensive Guide to Asserting Your parental Rights
 - g. TXu001588498; October 23, 2008; Unpublished Proprietary Documents
95. AFRA has an express and implied policy, and a long running practice to engage in wholesale copyright infringement and other misappropriation of intellectual property belonging to a plethora of authors.
 96. This policy is based, in part, on the premise that anything published on the Internet is “public domain.”
 97. The infringing content copied by the defendants is impermissibly published on the respective computers, web sites, groups and forums of the defendants, and on other public forums, all of which are accessible to the entire world on the Internet.
 98. AFRA has provided instruction to its members on it’s groups how to copy entire web sites without seeking prior permission.
 99. As a regular practice, AFRA publishes copyrighted content not authored by Henderson or AFRA members on the AFRA web site and on AFRA groups without seeking or obtaining prior permission from the copyright owners.
 100. The defendants and AFRA members and associates have accepted and endorsed this policy and practice and used it to justify their pervasive infringing practice on their respective web sites and online groups and public forums.
 101. The defendants deliberately attempt to conceal their infringement from me by denying me access to their groups for observation.
 102. The defendants utterly refuse to insure infringement does not occur.
 103. On July 31, 2004, Henderson published and advertised on AFRA Directors that I had left AFRA, and that my efforts to protect my intellectual property was a “problem” for

AFRA.

104. On or about March 18, 2006, T. Dutkiewicz dba Connecticut DCF Watch published a broadcast email on all AFRA groups and on AFRA affiliate groups, on the express behalf of AFRA Board of Director member Tower, that my web site was no longer copyrighted. This publication did not mention that I still held a valid copyright on that content.
105. On or about March 19, 2006, AFRA's new president, Gregory Hession, negotiated an agreement between myself and Mr. Hession, wherein, *inter alia*, Mr. Hession would establish and enforce a policy for AFRA and its members designed and intended to protect the intellectual property rights of anyone.
106. Tower, Kiefer, Hinger and others in the AFRA membership and leadership, acting in collusion with T. Dukiewicz and A. Dutkiewicz, undermined and sabotaged this agreement causing Mr. Hession, to resign as president of AFRA.
107. Tower was later elected and appointed President and CEO of AFRA.
108. On April 25, 2006, AFRA published an express policy stating that articles from any web resource could be re-published on their groups.
109. On September 26, 2006 Executive Vice President of AFRA Hinger published a broadcast message on all AFRA groups, and to a list of private individuals, that I had lost all rights to claim any copyright protections, encouraging the public to infringe my copyrights.
110. Hinger also advised these recipients how to prevent their Internet service providers (ISPs) from removing my copyrighted content from their web sites and groups when I made copyright infringement claims against them to their ISPs. As a result, ISPs have refused my copyright infringement takedown demands.
111. There are multiple instances of copyright infringement by the defendants occurring between 2000 and 2009, including but not limited to:

- a. On October 28, 2008, I discovered that or about June 5, 2004, AFRA member Linda Weston impressibly published infringing content on AFRA_Helpline from my copyrighted web site, the document Letter to Attorney. This content is still on that web site as message # 4181. I had requested and was denied access to this group, and could not discover the infringement prior to this date. Yahoo! failed and refused to honor my copyright infringement notice.
- b. This letter was subsequently copied from that group by AFRA member and agent Christy Amtower and republished on the web site at http://www.geocities.com/family_rights_wv?sample_letters.html with credit given to Linda Weston. It was still displayed as of October 28,2008. The ISP refused to remove the infringing content pursuant to my copyright infringement notice.
- c. I discovered my copyrighted 4th amendment letter from my web site published on the AFRA web site on November 13, 2005.
- d. I discovered my copyrighted Letter to Lawyer from my web site impressibly published on the AFRA web site on November 13, 2005.
- e. I discovered my copyrighted treatment plan objection impermissibly published on the Child Protection Reform Yahoo! Group on January 6, 2006. (I was not a member of this group and did not have access to files). Published by AFRA member cha/kwaina chakwaina@comcast.net.
- f. On March 10, 2006, Kiefer impermissibly published distinctive copyrighted content from my web site on an online forum to promote himself and his radio show.
- g. On March 14, 2006, Wiseman impermissibly copied and distributed complete verbatim copies of four discrete, stand-alone documents and/or articles from my

copyrighted web site on AFRA_CenCom Yahoo! Group.

- h. On or about March 18, 2006, Tower impermissibly copied and distributed verbatim content from an article on my copyrighted website to multiple AFRA groups and affiliate groups.
- i. On or before April 11, 2006, Wiseman impermissibly circumvented copy protections and copied the content of my entire web site www.profane-jsutice.org and published it on his web site, thetruthistold.com,
- j. I discovered that Henderson had impermissibly published a discrete article and/or document from my web site on September 24, 2006.
- k. On June 6, 2007, AFRA member Lisa R. Smith impermissibly copied an entire article from my web site to syc Yahoo! group.
- l. In 2007, the document *hdt.pdf* was impermissibly copied on all AFRA groups by AFRA Director Hinger, and also published on a web site of his, and is a derivative work of my copyrighted seminar handout.
- m. On October 1, 2007, AFRA Board member Kiefer impermissibly copied an entire article *Nazis and CPS* published on my web site verbatim on USA_EAGLE, after removing my name as author.
- n. On an unknown date, discovered on October 29, 2008, Wiseman circumvented copy protections and copied 10 pages from www.profane-justice.org; a copy-protected document *Igeeks.pdf* and converted it to HTML and published it to http://thetruthistold.com/1internet_geeks.htm.
- o. Ringo Kamens advised me on May 30, 2007, that he had willfully circumvented my copy protections and copied my entire website onto his hard drive, then onto a removable USB drive, and then printed it out without my permission. Kamens

published articles on the World Wide Web urging the public to infringe my copyright as he had which many did.

- p. Barnes, CPS Watch, Inc., Thompson and Clabo disseminated and published Barnes book, *A Parent's Guide to the System*, since 2000 and sold it to the public. This book is also recommended and disseminated by AFRA members on their forums. This book is an impermissible derivative work of my unpublished copyrighted works. The most recent infringements occur when new members join the CPS Watch Yahoo! group. This publication has been automatically sent to the new members as recently as November 2008. This is an ongoing infringement.
112. The defendants's infringements have been committed willfully, and have been and are being engaged in with total disregard for my intellectual property rights.
113. The defendants are in fact acting egregiously and are not merely engaged in technical violations of the law. Factors to show that the defendants are acting egregiously include: (1) defendants engaged in a significant amount of infringement against numerous authors, and has institutionalized the infringing conduct as a matter of practice; (2) the infringing activity occurred repeatedly over a lengthy period of time, by placing copies of my and other author's intellectual property in their permanent storage and publicly displaying them; (3) the defendants are so involved in wholesale infringement as to lead unavoidably to the conclusion that their actions were willful; (4) the defendants's communications indicating their intent to infringe reflects their knowledge of the illegality of their conduct, and/or malice or other criminal intent; and (5) the defendants refused to pay license fees demanded by me for the property it acquired in violation of my exclusive rights as copyright owner, (6) the copyrighted works that are the subject of this complaint belong to a much smaller company or single individual, namely me, whose sole assets

consist of my intellectual property inventory and whose profitability has certainly been jeopardized by the defendants's conduct.

114. The copyright infringement of my web site, books and other literary and works is ongoing since 2000.
115. As a proximate cause of this infringement, I have suffered continued, ongoing and far-reaching copyright infringement, effectuation of new and further infringements, depreciation in the value of and ability to sell and license my work, lost profits and/or opportunities, and damage to my goodwill and reputation.
116. As a proximate cause of this infringement, I have suffered actual and statutory damages.

Third Cause of Action
Contributory Copyright Infringement

117. I repeat and re-allege the facts in the preceding paragraphs this Complaint as if fully set forth herein
118. The defendants had knowledge of the aforementioned infringing activity, and induced, caused or materially contributed to the infringing activity of another.
119. The defendants knew the subject content was copyrighted.
120. The defendants knew the particular use violated copyright law.
121. The defendants knew of the direct infringement when it occurred.
122. The defendants encouraged or facilitated the infringement and provided multiple locations accessible to the entire world for the infringing content to be copied, displayed and infringed further.
123. As a proximate cause of this contributory copyright infringement, I have suffered continued, ongoing and far-reaching copyright infringement, effectuation of new and further infringements, depreciation in the value of and ability to sell and license my work, lost profits and/or opportunities, and damage to my goodwill and reputation.

124. As a proximate cause of this contributory copyright infringement, I have suffered actual and statutory damages.

Fourth Cause of Action
Vicarious Copyright Infringement

125. I repeat and re-allege the facts in the preceding paragraphs this Complaint as if fully set forth herein.

126. The defendants had the right and the ability to control the infringer's acts which occurred on their respective organizations, web sites, groups and forums.

127. The defendants received financial benefit from the infringement pursuant to the No Electronic Theft Act including receipt, or expectation of receipt, of anything of value, including but not limited to the receipt of other copyrighted works, obtaining commercial advantage or financial gain, obtaining increased consumer patronage, improving their market advantage, donations, unjust enrichment, enhanced reputation, and the expectation of acquiring more of my intellectual property which they could exploit to their advantage and at my expense.

128. As a proximate cause of this vicarious copyright infringement, I have suffered continued, ongoing and far-reaching copyright infringement, effectuation of new and further infringements, depreciation in the value of and ability to sell and license my work, lost profits and/or opportunities, and damage to my goodwill and reputation.

129. As a proximate cause of this vicarious copyright infringement, I have suffered actual and statutory damages.

Fifth Cause of Action
Breach of Contract

130. I repeat and re-allege the facts in the preceding paragraphs this Complaint as if fully set forth herein.

131. Breach of Contract claims are not preempted because the defendants's violations are

predicated upon acts incorporating elements beyond mere reproduction or the like, therefore, my rights involved are not equivalent and preemption will not occur; and this cause of action does not provide a substitute rule of law, but merely an additional means of recovery.

Count One

132. On March 11, 2005, Ann Durand, as a condition of attending my training seminar, entered into an express contract with me wherein she agreed not to copy or distribute any written handout, or audio or video recording of a seminar I presented and which she attended in Ft. Lauderdale, FL, except upon prepayment of license fee of \$300,000.00 per copy or portion thereof. She also agreed that any violation of the terms constitutes Harm or Injury to me and shall constitute actual damages of \$100,000.00 per violation as well as other penalties which would apply.
133. Durand knowingly and wilfully breached this contract by disseminating at least one copy and possibly more copies of the written handout to the defendants or others in direct violation of the terms of the contract.
134. I suffered injury as result of this breach, as described at the end of this cause of action.

Count Two

135. On March 11, 2005, Brenda Swallow, as a condition of attending my training seminar, entered into an express contract with me wherein she agreed not to copy or distribute any written handout, or audio or video recording of a seminar I presented and she attended in Ft. Lauderdale, FL, except upon prepayment of license fee of \$300,000.00 per copy or portion thereof. She also agreed that any violation of the terms constitutes Harm or Injury to me and shall constitute actual damages of \$100,000.00 per violation as well as other penalties which would apply.

136. Swallow knowingly and wilfully breached this contract by disseminating at least one copy and possibly more copies of the written handout to the defendants or others in direct violation of the terms of the contract.
137. I suffered injury as result of this breach, as described at the end of this cause of action.
138. The following counts each represent an instance where the named defendant expressly and knowingly entered into a contract with me, defined and published on my web site as “Copyright notice/security agreement”(security agreement). The security agreement contained an offer to copy or distribute any content on my web site profane-justice.org in exchange for pre-payment of posted license fees equal to \$5,000.00 per printed page per copy. The named defendant(s) expressly accepted the posted offer and received the consideration offered when he or she affirmatively performed the act of circumventing copy protections and/or copying content published on my web site, profane-justice.org and republishing my copyrighted content verbatim on the location(s) named in the respective count, without permission and without prepayment of license fees in violation of the published contract terms.

Count Three

139. Sometime between March 25, 2007 and October 12, 2007, Wiseman copied igeeks.pdf, circumvented copy protections, converted it to .html and published it at http://thetruthistold.com/1internet_geeks.htm This document is still being displayed on that web site as of October 29, 2008.

Count Four

140. I discovered my copyrighted 4th amendment letter from my web site published on the AFRA web site by Henderson on November 13, 2005. This content was from my copyright web site and was in violation of the security agreement describe in the previous

paragraph.

Count Five

141. I discovered my copyrighted Letter to Lawyer from my web site impressibly published on the AFRA web site by Henderson on November 13, 2005.

Count Six

142. I discovered my copyrighted treatment plan objection impermissibly published on the Child Protection Reform Yahoo! Group on January 6, 2006. (I was not a member of this group and did not have access to files). It was attributed as being published by AFRA member cha/kwaina chakwaina@comcast.net.

Count Seven

143. On March 10, 2006, Kiefer impermissibly published copyrighted content from my web site on an online forum owned and operated by the defendants to promote himself and his radio show.

Count Eight

144. On March 14, 2006, Wiseman impermissibly copied and distributed complete verbatim copies of four discrete, stand-alone documents about my seminars and/or articles from my copyrighted web site on AFRA_CenCom Yahoo! Group.

Count Nine

145. On or about March 18, 2006, Tower impermissibly copied and distributed verbatim content from an article on my copyrighted website to multiple groups owned and operated by the defendants and on AFRA affiliate groups.

Count Ten

146. On or before April 11, 2006, Wiseman impermissibly circumvented copy protections and copied the content of my entire web site and published it on his web site,

thetruthistold.com.

Count Eleven

147. I discovered that Henderson had impermissibly published a discrete article and/or document from my web site on September 24, 2006.

Count Twelve

148. The document hdt.pdf was impermissibly copied on all AFRA groups by AFRA Director Hinger and is a derivative work of my copyrighted and misappropriated proprietary seminar handout

Count Thirteen

149. On October 1, 2007, AFRA Board member Kiefer impermissibly copied an entire article, *Nazis and CPS*, from my web site verbatim on USA_EAGLE, after removing my name as author.

Count Fourteen

150. Ringo Kamens advised me on May 30, 2007, that he had willfully circumvented my copy protections and copied my entire website onto his hard drive, then onto a removable USB drive, and then printed it out without my permission in violation of the terms printed on my web site.
151. As a proximate cause of these breaches of contract, I have suffered continued, ongoing and far-reaching copyright infringement, effectuation of new and further infringements, depreciation in the value of and ability to sell and license my work, lost profits and/or opportunities, theft of property, damage to my goodwill and reputation, damage to my business and my business reputation, loss of my professional reputation, deprivation of my property and my rights under copyright to control the uses of that property and exploit that property, loss of stature in the business community, loss of my business and

livelihood, diversion of sales, and loss of income associated with each breach.

Sixth Cause of Action

Tortious Interference with Business Relationship and/or Business Contract

152. I repeat and re-allege the facts in the preceding paragraphs of this Complaint as if fully set forth herein.
153. The defendants intentionally interfered with my existing or potential economic relations for an improper purpose and with improper means causing injury to me.
154. There existed an express contractual relationship between me and Durand and between me and Swallow as described in Counts One and Two of the Breach of Contract claim.
155. The defendants had knowledge of that relationship.
156. The defendants intended to induce Durand and Swallow to breach the relationship and violate the terms of the contract by disseminating the seminar handout to them.
157. Durand and Swallow breached the contract and disseminated the seminar handout.
158. There existed other contractual relationships as published on my web site described in Counts three through fourteen of the Breach of Contract cause of action, wherein the defendants induced others to breach that contract by copying my copyrighted content and refusing to abide by the terms of that contract by refusing to seek permission and refusing to pay license fees..
159. The other defendants were strangers to these contractual relationships and had no right or authority to induce such a breach.
160. As a proximate cause of this tortious interference with business relationships or contracts, I have suffered continued, ongoing and far-reaching copyright infringement, effectuation of new and further infringements, depreciation in the value of and ability to sell and license my work, lost profits and/or opportunities, theft of property, damage to my

goodwill and reputation, damage to my business and my business reputation, loss of my professional reputation, deprivation of my property and my rights under copyright to control the uses of that property and exploit that property, loss of stature in the business community, loss of my business and livelihood, diversion of sales, and loss of income associated with the breach.

Seventh Cause of Action

Racketeering or RICO

161. I repeat and re-allege the facts in the preceding paragraphs of the Complaint as if fully set forth herein.
162. Racketeering claims are not preempted because the defendants's violations are predicated upon acts incorporating elements beyond mere reproduction or the like, therefore, my rights involved are not equivalent and preemption will not occur; and this cause of action does not provide a substitute rule of law, but merely an additional means of recovery.
163. Regardless of whether a RICO claim is predicated upon state or federal criminal violations (or a combination of both), the defendant need not be criminally convicted before a civil plaintiff can sue for treble damages under RICO. The statute requires only that the criminal activities are "chargeable" or "indictable" under state or federal law, not that the defendant has already been charged or indicted.
164. The defendants operate or manage an enterprise or are associated with the enterprise which is engaged in, or the activities of which affect, interstate or foreign commerce, to conduct or participate, directly or indirectly, in the conduct of such enterprise's affairs through a pattern of racketeering activity.

Defendant Persons

165. Named as RICO defendants are defendants American Family Rights Association, Ann Tower, Leonard Henderson, Susan Adams Jackson aka Susan Wolverton, Cletus Kiefer, Francine Renee Cygan, Mark Cygan, Illinois Family Advocacy Coalition, Dorothy Kernaghan-Baez, Georgia Family Rights, Inc., Dennis Hinger, National Association of Family Advocates, Aimee Dutkiewicz, Thomas Dutkiewicz, Connecticut DCFWatch, William Wiseman, Wiseman Studios, Dee Contreras, Randall Blair, Brenda Swallow, Ann Durand, Ringo Kamens, Cheryl Barnes, CPS Watch, Inc., Sarah Thompson and Desere' Clabo.

Victims

166. Victim of the defendants's pattern of racketeering activity in this action is the plaintiff Suzanne Shell.
167. Victims of the pattern of racketeering activity who are not named in this complaint include American Family Advocacy Center, Family Rights Advocacy Institute, Effie Belou, A Child Caring Concern, Inc., Kay Henson, Florida Family Rights Advocacy Institute, Vickie Burris, Citizens for Change, Christine Korn, Colorado Family Advocacy Institute, Robin Scoins, Arizona Family Rights Advocacy Institute, The Editors @badadvocates.com (pseudonym for the editors of an online publication to whom the copyright is pseudonymously registered) . Other known victims include Pearson Assessments² (for the MMPI); and Mr. Watterson and Andrews McMeel Universal (for Calvin and Hobbs); British Broadcasting Corporation³ (for BBC web site content); Mr.

²March 10, 2004

³December 10, 2004

Inkel⁴ (for web site content).

The Enterprise

168. At all relevant times, the defendants's association-in-fact consisting of American Family Rights Association (AFRA), William O. Tower, Ann Tower, Leonard Henderson, Susan Adams Jackson Aka Susan Wolverton, Justice for Families (JFF), Keith Fredericks, Tere Fredericks, Cletus Kiefer, Families at Risk Defense Alliance (FAR), Francine Renee Cygan, Mark Cygan, Illinois Family Advocacy Coalition (IFAC), Dorothy Kernaghan-Baez, Georgia Family Rights, Inc. (GAFR), Dennis Hinger, National Association of Family Advocates (NAFA), Aimee Dutkiewicz, Thomas Dutkiewicz, Connecticut DCF Watch (CTDCFWatch), William Wiseman, Wiseman Studios, Dee Contreras, Ann Durand, Nancy Luckhurst, CPS Watch, Cheryl Barnes, Amanda James-Faulkner, Betty Kilbride, Brenda Swallow, Desere Clabo, Randall Blair, Kathy Tilly, AFRA_EAGLE aka USA_EAGLE (USA Eagle), Robert T. McQuaid, Roz McAllister, Christina Amtower, Ringo Kamens, Cheryl Barnes, CPS Watch, Inc., Sarah Thompson and Desere' Clabo constituted an "enterprise," within the meaning of 18 U.S.C. §§ 1961(4) and 1962(c).
169. The defendants each are an individual "person" within the meaning of 18 U.S.C. §§ 1961(3) and 1962 (c) and (d), and Colorado Revised Statutes § 18-17-103(4) and § 18-17-104(3) who associated with and/or participated in the conduct of said enterprise's affairs.
170. The Enterprise possesses continuity of structure and personnel, beginning in 2000 and continuing to the present with an administrative hierarchy and command structure.
171. The defendants are an association-in-fact enterprise in that they are a group of individuals or legal entities that are linked by the fact or circumstance that they are or were

⁴March 25, 2006

intertwined as members or affiliates or associates of AFRA, CPS Watch and other child welfare reform groups, and they share the same purpose.

172. Members of the Enterprise bear some relationship in that they have a common or shared purpose both in the geographic United States and on the Internet, through AFRA, CPS Watch and other child welfare reform groups, and/or through AFRA online groups and web sites, and/or through AFRA members's, associates's, and affiliates's or other child welfare reform online groups and web sites for the united purpose to engage in legitimate activities related to child welfare reform.
173. The Enterprise has an ascertainable structure distinct from that inherent in the pattern of racketeering activity.
174. The Enterprise is distinct from the defendant persons in that the defendants each conduct legitimate affairs related to child welfare reform and the promotion of family rights or parental rights according to their respective organizations's missions, and also join collectively under the umbrella of AFRA or CPS Watch to conduct legitimate affairs related to child welfare reform and the promotion of family rights or parental rights.
175. The defendants directed, caused, operated or managed other individuals, legal entities, or a group of individuals to commit a series of crimes which are predicate acts under RICO.

Predicate Acts

176. I repeat and re-allege the infringing events in the Copyright Infringement claim as if fully set forth herein, which constitute fifteen predicate acts of criminal copyright infringement within the past ten years. Each instance of infringement listed has a contractual value of at least \$2000.00 per infringing event.
177. Additional predicate acts of criminal copyright infringement include:
178. February 17, 2004 Jackson posted the following admission of infringement referring to

my 4th amendment letter from my web site, "Heigh Ho, Heigh Ho, a-stealing we will go... duly lifted and placed in our JFF files section, Al!! Best, Sue "The Filch" J. in Mass."

179. At the same time, I discovered JFF had also impermissibly copied my letter to lawyer and placed it in their files section.
180. JFF had also accepted and displayed infringing content from my web site in five messages ## 33963, 33962, 33218, 27402, and 27389.
181. On or about April 6, 2004, I discovered that AFRA member and agent, James Roger Brown, had impermissibly published on his web site, the sociologercenter.com, an evidence book that I had written.
182. On May 2, 2004, I discovered that defendants T. Dutkiewicz and A. Dutkiewicz had published infringing content from my copyrighted works on AFRA groups as "Tip of the Week" and on their web site as a handbook on parent and children's rights. I advised them of the infringement and they refused to cease publishing their infringing content. defendants, who were group owners, refused to prevent future infringement by the Dutkiewicz's. They still publish their handbook to this day. This has been an ongoing infringement.
183. Henderson impermissibly copied an entire article from my web site to AFRA_Cencom on September 13, 2004.
184. On April 8, 2005, Henderson impermissibly published an entire document from my web site in the files section of the AFRA website.
185. The predicate acts have been committed by The Enterprise continuously since 2000. The actors have gone to great lengths to conceal their activities and I do not know the full scope of their criminal copyright infringements against me over the years.

186. The defendants receive “financial gain” as defined in the No Electronic Theft Act for their criminal copyright infringement, including receipt, or expectation of receipt, of anything of value, including but not limited to the receipt of other copyrighted works.
187. Between 2000 and the present, and with regard to Shell for the purposes of this complaint, the defendants conducted, participated in, engaged in, conspired to engage in, or aided and abetted, the conduct of the affairs of the enterprise through a pattern of racketeering activity within the meaning of 18 U.S.C. §§ 1961(1), 1961(5) and 1962(c) and (d) and within the meaning of Colorado Revised Statutes §§ 18-17-103(3), 18-17-103(5) and 18-17-104(3), the defendants’s pattern of racketeering activity consisted of :
- a. **Mail and Wire Fraud e.g. 18 U.S.C. § 1343. Fraud by wire, radio, or television and § 1341. Frauds and swindles:** The defendants have devised or intended to devise a scheme or artifice for acquiring intellectual property and maintaining interest and control in the illegally acquired intellectual property by means of false or fraudulent pretenses, representations or promises, which scheme to defraud includes material misrepresentations, or the omission or concealment of material facts, including conduct which fails to conform to standards of moral uprightness, fundamental honesty, and fair play, and including conduct calculated to deceive, whether it be by direct falsehood or by innuendo, by speech or silence, by word of mouth, by look, or by gesture, including the suppression of the truth, wherein fraud and deceit arose from the defendants’s silence where there was an affirmative legal and moral duty to seek permission from the copyright owner prior to acquiring copyrighted intellectual property, and where the defendants’s silence associated with its acquisitions and disseminations of that property was wilful and intentional fraud in order to avoid paying permission license fees or obtaining permission from the copyright owners thereby causing injury to the copyright owners and their intellectual property and businesses, when they covertly, secretly and stealthily transmitted or caused to be transmitted by means of wire or other communication in interstate or foreign commerce, any writings, signs, signals, pictures, or sounds for the purpose of executing such scheme or artifice of finding and acquiring said intellectual property by means of wire or other communication and to covertly, secretly and stealthily transmit the stolen copy of that property to their respective servers or computer systems for their own use and purposes.
- b. **18 U.S.C. § 2319. Criminal infringement of a copyright 17 U.S.C. § 506.** By knowingly and wilfully having caused or allowed to be caused repeated copyright infringement of Shell’s property and other copyright owners’ copyrighted content for purposes of commercial advantage or private financial gain e.g. increased

consumer patronage, market advantage, donations, unjust enrichment, enhanced reputation, and the expectation of acquiring intellectual property, etc. - including but not limited to illegally copying, distributing, displaying and using infringed and stolen intellectual property - or by the reproduction or distribution, including by electronic means, during any 180-day period, of 1 or more copies of 1 or more copyrighted works, which have a total retail value of more than \$1,000; as described in the Copyright Infringement, Vicarious Copyright Infringement, and Contributory Copyright Infringement causes of action above wherein each infringement is contractually established as having a minimum retail value of \$5000.

- c. **§ 18-5.5-102(a) C.R.S. Computer crime.** By knowingly and wilfully devised, caused to be devised or perpetuated and expanded an existing scheme to access, and encouraged accessing the computer, computer network, or computer system or any part thereof wherein Shell's web site was situated and exceeded authorized access to that computer, computer network, or computer system or any part thereof; or used a computer, computer network, or computer system or any part thereof without authorization or in excess of authorized access; by illegally circumventing copy protections installed on her web site content and copying her web site which exceeded their published authority to do so, and transmitted or caused to be transmitted the stolen copies of her intellectual property to servers and computer systems owned and operated by the defendants where it could be stored, disseminated and displayed.
- d. **§ 18-5.5-102 (d) C.R.S. Computer Crime.** By knowingly and wilfully devised, caused to be devised or perpetuated and expanded an existing scheme to access, and encouraged accessing the computer, computer network, or computer system, or any part thereof, which hosted Shell's web site, to commit theft of Shell's intellectual property e.g. her web site profane-justice.org and theft of her trade secret and proprietary information..

188. At all relevant times, the enterprise alleged herein was engaged in, and their activities affected, interstate commerce and foreign commerce.

189. All of the predicate acts described herein were related so as to establish a pattern of racketeering activity, within the meaning of 18 U.S.C. § 1962(c) and (d) and § 18-17-104(3) C.R.S., in that their common purpose was to infringe copyrights and acquire intellectual properties by theft and/or fraud; their common result was to infringe copyrights, including but not limited to my copyrights, and acquire intellectual property, including my property, to deprive me of the benefits of that property, including but not

limited to my intellectual property, by theft and/or fraud; the defendants, personally or through their actors or agents, directly or indirectly, participated in all of the acts and employed the same or similar methods of commission; I was the victim of the acts of racketeering; and/or the acts of racketeering were otherwise interrelated by distinguishing characteristics and were not isolated events.

190. All of the predicate acts described herein were continuous so as to form a pattern of racketeering activity in that:
- a. The defendants engaged in the predicate acts over a substantial period of time; or
 - b. The patterns of racketeering activity engaged in by the defendants continues or threatens to continue because the such conduct has become a regular way of conducting the defendants's respective on-going business activities.

Count One
Henderson

191. Henderson is an individual "person," within the meaning of 18 U.S.C. §§ 1961(3) and 1962(c), Colorado Revised Statutes § 18-17-103(4) and § 18-17-104(3) who associated with and/or participated in the conduct of said enterprise's affairs.
192. Between May 2002 and November 2008, Henderson conducted, participated in, engaged in, conspired to engage in, or aided and abetted, the conduct of the affairs of the enterprise through a pattern of racketeering activity within the meaning of 18 U.S.C. §§ 1961(1), 1961(5) and 1962(c) and (d). Henderson's pattern of racketeering activity consisted of:
- a. **Mail and Wire Fraud e.g. 18 U.S.C. § 1343. Fraud by wire, radio, or television and § 1341.** *Supra.* Henderson knowingly or intentionally devised a scheme or artifice for acquiring intellectual property and maintaining interest and control in the illegally acquired intellectual property by fraud. and encouraged others to covertly, secretly and stealthily transmit the stolen copy of that property to the respective servers or computer systems of other defendants for their own

use and purposes and to AFRA's servers or computer systems for storage and display.

- b. **18 U.S.C. § 2319. Criminal infringement of a copyright 17 U.S.C. § 506.** *Supra.* Henderson established and implemented the policy endorsing wholesale copyright infringement, with a focus on infringing my intellectual property to be used for the benefit of AFRA and AFRA members, affiliates and associates and to cause injury to my intellectual property and my business. He accepted and published infringing content on all AFRA web sites, forums and groups and advised members, affiliates and associates how to infringe copyrights.
- c. **§ 18-5.5-102(a) C.R.S. Computer crime.** *Supra.* Henderson knowingly and wilfully devised, caused to be devised or perpetuated and expanded an existing scheme to access, and encouraged accessing the computer, computer network, or computer system or any part thereof wherein Shell's web site was situated and exceeded authorized access and or encouraged and instructed others to exceed authorized access to that computer, computer network, or computer system or any part thereof; or used a computer, computer network, or computer system or any part thereof without authorization or in excess of authorized access; by illegally circumventing copy protections installed on my web site content and copying my web site which exceeded his and others authority to do so, and transmitted or caused to be transmitted the stolen copies of my intellectual property to servers and computer systems owned and operated by the defendants where it could be stored, disseminated and displayed.
- d. **§ 18-5.5-102 (d) C.R.S. Computer Crime** *Supra* By knowingly and wilfully devised, caused to be devised or perpetuated and expanded an existing scheme to access, and encouraged accessing the computer, computer network, or computer system, or any part thereof, which hosted Shell's web site, to commit theft of Shell's intellectual property e.g. her web site profane-justice.org and theft of her trade secret and proprietary information.
193. American Family Rights Association (AFRA), William O. Tower, Ann Tower, Susan Adams Jackson Aka Susan Wolverton, Justice for Families (JFF), Cletus Kiefer, Keith Fredericks, Tere Fredericks, Cletus Kiefer, FAR Defense Alliance, Francine Renee Cygan, Mark Cygan, Illinois Family Advocacy Coalition (IFAC), Dorothy Kernaghan-Baez, Georgia Family Rights, Inc. (GAFR), Dennis Hinger, National Association of Family Advocates (NAFA), Aimee Dutkiewicz, Thomas Dutkiewicz, Connecticut DCF Watch (CTDCFWatch), William Wiseman, Wiseman Studios, Dee Contreras, Ann Durand, Brenda Swallow, Nancy Luckhurst, Randall Blair, Kathy Tilly, Ringo Kamens, Cheryl Barnes, CPS Watch, Inc., Sarah Thompson and Desere' Clabo violated section 1962(d) in that they they knowingly furthered, advanced or participated in Henderson's 1962 violation within the meaning of 18 U.S.C. § 1962 (d).
194. These acts all occurred after the effective date of RICO and more than two such acts

occurred within ten years of one another.

Count Two
Kiefer

195. Kiefer is an individual “person,” within the meaning of 18 U.S.C. §§ 1961(3) and 1962(c), and Colorado Revised Statutes § 18-17-103(4) and § 18-17-104(3), who associated with and/or participated in the conduct of said enterprise’s affairs.
196. Between May 2002 and November 2008, Kiefer conducted, participated in, engaged in, conspired to engage in, or aided and abetted, the conduct of the affairs of the enterprise through a pattern of racketeering activity within the meaning of 18 U.S.C. §§ 1961(1), 1961(5) and 1962(c) and (d). Kiefer’s pattern of racketeering activity consisted of:
- a. **Mail and Wire Fraud e.g. 18 U.S.C. § 1343. Fraud by wire, radio, or television and § 1341.** *Supra.* Kiefer knowingly or intentionally devised or perpetuated and expanded an already devised scheme or artifice for acquiring intellectual property and maintaining interest and control in the illegally acquired intellectual property by means of false or fraudulent pretenses. Kiefer exploited Wiseman dba Wiseman Studios to accomplish his fraud, and to accomplish the purpose of executing such scheme or artifice of finding and acquiring said intellectual property by means of wire or other communication and to covertly, secretly and stealthily transmit the stolen copy of that property to Wiseman’s dba Wiseman Studios’ servers or computer systems for their own use and purposes and to AFRA’s servers or computer systems for storage and display.
 - b. **18 U.S.C. § 2319. Criminal infringement of a copyright 17 U.S.C. § 506.** *Supra.* Kiefer knowingly and wilfully caused or allowed to be caused repeated copyright infringement of Shell’s property by Wiseman dba Wiseman Studios on Wiseman’s web site, the truthistold.com. He further orchestrated the escalation of copyright infringement against me by other defendants.
 - c. **18 U.S.C. § 2319. Criminal infringement of a copyright 17 U.S.C. § 506.** *Supra.* Kiefer knowingly and wilfully caused or allowed to be caused repeated copyright infringement of Shell’s property on other defendants’s web sites and online groups. He further orchestrated the escalation of copyright infringement against me by other defendants.
 - d. **§ 18-5.5-102(a) C.R.S. Computer crime.** *Supra.* Kiefer knowingly and wilfully devised, caused to be devised or perpetuated and expanded an existing scheme to access my information, and transmitted or caused to be transmitted the stolen copies of her intellectual property to his, Wiseman’s and AFRA’s own servers and computer systems where it could be stored and displayed.
 - e. **§ 18-5.5-102 (d) C.R.S. Computer Crime** *Supra.* Kiefer knowingly and wilfully devised, caused to be devised or perpetuated and expanded an existing scheme exploiting Wiseman to access, and encouraged accessing the computer, computer network, or computer system, or any part thereof, which hosted Shell’s web site, to commit theft of Shell’s intellectual property e.g. her web site profane-justice.org.

197. American Family Rights Association (AFRA), Leonard Henderson, William O. Tower, Ann Tower, Susan Adams Jackson Aka Susan Wolverton, Justice for Families (JFF), Keith Fredericks, Tere Fredericks, FAR Defense Alliance, Francine Renee Cygan, Mark Cygan, Illinois Family Advocacy Coalition (IFAC), Dorothy Kernaghan-Baez, Georgia Family Rights, Inc. (GAFR), Dennis Hinger, National Association of Family Advocates (NAFA), Aimee Dutkiewicz, Thomas Dutkiewicz, Connecticut DCF Watch (CTDCFWatch), William Wiseman, Wiseman Studios, Ann Durand, Brenda Swallow, Nancy Luckhurst, Randall Blair, Kathy Tilly, Ringo Kamens, violated section 1962(d) in that they they knowingly furthered, advanced or participated in Kiefer's 1962 violation within the meaning of 18 U.S.C. § 1962 (d).
198. These acts all occurred after the effective date of RICO and more than two such acts occurred within ten years of one another.

Count Three
Hinger

199. Hinger is an individual "person," within the meaning of 18 U.S.C. §§ 1961(3) and 1962(c), and Colorado Revised Statutes § 18-17-103(4) and § 18-17-104(3), who associated with and/or participated in the conduct of said enterprise's affairs.
200. Between May 2003 and November 2008, Hinger conducted, participated in, engaged in, conspired to engage in, or aided and abetted, the conduct of the affairs of the enterprise through a pattern of racketeering activity within the meaning of 18 U.S.C. §§ 1961(1), 1961(5) and 1962(c) and (d). Hinger's pattern of racketeering activity consisted of:
- a. **Mail and Wire Fraud e.g. 18 U.S.C. § 1343. Fraud by wire, radio, or television and § 1341.** *Supra.* Hinger knowingly or intentionally devised or perpetuated and expanded an already devised scheme or artifice for acquiring intellectual property and maintaining interest and control in the illegally acquired intellectual property by means of false or fraudulent pretenses. Hinger encouraged or caused the defendants's and Wiseman's dba Wiseman Studios's silence associated with their illicit acquisitions of that property, and provided the information needed to illicitly acquire the property, and provided instructions to store and display the illicitly acquired property. Hinger assisted and exhorted Wiseman dba Wiseman Studios to covertly, secretly and stealthily transmit or cause to be transmitted by means of wire or other communication in interstate or foreign commerce, any writings, signs, signals, pictures, or sounds for the purpose of executing such scheme or artifice of finding and acquiring said intellectual property by means of wire or other communication and to covertly, secretly and stealthily transmit the stolen copy of that property to Wiseman's dba Wiseman Studios's servers or computer systems for their own use and purposes and to

- AFRA's servers or computer systems for storage and display.
- b. **18 U.S.C. § 2319. Criminal infringement of a copyright 17 U.S.C. § 506.** *Supra.* Hinger knowingly and wilfully caused or allowed to be caused repeated copyright infringement of Shell's copyright. He exploited the illicit access to her content by creating and offering to the public unauthorized derivative works based on her trade secret and proprietary information which was provided to him by other defendants. He also encouraged others to commit copyright infringement by advising them that I had no copyright protections.
 - c. **§ 18-5.5-102(a) C.R.S. Computer crime.** *Supra.* Hinger knowingly and wilfully devised, caused to be devised or perpetuated and expanded an existing scheme of computer crime association with the fraudulent acquisition of Shell's property
 - d. **§ 18-5.5-102 (d) C.R.S. Computer Crime** Hinger knowingly and wilfully devised, caused to be devised or perpetuated and expanded an existing scheme to access, and encouraged accessing the computer, computer network, or computer system, or any part thereof, which hosted Shell's web site, to commit theft of Shell's intellectual property e.g. her web site profane-justice.org and her trade secret and proprietary information.
201. American Family Rights Association (AFRA), Leonard Henderson, William O. Tower, Ann Tower, Susan Adams Jackson Aka Susan Wolverton, Cletus Kiefer, FAR Defense Alliance, Francine Renee Cygan, Mark Cygan, Illinois Family Advocacy Coalition (IFAC), Dorothy Kernaghan-Baez, Georgia Family Rights, Inc. (GAFR), National Association of Family Advocates (NAFA), Aimee Dutkiewicz, Thomas Dutkiewicz, Connecticut DCF Watch (CTDCFWatch), William Wiseman, Wiseman Studios, Ann Durand, Brenda Swallow, Nancy Luckhurst, Randall Blair, Kathy Tilly, Ringo Kamens, violated section 1962(d) in that they knowingly furthered, advanced or participated in Hinger's 1962 violation within the meaning of 18 U.S.C. § 1962 (d).
202. These acts all occurred after the effective date of RICO and more than two such acts occurred within ten years of one another..

Count Four

Barnes

203. Barnes is an individual "person," within the meaning of 18 U.S.C. §§ 1961(3) and 1962(c), Colorado Revised Statutes § 18-17-103(4) and § 18-17-104(3) who associated with and/or participated in the conduct of said enterprise's affairs.
204. Between 2000 and 2009, Barnes conducted, participated in, engaged in, conspired to engage in, or aided and abetted, the conduct of the affairs of the enterprise through a pattern of racketeering activity within the meaning of 18 U.S.C. §§ 1961(1), 1961(5)

and 1962(c) and (d). Barnes's pattern of racketeering activity consisted of:

- a. **Mail and Wire Fraud e.g. 18 U.S.C. § 1343. Fraud by wire, radio, or television and § 1341.** *Supra.* Barnes knowingly or intentionally devised a scheme or artifice for acquiring my intellectual property and maintaining interest and control in the acquired intellectual property by fraud, and encouraged others to covertly, secretly and stealthily transmit the stolen copy of that property to the respective servers or computer systems of the defendants or by using the U.S. Mail, for their own use and purposes and to defendants's servers or computer systems for storage and display.
 - b. **18 U.S.C. § 2319. Criminal infringement of a copyright 17 U.S.C. § 506.** *Supra.* Barnes advanced the policy endorsing wholesale copyright infringement, with a focus on infringing my intellectual property to be used for the benefit of CPS Watch and AFRA members, affiliates and associates and to cause injury to my intellectual property and my business.
205. American Family Rights Association (AFRA), William O. Tower, Ann Tower, Susan Adams Jackson Aka Susan Wolverton, Justice for Families (JFF), cletus Kiefer, Keith Fredericks, Tere Fredericks, Cletus Kiefer, FAR Defense Alliance, Francine Renee Cygan, Mark Cygan, Illinois Family Advocacy Coalition (IFAC), Dorothy Kernaghan-Baez, Georgia Family Rights, Inc. (GAFR), Dennis Hinger, National Association of Family Advocates (NAFA), Aimee Dutkiewicz, Thomas Dutkiewicz, Connecticut DCF Watch (CTDCFWatch), William Wiseman, Wiseman Studios, Dee Contreras, Ann Durand, Brenda Swallow, Nancy Luckhurst, Randall Blair, Kathy Tilly, CPS Watch, Inc., Sarah Thompson and Desere' Clabo violated section 1962(d) in that they they knowingly furthered, advanced or participated in Barnes's 1962 violation within the meaning of 18 U.S.C. § 1962 (d).
206. These acts all occurred after the effective date of RICO and more than two such acts occurred within ten years of one another.

Count Five
Jackson

207. Jackson an individual "person," within the meaning of 18 U.S.C. §§ 1961(3) and 1962(c), and Colorado Revised Statutes § 18-17-103(4) and § 18-17-104(3), who associated with and/or participated in the conduct of said enterprise's affairs.
208. Between May, 2003 and November 2008, Jackson conducted, participated in, engaged in, conspired to engage in, or aided and abetted, the conduct of the affairs of the enterprise through a pattern of racketeering activity within the meaning of 18 U.S.C. §§ 1961(1), 1961(5) and 1962(c) and (d). Jackson's pattern of racketeering activity consisted of:

- a. **Mail and Wire Fraud e.g. 18 U.S.C. § 1343. Fraud by wire, radio, or television and § 1341.** *Supra.* Jackson knowingly or intentionally devised or perpetuated and expanded an already devised scheme or artifice for acquiring intellectual property and maintaining interest and control in the illegally acquired intellectual property by means of false or fraudulent pretenses. She was instrumental in acquiring much infringing intellectual property by means of wire or other communication and to covertly, secretly and stealthily transmit the stolen copy of that property to JFF and AFRA groups. In fact, JFF's infringing conduct, under Jackson's oversight, was so egregious that Yahoo! was compelled to shut the group down due to repeated copyright infringement complaints. Jackson also had oversight over AFRA's servers or computer systems for storage and display of infringing content.
 - b. **18 U.S.C. § 2319. Criminal infringement of a copyright 17 U.S.C. § 506.** *Supra.* Jackson knowingly and wilfully caused or allowed to be caused repeated copyright infringement of Shell's property and other copyright owners copyrighted content for purposes of commercial advantage or private financial gain, often bragging about stealing other's protected content. She provided online locations, safe from my scrutiny, to display and publish infringing content.
 - c. **§ 18-5.5-102(a) C.R.S. Computer crime.** *Supra.* Jackson knowingly and wilfully devised, caused to be devised or perpetuated and expanded an existing scheme to access, and encouraged accessing the computer, computer network, or computer system or any part thereof wherein Shell's web site was situated and exceeded authorized access to that computer, computer network, to steal intellectual property.
 - d. **§ 18-5.5-102 (d) C.R.S. Computer Crime** Jackson knowingly and wilfully devised, caused to be devised or perpetuated and expanded an existing scheme to access, and encouraged accessing the computer, computer network, or computer system, or any part thereof, which hosted Shell's web site, to commit theft of Shell's intellectual property e.g. her web site profane-justice.org.
209. American Family Rights Association (AFRA), Leonard Henderson, William O. Tower, Ann Tower, Dennis Hinger, Justice for Families (JFF), Keith Fredericks, Tere Fredericks, Cletus Kiefer, FAR Defense Alliance, Francine Renee Cygan, Mark Cygan, Illinois Family Advocacy Coalition (IFAC), Dorothy Kernaghan-Baez, Georgia Family Rights, Inc. (GAFR), National Association of Family Advocates (NAFA), Aimee Dutkiewicz, Thomas Dutkiewicz, Connecticut DCF Watch (CTDCFWatch), William Wiseman, Wiseman Studios, Ann Durand, Brenda Swallow, Nancy Luckhurst, Randall Blair, Kathy Tilly, violated section 1962(d) in that they they knowingly furthered, advanced or participated in Jackson's 1962 violation within the meaning of 18 U.S.C. § 1962 (d).
210. These acts all occurred after the effective date of RICO and more than two such acts occurred within ten years of one another.

Count Six

Kamens

211. Kamens is an individual “person,” within the meaning of 18 U.S.C. §§ 1961(3) and 1962(c), Colorado Revised Statutes § 18-17-103(4) and § 18-17-104(3) who associated with and/or participated in the conduct of said enterprise’s affairs.
212. Between 2007 and 2009, Kamens conducted, participated in, engaged in, conspired to engage in, or aided and abetted, the conduct of the affairs of the enterprise through a pattern of racketeering activity within the meaning of 18 U.S.C. §§ 1961(1), 1961(5) and 1962(c) and (d). Kamens’s pattern of racketeering activity consisted of:
- a. **Mail and Wire Fraud e.g. 18 U.S.C. § 1343. Fraud by wire, radio, or television and § 1341.** *Supra.* Kamens knowingly or intentionally devised a scheme or artifice for acquiring my intellectual property and maintaining interest and control in the acquired intellectual property by fraud, and encouraged others to covertly, secretly and stealthily transmit stolen copies of that property to the respective servers or computer systems of others, or by using the U.S. Mail, for their own use and purposes and to his, or defendants’s, or others’s servers or computer systems for storage and display.
 - b. **18 U.S.C. § 2319. Criminal infringement of a copyright 17 U.S.C. § 506.** *Supra.* Kamens advanced the policy endorsing wholesale copyright infringement, with a focus on infringing my intellectual property to be used to cause injury to my intellectual property and as a means of proving that copyright protections on digital content were invalid. He caused Wiseman dba Wiseman Studios to infringe my copyrighted web site content and encouraged him to publish it on his web site. He also encouraged the general public to infringe my copyright in similar manner, which occurred on a wholesale basis.
 - c. **§ 18-5.5-102(a) C.R.S. Computer crime.** *Supra.* Kamens knowingly and wilfully devised, caused to be devised or perpetuated and expanded an existing scheme to access, and encouraged accessing the computer, computer network, or computer system or any part thereof wherein Shell’s web site was situated and exceeded authorized access to that computer, computer network, to steal intellectual property.
 - d. **§ 18-5.5-102 (d) C.R.S. Computer Crime.** Kamens knowingly and wilfully devised, caused to be devised or perpetuated and expanded an existing scheme to access, and encouraged accessing the computer, computer network, or computer system, or any part thereof, which hosted Shell’s web site, to commit theft of Shell’s intellectual property e.g. her web site profane-justice.org.
213. William Wiseman, Wiseman Studios, Dorothy Baez, and other unnamed defendants violated section 1962(d) in that they knowingly furthered, advanced or participated in Kamens’s 1962 violation within the meaning of 18 U.S.C. § 1962 (d).
214. These acts all occurred after the effective date of RICO and more than two such acts occurred within ten years of one another.

215. As a direct and proximate result of, and by reason of, the activities of the defendants and their conduct in violation of 18 U.S.C. §§ 1962(c) and (d) and § 18-17-104(3) C.R.S., I have been injured in my business or property, within the meaning of 18 U.S.C. § 1964(c) and § 18-17-106(7) C.R.S. Among other things, I have suffered damages to the extent the defendants infringed my copyrights and incited others to infringe my copyrights, and illegally obtained my copyrighted intellectual property and copyrighted proprietary content by theft and exploited it, and exercised dominion and control over that property, deprived me of dominion and control of that property, deprived me of my rights to exploit my preoperty, and refused to pay license fees for the acquisition and use of that property and deprived me of the use and benefit of that property and harmed my business and property. I am, therefore, entitled to recover threefold the damages I have sustained together with the cost of the suit, including reasonable attorneys' and experts' fees.

Eighth Cause of Action
False and Misleading Advertising
§43(a) of the Lanham Act, 15 U. S. C. §1125(a)

216. I repeat and re-allege the facts in the preceding paragraphs of this Complaint as if fully set forth herein.
217. All defendants are liable for the injuries and harms named in this cause of action.
218. I offer and provide information, goods and services (products) to the public, to consumers and to professionals related to the administration of and response to child welfare investigations and court cases nationwide.
219. The defendants offer and provide information, goods and services (products) to the public, to consumers and to professionals related to the administration of and response to child welfare investigations and court cases in their respective jurisdictions and nationwide.
220. These products, include, but are not limited to, support services, information goods and services, advocacy services, lobbying, consulting and paralegal goods and services.
221. The defendants used in commerce either a false designation of origin, or any false description or representation in connection with any goods or services.
222. The misrepresentations are material, and they are likely to influence the purchasing decision.

223. The defendants's statements were made in the course of business operations and constitute the promotion of and/or representations of my products and/or of the defendants's products.
224. The subject statements misrepresent the nature, characteristics, qualities, association, approval or origin of my products and/or of their products.
225. The misrepresentations actually deceive or have the tendency to deceive a substantial segment of the audience.
226. The defendants know or should know that the representations concerning their products and/or my products are false and misleading.
227. The defendants are participants, owners and operators of web sites and public and private forums where some of this false and deceptive advertising is disseminated.
228. The defendants are directly liable and vicariously liable for false representations in connection with any goods or services.
229. The defendants fraudulently, willfully, knowingly, or intentionally made and caused to be made statements to the public and to the relevant market the for the purpose of influencing the public to seek and obtain the defendants's products and/or eschew my products.
230. The contested statements were disseminated sufficiently to the relevant purchasing public to constitute "advertising" or "promotion" within the industry.
231. Between the dates of August 2000, and continuing to the date of this complaint, defendants made or caused to be made multiple false or misleading descriptions or representations of facts about my products and/or about the defendants's products.
232. The subject false or misleading statements were made or caused to be made before the general public in the United States and around the world, including *inter alia*, on the Internet, person to person, and in various other public forums.
233. This false advertising is ongoing and continues to this date.
234. These false and misleading statements about my products and my business include repeated and multiple advertisements as follows:
 235. That I am a convicted criminal; and
 236. That I am awaiting sentencing for criminal convictions; and
 237. That I committed crimes of violence; and
 238. That I committed other crimes against the defendants and/or clients; and

239. That I demanded the defendants commit crimes; and
240. That I teach advocates how to commit crimes; and
241. That I publish pornography on my web site, including kiddie porn; and
242. That I abused or allowed my children to be abused; and
243. That my children were removed from my custody and I never got them back; and
244. That I did not possess the credentials I claimed; and
245. That the articles, books, and other intellectual property I authored was plagiarized and/or stolen from others; and
246. That the resultant intellectual properties were not protected under copyright laws or other intellectual property laws; and
247. That I and my associates “con” our clients; and
248. That I and my associates force our clients to hire disreputable attorneys; and
249. That disreputable attorneys are members of my and/or my associates’s respective organization(s); and
250. That I am responsible for a child being in a coma; and
251. That certain individuals who had committed unethical acts or demonstrated incompetence were part of my “group” and/or were trained and certified by me; and
252. That I engage in stalking and harassment of the defendants; and
253. That I phoned in a bomb threat to Amtrack; and
254. That my clients and the clients of anyone associated with me end up losing their children forever; and
255. That I have never gotten a single child returned to his or her parents or that I rarely get children returned to parents; and
256. That I suffer from mental problems and was a sociopath; and
257. That I am a terrorist; and
258. That I am part of the group that did the Ruby Ridge standoff; and
259. That I made death threats against the defendants; and
260. That I was engaged in “cult building;” and
261. That I am connected with Scientology; and
262. That I am a threat to society; and
263. That people are afraid of what I will have done to them; and
264. That my seminar products and training programs were not unique and that I had no

- proprietary rights to the methods I had developed; and
265. That I had offered to “represent” one of the defendants in a case for \$5000; and
266. That I fabricated sexual harassment charges against one of the defendants; and
267. That I shoot at people with guns; and
268. That I ran over someone in my driveway; and
269. That I am a liar; and
270. That I was being investigated for various crimes including *inter alia* racketeering, kiddie porn, stalking and extortion and there were multiple open FBI cases against me; and
271. That I owned and operated an illegal underground railroad to conceal fugitives from the law; and
272. That I issued death threats against others; and
273. That I was linked to the Christian Patriot and/or Sovereign Citizen movement and I had participated in a tribunal and adjudicated A. Dutkiewicz to death; and
274. That I had committed perjury and was going to jail.
275. The false statements made about me and about by associates described above, and concerning criminal conduct, abuse or neglect of children, parenting, wrongs against others, competence, outcomes, skill, and efficacy, directly reflect on my professional abilities, and on the quality of the goods and services I created and which I personally represent as part of my commercial activities and which I offer to the public based substantially on my competence, integrity and skill.
276. The defendants’s false advertisements on those subjects are intended to undermine my business reputation and goodwill by suggesting I conduct my commercial activities in an incompetent, unethical or immoral manner.
277. These false and misleading statements made by the defendants about the defendants’s products include repeated and multiple false advertisements as follows:
278. That any or all of the defendants possess credentials they do not possess; and
279. Statements which exaggerate or misrepresent the rate of their successful outcomes on cases which they provided services as advocates; and
280. Statements which exaggerate or misrepresent their expertise in certain areas of skill and knowledge; and
281. Statements which exaggerate or misrepresent their competence or qualifications to offer goods and services; and

282. Statements which exaggerate or misrepresent the mental health and stability of certain defendants; and
283. Statements which exaggerate or misrepresent the origin or efficacy of publications and training offered or promoted by them; and
284. Statements which offer harmful or false advice to consumers about how to handle their family's child welfare case; and
285. Statements which falsely represent that they work with attorneys and that the attorneys find their services valuable on cases.
286. The statements made by the defendants were literally false on their face or by necessary implication, or that the statements were literally true but likely to mislead or confuse consumers.
287. The statements were made on multiple public forums which are used to conduct our respective businesses activities for the express purposes of soliciting consumers to utilize the defendants's respective products and services, and on multiple public forums directed to the general public.
288. The defendants's false advertising included but was not limited to product disparagement directing consumers to eschew my products by libeling and slandering my products, my qualifications, my competence, my ethics, my outcomes and my commercial activities.
289. The defendants's false and misleading advertisements and product disparagement statements about me and my associates were done deliberately, maliciously and in bad faith and include representations that the defendants had no reasonable basis to believe.
290. As a proximate cause of the pervasive false and deceptive advertising, I have suffered substantial damages including but not limited to loss of business, diversion of sales, loss of goodwill, loss of business reputation and consumer confusion.

Ninth Cause of Action
Unfair or Deceptive Trade Practices and Unfair Methods of Competition
6-1-105 C.R.S and 5 U.S.C. §§ 1051; 15 U.S.C. § 1127

291. I repeat and re-allege the facts in the preceding paragraphs of this Complaint as if fully set forth herein.
292. All defendants are liable for the injuries and harms claimed in this cause of action.
293. From the period of time starting on or about August 2000, continuing to the present, the

defendants have engaged in unfair or deceptive acts or practices, or in unfair methods of competition in or affecting commerce.

294. The defendants engaged in unfair or deceptive trade practices with the intent to injure competitors and to destroy or substantially lessen competition.
295. The defendants acted in bad faith and their conduct was fraudulent, willful, knowing or intentional.
296. The challenged practices occurred in the course of defendants's businesses, vocations, or occupations.
297. The challenged conduct significantly impacts the public as actual or potential consumers of the defendant's goods, services, or property.
298. In the course of the defendants's business, vocation, or occupation, the defendants knowingly make false representations as to affiliation, connection, or association with or certification by another; knowingly makes a false representation as to the characteristics, uses, benefits, property or a false representation as to the sponsorship, approval, status, affiliation, or connection of a person therewith; represents that goods, services, or property are of a particular standard, quality, or grade, or that goods are of a particular style or model, if they know or should know that they are of another; knowingly disparages the goods, services, property, or business of another by false or misleading representation of fact; make false or misleading statements of fact concerning the price of goods, services, or property or the reasons for, existence of, or amounts of price reductions; with intent to injure competitors and to destroy or substantially lessen competition.
299. The unfair or deceptive trade practices and unfair methods of competition committed by the defendants include, *inter alia*;
300. Theft and misappropriation of my trade secrets and proprietary information; and
301. Fraud or misrepresentation in a commercial setting; and
302. Situations in which the defendants divide up a territory in order to minimize competition; and
303. Libeling or slandering my business, my products or my business activities; and
304. Reverse "passing off" of my superior products as originating with the defendants; and
305. Wrongful interference with my contracts and business relationships; and
306. Filing false reports to get my business services, including *inter alia*, my internet services,

- cancelled or revoked; and
307. Filing false police reports to create a criminal history as to me; and
 308. Submitting forged or falsified evidence to support those false reports; and
 309. Causing messages posted on my Improvement Project Yahoo! group consumer advisory publication to be deleted from the public archives; and
 310. Falsely attributing publications to me which are not my publications and which I did not author; and
 311. Engaging in “bandwidth theft” intended to use up my or my associates’s web site bandwidth allotments in the beginning of the month consequently causing our web sites to be shut down until the end of the month and/or costing me tens of thousands of dollars in excess bandwidth fees; and
 312. Falsely representing themselves as my agent and cancelling my business services; and
 313. Altering my and my associates advertisements and promotional publications and disseminating the altered content to misdirect the public to their businesses and publications or to change the content of the advertisement to their version; and
 314. Threatening my business service providers with legal action if they didn’t stop providing their services to me; and
 315. Harassing, stalking and threatening my associates and licensees with harm, legal action or bad publicity if they continue to support me, endorse me or associate with me; and
 316. Creating web site with a .com extension of my web site domain name, populating it with derogatory content about my business and misdirecting the public to that site representing it as my site; and
 317. Coercing me to utilize AFRA as a “delivery system” for my products and retaliating against me when I refused; and
 318. Contacting and harassing the locations were I was appearing as a speaker, and contacting and harassing the sponsors, other speakers and hosts with disparaging descriptions about me and telling them not to do business with me or to appear with me; and
 319. Encouraging the public not to attend any function where I was speaking, usually in conjunction with the advertisements of my appearance; and
 320. Physically appearing at my presentations seeking to discourage the staff from allowing me to speak; and
 321. Sending people to my presentations to fraudulently obtain my proprietary content to

- deliver to the defendants; and
322. Causing a national continuing education company to breach its contract with me and discharge me from the faculty; and
323. Altering my Wikipedia entry to mislead the public and to using my Wikipedia entry to redirect the public to their organizations; and
324. Repeated attempts to have my web site taken down; and
325. Contacting professional associations attempting get professional endorsement to discredit my credentials.
326. The aforementioned acts by the defendants are unconscionable, wilful and malicious.
327. As a proximate cause of the Unfair or Deceptive Trade Practices and Unfair Methods of Competition by the defendants, I have suffered substantial damages to my legally protected interests in Colorado, including, but not limited to loss of business, loss and or diversion of sales, loss of goodwill, loss of business reputation, loss of public speaking and training appearances, and monetary damages exceeding \$16,000.00 due to bandwidth theft and other wrongful interferences with business activities.

Tenth Cause of Action
Conspiracy

328. I repeat and re-allege the facts in the preceding paragraphs of this Complaint as if fully set forth herein.
329. One or more of the underlying torts is preempted, therefore this conspiracy claim is also preempted.
330. The parties to the conspiracy are American Family Rights Association, William O. Tower, Ann Tower, Leonard Henderson, Susan Adams Jackson Aka Susan Wolverton, Cletus Kiefer, FAR Defense Alliance, Francine Renee Cygan, Mark Cygan, Illinois Family Advocacy Coalition, Dorothy Kernaghan-Baez, Georgia Family Rights, Inc., Dennis Hinger, National Association of Family Advocates, Aimee Dutkiewicz, Thomas Dutkiewicz, Connecticut DCFWatch, William Wiseman, Wiseman Studios, Dee Contreras, Randall Blair, Brenda Swallow, Ann Durand, Lloyd Phillips, Ringo Kamens, Cheryl Barnes, CPS Watch, Inc., Sarah Thompson, and Desere' Clabo.
331. The defendants knowingly entered into the conspiracy.
332. The conspiracy began in August 2000.
333. The conspiracy has continued to the date of this filing, with the most recent act occurring

as of the date of this filing.

334. The defendants used legal means to accomplish an illegal result, and/or used illegal means to achieve something that in itself is lawful in furtherance of the conspiracy.
335. The defendants acted intentionally, purposefully and without lawful justification.
336. The purpose of the conspiracy has been to deprive me of my business and my business reputation, to deprive me of my professional reputation, deprive me of my property, to deprive me of my property rights under copyright to control the uses of or exploit my intellectual property, to deprive me of my professional reputation and stature, to deprive me of my legitimate livelihood, to drive my business off of the Internet, to defraud the public, and to eliminate me as competition.
337. The defendants conspired to commit multiple wrongful acts against me including but not limited to false advertising and unfair trade practices, copyright infringement, theft and/or misappropriation of trade secrets and proprietary information, plagiarism, a pattern of racketeering activity, to induce or commit breach of contract, and tortious interference with business relationships.
338. The defendants committed multiple overt acts in furtherance of the common design.
339. As proximate cause of the conspiracy, I have suffered injury and damages including damage to my business and my business reputation, loss of my professional reputation, deprivation of my property and my rights under copyright to control the uses of that property and exploit that property, loss of stature in the business community, loss of my business and livelihood, loss of goodwill, diversion of sales, continued, ongoing and far-reaching copyright infringement, effectuation of new and further infringements, depreciation in the value of and ability to sell and license my work, and lost profits and/or opportunities.

Eleventh Cause of Action
Antitrust / The Sherman Act
15 U.S.C. §2 et. seq

340. I repeat and re-allege the facts in the preceding paragraphs this Complaint as if fully set forth herein.
341. A combination or conspiracy among all of the defendants existed as described in the cause of action for Conspiracy and in the rest of this complaint.
342. Another purpose of this conspiracy was to engage in price-fixing of the products offered

- to the public by me and by the defendants.
343. The defendants determined that the products and services offered should be made available to the public for free.
344. The defendants subsequently made their products available to the public for free.
345. When I charged for certain of my products and services, the defendants attempted to eliminate me as competition.
346. The defendants also stole my copyrighted intellectual property that I license for a fee, without paying for it, and gave it away to the public for free, sometimes as verbatim content, sometimes after altering it and creating derivative works from it.
347. The defendants also refused to deal with me or my associates and boycotted and encouraged the public to boycott my and my associates's products, services and training events.
348. This combination or conspiracy was an unreasonable restraint of trade or commerce.
349. The trade or commerce restrained was interstate or international in nature or the conspiracy affected interstate or foreign trade.
350. As proximate cause of the antitrust conspiracy, I have suffered injury and damages including damage to my business and my business reputation, loss of my professional reputation, deprivation of my property and my rights under copyright to control the uses of that property and exploit that property, loss of stature in the business community, loss of my business and livelihood, loss of goodwill, diversion of sales, continued, ongoing and far-reaching copyright infringement, effectuation of new and further infringements, depreciation in the value of and ability to sell and license my work, and lost profits and/or opportunities.

RELIEF

(Damages and Injunctive Relief)

Wherefore, plaintiff Shell **demands trial by jury** and judgment from the Court as follows:

- a. To accept jurisdiction over this case;
- b. To award damages against all defendants, jointly and severally, for copyright infringement, vicarious copyright infringement and contributory copyright infringement for a sum of money equal to the amount of damages and/or losses Shell has sustained or will sustain; or

- c. In lieu thereof, should Shell elect an award of statutory damages, pursuant to 17 U.S.C. § 504(c) against the defendants, jointly and severally, to be increased to the maximum permitted by law, for each act of willful, copyright infringement, vicarious copyright infringement and contributory copyright infringement;
- d. To award damages against all defendants, jointly and severally, for a sum of money equal to the amount of damages and/or losses Shell has sustained or will sustain, for engaging in a pattern of racketeering activity, and to treble the amount of said damages pursuant to 18 U.S.C. § 1964(c) and C.R.S. § 18-17-106(7).
- e. To award damages against Ann Durand and Brenda Swallow equal to the amount of damages and/or losses Shell has sustained or will sustain as defined in the contract and security agreement, plus triple damages, for breach of contract pursuant to the agreement they expressly entered into with Shell by virtue of their express agreement to that contract;
- f. To award damages against the defendants, jointly and severally, equal to the amount of damages and/or losses Shell has sustained or will sustain as defined in the copyright notice and security agreement on her web site, for breach of contract when they copied her web site content without her permission and without prepaying the posted license fees.
- g. To award damages against the defendants, jointly and severally, for a sum of money equal to the amount of damages and/or losses Shell has sustained or will sustain for engaging in tortious interference with contractual relationships;
- h. To award damages against all defendants, jointly and severally, for a sum of money equal to the amount of damages and/or losses Shell has sustained or will sustain for engaging in unfair or deceptive trade practices, plus triple damages and attorneys fees and costs as authorized by state statute, and to enjoin the defendants from engaging in Unfair or Deceptive Trade Practices;
- i. To award damages against all defendants, jointly and severally, for a sum of money equal to the amount of damages and/or losses Shell has sustained or will sustain for engaging in false advertising and to enjoin the defendants from engaging in false advertising; ;
- j. To award damages against all defendants, jointly and severally, for a sum of money equal to the amount of damages and/or losses Shell has sustained or will

sustain for the defendants's anti-trust practices, plus triple damages and attorney's fees and costs as authorized by statute, and to enjoin the defendants from engaging in antitrust activities and/or to seize the defendants's businesses;

- k. To award damages against all defendants, jointly and severally, for a sum of money equal to the amount of damages and/or losses Shell has sustained or will sustain for engaging in a conspiracy to commit the wrongs named in this complaint;
- l. To award punitive damages pursuant to Colorado statutory or common law;
- m. To enjoin all defendants, from all future copyright infringement and theft of intellectual property and theft or misappropriation of trade secrets, and to require them to pay license fees or to negotiate fee reductions or waivers of license fees for its original acquisitions, and to obtain written permission from and/or to establish an affirmative 'opt-in' policy and technology which is executed solely by the copyright owner, before copying, storing or publicly displaying anyone's intellectual property in any format anywhere;
- n. To enjoin Billy Wiseman and Wiseman Studios from publishing anything on the Internet about the plaintiff or any of the plaintiff's associates, due to his cognitive disability, without his proposed content first being verified for accuracy and the absence of other violations related to this complaint by a qualified professional or designee of this court;
- o. To order defendants to print retractions and apologies for each violation in the market and forum where the false advertising or other violation was originally published;
- p. Issue appropriate orders pursuant to 18 U.S.C. §1964, including, but not limited to: ordering all defendants, to divest themselves of any interest, direct or indirect, in the enterprises known as American Family Rights Association, Illinois Family Advocacy Coalition, National Association of Family Advocates, Georgia Family Rights, Inc., Families at Risk Defense Alliance, Connecticut DCF Watch, CPS Watch, Inc., and Wiseman Studios; imposing reasonable restrictions on the future activities or investments of the defendants, including, but not limited to, prohibiting all defendants, from engaging in the same type of endeavor as they have been engaged in, the activities of which affect interstate or foreign

commerce; or ordering dissolution or reorganization of American Family Rights Association, Illinois Family Advocacy Coalition, National Association of Family Advocates, Georgia Family Rights, Inc., Families at Risk Defense Alliance, Connecticut DCF Watch, CPS Watch, Inc., and Wiseman Studios;

- q. To award prejudgment interest on the amount of damages and/or losses that Shell has sustained;
- r. To award all costs of litigation incurred by Shell, including her reasonable attorney's fees and experts' fees, pursuant to 18 U.S.C. § 1964(c) and § 18-17-106(7) C.R.S. ;
- s. To provide Shell with opportunity to correct deficiencies or errors associated with her pro se pleadings in the interests of justice;
- t. To award such other and further relief as the Court deems just and equitable.

Respectfully Submitted February 13, 2009

/s/ Suzanne Shell

Suzanne Shell - pro se
14053 Eastonville Rd.
Elbert, CO 80106
719.749.2971
dshell@gmail.comf

Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Marybeth Peters

Register of Copyrights, United States of America

Form TX
For a Nondramatic Literary Work
UNITED STATES COPYRIGHT OFFICE

TXu 1-364-413



EFFECTIVE DATE OF REGISTRATION

6 7 07
Month Day Year

DO NOT WRITE ABOVE THIS LINE IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET

1

TITLE OF THIS WORK ▼

Family Advocacy Consumer Advisory

PREVIOUS OR ALTERNATIVE TITLES ▼

badadvocates.com, www.badadvocates.com, Family Advocate Consumer Advisory, Bad Advocates Page

PUBLICATION AS A CONTRIBUTION If this work was published as a contribution to a periodical, serial, or collection, give information about the collective work in which the contribution appeared Title of Collective Work ▼

If published in a periodical or serial give Volume ▼ Number ▼ Issue Date ▼ On Pages ▼

2

NAME OF AUTHOR ▼

a Suzanne Shell

DATES OF BIRTH AND DEATH

Year Born ▼ Year Died ▼
1956

Was this contribution to the work a work made for hire?
 Yes
 No

AUTHOR'S NATIONALITY OR DOMICILE
Name of Country

OR { Citizen of ► United States
Domiciled in ►

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK

Anonymous? Yes No
Pseudonymous? Yes No

If the answer to either of these questions is Yes, see detailed instructions.

NATURE OF AUTHORSHIP Briefly describe nature of material created by this author in which copyright is claimed ▼
Author of text which is expressly attributed to Suzanne Shell

NOTE

Under the law the author of a work made for hire is generally the employer not the employee (see instructions) For any part of this work that was made for hire check Yes in the space provided give the employer (or other person for whom the work was prepared) as Author of that part and leave the space for dates of birth and death blank

NAME OF AUTHOR ▼

b The Editors @badadvocates.com (Pseudonym)

DATES OF BIRTH AND DEATH

Year Born ▼ Year Died ▼

Was this contribution to the work a work made for hire?
 Yes
 No

AUTHOR'S NATIONALITY OR DOMICILE
Name of Country

OR { Citizen of ► United States
Domiciled in ►

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK

Anonymous? Yes No
Pseudonymous? Yes No

If the answer to either of these questions is Yes, see detailed instructions.

NATURE OF AUTHORSHIP Briefly describe nature of material created by this author in which copyright is claimed ▼
Co-Author(s) of text not expressly attributed to Suzanne Shell

NAME OF AUTHOR ▼

c

Was this contribution to the work a work made for hire?
 Yes
 No

AUTHOR'S NATIONALITY OR DOMICILE
Name of Country

OR { Citizen of ►
Domiciled in ►

DATES OF BIRTH AND DEATH

Year Born ▼ Year Died ▼

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK

Anonymous? Yes No
Pseudonymous? Yes No

If the answer to either of these questions is Yes, see detailed instructions.

NATURE OF AUTHORSHIP Briefly describe nature of material created by this author in which copyright is claimed ▼

3

YEAR IN WHICH CREATION OF THIS WORK WAS COMPLETED

2006

This information must be given in all cases

DATE AND NATION OF FIRST PUBLICATION OF THIS PARTICULAR WORK

Month ► Day ► Year ►

Complete this information ONLY if this work has been published

4

COPYRIGHT CLAIMANT(S) Name and address must be given even if the claimant is the same as the author given in space 2 ▼

Suzanne Shell, 14053 Eastonville Rd Elbert, CO 80106
The Editors @badadvocates.com, C/O Suzanne Shell,
14053 Eastonville Rd Elbert, CO 80106

APPLICATION RECEIVED

JUN - 7 2007

ONE DEPOSIT RECEIVED

JUN - 7 2007

TWO DEPOSITS RECEIVED

FUNDS RECEIVED

TRANSFER If the claimant(s) named here in space 4 is (are) different from the author(s) named in space 2 give a brief statement of how the claimant(s) obtained ownership of the copyright ▼

DO NOT WRITE HERE OFFICE USE ONLY

MORE ON BACK ►

Complete all applicable spaces (numbers 5-9) on the reverse side of this page See detailed instructions Sign the form at line 8

DO NOT WRITE HERE

Page 1 of 2 pages

EXAMINED BY MMJ JRP FORM TX

CHECKED BY _____

CORRESPONDENCE
Yes

FOR
COPYRIGHT
OFFICE
USE
ONLY

DO NOT WRITE ABOVE THIS LINE IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET

PREVIOUS REGISTRATION Has registration for this work or for an earlier version of this work already been made in the Copyright Office?

Yes No If your answer is Yes why is another registration being sought? (Check appropriate box) ▼

a This is the first published edition of a work previously registered in unpublished form

b This is the first application submitted by this author as copyright claimant

c This is a changed version of the work, as shown by space 6 on this application

If your answer is Yes give Previous Registration Number ▶

Year of Registration ▶

5

DERIVATIVE WORK OR COMPILATION

Preexisting Material Identify any preexisting work or works that this work is based on or incorporates ▼

Former consumer advisory/bad advocates pages from AFAC web site at www profane-justice.org

a 6

See instructions before completing this space

Material Added to This Work Give a brief general statement of the material that has been added to this work and in which copyright is claimed ▼

Text, literary content

b

DEPOSIT ACCOUNT If the registration fee is to be charged to a Deposit Account established in the Copyright Office give name and number of Account Name ▼ Account Number ▼

a 7

CORRESPONDENCE Give name and address to which correspondence about this application should be sent Name/Address/Apt/City/State/Zip ▼

Suzanne Shell, Agent for The Editors @badadvocates.com
14053 Eastonville Rd
Elbert, CO 80106

b

Area code and daytime telephone number ▶ 719-749-2971

Fax number ▶

Email ▶ dsshell@gmail.com,

CERTIFICATION* I the undersigned hereby certify that I am the

Check only one ▶

- author
- other copyright claimant
- owner of exclusive right(s)
- authorized agent of The Editors @badadvocates.com

of the work identified in this application and that the statements made by me in this application are correct to the best of my knowledge

Name of author or other copyright claimant or owner of exclusive right(s) ▲

8

Typed or printed name and date ▼ If this application gives a date of publication in space 3 do not sign and submit it before that date

Suzanne Shell

Date ▶ June 5, 2007

Handwritten signature ▼

Certificate will be mailed in window envelope to this address

Name ▼
Suzanne Shell, Agent for The Editors @badadvocates.com

Number/Street/Apt ▼
14053 Eastonville Rd

City/State/Zip ▼
Elbert, CO 80106

YOU MUST

Complete all necessary spaces. Sign your application in space 8

SEND ALL 3 ELEMENTS IN THE SAME PACKAGE.

- 1 Application form
- 2 Nonrefundable filing fee in check or money order payable to Register of Copyrights
- 3 Deposit material

MAIL TO

Library of Congress
Copyright Office
101 Independence Avenue SE
Washington DC 20559 6222

9

17 USC §506(e) Any person who knowingly makes a false representation of a material fact in the application for copyright registration provided for by section 409 or in any written statement filed in connection with the application shall be fined not more than \$2 500



This Certificate issued under the seal of the Copyright Office in accordance with title 17, United States Code, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Marybeth Peters
 Register of Copyrights, United States of America

FORM TX
 For a Nondramatic Library Work
 UNITED STATES COPYRIGHT OFFICE

TX 6-404-010



EFFECTIVE DATE OF REGISTRATION

Apr. 10 2006
 Month Day Year

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

1

TITLE OF THIS WORK ▼

profane-justice.org

PREVIOUS OR ALTERNATIVE TITLES ▼

American Family Advocacy Center Web Site, AFAC Web Site, profanejustice.org

PUBLICATION AS A CONTRIBUTION If this work was published as a contribution to a periodical, serial, or collection, give information about the collective work in which the contribution appeared. Title of Collective Work ▼

If published in a periodical or serial give: Volume ▼ Number ▼ Issue Date ▼ On Pages ▼

2

a NAME OF AUTHOR ▼

Suzanne Shell

DATES OF BIRTH AND DEATH

Year Born ▼ Year Died ▼
 1956

Was this contribution to the work a "work made for hire"?
 Yes
 No

AUTHOR'S NATIONALITY OR DOMICILE

Name of Country

OR { Citizen of ▶
 Domiciled in ▶

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK

Anonymous? Yes No
 Pseudonymous? Yes No

If the answer to either of these questions is "Yes," see detailed instructions.

NOTE

Under the law, the "author" of a "work made for hire" is generally the employer, not the employee (see instructions). For any part of this work that was "made for hire" check "Yes" in the space provided, give the employer (or other person for whom the work was prepared) as "Author" of that part, and leave the space for dates of birth and death blank.

NATURE OF AUTHORSHIP Briefly describe nature of material created by this author in which copyright is claimed. ▼

*Text, literary content, audio content Work contains both published and unpublished content

b NAME OF AUTHOR ▼ *Revised and additional text in website

DATES OF BIRTH AND DEATH

Was this contribution to the work a "work made for hire"?
 Yes
 No

AUTHOR'S NATIONALITY OR DOMICILE

Name of Country

OR { Citizen of ▶
 Domiciled in ▶

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK

Anonymous? Yes No
 Pseudonymous? Yes No

If the answer to either of these questions is "Yes," see detailed instructions.

NATURE OF AUTHORSHIP Briefly describe nature of material created by this author in which copyright is claimed. ▼

c NAME OF AUTHOR ▼

Was this contribution to the work a "work made for hire"?
 Yes
 No

AUTHOR'S NATIONALITY OR DOMICILE

Name of Country

OR { Citizen of ▶
 Domiciled in ▶

DATES OF BIRTH AND DEATH

Year Born ▼ Year Died ▼

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK

Anonymous? Yes No
 Pseudonymous? Yes No

If the answer to either of these questions is "Yes," see detailed instructions.

NATURE OF AUTHORSHIP Briefly describe nature of material created by this author in which copyright is claimed. ▼

3

a YEAR IN WHICH CREATION OF THIS WORK WAS COMPLETED

2006

This information must be given in all cases.

b DATE AND NATION OF FIRST PUBLICATION OF THIS PARTICULAR WORK

Complete this information ONLY if this work has been published.

Month ▶ March Day ▶ 26 Year ▶ 2006

USA Partially published, includes unpublished clean

4

4 COPYRIGHT CLAIMANT(S) Name and address must be given even if the claimant is the same as the author given in space 2. ▼

Suzanne Shell
 14053 Eastonville Rd. Elbert, CO 80106

TRANSFER If the claimant(s) named here in space 4 is (are) different from the author(s) named in space 2, give a brief statement of how the claimant(s) obtained ownership of the copyright. ▼

APPLICATION RECEIVED
 APR 10 2006
 ONE DEPOSIT RECEIVED

TWO DEPOSITS RECEIVED
 APR 10 2006
 FUNDS RECEIVED

DO NOT WRITE HERE OFFICE USE ONLY

EXAMINED BY <i>HM</i>	FORM TX
CHECKED BY	
<input type="checkbox"/> CORRESPONDENCE Yes	FOR COPYRIGHT OFFICE USE ONLY

*Amended by C.O. authority telephone call with Suzanne Shell 8/17/06.

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

PREVIOUS REGISTRATION Has registration for this work, or for an earlier version of this work, already been made in the Copyright Office?

Yes No If your answer is "Yes" why is another registration being sought? (Check appropriate box.)

- a. This is the first published edition of a work previously registered in unpublished form.
- b. This is the first application submitted by this author as copyright claimant.
- c. This is a changed version of the work, as shown by space 6 on this application.

If your answer is "Yes," give: Previous Registration Number ▶

TX 5-989-070

Year of Registration ▶

2004

5

DERIVATIVE WORK OR COMPILATION

Preexisting Material Identify any preexisting work or works that this work is based on or incorporates.

*-profess-justice.org Previous version of website

a 6

Material Added to This Work Give a brief, general statement of the material that has been added to this work and in which copyright is claimed.

*Additional pages, text and literary and audio content-

Revised and additional text in website

See instructions before completing this space.

b

DEPOSIT ACCOUNT If the registration fee is to be charged to a Deposit Account established in the Copyright Office, give name and number of Account.

Name ▼

Account Number ▼

a 7

CORRESPONDENCE Give name and address to which correspondence about this application should be sent. Name/Address/Apt/City/State/ZIP ▼

Suzanne Shell
14053 Eastonville Rd.
Elbert, CO 80106

b

Area code and daytime telephone number ▶ 719-749-2971

Fax number ▶

Email ▶ dsshell@ix.netcom.com

CERTIFICATE I, the undersigned, hereby certify that I am the

author

Check only one ▶

- other copyright claimant
- owner of exclusive right(s)
- authorized agent of _____

of the work identified in this application and that the statements made by me in this application are correct to the best of my knowledge.

Name of author or other copyright claimant, or owner of exclusive right(s) A

8

Typed or printed name and date ▼ If this application gives a date of publication in space 3, do not sign and submit it before that date.

Suzanne Shell

Date ▶ April 5, 2006

Handwritten signature (X) ▼

X *Suzanne Shell*

Certificate will be mailed in window envelope to this address:

Name ▼
Suzanne Shell

Number/Street/Apt ▼
14053 Eastonville Rd

City/State/ZIP ▼
Elbert, CO 80106

• Complete all necessary spaces
• Sign your application in space 8

1. Application form
2. Nonrefundable filing fee in check or money order payable to Registrar of Copyrights
3. Deposit material

Library of Congress
Copyright Office
101 Independence Avenue, S.E.
Washington, D.C. 20540-0000

9

As of July 1, 2006, the filing fee for Form TX is \$39.



This Certificate issued under the seal of the Copyright Office in accordance with title 17, United States Code, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Marybeth Peters

Register of Copyrights, United States of America

Form TX
For a Non-dramatic Literary Work
UNITED STATES COPYRIGHT OFFICE

TX 5-907-307

EFFECTIVE DATE OF REGISTRATION

TXU
Mar 15 2004
Month Day Year

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

1

TITLE OF THIS WORK ▼
profane-justice.org

PREVIOUS OR ALTERNATIVE TITLES ▼
American Family Advocacy Center web site

PUBLICATION AS A CONTRIBUTION If this work was published as a contribution to a periodical, serial, or collection, give information about the collective work in which the contribution appeared. **Title of Collective Work** ▼

If published in a periodical or serial give: **Volume** ▼ **Number** ▼ **Issue Date** ▼ **On Pages** ▼

2

NAME OF AUTHOR ▼
a Suzanne Shell

DATES OF BIRTH AND DEATH
Year Born ▼ Year Died ▼
1956

Was this contribution to the work a "work made for hire"?
 Yes
 No

AUTHOR'S NATIONALITY OR DOMICILE
Name of Country
OR { Citizen of ► USA
Domiciled in ►

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK
Anonymous? Yes No
Pseudonymous? Yes No
If the answer to either of these questions is "Yes," see detailed instructions.

NATURE OF AUTHORSHIP Briefly describe nature of material created by this author in which copyright is claimed. ▼
Text, content.

NOTE

Under the law, the "author" of a "work made for hire" is generally the employer, not the employee (see instructions). For any part of this work that was "made for hire" check "Yes" in the space provided, give the employer (or other person for whom the work was prepared) as "Author" of that part, and leave the space for dates of birth and death blank.

NAME OF AUTHOR ▼
b

DATES OF BIRTH AND DEATH
Year Born ▼ Year Died ▼

Was this contribution to the work a "work made for hire"?
 Yes
 No

AUTHOR'S NATIONALITY OR DOMICILE
Name of Country
OR { Citizen of ►
Domiciled in ►

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK
Anonymous? Yes No
Pseudonymous? Yes No
If the answer to either of these questions is "Yes," see detailed instructions.

NATURE OF AUTHORSHIP Briefly describe nature of material created by this author in which copyright is claimed. ▼

NAME OF AUTHOR ▼
c

DATES OF BIRTH AND DEATH
Year Born ▼ Year Died ▼

Was this contribution to the work a "work made for hire"?
 Yes
 No

AUTHOR'S NATIONALITY OR DOMICILE
Name of Country
OR { Citizen of ►
Domiciled in ►

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK
Anonymous? Yes No
Pseudonymous? Yes No
If the answer to either of these questions is "Yes," see detailed instructions.

NATURE OF AUTHORSHIP Briefly describe nature of material created by this author in which copyright is claimed. ▼

3

YEAR IN WHICH CREATION OF THIS WORK WAS COMPLETED This information must be given in all cases.
2004

DATE AND NATION OF FIRST PUBLICATION OF THIS PARTICULAR WORK Complete this information ONLY if this work has been published.
Month ► 02 Day ► 14 Year ► 2004
USA

4

COPYRIGHT CLAIMANT(S) Name and address must be given even if the claimant is the same as the author given in space 2. ▼
Suzanne Shell
14053 Eastonville Rd., Elbert, CO 80106

See instructions before completing this space.

TRANSFER If the claimant(s) named here in space 4 is (are) different from the author(s) named in space 2, give a brief statement of how the claimant(s) obtained ownership of the copyright. ▼

APPLICATION RECEIVED
MAR 15 2004
ONE DEPOSIT RECEIVED
MAR 15 2004
TWO DEPOSITS RECEIVED
FUNDS RECEIVED

EXAMINED BY

[Handwritten Signature]

FORM TX

CHECKED BY

CORRESPONDENCE

Yes

FOR
COPYRIGHT
OFFICE
USE
ONLY

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

PREVIOUS REGISTRATION Has registration for this work, or for an earlier version of this work, already been made in the Copyright Office?

Yes No If your answer is "Yes," why is another registration being sought? (Check appropriate box.) ▼

a. This is the first published edition of a work previously registered in unpublished form.

b. This is the first application submitted by this author as copyright claimant.

c. This is a changed version of the work, as shown by space 6 on this application.

If your answer is "Yes," give: Previous Registration Number ▶

Year of Registration ▶

5

DERIVATIVE WORK OR COMPILATION

Preexisting Material Identify any preexisting work or works that this work is based on or incorporates. ▼

a

6

See instructions before completing this space.

Material Added to This Work Give a brief, general statement of the material that has been added to this work and in which copyright is claimed. ▼

b

DEPOSIT ACCOUNT If the registration fee is to be charged to a Deposit Account established in the Copyright Office, give name and number of Account.

Name ▼

Account Number ▼

a

7

CORRESPONDENCE Give name and address to which correspondence about this application should be sent. Name/Address/Apt/City/State/ZIP ▼

b

Suzanne Shell
14053 Eastonville Rd.
Elbert, CO 80106

Area code and daytime telephone number ▶ 719-749-2971

Fax number ▶

Email ▶ dshell@ix.netcom.com

CERTIFICATION I, the undersigned, hereby certify that I am the

Check only one ▶

- author
- other copyright claimant
- owner of exclusive right(s)
- authorized agent of _____

of the work identified in this application and that the statements made by me in this application are correct to the best of my knowledge.

Name of author or other copyright claimant, or owner of exclusive right(s) ▲

8

Typed or printed name and date ▼ If this application gives a date of publication in space 3, do not sign and submit it before that date.

Suzanne Shell

Date ▶ 2-26-2004

Handwritten signature (X) ▼

[Handwritten Signature: Suzanne Shell]

Certificate will be mailed in window envelope to this address:

Name ▼	Suzanne Shell
Number/Street/Apt ▼	14053 Eastonville Rd
City/State/ZIP ▼	Elbert, CO 80106

- Complete all necessary spaces
- Sign your application in space 8

9

1. Application form
2. Nonrefundable filing fee in check or money order payable to Register of Copyrights
3. Deposit material

Library of Congress
Copyright Office - TX
101 Independence Avenue, S.E.
Washington, D.C. 20540-4222

Form not subject to change. For current fees, check the Copyright Office website at www.copyright.gov, call the Copyright Office, or call (800) 771-0700.

*17 U.S.C. § 506(e): Any person who knowingly makes a false representation of a material fact in the application for copyright registration provided for by section 408, or in any written statement filed in connection with the application, shall be fined not more than \$2,500.



This Certificate issued under the seal of the Copyright Office in accordance with title 17, United States Code, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Marybeth Peters

Register of Copyrights, United States of America

Form TX For a Nondramatic Literary Work

REGI TX 5-989-070



TX0005599670M

EFFECTIVE DATE OF REGISTRATION

Month June Day 21 Year 2004

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

1

TITLE OF THIS WORK

profane-justice.org

PREVIOUS OR ALTERNATIVE TITLES

American Family Advocacy Center web site & profanejustice.org & profanejustice.us

PUBLICATION AS A CONTRIBUTION If this work was published as a contribution to a periodical, serial, or collection, give information about the collective work in which the contribution appeared. Title of Collective Work

If published in a periodical or serial give: Volume Number Issue Date On Pages

2

NAME OF AUTHOR

a Suzanne Shell

DATES OF BIRTH AND DEATH

Year Born 1956 Year Died

Was this contribution to the work a "work made for hire?"

No

AUTHOR'S NATIONALITY OR DOMICILE

Citizen of USA

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK

Anonymous? Pseudonymous? No

If the answer to either of these questions is "Yes," see detailed instructions.

NOTE

Under the law, the "author" of a "work made for hire" is generally the employer, not the employee (see instructions). For any part of this work that was "made for hire" check "Yes" in the space provided, give the employer (or other person for whom the work was prepared) as "author" of that part, and leave the space for dates of birth and death blank.

NATURE OF AUTHORSHIP Briefly describe nature of material created by this author in which copyright is claimed. Text, content,

NAME OF AUTHOR

b

DATES OF BIRTH AND DEATH

Year Born Year Died

Was this contribution to the work a "work made for hire?"

No

AUTHOR'S NATIONALITY OR DOMICILE

Citizen of Domiciled in

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK

Anonymous? Pseudonymous? No

If the answer to either of these questions is "Yes," see detailed instructions.

NATURE OF AUTHORSHIP Briefly describe nature of material created by this author in which copyright is claimed.

NAME OF AUTHOR

c

DATES OF BIRTH AND DEATH

Year Born Year Died

Was this contribution to the work a "work made for hire?"

No

AUTHOR'S NATIONALITY OR DOMICILE

Citizen of Domiciled in

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK

Anonymous? Pseudonymous? No

If the answer to either of these questions is "Yes," see detailed instructions.

NATURE OF AUTHORSHIP Briefly describe nature of material created by this author in which copyright is claimed.

3

YEAR IN WHICH CREATION OF THIS WORK WAS COMPLETED

2004

DATE AND NATION OF FIRST PUBLICATION OF THIS PARTICULAR WORK

Month 05 Day 15 Year 2004

USA

4

COPYRIGHT CLAIMANT(S) Name and address must be given even if the claimant is the same as the author given in space 2.

Suzanne Shell 14053 Eastonville Rd., Elbert, CO 80106

APPLICATION RECEIVED

JUN 21 2004

TWO DEPOSITS RECEIVED

FUNDS RECEIVED

EXAMINED BY <i>[Signature]</i>	FORM TX
CHECKED BY	
<input type="checkbox"/> CORRESPONDENCE	FOR COPYRIGHT OFFICE USE ONLY
<input type="checkbox"/> Yes	

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

PREVIOUS REGISTRATION Has registration for this work, or for an earlier version of this work, already been made in the Copyright Office?

Yes No If your answer is "Yes," why is another registration being sought? (Check appropriate box.)

- a. This is the first published edition of a work previously registered in unpublished form.
- b. This is the first application submitted by this author as copyright claimant.
- c. This is a changed version of the work, as shown by space 6 on this application.

If your answer is "Yes," give: Previous Registration Number ▶ TX 5-907-307

Year of Registration ▶ 2004

5

DERIVATIVE WORK OR COMPILATION

Preexisting Material Identify any preexisting work or works that this work is based on or incorporates.

profane-justice.org

Material Added to This Work Give a brief, general statement of the material that has been added to this work and in which copyright is claimed.

additional pages, text and content

a 6

See instructions before completing this space.

b

DEPOSIT ACCOUNT If the registration fee is to be charged to a Deposit Account established in the Copyright Office, give name and number of Account.

Name

Account Number

a 7

CORRESPONDENCE Give name and address to which correspondence about this application should be sent. Name/Address/Apt/City/State/ZIP

Suzanne Shell
14053 Eastonville Rd.
Elbert, CO 80106

b

Area code and daytime telephone number ▶ 719-749-2971

Fax number ▶

Email ▶ dsshell@ix.netcom.com

CERTIFICATION I, the undersigned, hereby certify that I am the

Check only one ▶

- author
- other copyright claimant
- owner of exclusive right(s)
- authorized agent of

Name of author or other copyright claimant, or owner of exclusive right(s)

of the work mentioned in this application and that the statements made by me in this application are correct to the best of my knowledge.

8

Typed or printed name and date If this application gives a date of publication in space 3, do not sign and submit it before that date.

Suzanne Shell

Date ▶ 6-14-2004

Handwritten signature (X)

X *[Handwritten Signature]*

Certificate will be mailed in window envelope to this address:

Name	Suzanne Shell
Number/Street/Apt	14053 Eastonville Rd
City/State/ZIP	Elbert, CO 80106

- Complete all necessary spaces
- Sign your application in space 8

1. Application form
 2. Nonrefundable filing fee in check or money order payable to Registrar of Copyrights
 3. Deposit material

Library of Congress
 Copyright Office - TX
 101 Independence Avenue, S.E.
 Washington, D.C. 20559-6222

9
Fees are subject to change. For current fees, consult the Copyright Office website at www.copyright.gov or call (800) 777-0669.

*17 U.S.C. § 508(e): Any person who knowingly makes a false representation of a material fact in the application for copyright registration provided for by section 408, or in any written statement filed in connection with the application, shall be fined not more than \$2,500.



OFFICIAL SEAL

This Certificate issued under the seal of the Copyright Office in accordance with title 17, United States Code, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Marybeth Peters

REGISTER OF COPYRIGHTS
United States of America

SHORT FORM TX

For a Nondramatic Literary Work

UNITED STATES COPYRIGHT OFFICE

TX 5-677-193



TX 5-677-193

Effective Date of Registration

12 2 02

Application Received

DEC 02 2002

Deposit Received

One

Two

DEC 02 2002

Fee Received

Examined By

Correspondence

TYPE OR PRINT IN BLACK INK. DO NOT WRITE ABOVE THIS LINE.

Title of This Work:

Profane Justice: A Comprehensive Guide to Asserting Your Parental Rights Second Edition

Alternative title or title of larger work in which this work was published:

Name and Address of Author and Owner of the Copyright:

*Suzanne Shell
14053 Eastonville Rd
Elbert, CO 80106*

Nationality or domicile: Phone, fax, and email:

Phone (719) 749-2971

Fax (719) 749-2972

Email *dshell@epobox.ws*

Year of Creation:

2002

If work has been published, Date and Nation of Publication:

a. Date *February 1 2002* (Month, day, and year all required)
Month Day Year

b. Nation *USA*

Type of Authorship in This Work:

- Text (includes fiction, nonfiction, poetry, computer programs, etc.)
- Illustrations
- Photographs
- Compilation of terms or data

Check all that this author created.

Signature:

Registration cannot be completed without a signature.

I certify that the statements made by me in this application are correct to the best of my knowledge.* Check one:

- Author
- Authorized agent

Suzanne Shell

Name and Address of Person to Contact for Rights and Permissions:

Check here if same as #2 above.

Phone, fax, and email:

Phone ()

Fax ()

Email

Certificate will be mailed in window envelope to this address:

Name *Suzanne Shell*
 Number/Street/Apt *14053 Eastonville Rd*
 City/State/ZIP *Elbert CO 80106*

Complete this space only if you currently hold a Deposit Account in the Copyright Office.

Deposit Account # _____

Name _____

DO NOT WRITE HERE Page 1 of pages

*17 U.S.C. § 508(e). Any person who knowingly makes a false representation of a material fact in the application for copyright registration provided for by section 409, or in any written statement filed in connection with the application, shall be fined not more than \$2,500.

CERTIFICATE OF REGISTRATION

Case 1:09-cv-00309-MSK-KMT Document 1 Filed 02/19/20

FORM TX
For 2006 Dramatic Literary Works
UNITED STATES COPYRIGHT OFFICE



OFFICIAL SEAL

This Certificate issued under the seal of the Copyright Office in accordance with title 17, United States Code, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Marybeth Peters

REGISTER OF COPYRIGHTS
United States of America

TX 4-842-955



TX0004842955*

EFFECTIVE DATE OF REGISTRATION

Aug. 24, 1998
Month Day Year

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

1 TITLE OF THIS WORK ▼

Profane Justice: A Comprehensive Guide to Asserting your Parental Rights

PREVIOUS OR ALTERNATIVE TITLES ▼

PUBLICATION AS A CONTRIBUTION If this work was published as a contribution to a periodical, serial, or collection, give information about the collective work in which the contribution appeared. Title of Collective Work ▼

If published in a periodical or serial give: Volume ▼ Number ▼ Issue Date ▼ On Pages ▼

2 a NAME OF AUTHOR ▼

Suzanne Shell

DATES OF BIRTH AND DEATH

Year Born ▼ Year Died ▼
1956

Was this contribution to the work a "work made for hire?"

Yes
 No

AUTHOR'S NATIONALITY OR DOMICILE
Name of Country

OR { Citizen of ► USA
Domiciled in ► USA

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK

Anonymous? Yes No
Pseudonymous? Yes No

If the answer to either of these questions is "Yes," see detailed instructions

NATURE OF AUTHORSHIP Briefly describe nature of material created by this author in which copyright is claimed ▼

b NAME OF AUTHOR ▼

Was this contribution to the work a "work made for hire?"

Yes
 No

AUTHOR'S NATIONALITY OR DOMICILE
Name of Country

OR { Citizen of ►
Domiciled in ►

DATES OF BIRTH AND DEATH

Year Born ▼ Year Died ▼

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK

Anonymous? Yes No
Pseudonymous? Yes No

If the answer to either of these questions is "Yes," see detailed instructions

NATURE OF AUTHORSHIP Briefly describe nature of material created by this author in which copyright is claimed ▼

c NAME OF AUTHOR ▼

Was this contribution to the work a "work made for hire?"

Yes
 No

AUTHOR'S NATIONALITY OR DOMICILE
Name of Country

OR { Citizen of ►
Domiciled in ►

DATES OF BIRTH AND DEATH

Year Born ▼ Year Died ▼

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK

Anonymous? Yes No
Pseudonymous? Yes No

If the answer to either of these questions is "Yes," see detailed instructions

NATURE OF AUTHORSHIP Briefly describe nature of material created by this author in which copyright is claimed ▼

3 a YEAR IN WHICH CREATION OF THIS WORK WAS COMPLETED

1997

b DATE AND NATION OF FIRST PUBLICATION OF THIS PARTICULAR WORK

Complete this information ONLY if this work has been published. Month ► Feb Day ► 27 Year ► 1997
United States

4 COPYRIGHT CLAIMANT(S) Name and address must be given even if the claimant is the same as the author given in space 2. ▼

Suzanne Shell
14053 Eastonville Rd
Elbert CO 80106

APPLICATION RECEIVED

AUG 24 1998

ONE DEPOSIT RECEIVED

TWO DEPOSITS RECEIVED

AUG 24 1998

FUNDS RECEIVED

DO NOT WRITE HERE OFFICE USE ONLY

MORE ON BACK ►

• Complete all applicable spaces (numbers 5-9) on the reverse side of this page.
• See detailed instructions. • Sign the form at line 8

DO NOT WRITE HERE

Page 1 of 2 pages

EXAMINED BY _____
CHECKED BY 7/1/8

CORRESPONDENCE
Yes

FOR
COPYRIGHT
OFFICE
USE
ONLY

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

PREVIOUS REGISTRATION Has registration for this work, or for an earlier version of this work, already been made in the Copyright Office?

Yes No If your answer is "Yes," why is another registration being sought? (Check appropriate box) ▼

a. This is the first published edition of a work previously registered in unpublished form.

b. This is the first application submitted by this author as copyright claimant.

c. This is a changed version of the work, as shown by space 6 on this application.

If your answer is "Yes," give: Previous Registration Number ▼

Year of Registration ▼

5

DERIVATIVE WORK OR COMPILATION

Preexisting Material Identify any preexisting work or works that this work is based on or incorporates. ▼

a

6

See instructions
before completing
this space.

b

Material Added to This Work Give a brief, general statement of the material that has been added to this work and in which copyright is claimed. ▼

DEPOSIT ACCOUNT If the registration fee is to be charged to a Deposit Account established in the Copyright Office, give name and number of Account.
Name ▼ Account Number ▼

a

7

CORRESPONDENCE Give name and address to which correspondence about this application should be sent. Name/Address/Apt/City/State/ZIP ▼

b

Suzanne Shell 14053 Eastonville Rd Elbert CO 80106

Area code and daytime telephone number ▶ 719-661-5968

Fax number ▶ 719-749-2971

Email ▶ dsshell@ix.netcom.com

CERTIFICATION* I, the undersigned, hereby certify that I am the

Check only one ▶

- author
- other copyright claimant
- owner of exclusive right(s)
- authorized agent of

of the work identified in this application and that the statements made by me in this application are correct to the best of my knowledge.

Name of author or other copyright claimant, or owner of exclusive right(s) ▲

Suzanne Shell

8

Typed or printed name and date ▼ If this application gives a date of publication in space 3, do not sign and submit it before that date.

Suzanne Shell

Date ▶ 8-19-98

Handwritten signature (X) ▼

X *Suzanne Shell*

The filing fee of \$20.00 is effective through June 30, 1999. After that date, please write the Copyright Office, check the Copyright Office Website at <http://www.loc.gov/copyright>, or call (202) 707-3000 for the latest fee information.

Mail certificate to:

Certificate will be mailed in window envelope

Name ▼ Suzanne Shell

Number/Street/Apt ▼ 14053 Eastonville Rd

City/State/ZIP ▼ Elbert CO 80106

YOU MUST

- Complete all necessary spaces
- Sign your application in space 8

SEND ALL 3 ELEMENTS IN THE SAME PACKAGE

1. Application form
2. Nonrefundable filing fee in check or money order payable to Register of Copyrights
3. Deposit material

MAIL TO

Library of Congress
Copyright Office
101 Independence Avenue, S.E.
Washington, D.C. 20559-6000

9



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Marybeth Peters

Register of Copyrights, United States of America

Registration Number:

TXu 1-588-498

Effective date of registration:

October 23, 2008

Title

Title of Work: Unpublished Proprietary Documents
Hawaii Key Issues Matrix
Arizona Case Plan Key Issues Matrix
Arizona Reasonable Efforts Key Issues Matrix
Connecticut Issues & Strategies in Dependency & Neglect Key Issues Matrix
Kansas Key Issues Matrix
Florida Issues & Strategies in Dependency & Neglect CLE
Arizona Family Rights Seminar Handout
CLE Issues in Dependency & Neglect
Florida Issues & Strategies in Dependency & Neglect, Family Rights
Hawaii Seminar Handout
Case Management

Completion/Publication

Year of Completion: 2007

Author

Author: Suzanne Shell

Author Created: text, editing

Work made for hire: No

Citizen of: United States

Domiciled in: United States

Copyright claimant

Copyright Claimant: Suzanne Shell

14053 Eastonville Rd, Elbert, CO, 80106, United States

Limitation of copyright claim

Material excluded from this claim: some preexisting legal text

Certification

Name: Suzanne Shell

Date: October 23, 2008

Correspondence: Yes

IPN#:



Registration #: TXU001588498

Service Request #: 1-126668661

Document ID:
IPN#
TXU001588498