

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS**

LARRY KLAYMAN,
a Natural Person and Resident of Florida,
on behalf of himself and all U.S. police officers,
Jews, and Caucasians

Plaintiffs,

v.

BARACK HUSSEIN OBAMA,
acting as President of the United States of America
1600 Pennsylvania Avenue
Washington, D.C. 20500

and

LOUIS FARRAKHAN,
a Natural Person, and Minister and Leader of
Nation of Islam
7351 South Stony Island Avenue
Chicago, Illinois 60649

and

ERIC HOLDER,
a Natural Person, and former Attorney General of
the United States of America
Covington & Burling LLP
One City Center
850 Tenth Street, NW
Washington, DC 20001-4956

and

REVEREND AL SHARPTON,
a Natural Person, and founder and President of
the National Action Network
106 W. 145th Street
Harlem, New York 10039

and

CLASS ACTION COMPLAINT

Civil Action No. _____

RASHAD TURNER
a Natural Person, and leader of the
Black Lives Matter movement

and

OPAL TOMETI,
a Natural Person, and co-founder and leader of
the Black Lives Matter movement and
#blackLivesMatter network

and

PATRISSE CULLORS,
a Natural Person, and co-founder and leader of
the Black Lives Matter movement and
#blackLivesMatter network

and

ALICIA GARZA,
a Natural Person, and co-founder and leader of
the Black Lives Matter movement and
#blackLivesMatter network

and

DERAY MCKESSON
a Natural Person, and leader of the
Black Lives Matter movement

Defendants.

CLASS ACTION COMPLAINT

In this class action complaint, Plaintiffs Larry Klayman and police officers and other law enforcement persons of all races and ethnicities Jews, and Caucasians (collectively “Plaintiffs”) sue Defendants Louis Farrakhan, President Barack Hussein Obama, Reverend Al Sharpton, former Attorney General Eric Holder, and leaders of the so called “Black Lives Matter” movement, Rashad Turner, Opal Tometi, Patrisse Cullors, Alicia Garza, and Deray McKesson

(collectively “Defendants”) in their individual and official capacities where applicable, and in support allege as follows:

I. INTRODUCTION AND NATURE OF THE ACTION

1. This is a class action complaint for damages and equitable relief arising out of the threats, severe bodily injury and/or deaths, future deaths, emotional harm, and imminent fears of death and/or serious bodily harm resulting from Black Lives Matter leaders, former Attorney General Eric Holder, President Barack Hussein Obama, Minister Louis Farrakhan and Reverend Al Sharpton. Those Defendants have repeatedly incited their supporters and others to engage in threats of and attacks to cause serious bodily injury or death upon police officers, Jews, and Caucasians. Thus, Defendants, each and every one of them, jointly and severally, conspiring and/or acting in concert either expressly or otherwise, are inciting and causing serious bodily injury or death to police officers and other law enforcement persons of all races and ethnicities, Jews, and Caucasians.
2. This is a civil action for the deprivation of the Plaintiff and other members of the class herein of their civil rights, conspiracy against the Plaintiff’s and other members of the class herein civil rights and obstruction of justice to prevent the enforcement of civil rights, *Bivens* relief, assault, and intentional infliction of emotional distress resulting from the incitement of violent attacks that have led to the murders of, and have caused serious bodily injuries to, police officers of all races ethnicities, Jews, and Caucasians.
3. Directing, provoking and even inciting angry crowds to violence is illegal, as illuminated by the U.S. Supreme Court in *Brandenburg v. Ohio*, 395 U.S. 444 (1969).

II. CLASS ACTION STATUS

4. Plaintiff and other members of the class herein reserve the right to move the Court to certify this case and its causes of action as a class action pursuant to the Federal Rules of Civil Procedure.
5. The class proposed by the Plaintiff includes all domestic actual and defacto law enforcement officials and persons, police officers, Sheriff's and Sheriff's Deputies, and law enforcement persons of all races and ethnicities, as well as relevant Jews and Caucasians also threatened and targeted and harmed by the Defendants' ignited race war, who reside within the domestic United States.

III. JURISDICTION AND VENUE

6. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. § 1331, 28 U.S.C. § 1332(a)(2), as a civil action brought by citizens of the United States.
7. This Court also has subject matter jurisdiction over this action pursuant to 28 U.S.C. § 1605 (general exceptions to jurisdictional immunity).
8. This Court also has subject matter jurisdiction over this action based on diversity of citizenship pursuant to 28 U.S.C. § 1332(a)(2), because there is complete diversity of citizenship between the Plaintiff and the Defendants.
9. On information and belief, the citizenship of the Defendants is:
 - a. Louis Farrakhan, Illinois
 - b. Barack Obama, Illinois
 - c. Eric Holder, Washington, D.C. after moving from New York
 - d. Al Sharpton, State of New York
 - e. Mr. Rashad Turner, St. Paul, Minnesota

- f. Ms. Opal Tometi, State of New York
- g. Ms. Patrisse Cullors, Los Angeles, California
- h. Ms. Alicia Garza, San Francisco, California

10. Jurisdiction is also proper under *Bivens v. Six Unknown Named Agents*, 403 U.S. 388 (1971), in so far as the actions violate the 1st, 4th, 5th, and 14th Amendments to the U.S. Constitution.
11. The matter in controversy exceeds the sum or value of \$75,000, exclusive of interest and costs.
12. This Court also has supplemental jurisdiction over this action pursuant to 28 U.S.C. § 1367.
13. Venue is proper in this district pursuant to 18 U.S.C. § 2334(a) and 28 U.S.C. §§ 1391(b) and 1391(d) because harm from the conspiracy and incitement occurred in this District in Dallas, Texas, when twelve police officers were shot, five dead at this writing, within this District on July 7, 2016.

IV. STANDING AND THE INDIVIDUAL PLAINTIFF PARTIES

14. Plaintiff Larry Klayman is a Florida citizen, who is a Caucasian of Jewish origin. Plaintiff Larry Klayman is a part of law enforcement as a former federal prosecutor of the U.S. Department of Justice, as a former public official as a candidate for U.S. Senate, as the founder of Judicial Watch and Freedom Watch whose mission is to enforce the rule of law and fight against racism, public corruption, and to further civil rights and equality for all persons under the U.S. Constitution. Klayman has been highly visible and active in defending police, other law enforcement officials, Jews and Israel and opposing Obama's and Holder's efforts to stir up racial, ethnic and religious conflict to suit their agendas in

every area of American life in court and in public. At all times relevant to this action, Plaintiff Larry Klayman has been present in the United States of America before and at the time that innocent police officers and other law enforcement officials of all races, ethnicities have been subjected to threats and actual violence that has resulted in severe bodily injury or death as a result of Defendants' promotion and incitement of riots and violent acts against police officers, Jews, and Caucasians. He has also been present before and at the time Defendants called for and incited such violence. He was subject to, and continues to be subject to, fear and intimidation of serious bodily injury or death by those who wish to harm him and police officers and other law enforcement persons of all races and ethnicities, and Jews and Caucasians in unlawful acts to promote and implement a race war. As a high profile Caucasian of Jewish origin, Plaintiff Larry Klayman imminently fears, including in this District where his organization does business and solicits support, great bodily injury and death and thus harm as a result of Defendants' promotion and incitement of riots and violent acts, including death and great bodily harm, against law enforcement and police officers of all races and ethnicities, Jews, and Caucasians. Plaintiff Klayman has been actually so threatened as also set forth below.

V. FACTS COMMON TO ALL COUNTS

15. By the acts alleged herein, Defendants, each and every one of them, have incited committed unlawful acts including violent riots, assaults and murders of law enforcement, police, and acts of violence, including seriously bodily injury or death, against police officers and other law enforcement persons of all races and ethnicity, Jews, and Caucasians. In a classic form of illegal incitement to imminent violence of an angry mob, the Defendants acting in concert and each of them are inciting the imminent serious

bodily injury and killing of police officers and other law enforcement persons of all races and ethnicities, Jews, and Caucasians by convincing their supporters and others that there is a civil war between blacks and law enforcement, thereby calling for immediate violence and severe bodily injury or death in response to that non-existent and fictitious threat. Defendants incite people to violence and cause violence by telling those people that they are under attack. Defendants are encouraging disaffected blacks and black Muslims to ignore, disrespect, and assault law enforcement officials, and commit violence and lethal force.

16. The Defendants acting in concert and each of them have publicly incited people to violence with the fiction that police officers and other law enforcement (including many black and minority police officers) are intentionally and systematically targeting and hunting blacks and other minorities to kill them for no reason other than racism or sport.
17. The Defendants acting in concert and each of them have publicly incited people with the fiction that police officers (including many black and minority police officers) are intentionally and knowingly arresting and prosecuting blacks, black Muslims and other minorities who have not committed a crime.
18. The Defendants acting in concert and each of them have publicly incited people to violence against the Plaintiff and other members of the class herein with the fiction that blacks and black Muslims and other minorities are being arrested and prosecuted disproportionately to the crimes that individual arrestees actually committed.
19. Because experience shows that the vast majority of crimes in the United States are committed by repeat offenders, the Defendants' efforts to prevent the arrest, prosecution, and incarceration of criminals merely because of their race directly and proximately

causes a significant increase and eruption of growing crime. The Defendants are causing actual repeat offenders to be released back onto the streets in furtherance of their (inappropriately) race-based political movements.

20. As a direct and proximate result of Defendants' race war against police officers and law enforcement persons of all races and ethnicity, Jews, and Caucasians, intimidating and threatening law enforcement from doing their duties, more than 30 major U.S. cities have reported increases in violence in the last years.¹
21. The inevitable, entirely foreseeable, and predictable result proximately caused by the war and law enforcement became crystal clear Thursday night, July 7, 2106, in Dallas, Texas. What everyone knew was going to happen as a proximate result of the Defendants' malicious conspiracy to attack the rule of law and the legal system of this country thus unfolded in tragedy on July 7, 2016, in Dallas.
22. This direct attack on the fabric of society by killing police officers and law enforcement in Dallas followed yet another incident of incitement and shameful slander of police officers and law enforcement by Defendant Obama in Warsaw, Poland. Posting on Facebook from Warsaw, Obama incited imminent violence again police and the entire legal system, including judges, prosecutors, and lawyers, by spreading the lie that the law enforcement -- presumably including this Court -- is racist and is engaging in a conspiracy to "hunt" down black men purely for sport -- that is, not because suspects engaged in probable cause to commit crime for which they could be charged and should be arrested pursuant to law for the alleged crimes for which there is probable cause.

¹ Monica Davey & Mitch Smithaugh, "Murder Rates Rising Sharply in Many U.S. Cities," The New York Times, August 31, 2015, available at <http://www.nytimes.com/2015/09/01/us/murder-rates-rising-sharply-in-many-us-cities.html/>

23. On July 7, 2016, Defendant Obama accused the U.S. legal system -- presumably

including this Court -- of a conspiracy to kill Black men (for no reason) in that statement:

"What's clear is that these fatal shootings are not isolated incidents," the nation's first black President said in the statement.

"They are symptomatic of the broader challenges within our criminal justice system, the racial disparities that appear across the system year after year, and the resulting lack of trust that exists between law enforcement and too many of the communities they serve." ²

24. Clearly, the accusation that shootings "are not an isolated incident" is an incitement

claiming that there is a knowing, intentional related and connected conspiracy -- "not isolated incidents" -- to intentionally murder Black people.

25. Thus, Defendant Obama directly incited early in the day the murders that occurred much later that same day in Dallas, Texas. Once again, the Defendants incited imminent violence.

26. The Defendants incite imminent violence by hiding the reality that police officers usually respond to calls for help from civilians who are the victims of crime, often minority victims, and the police take the 911 calls for help as they come, regardless of race. Instead the Defendants spread the false narrative that police are intentionally targeting lawbreakers or innocent people based on their race.

27. Then, around 9:00 p.m., on July 7, 2016, at a "Black Live Matters" protest, at least one sniper shot 12 police officers who were on duty to keep the peace at the rally. As of this writing, 5 police officers are dead and seven are wounded in an ambush.

² Leonard Greene, "President Obama gives voice to police brutality victims after Alton Sterling, Philando Castile shootings," New York Daily News, accessible at: <http://www.nydailynews.com/news/politics/president-obama-voice-police-brutality-victims-article-1.2703404> (emphasis added).

28. The impact upon public safety from the attack of society's rule of law and law enforcement is clear:

“We’re hurting,” David Brown, the Dallas police chief, said Friday morning. “Our profession is hurting. Dallas officers are hurting. We are heart broken.” Four Dallas Police officers and one Dallas Area Rapid Transit officer were killed by “snipers” perched atop “elevated positions,” officials said.³

29. The suspect took a position in a parking garage high above the protest so that he could pick off the police officers and other law enforcement from a high angle and altitude without hitting anyone else in the parade but police officers. As the Washington Post reported:

Videos circulating on social media showed an individual with an assault-style rifle shoot a police officer in the back at point-blank range.

A gunman, believed to be the same shooter, then engaged in a violent, three-hour standoff with SWAT officers, police said. Brown said the attacker was killed when police detonated an explosive device near him after a hostage negotiator spoke with him.

During this standoff, Brown said the suspect, who was not identified, told police that “he was upset about Black Lives Matter” and angered by the recent police shootings in Louisiana and Minnesota that dominated national news this week.

“He said he was upset about the recent police shootings,” Brown said during a Friday morning news conference. “The suspect said he was upset at white people. The suspect stated he wanted to kill white people, especially white officers.”

Dallas Mayor Mike Rawlings told CBS News that in addition to the dozen officers shot, two other people also wounded by gunfire, though their conditions were not immediately known.

³ *Id.*

“No words to describe the atrocity that happened to our city,” Brown said. “All I know is this must stop, this divisiveness between our police and our citizens.”⁴

30. According to The Washington Post drawing on multiple reporters: "The Dallas police chief said an attacker told authorities 'he was upset about the recent police shootings' and 'wanted to kill white people, especially white officers.'"⁵

31. The suspect arrested in Dallas, Texas, as stated that he wanted to kill whites and white police officers, not police officers in general.

[Dallas police chief David Brown]told reporters at an early morning news conference: “The suspect said he was upset about Black Lives Matter,” during negotiations. “He said he was upset about the recent shootings, he was upset at white people. The suspect said he wanted to kill white people, especially white officers.”⁶

32. Thus, the shooter or shooters systematically and intentionally picked off 12 police officers while largely ignoring the rest of the crowd who were not police.

33. The Daily Caller similarly reported the statements by the Dallas shooting suspect:

Dallas police chief David Brown announced at a press conference Friday morning that one of the suspects in Thursday night’s sniper attacks that left five officers dead and seven others wounded told authorities his motivation for the shooting was that he was “upset about Black Lives Matter” and “wanted to kill white people,” especially white police officers.

⁴ *Id.*

⁵ Tim Madigan, Michael E. Miller, Travis M. Andrews and Mark Berman, "Snipers kill five police officers in Dallas, wound seven others during protest," The Washington Post, July 8, 2016, accessible at: https://www.washingtonpost.com/news/morning-mix/wp/2016/07/08/like-a-little-war-snipers-shoot-11-police-officers-during-dallas-protest-march-killing-five/?hpid=hp_rhp-top-table-main_mm-dallas-1120pm-6a%3Ahomepage%2Fstory

⁶ Jamie Grierson and Oliver Laughland, and Tom Dart in Dallas, "Dallas shooting suspect stated he wanted to 'kill white officers'," The Guardian, July 8, 2016, accessible at: Dallas shooting suspect stated he wanted to 'kill white officers'

“The suspect said, he was upset about Black Lives Matter. He said, he was upset about the recent police shootings. The suspect said he was upset at white people. The suspect said he wanted to kill white people, especially white officers. The suspect stated that we will eventually find the IEDs,” Brown said. “The suspect stated that he was not affiliated with any groups and he stated that he did this alone.”⁷

34. The Guardian further reported:

The shooting marked the deadliest attack on law enforcement officers since 9/11 and threatened to inject yet more tension into the already divisive debate over racial disparities in US policing.⁸

35. Col. Derek Harvey (U.S. Army - Retired) has analyzed the situation and determined that the Black Lives Matter movement is directly and proximately responsible for the recent increase in violence against police officers and the shootings of police officers in Dallas, Texas. Derek J. Harvey is qualified to make this determination. He was the first Director of the Afghanistan-Pakistan Center of Excellence at U.S. Central Command (CENTCOM) and a retired United States Army Colonel. He was selected by General David Petraeus in 2009 to lead the new organization. Harvey is a Senior Executive Service-member of the Defense Intelligence Agency (DIA), and was the previous senior analytical specialist for Iraq to Petraeus, then Commander, Multi-National Forces-Iraq.

36. Col. Derek Harvey stated on Fox News at 11:20 a.m. on July 8, 2016, that Black Lives Matter directly caused and incited the shooting of 12 police officers in Dallas, Texas, on July 8, 2016.

⁷ Peter Hasson, "Police: Dallas Suspect 'Upset About Black Lives Matter,' 'Wanted To Kill White People,'" Daily Caller, July 8, 2016, accessible at <http://dailycaller.com/2016/07/08/police-dallas-suspect-upset-about-black-lives-matter-wanted-to-kill-white-people/#ixzz4Dpv3nyCs>

⁸ *Id.*

37. By the Defendants always condemning injury or death of black people, but almost never white people, the Defendants led by President Obama send the clear signal that it is acceptable to kill white people, especially White police officers and law enforcement such as the lead plaintiff Larry Klayman.

38. As even The New York Times must reluctantly concede, “Among some experts and rank-and-file officers, the notion that less aggressive policing has emboldened criminals — **known as the “Ferguson effect”** in some circles — is a popular theory for the uptick in violence.”⁹

39. Obama's War on the Police is directly endangering the public safety of all Americans, but particularly placing in danger law enforcement, members of the legal system, judges, prosecutors, and lawyers:

The number of uniformed officers in the mid-Atlantic city [Baltimore, Maryland] fell 6.1 percent last year and has shrunk by even more in the first half of this year, according to police data seen by Reuters and not previously reported.

The fall in 2015 was the biggest decline in police numbers among nine comparably-sized U.S. cities reviewed by Reuters. The police force in Detroit and El Paso shrank by 4.9 percent and 4.3 percent, respectively, while Denver and Las Vegas saw increases of over 5 percent.

The reasons for the fall are unclear, but it comes at a difficult time when the number of murders and other violent crimes have risen sharply in Baltimore and many other U.S. cities.¹⁰

40. “The equilibrium has changed between police and offenders,” said Alfred Blumstein, a professor and a criminologist at Heinz College, Carnegie Mellon University.¹¹

⁹ *Id.* (Emphasis added.)

¹⁰ Scott Malone, "Baltimore Saw Steep Fall in Police Numbers as Murder Rate Soared," Reuters, July 7, 2016, accessible at: <http://www.reuters.com/article/us-baltimore-police-hiring-insight-idUSKCN0ZN0BF>

41. Murders in the City of Baltimore have soared by 56% over the last year as a direct and proximate consequence of the Defendants' political war on police and law enforcement, intimidating and threatening police and law enforcement with prosecution for doing their jobs, encouraging criminals that the police are being restrained and held back from enforcing the law, and inciting criminals with rationalizations, pretexts, and excuses for their looting, crimes, and murder in the name of the grievances spread by the Defendants.
42. Milwaukee, Wisconsin, experienced a 76 percent increase in murder over the same period last year, with 104 people killed so far this year.
43. In St. Louis, Missouri, 136 people had been killed this year, a 60 percent rise from the 85 murders the city had during the same time last year.
44. In New Orleans, 120 people have been killed by late August, 2015, compared with 98 during the same period a year ago.
45. In Washington, D.C., murders totaled 105, compared with 73 people a year ago.
46. In New York, New York, killings have increased by about 9 percent, to 208 through mid-August from 190 a year earlier. Homicides in Chicago are up about 20 percent over the same period a year ago.
47. When no police officers were indicted in the death of Eric Garner in New York City, the Mayor of New York City, William de Blasio, stigmatized and defamed his own New York City's police department as racists and bullies who need to be reigned in and retrained, thus justifying and excuses the violent attacks upon police officers.

¹¹ *Id.*

48. Defendants Obama, Holder, Farrakhan, Sharpton, and Black Lives Matter joined in and helped further the incitement, agitation, and hatred and violence against police officers of all races and ethnicities, Jews, and Caucasians.¹²

49. On information and belief, the rallies, demonstrations and marches by the “Black Lives Matter” movement and those without a name during the last year from August 2014 were pre-planned, orchestrated, and organized in advance with the participation and encouragement of all of the Defendants. That is, the Defendants could not know ahead of time when and where a controversy would erupt, but organized and prepared paid activists, community organizers, and volunteers ready for a rapid response to inflame any situation into race-based, anti-law-enforcement rioting as soon as it might occur.

A. Defendant Nation of Islam Leader and Minister Louis Farrakhan And Relevant Acts

50. On March 5, 2015, National of Islam Leader and Minister Louis Farrakhan (“Defendant Farrakhan”) incited Black members of the U.S. military to desert and engage in mutiny and violent insurrection against their country.

51. Specifically referring to the deaths of Michael Brown, Tamir Rice and Eric Garner, among others, during encounters with the police, Farrakhan incited the crowd that day that --

If the government cannot protect our lives ... why are you in the Armed Forces, fighting for a democracy that you don't have at home? Why are you in the Armed Forces of America going overseas to fight somebody that never did a thing to you and act pitiful when your own people are shot down in front of you?

¹² Ben Shapiro, "Obama, Holder, Sharpton Stoke Flames, Ferguson Officers Shot," Breitbart, March 12, 2015, accessible at: <http://www.breitbart.com/big-government/2015/03/12/obama-holder-sharpton-stoke-flames-ferguson-officers-shot/>

And:

I'm calling on all the soldiers that fight for America, come home and let's unite and fight for our lives that the federal government refuses to fight for us. Then we must fight for ourselves.¹³

52. During the speech, Farrakhan held up the deaths of Michael Brown, Tamir Rice and Eric Garner as evidence that there is inequality in the treatment of black and black Muslim citizens, who must therefore wage war against police officers.
53. Then Farrakhan reinforced this call for violence by sharing a link to the video of his speech, which he had posted on Facebook, through his official Twitter account, with the explanation, "Why I'm calling on all black soldiers in the U.S. Armed Forces to come home, unite & fight for our own lives."
54. Farrakhan's incitement to armed conflict of black active-duty members of the military to engage in armed insurrection against U.S. society also includes inciting black military veterans.
55. On November 22, 2014, Farrakhan spoke to a packed auditorium at the Murphy Fine Arts Center at Morgan State University in Baltimore, Maryland. More than 2,000 people including students, community leaders and distinguished guests came to hear the lecture by the 81 one-year old Nation of Islam leader.¹⁴

¹³ Video of Farrakhan's speech posted at: Billy Hallowell, "Did Louis Farrakhan Just Call for Armed Resistance? Minister's Fiery Call to all 'Black Soldiers in the U.S. Armed Forces' to 'Come Home, Unite and Fight'," March 5, 2015, accessible at <http://www.theblaze.com/stories/2015/03/05/did-louis-farrakhan-just-call-for-armed-resistance-ministers-fiery-call-to-all-black-soldiers-in-the-u-s-armed-forces-to-come-home-unite-and-fight/#sthash.GoVh5b3s.dpuf>

¹⁴ Askia Muhammad, "'We need Minister Farrakhan' say Black college students," The Final Call, November 25, 2014, accessible at: http://www.finalcall.com/artman/publish/National_News_2/article_101953.shtml

56. During the speech, Louis Farrakhan urged retaliation by violent conflict for the death of Michael Brown, a thief who was shot and killed by a Caucasian police officer in Ferguson, Missouri.

57. Defendant Farrakhan explicitly and specifically sought to stop black and black Muslim community leaders from discouraging the violent revolution, riots, and crime waves that he was calling for.

58. Defendant Farrakhan also directed his attacks at other black leaders, but attacked them for discouraging riots and violence:

"But time has moved on. Your day of leading our people is over," he said. Then he turned to his fellow preachers and repeated the admonition. "You preachers — *your day of being the pacifier for the white man's tyranny on black people is over. You've got to know they're not going to hear you anymore.*"

(*Emphasis added.*)¹⁵ Defendant Farrakhan condemned others for trying to prevent violence.

59. Defendant Farrakhan called for further violence in Ferguson, Missouri, and clarified his condemnation of other leaders who are trying to avoid the violence:

"They know an explosion is going to come," the Nation of Islam leader said to cheers from the more than 2,000 people crowding the university's Murphy Fine Arts Center. "You leaders are the worst."

60. At one point, Defendant Farrakhan held up what resembled a Quran inside the public school, saying that both the central religious text of Islam and the Bible require a "law of retaliation" and the punishment of "a life for a life."¹⁶

¹⁵ Doug Donovan, "Speaking at Morgan, Farrakhan predicts violence in Ferguson," [The Baltimore Sun](http://www.baltimoresun.com/news/maryland/baltimore-city/bs-md-farrakhan-morgan-20141122-story.html), November 22, 2014, <http://www.baltimoresun.com/news/maryland/baltimore-city/bs-md-farrakhan-morgan-20141122-story.html>

¹⁶ Eric Owens, "Louis Farrakhan Urged 'Retaliation' For Michael Brown A Month Before Ismaaiyl Abdullah Brinsley Executed NYPD Cops," [Daily Caller](http://dailycaller.com/2015/01/02/louis-farrakhan-urged-retaliation-for-michael-brown-a-month-before-nypd-cops-executed/), January 2, 2015, accessible at: <http://dailycaller.com/2015/01/02/louis-farrakhan-urged-retaliation-for-michael-brown-a-month-before-nypd-cops-executed/>

61. Then Ismaaiyl Abdullah Brinsley brutally executed two New York City police officers only 28 days after Farrakhan's November 22, 2015, incitement to violence.
62. Those two uniformed NYPD officers were shot dead as they sat in their marked police car on a Brooklyn street corner by the gunman's assassination-style mission to avenge Eric Garner and Michael Brown.
63. There was no warning, no provocation, no other interaction — the two police officers were simply assassinated, targeted for wearing a police uniform.¹⁷
64. Just three hours before shooting of the two officers, vile anti-police threats were posted to Brinsley's Instagram (social media) page. The threats referenced the recent police-involved killings of Eric Garner and Michael Brown. The gunman wrote, "I'm Putting Wings on Pigs Today" and "They Take 1 Of Ours . . . Let's Take 2 of Theirs."¹⁸
65. Yet undeterred by the consequences of his intentional and reckless acts, Defendant Farrakhan continued unabated with his campaign of racial and violent incitement.
66. On July 30, 2015, Defendant Farrakhan delivered a speech at Mt. Zion Baptist Church in Miami, Florida again inciting 10,000 black and black Muslim volunteers to mobilize and kill police officers and law enforcement, Jews, and Caucasian Americans in retaliation of the oppression of black people.¹⁹

¹⁷ Larry Celona, Shawn Cohen, Jamie Schram, Amber Jamieson and Laura Italiano, "Gunman executes 2 NYPD cops in Garner 'revenge,'" *The New York Post*, December 20, 2014, accessible at: <http://nypost.com/2014/12/20/2-nypd-cops-shot-execution-style-in-brooklyn/>

¹⁸ *Id.*

¹⁹ Gregory Tomlin, "'Stalk them and kill them,' Farrakhan says, calling for 10,000 volunteers to kill whites," *Christian Examiner*, August 5, 2015, accessible at <http://www.christianexaminer.com/article/farrakhan.calls.for.10000.volunteers.to.kill.whites/49329.htm>. See also Farrakhan's Facebook Page <https://www.facebook.com/OfficialMinisterFarrakhan/videos/vb.365178373589441/845109225596351/>

67. Defendant Farrakhan called for angry blacks and black Muslims to “stalk them and kill them” (Jews and Caucasians) as the “400 year old enemy.”
68. Farrakhan explicitly incited “10,000 fearless men” to commit imminent violence saying “rise up and kill those who kill us; stalk them and kill them and let them feel the pain of death that we are feeling!”²⁰
69. Referring to a million as being the “Million Man March” that he is previously organized for October 10, 2015, in Washington, D.C., Farrakhan further incited
70. “I’m looking for 10,000 in the midst of a million. Ten thousand fearless men who say death is sweeter than continued life under tyranny.”²¹
71. On October 10, 2015, Farrakhan and his Nation of Islam will hold a rally on the National Mall in Washington, D.C. to mark the 20th anniversary of the Million Man March.
72. That is, Farrakhan called for 10,000 assassins specifically within the framework of an upcoming, future event on the twentieth anniversary of the “Million Man March.”
73. Farrakhan incited blacks and black Muslims, with an appeal of being heroes in the race war cause, to “stalk them and kill them” referring to any and all Caucasians and especially police officers of all races and ethnicities.
74. Defendant Farrakhan called for the imminent killing of police officers and law enforcement of all races and ethnicities, Jews, and Caucasians when he demanded that “if

²⁰ Pam Key, “Farrakhan: We Must Rise Up and Kill Those Who Kill Us; Stalk Them and Kill Them,” Breitbart, August 4, 2015, accessible at <http://www.breitbart.com/video/2015/08/04/farrakhan-we-must-rise-up-and-kill-those-who-kill-us-stalk-them-and-kill-them/>

²¹ “Farrakhan speaks on 'Law of Retaliation,'" The Final Call - Uncompromised News & Perspectives, August 3, 2015, accessible at: <https://www.youtube.com/watch?v=Zr4bYXK7je8>

the federal government will not intercede in our affairs, then we must rise up and kill those who kill us, stalk them and let them feel the pain of death that we are feeling!”²²

75. Defendant Farrakhan further stated that “Death is sweeter than watching us slaughter each other to the joy of a 400-year-old enemy. Death is sweeter. The Qur’an teaches persecution is worse than slaughter then it says, retaliation is prescribed in matters of the slain. Retaliation is a prescription from God to calm the breasts of those whose children have been slain.”²³

76. Similarly, in June 2015, appearing in the course of the same “Justice or Else! Tour” at the Metropolitan African Methodist Episcopal church in Washington DC, Farrakhan gave an impassioned speech denouncing America and aligning all white Americans with the sentiments of the racist murderer in Charleston, South Carolina, Dylan Roof.²⁴

77. This speech received thunderous applause and cheers in the historic Metropolitan AME Church in Washington D.C., called the “National Cathedral of African Methodism.”

78. Speaking of the white people of Charleston that joined in the services, vigils, and marches in sympathy with the black victims, Defendant Farrakhan shouted,

“White folks march with you because they don't want you upsetting the city. They don't give a damn about them nine” [the nine black church-goers murdered in a prayer meeting].

²² *Id.*

²³ Richard B. Muhammad and Janiah Muhammad, "We are not asking for justice, we are demanding justice," *The Final Call*, August 4, 2015, accessible at http://www.finalcall.com/artman/publish/National_News_2/article_102517.shtml

²⁴ Matthew Maule, “Farrakhan Exploits Charleston Tragedy,” June 30, 2015, <http://www.christianpost.com/news/farrakhan-exploits-charleston-tragedy-140998/#wwOk9TDoEa6wPVSr.99>

79. That is, while all of Charleston, South Carolina's churches and community leaders were standing together in unity, appealing for calm, black and white pastors standing side-by-side, Farrakhan was seeking to destroy any sense of unity, calm, or forgiveness.

80. That is, in the classic legal definition of incitement of an angry mob to imminent violence, Defendant Farrakhan sought to inflame anger even against those whites trying to sympathize with the murdered victims, de-legitimize efforts to calm the situation, and nullify and cancel out calls by others for restraint and peace. Farrakhan was clearly and intentionally stoking the flames for imminent violence.

81. Because the Charleston, South Carolina, police fed the murderer, as required, shortly after he was arrested, Farrakhan accused the Charleston police of supporting the murders and praising the murderer Dylann Roof, slanderously proclaiming an inflammatory lie, which Farrakhan knew to be false but knew would incite violence:

“And you know what they [the police] were saying? 'You did a good job killing all them [racial epithet].' You think they were sympathetic? If they were sympathetic with us they would have snatched him, put him in chains, had the gun on him.”

82. In fact, news photographs show that the murderer Dylann Roof was arrested in handcuffs by the Charleston, South Carolina police. Obviously, law enforcement cannot hold a criminal in detention and deprive them of food. Yet Farrakhan seeks to further lie to further incite violence by claiming that feeding a suspect in jail awaiting trial means that the police support, approve of, and assisted the murders by Dylann Roof.

83. Less than a month after Farrakhan's speech, on August 26, 2015, a black male named Bryce Williams (also known as Vester Flanagan) executed two of his Caucasian former co-workers filming a tourism story at an idyllic lake in Moneta, Virginia, who worked for

a small-town Roanoke, Virginia news station, live on television and then posted disturbing first-person video of the attack on social media.²⁵

84. Williams was neither crazy nor acting out of anger but making a political statement and hate crime. Demonstrating that Williams' double homicide was part of the political movement to effect a race war, Williams not only videotaped the entire incident in the format of news coverage but also carefully waited until the news crew anchorman panned his television camera, then broadcasting live, away from the lake and back to capture the murder live on television.

85. Before Williams was caught by police, Williams took to Twitter to explain his reasons for killing his former coworkers. Williams, who is black, wrote that one of his victims made "racist comments" and that a complaint was filed against her through the equal employment opportunity commission, but his station chose to hire her anyway.

86. Also, after the deadly attack, Williams faxed a 23-page manifesto to media, saying "Why did I do it? I put down a deposit for a gun on 6/19/15. The Church shooting in Charleston happened on 6/17/15" "What sent me over the top was the church shooting. And my hollow point bullets have the victims' initials on them.' 'As for Dylann Roof? You [redacted]! You want a race war [redacted]? BRING IT THEN YOU WHITE . . . [redacted]!!!"

87. That is, Williams intended to start a race war, inspired by Defendant Farrakhan's calls.

²⁵ Chris Pleasance and Ashley Collman, "Revenge race murder: Bitter black reporter who gunned down white ex-colleagues live on air and posted the video online blames Charleston shootings and anti-gay harassment in manifesto," *The Daily Mail*, August 27, 2015, accessible at: <http://www.dailymail.co.uk/news/article-3211529/WDBJ7-reporter-Alison-Parker-Adam-Ward-shot-live-TV-Moneta-gunman.html>

88. Williams is a supporter and follower of President Barack Obama. He once was reprimanded for wearing a sticker of President Obama while standing in line to vote in that year's general election. Williams was reprimanded because he had clearly breached not just company regulations but also "standard journalistic ethics".²⁶
89. Then on August 28, 2015, in Cypress, Texas, in Harris County, just two days after Williams' murders of the innocent Caucasian victims, black gunman Shannon J. Miles approached Deputy Darren Goforth (a 10-year veteran of the Harris County Sheriff's Office) from behind and killed him execution-style as he was pumping gas at a Chevron gas station.²⁷ Officials found 15 shell-casings at the scene,²⁸ indicating that Miles had fired 15 shots at Deputy Goforth. As reported, Deputy Goforth never drew nor fired his weapon.
90. Investigators found no provocation that might have set off the attack nor any connection or relationship between Deputy Goforth and his assassin Miles, leading together with the setting at a gas station and circumstances to the conclusion that Miles assassinated Goforth purely because Goforth was a law enforcement officer.

²⁶ Lauren Gambino and Jon Swaine, "Vester Flanagan told to seek medical help by Virginia TV station, say memos," The Guardian, August 27, 2015, accessible at: <http://www.theguardian.com/us-news/2015/aug/26/virginia-gunman-vester-flanagan-wdbj-2012-memos-medical-help>

²⁷ Manny Fernandez and David Montgomery, "Texas Deputy Killed 'Because He Wore a Uniform,' Sheriff Says," The New York Times, August 29, 2015, accessible at: http://www.nytimes.com/2015/08/30/us/shooting-of-texas-deputy-is-called-coldblooded-execution.html?_r=0

²⁸ Emily Shapiro, "Suspect Allegedly Unloaded His Entire Pistol in Texas Deputy," ABC News / Good Morning America, August 31, 2015, accessible at: <http://abcnews.go.com/US/suspect-allegedly-unloaded-entire-pistol-texas-deputy/story?id=33430131>

91. At a news conference, Harris County Sheriff Ron Hickman said that Deputy Goforth “was a target because he wore a uniform,” as Deputy Goforth had no previous contact with the suspect.²⁹

92. Harris County Sheriff Ron Hickman and Harris County District Attorney Devon Anderson pushed back against the criticism of police, as Hickman stated “We've heard Black Lives Matter, All Lives Matter. Well, cops' lives matter, too.”³⁰

93. Officials investigating the execution have tied the attack by Shannon Miles to the wave of protests across the country over police shootings, including the demonstrations after the deaths of Michael Brown and Eric Garner.³¹

94. Similarly, on September 1, 2015, only a few days after the murder of GoForth, Police Officer Joseph Gliniewicz was shot and killed in Fox Lake, Illinois,³² prompting a manhunt for his two killers still underway at this writing.

95. Defendant Farrakhan, a virulent black Muslim anti-Semite, includes especially Jews in his incitement against “the 400 year enemy.” Defendant Farrakhan has alleged that the Jewish people were responsible for the slave trade and that they conspire to control the government, the media, Hollywood, and various black individuals and organizations.

²⁹ “Texas Deputy Killed ‘Because He Wore a Uniform,’ Sheriff Says,” The New York Times, August 29, 2015, *supra*.

³⁰ “Sheriff links “Black Lives Matter” movement to slain deputy,” CBS News, August 31, 2015, 9:52 accessible at: <http://www.cbsnews.com/news/darren-goforth-killing-sheriff-cites-black-lives-matter-movement/>

³¹ , “Texas Deputy Killed ‘Because He Wore a Uniform,’ Sheriff Says,” The New York Times, August 29, 2015, *supra*.

³² “‘Blue and Brave’: Illinois town rallies around police as search for officer's killer goes on,” Fox News, September 02, 2015, accessible at: <http://www.foxnews.com/us/2015/09/01/manhunt-on-for-gunman-after-cop-reportedly-killed-in-chicago/>

Farrakhan often promotes such messages at public speeches and sermons, some of which attract thousands of followers.

96. During Part II of his 2015 Saviours' Day keynote address at the Mosque Maryam in Chicago, Illinois, Farrakhan alleged (again) that Israel and Jews orchestrated the 9/11 attacks on the United States, claiming that "Israelis had foreknowledge of the attacks" and that Jews were warned ahead of time not to come to work that day.
97. Farrakhan then went on to speak more broadly of Israeli control of the American government, stating that Israel and Jews "don't fear America because they control it from within."
98. Defendant Farrakhan received a standing ovation after telling his audience that "the Satanic Jews that control everything and mostly everybody, if they are your enemy, then you must be somebody."³³
99. One of Defendant Farrakhan's largest attempts to reach new audiences was a 58-part online lecture series, started in January 2013 that lasted through February 2014. In the series, Farrakhan frequently characterized Jews as "Satanic" and promoted a wide range of anti-Semitic conspiracy theories, alleging Jewish control over government, finance, entertainment, and other sectors. The lecture series, which received an average of about 40,000 views per sermon, is part of a larger effort by the Nation of Islam's media arm to spread its hate through a range of propaganda, including through its newspaper and various social media sites.³⁴

³³ "Farrakhan In His Own Words," Anti-Defamation League, March 20, 2015, accessible at: <http://www.adl.org/anti-semitism/united-states/c/farrakhan-nation-of-islam-noi-in-his-own-words.html>

³⁴ *Id.*

100. Defendant Farrakhan has attacked Judaism as a “gutter religion” and Israel as an “outlaw” nation.³⁵

101. According to The New York Times, Defendant Farrakhan has repeated for a national television audience his description of Adolf Hitler as “a very great man.”³⁶

102. Defendant Farrakhan’s speeches have resulted in the deaths of police officers and law enforcement officials, Jews and Caucasians such as Plaintiff and other members of the class, and, because of his enormous and very loyal followers, continue to cause imminent fear of harm and actual harm through serious bodily injury or death to all police officers and law enforcement persons of all races and ethnicities, Jews and Christians.

B. Defendant President Barack Hussein Obama And Relevant Acts

103. A public official can be personally liable for abuse, corruption, or misuse of public office that violate constitutional rights in particular.

104. Revealing the knowing, willful, and intentional purpose of the Defendants' concerted actions, on October 30, 2008, then candidate Defendant President Barack Hussein Obama (“Defendant Obama”), roared to an excited crowd of his supporters: “We are five days away from fundamentally transforming America.”

105. To fundamentally transform an entire society, requires replacing the old society with a new version of society, by definition. To effect this, Defendant Obama utilized the

³⁵ “Jews Express Outrage at Farrakhan Calling Judaism ‘gutter Religion’, Israel Described As ‘outlaw’ State,” Jewish Telegraphic Agency, June 27, 1984, accessible at: <http://www.jta.org/1984/06/27/archive/jews-express-outrage-at-farrakhan-calling-judaism-gutter-religion-israel-described-as-outlaw-st>

³⁶ “Farrakhan Again Describes Hitler as a ‘Very Great Man,’” The New York Times, July 17, 1984, accessible at: <http://www.nytimes.com/1984/07/17/us/farrakhan-again-describes-hitler-as-a-very-great-man.html>

strategy to “divide and conquer,” by furthering, in concert with the other Defendants, as set forth below, a race war pitting blacks against whites, working with Muslims and Black Muslims such as Defendant Minister Louis Farrakan and others against police officers and law enforcement persons of all races and ethnicities, and Jews and Caucasians.

106. Defendants Barack Obama and Eric Holder have conspired with all Defendants and others to incite violence, looting, arson, assault against law enforcement and helpless communities with the purpose of making a new “fundamentally transformed America” appear preferable to the crime waves and chaos they themselves are creating.

107. On information and belief, Defendant Obama and Defendant Holder conspired with, encouraged, engaged in joint planning with, and developed strategies, plans, and courses of action with, the Black Lives Matter leaders, Al Sharpton, and Louis Farrakhan.

108. Al Sharpton had visited with Barack Obama 73 times in The White House as of February 27, 2015.³⁷ His visit in February 2015 was announced as

The main topic discussed at the summit, according to the White house, was the presidential task force formed in response to violent clashes with police in Ferguson, Missouri, and New York sparked by the killings of Michael Brown and Eric Garner. ‘The president highlighted the upcoming release of the report by the Task Force on 21st Century Policing, and emphasized the work of the Task Force leading to the report’s creation,’ said the news release.

109. On September 17, 2015, leaders of Black Lives Matter and Campaign Zero met in

The White House with President Obama’s primary adviser, aide, and implementer

Valerie Jarrett and other White House officials.³⁸

³⁷ Snezana Farberov, “Home is where the POTUS is: Al Sharpton returns to White House 'for his 73RD visit' with Obama to discuss problems facing minorities,” The Daily Mail, February 27, 2015, accessible at: <http://www.dailymail.co.uk/news/article-2973067/Al-Sharpton-returns-White-House-73RD-visit-Obama-discuss-problems-facing-minorities.html#ixzz3mOt6XqXN>

110. According to news reports, participants included Defendant DeRay Mckesson, Phil Agnew of the Dream Defenders; Brittany Packnett, and Johnetta Elzie of Campaign Zero; and Jamye Wooten, an organizer for Baltimore United for Change.

111. The topic of The White House meeting with Black Lives Matter and similar groups was mutual plans for changing official government policies about police officers and law enforcement.

112. Defendants Barack Obama and Eric Holder have knowingly and intentionally lied to and deceived the black community – cloaked with credibility as government officials – with the claim that police officers and other law enforcement persons, are systematically hunting and killing innocent blacks for no reason but racism.

113. The Defendants have incited and inflamed violent crowds into committing arson, looting, destruction of property, assaults on police officers of all races and ethnicities, Jews, and Caucasians, and other violence based upon the false idea that the nation's police officers of all races and ethnicities are intentionally and systematically targeting, hunting, and killing blacks and arresting and prosecuting innocent blacks.

114. Without the false propaganda from Defendant Obama and Defendant Holder that blacks and black Muslims are being intentionally hunted, targeted and/or disproportionately arrested based on race, the waves of violence now would not be occurring.

115. Defendants Obama and Holder suppress and conceal the reality that police officers and law enforcement are only responding to 911 emergency calls from residents

³⁸ Darren Sands, BuzzFeed, September 17, 2015, accessible at: <http://www.buzzfeed.com/darrensands/black-lives-matter-activists-meet-with-white-house-officials#.utj953aVw>

of their communities, who are other blacks and minorities also living in the same communities as the neighbors of Black Lives Matter activists.

116. Defendants Obama and Holder began almost immediately at the start of the Obama administration to undermine the nation's police officers and other law enforcement when on July 16, 2009, Harvard University professor Henry Louis Gates, Jr., was arrested at his Cambridge, Massachusetts home by a local police officer responding to a neighbor's 911 call of men breaking and entering the residence.
117. Ignoring, as always, that the policeman was called by a report from the neighbors that a man was breaking in (Gates had been absent for a long time) President Obama stoked racial animosity by accusing the police of acting stupidly – after admitting he did not know what happened.
118. But of greatest significance here, Defendant Obama fueled incited discord by stating in his frequent and persistent theme “that there's a long history in this country of African Americans and Latinos being stopped by law enforcement disproportionately.”
119. As early as January 24, 2011, Richard Roberts, spokesman for the International Union of Police Associations, explained “It's not a fluke. There's a perception among officers in the field that there's a war on cops going on.”
120. As reported by a former top deputy of the Defendant Farrakhan, Dr. Vibert White Jr., Defendant Obama's ties to the black nationalist movement in Chicago run “*DEEP*,” and that for many years, Defendants Farrakhan and Obama have had “an open line between them” to discuss policy and strategy, either directly or through intermediaries.³⁹

³⁹ “Obama-Farrakhan Ties Are Close, Ex-Aide Says,” Newsmax, November 3, 2008, accessible at: <http://www.newsmax.com/InsideCover/farrakhan-obama-islam/2008/11/03/id/326298/> Dr. Vibert White Jr., who spent most of his adult life as a

121. Farrakhan endorsed Obama in a videotaped speech to his followers at his mosque in Chicago in February. “You are the instruments that God is gonna use to bring about universal change, and that is why Barack has captured the youth,” Farrakhan said. He told the crowd that Obama was the new “messiah.”⁴⁰

122. Defendant Obama still has not spoken on the execution of Caucasian Sheriff Darren Goforth by black criminal Shannon J. Miles.⁴¹

123. Courageous African-American Milwaukee County Sheriff David Clarke blames a lack of presidential leadership by Defendant Obama for creating an atmosphere where protesters can openly call for the murder of police officers and law enforcement of all races and ethnicity without comment or action from the white House.⁴²

124. Sheriff Clarke charged the White House for creating an environment for over-the-top rhetoric and violence against police officers: “I said last December that war had been declared against the American police officer, led by some high-profile people. One of them coming out of the white House, another one coming out of the U.S. Department of Justice. And it’s open season right now, no doubt about it.” Later in the interview, the

member and ultimately top officer of the Nation of Islam, said: “Remember that for years, if you were a politician in Chicago, you had to have some type of relationship with Louis Farrakhan. You had to. If you didn’t, you would be ostracized out of black Chicago.” *Id.* white further stated that Obama was very much a “part of the Chicago scene” where Farrakhan, Jesse Jackson, the Rev. Jeremiah Wright Jr. and radicals would go to each other’s events and support each other’s causes. Only after Hillary Clinton called him out for being a beneficiary of Farrakhan’s support did Obama “denounce” Farrakhan’s comments, but he DIDN’T denounce the man. *Id.*

⁴⁰ *Id.*

⁴¹ “Obama statement on murder of Deputy Goforth Shannon Miles,” August 30, 2015, accessible at: <http://www.fireandreamitchell.com/2015/08/30/obama-statement-on-murder-of-deputy-goforth-shannon-miles/>

⁴² Becker, *Independent Journal Review*, August 29, 2015, *supra*.

sheriff pointed his finger at the president himself: “That’s why I said the President of the United States started this ‘war on police.’”⁴³

125. Sheriff Mike Lewis, Wicomico County, Maryland, states, including on Fox News (“The Sean Hannity Show”) on September 1, 2015, “You bet it is open season against law enforcement across this country. Law enforcement across this country is under siege.”

126. Defendant Obama started anti-police rhetoric when Michael Brown was shot while attacking a police officer in Ferguson, Missouri. Defendant Obama saw this as another opportunity to stir up major racial tensions and hatred for police officers of all races and ethnicity, Jews, and Caucasians.

127. Defendant Obama turned a defensive shooting into a national crisis. Defendant Obama was quickly aided by then Attorney General Eric Holder and Al Sharpton in raising racial tensions and hatred for police in Ferguson, St. Louis, and eventually nationwide.

128. When a grand jury declined to indict the police officer who shot Michael Brown, rioting commenced and Obama did not try to stop the riots.⁴⁴

C. **Defendant Reverend Al Sharpton And Relevant Acts**

129. Defendant Reverend Al Sharpton (“Defendant Sharpton”) is a supposed political activist against racial prejudice and injustice.⁴⁵

⁴³ *Id.*

⁴⁴ Ben Shapiro, "Obama, Holder, Sharpton Stoke Flames, Ferguson Officers Shot," Breitbart, March 12, 2015, accessible at: <http://www.breitbart.com/big-government/2015/03/12/obama-holder-sharpton-stoke-flames-ferguson-officers-shot/>

⁴⁵ Al Sharpton, BIO, <http://www.biography.com/people/al-sharpton-207640>

130. Defendant Sharpton has persistently for many years made statements and committed acts to incite and inflame the public, especially minority communities, to commit attacks of violence, death, or serious bodily injury against the police and other law enforcement persons of all races and ethnicities Jews, and Caucasians.
131. On April 10, 2015, Al Sharpton pushed the idea of using “civil rights” laws to outlaw local police departments and create a “nationalized” police force.
132. Sharpton announced in 2015 that his tax-avoiding organization is now taking up the cause of having the U.S. Department of Justice taking over policing all across the country. He stated “That’s why we’re going to do this march from here to Washington. We need the Justice Department to step in and take over policing in this country.”⁴⁶
133. Since the deaths of Michael Brown and Eric Garner, Al Sharpton and his agents have travelled across the mid-west and northeast to hold rallies and protest marches inciting the blacks and others to undertake attacks causing death or serious bodily injury against police officers and law enforcement of all races and ethnicities, Jews and Caucasians.⁴⁷
134. Defendant Sharpton leading incendiary and inflammatory rallies in Ferguson, Missouri, early on in the developing violence incited and inflamed the ensuing looting, arson, destruction of property, assaults on police, threatening mobs, and violence.
135. In one of these rallies that occurred on December 15, 2014 in New York City, marchers were chanting death threats to the police: **“What do we want? Dead cops!**

⁴⁶ Brian Hayes, "Al Sharpton Wants to ‘End’ Local Policing, Demands NATIONALIZED Police Force," Top Right News, May 1, 2015, accessible at: <http://toprightnews.com/al-sharpton-wants-to-end-local-policing-demands-nationalized-police-force/>

⁴⁷ Video posted at: Geoffrey Grider, "Al Sharpton Incited Anti-Police Violence Now Seeks Police Protection, December 22, 2014, accessible at: <http://www.nowtheendbegins.com/blog/?p=29363>

When do we want it! Now!⁴⁸ The protesters event assaulted two NYPD officers and blocked traffic on the Brooklyn Bridge.⁴⁹

136. On December 20, 2014, only five days after the hateful protest involving death threats to the police and law enforcement, the murders by Ismaaiyl Abdullah Brinsley, the man who executed two New York City police officers as they ate lunch together in their police car, took place. As stated, Brinsley expressed that the police shootings of Michael Brown and Eric Garner were the reason he planned to murder the two police officers.⁵⁰

137. In a similar protest, a march organized by Sharpton's National Action Network again chanted the oft-heard slogan (and implied threat), "No Justice, No Peace" with marchers demanding that federal laws be enacted to curb local and state police agencies use of force rules.

138. Once the thousands of marchers reached the grounds outside the New York Capitol, Sharpton warned Congress that he and his supporters would not be ignored. "You thought you'd sweep it under the rug. You thought there'd be no limelight," Sharpton said. "We are going to keep the light on Michael Brown, on Eric Garner, on

⁴⁸ "Obama, Holder, Sharpton Stoke Flames, Ferguson Officers Shot," Breitbart, March 12, 2015, *supra*.

⁴⁹ Warner Todd Huston, "Al Sharpton Leads March in DC as NYC Protesters Chant: 'What Do We Want? Dead Cops!,'" Breitbart, December 13, 2014, accessible at: <http://www.breitbart.com/big-government/2014/12/13/al-sharpton-leads-thousands-in-saturday-march-on-washington-dc/>

⁵⁰ "Obama, Holder, Sharpton Stoke Flames, Ferguson Officers Shot," Breitbart, March 12, 2015, *supra*.

Tamir Rice, on all of these victims because the only way—I'm sorry, I come out of the 'hood—the only way you make roaches run, you got to cut the light on.”⁵¹

139. Defendant Sharpton's incitement of violence and rioting have brought about further discord and hatred in our Nation. Defendant Sharpton has been a prime contributor of civil unrest and violence in predominantly black urban communities.

140. Defendant Sharpton's actions and statements call for anarchy and encourage blacks to ignore, disrespect, and engage law enforcement officials, namely Caucasian officers, with violence and lethal force.⁵²

141. Defendant Sharpton's statements were intended to cause violence and/or death to U.S. police officers and law enforcement of all races and ethnicity, Jews, and Caucasians. Defendant Sharpton is a friend of and close confidant of Defendant Obama and is thus a frequent visitor to The White House, where he has and continues to participate in meetings designed for further a race war for their joint political missions and agendas.

⁵¹ "Al Sharpton Leads March in DC as NYC Protesters Chant: 'What Do We Want? Dead Cops!,'" Breitbart, December 13, 2014, *supra*. Rep. Peter T. King (R-N.Y.) and former New York governor George Pataki have blamed Sharpton for using rhetoric that they said fostered an anti-police environment. Former New York City police commissioner Bernard Kerik said Sharpton and others had "blood on their hands." Sandhya Somashekhar and Wesley Lowery, "Sharpton faces criticism after NYC officers' deaths," *The Washington Post*, December 23, 2014, accessible at: http://www.washingtonpost.com/politics/sharpton-faces-criticism-after-nyc-officers-deaths/2014/12/23/4ddeafd4-8ab6-11e4-8ff4-fb93129c9c8b_story.html

⁵² <https://www.change.org/p/patrick-murphy-remove-al-sharpton-from-white-house-advisory-team-and-conduct-a-federal-investigation-to-charge-mr-sharpton-with-inciting-riots-promoting-violence-against-law-enforcement-and-encouraging-civil-unrest-in-urban-communities-across-america>. Former New York City mayor Giuliani said himself that Defendant Sharpton has been to the white House as many as 85 times, and he blamed the "civil rights leader" for instigating riots and inflaming tensions between police and the public. Giuliani also said Obama "hasn't made strong comments" about the deaths of the New York police officers. He further stated that "If you would like to have a poster boy for hating the police, it's Al Sharpton. You make Al Sharpton a close adviser, you're going to turn the police in America against you." <http://www.ibtimes.com/obama-al-sharpton-relationship-shows-president-anti-cop-rudy-giuliani-1768276>.

Defendant Sharpton is also a close friend, confidant, and co-conspirator with Defendant Farrakhan and the other Defendants to the acts as pled herein.

D. Defendant Former Attorney General Eric Holder And Relevant Acts

142. A public official can be personally liable for abuse, corruption, or misuse of public office an in particular violations of the U.S. Constitution.
143. Former Attorney General Eric Holder (“Defendant Holder”) served as the Nation’s 82nd Attorney General.
144. Throughout his time as Attorney General, Defendant Holder’s Department of Justice (“DOJ”) has publicly targeted and blamed America of “biased policing” and “implicit bias” in law enforcement.
145. Defendant Holder incited a civil war against police and law enforcement agents during his time as Attorney General.
146. On information and belief, according to reports, Defendant Holder spent more time investigating police departments than he did investigating criminals.
147. Sheriff David Clarke recently stated that it is now “open season” on police in the US, and blames President Obama and former Attorney General Eric Holder for laying the groundwork by supporting ‘activists’ who have disparaged law enforcement based upon a set of lies.⁵³
148. Defendant Holder used his public office to justify, endorse, and seek to reinforce, spread, and justify the false narrative that blacks are being targeted and hunted by police and other law enforcement persons and disproportionately arrested, prosecuted, and/or confronted in hostile incidents of resisting arrest, while concealing the reality that police

⁵³ Steve Watson, “Sheriff Clarke: Black Lives Matter Is A “Vulgar, Vile, Vicious, Slimy Movement,”” Infowars.com, September 1, 2015, accessible at: <http://www.infowars.com/sheriff-clarke-black-lives-matter-is-a-vulgar-vile-vicious-slimy-movement/>

officers are typically only responding to 911 calls for help from blacks and other minorities.

149. Without false propaganda and lies spread by Defendant Holder and the DOJ under his command inaccurately convincing blacks and black Muslims that they are being targeted by police and other law enforcement persons the violent uprising and civil war against police would not have occurred.

150. When the DOJ targeted the Seattle Police Department, for example, their letter stated that officers were engaging in “discriminatory practices subconsciously.”

151. Crime skyrocketed in Seattle as a result of its consent decree with the police.⁵⁴

152. The DOJ has since failed to investigate any of the recent murders of police officers police officers of all races and ethnicity committed by black activists, when the DOJ would have investigated these murders had it been the other way around, and the DOJ has in the past.⁵⁵

E. **Defendants Opal Tometi, Patrisse Cullors, Alicia Garza, Rashad Turner, and Deray McKesson, Leaders Of The Black Lives Matter Movement, And Their Relevant Acts**

153. Black Lives Matter is a so called political project that was launched in the wake of the murder of Trayvon Martin in order to supposedly combat implicit bias and anti-black racism and to protect and affirm the beauty and dignity of all black lives.⁵⁶

⁵⁴ ”Obama, Holder, Sharpton Stoke Flames, Ferguson Officers Shot,” Breitbart, March 12, 2015, *supra*.

⁵⁵ Sarah Fisher, “Former NYPD Commish Blames Eric Holder for ‘War on Police,’” Truth Revolt, May 11, 2015, accessible at: <http://www.truthrevolt.org/news/former-nypd-commish-blames-eric-holder-war-police>

⁵⁶ “BAJI’s Staff,” Black Alliance for Just Immigration, <http://www.blackalliance.org/about/bajistaff/>

154. While the Black Lives Matter movement claims to combat anti-black racism, the movement has in fact incited and committed further violence, severe bodily injury and death against police officers of all races and ethnicities, Jews, and Caucasians.

155. The Black Lives Matter movement is in fact a violent and revolutionary criminal gang.

156. In response to the incitement to violence of the Defendants, on September 2, 2015, Carlos Anthony Hollis, under the Twitter name of “black guy in avi,” broadcast a message on Twitter saying: “IM NOT GONNA STAND FOR THIS NO. MORE. TONIGHT WE PURGE! KILL ALL THE WHITE PPL IN THE TOWN OF LAPLATA #BlackLivesMatter.”

157. The Maryland man called for the killing of white people in his town of La Plata and announced that he would be killing white people in La Plata. In other words, in the legal meaning of incitement, Carlos Anthony announced that he was heading out to kill white people and urged others to come join him in this imminent violence.

158. Carlos Anthony was arrested the same day and charged with the issuance of deadly threats against local citizens.

159. The term “purge” has been adopted by the Black Lives Matter movement, referring to a recent movie “The Purge” depicting a society in which on one night a year all laws are suspended and unlimited violence, looting, murder, assault, rape, etc. is allowed.

160. The term “Purge” within the Black Lives Matter movement specifically refers to lawless rioting, arson, murder, assault, looting, and rape carried out as perceived revenge

against anyone who has more, especially Jews or Caucasians, as a routine part of the movement.

161. However, rejecting the voices of Black Lives Matter, many blacks have joined the All Lives Matter movement at www.alllivesmattermovement.com/

162. A 27-year-old black Marine Michael Whaley explains in a video spreading nation-wide and rebroadcast on Fox news: ⁵⁷

This Black Lives Matter movement only promotes racism and now they are encouraging black people to go and kill white people because they want white people to feel what we felt 400 years ago. All Lives Matter. That police officer that got killed by that black man because that black man listened to what y'all were saying about going out and killing white people. That police officer's life mattered. That nine-year old girl in Ferguson, Missouri, that got shot in the head while she was doing her homework, in a drive-by shooting, that none of y'all protested. Her life mattered. ... The reason that I don't got a lot of support is, I'm gonna tell you the God honest truth, the reason that I don't got a lot of support is because black people can't accept the truth about their-selves. Black people admitting to the truth is like they're snitching on their-selves. And black people have this no-snitching rule. They're gonna deny till they die.

Y'all teaching black people to hate white people, and then you're encouraging black people to throw their lives down the drain by taking away somebody else's life. Sad. I'm gonna pray for y'all.

163. Michael Whaley explained further on Fox News on September 2, 2015, that

Black on black crime happens every day. So if a black person goes and kills another black person, they gonna deny till they die. They're not gonna admit the truth. Some people don't like admitting the truth because they don't like that. Like, it hurts me to say right there, it hurts me as a black man to say right here I have to tell the truth about my own people, but I love my own people.

⁵⁷ <http://video.foxnews.com/v/4460311780001/black-americans-fight-back-against-black-lives-matter-/?#sp=show-clips>

164. On August 29, 2015, the mixed-race Guiding Light Church led a "Restoring Unity Rally" and march in Birmingham, Alabama. On September 1, 2015, the mostly-black choir of the church performed a hymn 'All Lives Matter' calling for unity and forgiveness by God's grace.⁵⁸
165. In Ferguson, Missouri, after violent assaults by a repeat juvenile delinquent Michael Brown upon an elderly shopkeeper and then upon police officer on August 9, 2014, Defendants incited, instigated, and orchestrated violence, arson, looting, assault, and rioting.
166. Residents of Ferguson, Missouri, reported that most of the violence, arson, looting, assaults on police, and threatening behavior was committed by outsiders who came to Ferguson from all over the United States, as far away as San Francisco and New York City.
167. Comments by Eric Holder and Barack Obama and incitement on the scene by Al Sharpton in Ferguson inflamed and incited riots to commit violence, arson, and looting in Ferguson, Missouri.
168. The Black Lives Matter movement and network was created in response to the false and inciting propaganda by Defendants Obama, Holder, Sharpton, Farrakhan and others deceptively and fraudulently convincing blacks that they are being targeted by police officers and other law enforcement personnel and are being disproportionately arrested and prosecuted.

⁵⁸ <http://video.foxnews.com/v/4456810813001/the-guiding-light-church-performs-all-lives-matter/?#sp=show-clips>

169. Revealing the true motivations and actions of the “Black Lives Matter” movement, all across the country gatherings of the movement react violently and angrily at attempts to appeal for unity by saying “All Lives Matter.”
170. When the religious community in Charleston, South Carolina, called for calm and forgiveness in the wake of the shooting by Dylan Roof of church-goers in a Black church, outsiders orchestrated and organized by the Defendants descended upon Charleston to try to incite and instigate violence in sharp contrast with the wishes and intentions of the local community.
171. For example, on August 29, 2015, just a few days after Shannon J. Miles executed Deputy Darren Goforth, a march was led under the Black Lives Matter movement in St. Paul, Minnesota.
172. During the march, protesters chanted in unison, **“Pigs in a blanket, fry em’ like bacon.”** The chant was clearly meant to promote and cause severe bodily injury or death among innocent police officers policers of all races and ethnicities, who were ironically at the march to help protect the protestors’ free speech.⁵⁹
173. Milwaukee County Sheriff David Clarke has openly expressed that Black Lives Matter is a race baiting movement intended to create more division and segregation.⁶⁰
174. In an appearance on CNN, Sheriff Clarke pointed out that Black Lives Matter activists are directly tied to the brutal murder of Harris County, Texas deputy Darren Goforth.⁶¹

⁵⁹ Bill Hudson, “Black Lives Matter Chant Called ‘Disgusting’ By Police Leader,” CBS Minnesota, August 30, 2015, accessible at: <http://minnesota.cbslocal.com/2015/08/30/black-lives-matter-chant-called-disgusting-by-police-leader/> ; <https://www.youtube.com/watch?v=9xNxoeqf0Ws>

⁶⁰ “Sheriff Clarke: Black Lives Matter Is A ‘Vulgar, Vile, Vicious, Slimy Movement,’” Infowars.com, September 1, 2015, *supra*.

175. Sheriff Clarke has described the Black Lives Matter movement as “vile, vulgar, and slimy.”

176. As a result of all Defendants’ acts to promote and incite imminent violent riots and violence to cause death and/or serious bodily harm to U.S. police officers of all races and ethnicities, Jews, and Caucasians, other groups have formed to also cause severe bodily injury or death.

177. For example, members of the #FYF911 or #FukYoFlag and #blackLivesMatter movements called for the lynching and hanging of white people and cops.

178. Defendants have encouraged others on a radio show night to “turn the tide” and kill white people and cops to send a message about the killing of black people in America.⁶²

179. Together, Defendants incitement and having caused unlawful and deadly activities against U.S. police officers and law enforcement persons of all races and ethnicities, Jews, and Caucasians, acting in concert with each and every one of the other Defendants, have caused severe bodily injury or death of members of the class herein. Consequently, Plaintiff Larry Klayman and all police officers and law enforcement and ethnicities of all races and ethnicities, Jews and Christians, and the members of the class herein, continue to fear imminent severe bodily injury or death and have been caused and continue to suffer severe emotional distress.

⁶¹ *Id.*

⁶² Lana Shadwick, “Black Activists Call for Lynching and Hanging of White People and Cops,” *Breitbart*, August 28, 2015, accessible at: <http://www.breitbart.com/texas/2015/08/28/black-activists-called-for-lynching-and-hanging-of-white-people-and-cops/>

VI. CAUSES OF ACTION

FIRST CAUSE OF ACTION

***Deprivation of Civil Rights: Aiding and Abetting Murder
(42 U.S.C. §1983)***

180. Plaintiff and other members of the class herein repeat and re-allege each and every allegation of the foregoing paragraphs as if fully set forth herein.
181. By the acts and omissions all of the Defendants described above, the Defendants and each of them individually deprived the Plaintiff and other members of the class herein of their constitutional rights to life and liberty guaranteed by the Fifth Amendment to the U.S. Constitution, as reinforced by the Fourteenth Amendment.
182. Plaintiff and other members of the class herein have been injured in their person, property or business by reason of acts committed by Defendants that involve the aiding and abetting of violence or which are dangerous to human life and that violate the criminal laws of the United States, including violating the prohibition on killing, attempting to kill, causing serious bodily injury or attempting to cause serious bodily injury to police officers and law enforcement persons of all races and ethnicity, Jews, and Caucasians and other members of the class as pled herein.
183. The acts of black and black Muslim activists threatening and attempting to kill police officers and other law enforcement persons of all races and ethnicities, Jews, and Caucasians were and are intended (a) to intimidate or coerce the population of police officers and law enforcement of all races and ethnicities, Jews, and Caucasians, (b) to influence the policy of the government of the United States, and (c) to affect the conduct of the government of the United States by violence and murder of innocent police officers of all races and ethnicities, Jews, and Caucasians .

184. The acts of violence herein are extreme and outrageous and were committed with the knowledge of and intention to cause extreme physical pain and suffering to any and all persons within close proximity of these attacks and extreme emotional distress to the family members of those who were killed or injured by reason of those acts.

185. Each of the Defendants provides substantial assistance to criminal activity by inciting people to attack police officers and other law enforcement persons of all races and ethnicities, Caucasians and Jews in retaliation of the oppression of black people, and by Defendant Obama and Defendant Holder's refusal to investigate past murders of innocent police officers police officers and law enforcement persons of all races and ethnicities by black and other persons.

186. Each of the Defendants knows, or has recklessly disregarded, that each Defendant is providing material support to criminals for acts of murder and violence to police officers and other law enforcement persons of all races and ethnicities, Jews, and Caucasians.

187. Each of the Defendants knew or recklessly disregarded the fact that their activities alleged above have substantially assisted and encouraged and much more engaged in dangerous and criminal acts set forth herein.

188. By aiding and abetting black and black Muslim criminals have caused Plaintiff and other members of the class to be injured in his or her person, property, or business, Defendants are jointly and severally liable pursuant to 18 U.S.C. § 1983 for any and all damages that plaintiffs have sustained as a result of such injuries.

SECOND CAUSE OF ACTION

***Conspiracy to Deprive Plaintiffs of Civil Rights: Right to Life and Liberty
(42 U.S.C. §1985)***

189. Plaintiff and other members of the class herein repeat and re-allege each and every allegation of the foregoing paragraphs as if fully set forth herein.
190. Defendants have conspired together to knowingly and intentionally deprive the Plaintiff and other members of the class herein of their constitutional and civil rights to life, liberty, and property in violation of 42 U.S.C. § 1985.
191. Defendants have conspired “to prevent, by force, intimidation, or threat, any person from accepting or holding any office, trust, or place of confidence under the United States, or from discharging any duties thereof; or to induce by like means any officer of the United States to leave any State, district, or place, where his duties as an officer are required to be performed, or to injure him in his person or property on account of his lawful discharge of the duties of his office, or while engaged in the lawful discharge thereof, or to injure his property so as to molest, interrupt, hinder, or impede him in the discharge of his official duties” in violation of 42 U.S.C. § 1985.
192. Each of the Defendants, acting in concert, jointly and severally, have committed overt and public acts in furtherance of the conspiracy.
193. Defendants have conspired and acted “for the purpose of impeding, hindering, obstructing, or defeating, in any manner, the due course of justice in any State or Territory, with intent to deny to any citizen the equal protection of the laws, or to injure him or his property for lawfully enforcing, or attempting to enforce, the right of any person, or class of persons, to the equal protection of the laws in violation of 42 U.S.C. § 1985(2).

194. Defendants have invaded and gone upon the premises or within the zone of privacy of Plaintiff and other members of the protected classes of persons for the purpose of threatening, intimidating, and frightening and harming the Plaintiffs and depriving them of their constitutional and civil rights and also “for the purpose of preventing or hindering the constituted authorities of any State or Territory from giving or securing to all persons within such State or Territory the equal protection of the laws “ in violation of 42 U.S.C. § 1985(3).

195. Defendants agreed, including by implication or common understanding, to combine with each other, their agents, and other persons to act unlawfully, in the manner set forth in this complaint and committed overt acts in furtherance of the conspiracy.

196. At all relevant times, Defendants knew of this conspiracy and knew and knows, in particular, of the roles of front organizations and their leaders in furtherance of that conspiracy

197. At a minimum, Defendants recklessly disregarded the nature and purposes of the conspiracy.

198. Defendants knowingly and purposefully agreed to perform the acts complained of herein with the knowledge, and for the purpose, that such services facilitate their mutual goals and support what are in effect racially and ethnically based terrorist activities pursuant to a common scheme to encourage and incentivize acts of violence and death against police officers and other law enforcement persons of all races and ethnicities, Jews, and Caucasians .

THIRD CAUSE OF ACTION

***Fifth Amendment Violation: Deprivation of Right to Life
(Bivens v. VI Unknown Named Agents of Federal Bureau of Narcotics)***

199. Plaintiff and other members of the class herein repeat and re-allege each and every allegation of the foregoing paragraphs as if fully set forth herein.
200. Plaintiff and other members of the class enjoy constitutional rights in their persons of not being deprived of life or liberty by actions of the government without due process of law, as guaranteed by the Fifth Amendment to the U.S. Constitution.
201. Plaintiff and other members of the class herein have been injured in their persons and/or property by reason of acts committed by Defendants that involve the conspiracy to commit violence or which are dangerous to human life and that violate the criminal laws of the United States, including the prohibition on killing, attempting to kill, causing serious bodily injury or attempting to cause serious bodily injury to police officers and other law enforcement persons of all races and ethnicity, Jews, and Caucasians .
202. The acts of activists attempting to kill police officers and other law enforcement persons of all races and ethnicities, Jews, and Caucasians were and are intended (a) to intimidate or coerce and harm the population of police officers and law enforcement persons of all races and ethnicity, Jews, and Caucasians , (b) to influence the policy of the government of the United States, and (c) to affect the conduct of the government of the United States by violence and murder of innocent police officers and other law enforcement persons of all races and ethnicities, Jews, and Caucasians .
203. The acts of violence and murder set forth herein are extreme and outrageous and extremely harmful.

204. The violations of this liberty interest are compensable under *Bivens v. VI Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971).

FOURTH CAUSE OF ACTION
Terrorist Promotion of Gang Activity under Florida Law

205. Plaintiff Klayman is a citizen of the State of Florida as well as other potential members of the class and herein repeat and re-allege each and every allegation of the foregoing paragraphs as if fully set forth herein.

206. Pursuant to Florida Statutes 874.06 Civil cause of action.—

(1) A person or organization establishing, by clear and convincing evidence, coercion, intimidation, threats, or other harm to that person or organization in violation of this chapter has a civil cause of action for treble damages, an injunction, or any other appropriate relief in law or equity. Upon prevailing, the plaintiff may recover attorney's fees in the trial and appellate courts and the costs of investigation and litigation that are reasonably incurred.

207. In violation of Florida Statutes 874.03, *et seq.*, the Defendants have violated Florida Statutes 874.05 by recruiting what is in effect a violent criminal gang Black Live Matters and other groups threatening and carrying out arson, looting, rioting, assault, and the murder of police officers of all races and ethnicity.

208. In further violation of Florida Statutes 874.03, *et seq.*, Defendants have violated

Florida Statutes 874.10 Directing the activities of a criminal gang.—Any person who knowingly initiates, organizes, plans, finances, directs, manages, or supervises criminal gang-related activity commits a felony of the first degree, punishable by imprisonment for a term of years not exceeding life or as provided in s. 775.082, s. 775.083, or s. 775.084.

209. By recruiting and inciting riots and criminal gangs and inciting them into an organized movement, Defendants have violated Florida law against the recruitment and organizing of violent criminal gangs.

FIFTH CAUSE OF ACTION

Assault

210. Plaintiff and other members of the class herein repeat and re-allege each and every allegation of the foregoing paragraphs as if fully set forth herein.
211. Defendants have placed Plaintiff and all police officers and law enforcement persons of all races and ethnicities, Jews, and Caucasians in apprehension of an imminent harmful or offensive contact, and some have in fact suffered harmful, offensive bodily contact, and/or death.
212. Defendants' acts of promoting and/or carrying out actions of violence against police officers and other law enforcement persons of all races and ethnicities, Jews, and Caucasians were done with the intent to knowingly and purposefully place the Plaintiff and other members of the class in fear of immediate and imminent severe bodily injury physical danger, attacks, and/or execution, assassination, or death.
213. As a direct, foreseeable and proximate result of the conduct of Defendants, acting in concert, jointly and severally, as alleged hereinabove, Plaintiff and other members of the class have suffered non-pecuniary and other damages in amounts to be proven at trial.
214. By reason of the wrongful conduct of Defendants, Plaintiff and other members of the class herein, including family members, have suffered conscious pain, suffering, severe emotional distress and the fear of imminent serious bodily injury or death, and have suffered pecuniary and economic damage, loss of support, loss of nurture, care and guidance, grief, anguish, loss of services, loss of society, and other mental and physical injuries.

SIXTH CAUSE OF ACTION
Intentional Infliction of Emotional Distress

215. Plaintiffs repeat and re-allege each and every allegation of the foregoing paragraphs as if fully set forth herein.
216. Defendants' acts of inciting and/or carrying out actions of violence against police officers and law enforcement persons of all races and ethnicities, Jews, and Caucasians were done with the intent to terrorize, threaten, intimidate, and frighten the Plaintiff and class members, as well as to actually commit acts of violence against them.
217. Defendants' acts of promoting and/or carrying out actions of violence against police officers and other law enforcement persons of all races and ethnicities, Jews, and Caucasians were willful malicious, deliberate, or were done with reckless indifference to the likelihood that such behavior would cause severe emotional distress and with utter disregard for the consequences of such actions.
218. The acts of violence and murder set forth herein were committed with the knowledge of and intention to cause extreme physical pain and suffering to any and all persons within close proximity of the attack and extreme emotional distress to the Plaintiff and other members of the class herein and/or family members of those who were killed or injured by reason of those acts, or were done with reckless indifference to the likelihood that such behavior would cause such severe emotional distress and with utter disregard for the consequences of such actions.
219. Defendants' conduct, each and every one of them, jointly and severally, was unreasonable and outrageous and exceeds the bounds usually tolerated by decent society, and was done willfully, maliciously and deliberately, or with reckless indifference, to

cause Plaintiff and other members of the class herein, severe mental and emotional pain, distress, and anguish and loss of enjoyment of life.

220. By reason of the wrongful conduct of Defendants, Plaintiff and other members of the class herein, including their family members, have suffered conscious pain, suffering, severe emotional distress and the fear of imminent serious bodily injury or death, and have suffered pecuniary and economic damage, loss of support, loss of nurture, care and guidance, grief, anguish, loss of services, loss of society, and other mental and physical injuries.

221. Defendants, each and every one of them, conspiring and/or acting in concert, jointly and severally, undertook their actions willfully, wantonly, maliciously and in reckless disregard for Plaintiff's rights, and as a direct, foreseeable, and proximate result thereof plaintiffs suffered economic and emotional damage in a total amount to be proven at trial, therefore plaintiffs seeks punitive damages in an amount sufficient to deter Defendants and others from similar future wrongful conduct.

PRAYER FOR RELIEF

Plaintiff, on behalf of himself and all members of the class including police officers and law enforcement persons of all races and ethnicities, Jews, and Caucasians , demands that judgment be entered against Defendants, each and every one of them, jointly and severally, for compensatory and actual damages because of their demonstrable physical and emotional injury to Plaintiffs, punitive damages because of Defendants' callous and reckless indifference and malicious acts, and attorneys fees, costs, an award in excess of \$500,000,000.00 or \$1,500,000,000.00 in trebled damages where appropriate, punitive damages, and such other relief the Court may deem just and proper.

JURY DEMAND

Plaintiffs respectfully demand a jury trial on all issues so triable.

Dated: July 9, 2016

Respectfully submitted,
/s/ Larry Klayman
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