

**IN THE UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA**

LARRY KLAYMAN,  
a Natural Person  
c/o 7050 W. Palmetto Park Rd, #15-287  
Boca Raton, FL, 33433

Plaintiff,

v.

AMERICAN CIVIL LIBERTIES UNION,  
125 Broad Street, 18<sup>th</sup> Floor  
New York, NY 10004

and

COUNCIL ON AMERICAN ISLAMIC  
RELATIONS,  
453 New Jersey Ave, SE  
Washington, DC 20003

and

GEORGE SOROS,  
A Natural Person  
Katonah, New York

and

OPEN SOCIETY FOUNDATIONS,  
224 West 57<sup>th</sup> Street  
New York, NY, 10019

and

BARACK HUSSEIN OBAMA,  
A Natural Person  
Washington, D.C.

and

ORGANIZING FOR ACTION,  
Washington, DC

Case No: 2:17-cv-1703

and

ERIC HOLDER,  
a Natural Person  
One City Center  
850 Tenth Street, NW  
Washington, DC 20001

Defendants

## COMPLAINT

### I. INTRODUCTION AND NATURE OF THE ACTION

1. This is a civil action for damages against Defendants Barack Obama (“Defendant Obama”), George Soros, (“Defendant Soros”), Eric Holder (“Defendant Holder”), Council on American-Islamic Relations (“Defendant CAIR”), American Civil Liberties Union (“Defendant ACLU”), Open Society Foundations (“Defendant OSF”), and Organizing for Action (“Defendant OFA”) (collectively “Defendants”) for Assault and Intentional Infliction of Emotional Distress based on Defendants’ and their surrogates, agents and co-conspirators overt actions to incite and further violence and/or serious bodily harm stemming from President Donald Trump’s January 27, 2017 Executive Order titled *Protecting the Nation From Foreign Terrorist Entry into the United States* (the “Immigration Order”).<sup>1</sup> The Immigration Order temporarily suspended entry into the United States, as immigrants and nonimmigrants, of aliens from Iran, Iraq, Libya, Somalia, Sudan, Syria, and Yemen to temporarily reduce the investigative burdens on relevant agencies so that they may “immediately conduct a review to determine the information needed from any country to adjudicate any visa, admission, or other benefit under the INA

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<sup>1</sup> Donald J. Trump, *Protecting the Nation From Foreign Terrorist Entry into the United States*, The White House, Jan. 27, 2017, available at: <https://www.whitehouse.gov/the-press-office/2017/01/27/executive-order-protecting-nation-foreign-terrorist-entry-united-states>

(adjudications) in order to determine that the individual seeking the benefit is who the individual claims to be and is not a security or public-safety threat.”<sup>2</sup> The actions and/or omissions giving rise to Plaintiff Larry Klayman’s causes of action occurred within this judicial district, as set forth below.

## **II. STANDING AND THE INDIVIDUAL PLAINTIFF PARTIES**

2. Plaintiff Larry Klayman (“Plaintiff”) is a citizen of Florida. Plaintiff is a prominent public-interest attorney and advocate who has been vocal about his pro-Israel and Zionist beliefs, has brought several high profile and widely publicized lawsuits against Muslim terrorists and terrorist interests and nations, including but not limited to (1) the Islamic Republic of Iran, (2) the “so-called” Ground Zero mosque in New York City, (3) the Islamic Society of North America, and (4) the Council for American-Islamic Relations (“CAIR”), who had been named as an unindicted co-conspirator to terrorism in a federal criminal case concerning the Holy Land Foundation in the Northern District of Texas. Plaintiff has publically criticized Defendant Obama’s pro-Muslim, pro-radical Black leftist views and policies. Plaintiff has also brought suit against domestic as well as international terrorist groups<sup>3</sup> and Black Lives Matter, Louis Farrakhan and his Nation of Islam, Al Sharpton, and other radical Black leftist organizations, who have advocated and systematically practiced anti-Semitic and anti-Christian bigotry, and who have also advocated to severely harm and kill law enforcement.<sup>4</sup> As such, Plaintiff falls squarely within the zone of persons to be threatened with death and/or serious bodily harm as a result of his vocal and public criticism of, and legal action against, Defendant Obama’s pro-Muslim and pro-radical Black leftist views and policies, as well as radical and hostile Muslims and their organizations such as the Defendant CAIR. Plaintiff, as a public figure

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<sup>2</sup> *Id.*

<sup>3</sup> See *Strange v. Islamic Republic Of Iran*, 1:14-cv-435 (D.C. Dist.)

<sup>4</sup> See *Pennie v. Farrakhan*, 3:16-cv-2010 (N.D. Tx.)

and a quasi-law-enforcement officer as the founder of Judicial Watch and Freedom Watch and a former U.S. Department of Justice prosecutor, indeed fears for his life and safety as a result. Indeed, he was previously threatened by radical Islamic Imams and others, such as Imam Rauf, previously of the Ground Zero Mosque, when he filed suit on behalf of a first responder, Vincent Forras.

3. Defendant Obama is a citizen of the state of Illinois and, currently, a private citizen and resident in the District of Columbia.

4. Defendant Soros is a citizen and a resident of the state of New York.

5. Defendant Holder is a citizen and resident of Washington, D.C.

6. Defendant CAIR is headquartered and has its principal place of business in Washington, D.C.

7. Defendant ACLU is headquartered and has its principal place of business in New York, NY.

8. Defendant OSF is headquartered in and has its principal place of business in New York, NY.

9. Defendant OFA is headquartered in and has its principal place of business in Washington, D.C.

### **III. JURISDICTION AND VENUE**

10. This Court 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.

11. Defendant Obama is a citizen of Illinois.

12. Defendant Soros is a citizen of New York.

13. Defendant Holder is a citizen of Washington, D.C.

14. Defendant CAIR is headquartered and has its principal place of business in Washington, D.C.

15. Defendant ACLU is headquartered and has its principal place of business in New York, NY.

16. Defendant OSF is headquartered in and has its principal place of business in New York, NY.

17. Defendant OFA is headquartered in and has its principal place of business in Washington, D.C.

18. The matter in controversy exceeds the sum or value of \$75,000, exclusive of interest and costs.

19. Venue is proper in this district pursuant to 28 U.S.C. §§ 1391(b)(2).

#### **IV. FACTS COMMON TO ALL COUNTS**

20. Defendants, each and every one of them, have engaged in a pattern and practice of causing, inciting, and furthering deadly violence and/or seriously bodily harm and injury in this district through their actions, in concert with their surrogates, agents, and co-conspirators as set forth herein, with the intent to delegitimize and destroy the presidency of Donald J. Trump (“President Trump”) and to destabilize American society and reconstruct it to their own design.

21. Defendants, each and every one of them—working in concert with Black Lives Matter, Louis Farrakhan, Al Sharpton, and others—have furthered and incited death and/or serious bodily harm in this district against law enforcement officers, Caucasians, and Jews in support of the radical Black leftist, separatist, and black supremacy movements.

22. Defendants, each and every one of them, targeted their activity in such a manner that they knew, and/or it was reasonably foreseeable, that the wrongful conduct pled herein would occur within this judicial district in the Central District of California.

23. For instance, Al Sharpton was invited by and had visited with Defendant Obama seventy-three (73) times in the White House as of February 27, 2015.<sup>5</sup> 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.

24. In one of Al Sharpton’s 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! When do we want it! Now!”**<sup>6</sup> The protesters event assaulted two NYPD officers and blocked traffic on the Brooklyn Bridge.<sup>7</sup>

25. In the video embedded below, Al Sharpton explicitly tells his followers to murder Caucasian law enforcement officers, saying, “I believe in offing the pigs. Well they got pigs out here. You ain’t offed one of them. What I believe in, I do.” Defendants Sharpton goes on to rant, “I’ll off the man. Well off them. Plenty of crackers walking right around here tonight.”<sup>8</sup> He even

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<sup>5</sup> Snejana 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, Feb. 27, 2015, available at: <http://www.dailymail.co.uk/news/article-2973067/Al-Sharpton-returns-White-House-73RD-visit-Obama-discuss-problems-facing-minorities.html#ixzz3mOt6XqXN>

<sup>6</sup> *Obama, Holder, Sharpton Stoke Flames, Ferguson Officers Shot*, Breitbart, March 12, 2015,

<sup>7</sup> Warner Todd Huston, *Al Sharpton Leads March in DC as NYC Protesters Chant: ‘What Do We Want? Dead Cops!’*, Breitbart, Dec. 13, 2014, available at: <http://www.breitbart.com/big-government/2014/12/13/al-sharpton-leads-thousands-in-saturday-march-on-washington-dc/>.

<sup>8</sup> *Al Sharpton’s 1992 Off the Pigs Video*, Mar. 19, 2016, available at: <https://www.youtube.com/watch?v=XpZ0RwtvZmk> al s

urges his radical followers to commit acts of deadly violence against law enforcement, saying, “well fight then! Ain’t nobody holding you!”



26. As reported by a former top deputy of the Louis Farrakhan, Defendant Obama’s ties to the radical Black Muslim nationalist movement in Chicago run “deep,” and Louis Farrakhan and Defendant Obama have had “an open line between them” to discuss policy and strategy, either directly or through intermediaries.<sup>9</sup>

27. Louis Farrakhan, not coincidentally, endorsed Defendant 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.”<sup>10</sup>

28. On June 24, 2015, appearing in the course of the same “Justice or Else! Tour” at the Metropolitan African Methodist Episcopal church in Washington DC, Louis Farrakhan gave

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<sup>9</sup> *Obama-Farrakhan Ties Are Close, Ex-Aide Says*, Newsmax, Nov. 3, 2008, available at: <http://www.newsmax.com/InsideCover/farrakhan-obama-islam/2008/11/03/id/326298/>

<sup>10</sup> *Id.*

an impassioned hate filled speech denouncing America<sup>11</sup> and aligning all white Americans with the sentiments of the racist murderer in Charleston, South Carolina, Dylann Roof.<sup>12</sup>

29. In his speech, Louis Farrakhan explicitly called for murder, stating, “Retaliation is a prescription from God to calm the breasts of those whose children have been slain. So if the federal government will not intercede in our affairs, then we must 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.”<sup>13</sup>

30. Just hours before the Dallas massacre, Louis Farrakhan maliciously called for his followers to the shed blood.<sup>14</sup>



31. Moreover, on September 17, 2015, the Black Lives Matter leaders met in the White House with President Obama’s primary adviser, aide, and implementer Valerie Jarrett—who is of Iranian descent and Muslim—and other White House officials.<sup>15</sup> According to news reports, participants included Black Lives Matter leaders Deray Mckesson and Johnetta Elzie. The topic of the White House meeting with Black Lives Matter and similar groups was mutual

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<sup>11</sup> Gregory Tomlin, *Stalk them and kill them, 'Farrakhan says, calling for 10,000 volunteers to kill whites*, Christian Examiner, Aug. 5, 2015, available at

<http://www.christianexaminer.com/article/farrakhan.calls.for.10000.volunteers.to.kill.whites/49329.htm>.

<sup>12</sup> Matthew Maule, *Farrakhan Exploits Charleston Tragedy*, June 30, 2015, <http://www.christianpost.com/news/farrakhan-exploits-charleston-tragedy-140998/#wwOk9TDoEa6wPVSr.99>.

<sup>13</sup> Tomlin, *supra* note 11.

<sup>14</sup> <https://www.youtube.com/watch?v=rED7DYa6duE>

<sup>15</sup> Darren Sands, BuzzFeed, Sep. 17, 2015, available at: <http://www.buzzfeed.com/darrensands/black-lives-matter-activists-meet-with-white-house-officials#.utj953aVw>.



plans for “changing” official government policies, an euphemism for threatening and harming police officers and law enforcement.

32. Immediately after the Dallas Police Shooting in July, 2016, Defendant Obama met again with Black Lives Matter at the White House. At the conclusion of the meeting, Defendant Obama stated, “[w]e’re not at a point yet where communities of color feel confident that their police departments are serving them with dignity and respect and equality.”<sup>16</sup> This statement was made to implicitly blame law enforcement officers for the Dallas Police Shooting, instead of holding the true culprits—radical leftist, separatist, and supremacy Black power groups—responsible.

33. On August 29, 2015, during a Black Lives Matter protest in Minnesota, 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 of all races and ethnicities, who were, ironically, at the march to help protect the protestors’ free speech.<sup>17</sup>

34. On July 7, 2016, Lakeem Keon Scott (“Scott”) shot at passing cars along a Tennessee highway, killing one woman and wounding three others, including a police officer.<sup>18</sup> Witnesses heard Scott yelling “police suck! Black lives matter!” as he opened fire.<sup>19</sup> Police later

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<sup>16</sup> Theodore Schleifer, Allie Malloy, *Black Lives Matter Activists Join Obama at Forum on Policing*, CNN, July 14, 2016, available at: <http://www.cnn.com/2016/07/13/politics/obama-black-lives-matter-meeting/>

<sup>17</sup> Bill Hudson, *Black Lives Matter Chant Called ‘Disgusting’ By Police Leader*, CBS Minnesota, Aug. 30, 2015, available at: <http://minnesota.cbslocal.com/2015/08/30/black-lives-matter-chant-called-disgusting-by-police-leader/>.

<sup>18</sup> *Witness heard Bristol gunman yelling, ‘Police suck! Black lives matter!’ as he opened fire*, CNN Wire, July 8, 2016, available at: <http://wtvr.com/2016/07/08/bristol-gunman-lakeem-keon-scott-yelled-olice-suck-black-lives-matter/>

<sup>19</sup> *Id.*

on found “Black Lives Matter” materials inside of Scott’s home.<sup>20</sup> All of Scott’s victims were Caucasian.<sup>21</sup>

35. Defendants, each and every one of them, have worked in concert with Black Lives Matter, Al Sharpton, Louis Farrakhan, and others for years to further their mission to destabilize American society and rebuild it according to their own design by waging a war on law enforcement officers. Now, in furtherance of that same mission, Defendants, each and every one of them, are working in concert to delegitimize and destroy the presidency of President Trump by waging violent and potentially deadly “protests” against President Trump’s policies, including the Immigration Order.

36. Plaintiff himself has been the victim of each and every Defendants’ calculated furtherance and incitement, acting in concert with their surrogates, agents and co-conspirators, to violence and/or death when he was threatened by a “protestor” in the vulnerable off limits baggage claim area at Los Angeles International Airport (LAX).

37. Specifically, on January 29, 2017, while waiting for his baggage at LAX at approximately 8:30 P.M., Plaintiff was assaulted by a “protestor” in the baggage claim area of the Southwest Airlines terminal. The “protestor”, who had an Arabic accent and appeared to be of Islamic descent, was acting at the direction of each and every Defendant, their surrogates, agents and co-conspirators’ mission to incite and further serious violence and/or death against those who oppose their mission to destabilize American Society and reconstruct it in his own image contrary to the professed agenda of the new Trump administration.

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<sup>20</sup> *Id.*

<sup>21</sup> Mark Heim, *Tennessee Highway Gunman Kills 1, Injures 3, Motivated by Police Shootings, Authorities Said*, AL, July 8, 2016, available at: [http://www.al.com/news/index.ssf/2016/07/tennessee\\_highway\\_gunman\\_motiv.html](http://www.al.com/news/index.ssf/2016/07/tennessee_highway_gunman_motiv.html)

38. The “protestor” violently charged at Plaintiff and others around him waiting for their baggage, while yelling at a high pitch, “You are racists!”

39. Plaintiff suffered great fear of imminent bodily harm or death, given the recent Muslim ISIS inspired attack at Ft. Lauderdale International Airport baggage claim, as Plaintiff believed at that moment that he was amidst another terrorist attack, similar to the Fort Lauderdale shootings on January 6, 2017.

40. Plaintiff is a prominent public interest lawyer and a public figure, who is within the zone of persons to be threatened and assaulted by Defendants, their surrogates, agents and co-conspirators and his followers who respond to and obey Defendants’ and their surrogates, agents, and co-conspirators’ incitement to violence against those who differ from their pro-radical Black and Muslim agendas. It is no coincidence that Defendant Obama is in part of Black and Muslim heritage, while misleadingly claiming to be elected as president to be a died in the wool Christian. Indeed, Plaintiff Klayman has tongue in cheek parodied Obama’s claim of being a Christian, asking in a widely publicized speech at the World War II Memorial in Washington, D.C., that he get up off his knees, put the Quran down and figuratively come out (of the White House) with his hands up, given his latent anti-Semitic and anti-Israeli policies and refusal to call Islamic terrorism other than “workplace violence” and other deceptive subterfuges. Plaintiff Klayman is considered to be an ideological foe of Defendant Obama and his discriminatory radical Black and Muslim agenda against law enforcement and others who oppose him. Plaintiff has put the Mayor of Los Angeles and the Los Angeles World Airports on notice to preserve surveillance videos and other evidence of what occurred in this district.

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**Defendants Obama and OFA**

41. Defendant Obama is organizing the violent and potentially deadly “protests,” in part or in full, through Defendant OFA. Defendant OFA is chaired by Jim Messina, who was Defendant Obama’s deputy chief of staff during his first term and his campaign manager during the 2012 election.<sup>22</sup> Defendant OFA’s “agenda aligns closely with the Democratic party and Obama’s key policy positions.”<sup>23</sup>

42. Defendants Obama and OFA have publicly furthered, incited, and expressed support for the violent actions of Black Lives Matter, Louis Farrakhan and the Nation of Islam, and others who have threatened to kill and have killed law enforcement and who oppose black separatism and supremacy. Plaintiff Klayman, as a former U.S. Department of Justice prosecutor, founder of both Judicial Watch and Freedom Watch—both of which seek to enforce law and order throughout the nation and who legally represent law enforcement officers—and as an officer of the judicial system and courts himself, is part of the law enforcement community. Now, in an attempt to further their intent to delegitimize and destroy the presidency of President Trump, destabilize American society and restore their agenda—in whole or in part—under the Trump presidency, which they vehemently opposed and continues to oppose, and then reconstruct it to their own design and those of his agents, collaborators, and supporters, Defendants Obama and OFA, working in concert with his surrogates, agents and co-conspirators has again furthered and incited violence and/or serious bodily harm with regard to the Immigration Order signed by President Donald Trump on January 27, 2017. Defendants Obama and OFA are particularly aggressive and incensed, given that their endorsed presidential candidate in 2016, Hillary Clinton, who pledged to continue their agenda against law

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<sup>22</sup> *Id.*

<sup>23</sup> *Id.*

enforcement and who strongly supported the black radical, separatist, and supremacy movements to win votes was defeated by now President Donald J. Trump on November 8, 2016.

43. Defendant Obama is now furthering and inciting his primarily Muslim supporters, in addition to his black separatist and supremacist supporters, surrogates, agents and co-conspirators to commit and/or threaten acts of serious violence against persons, such as Plaintiff, who disagree with them and their actions to to delegitimize and destroy the presidency of President Trump and destabilize American society and then reconstruct it to their own design. Not coincidentally, the various radical leftist, separatist, and supremacist Black power groups that Defendant Obama has vocally supported have also now conveniently and tactically joined Defendant Obama's primarily Muslim supporters in "protesting" the Executive Order by effectively furthering and inciting acts and/or threats of serious violence and/or death.

44. Seizing on an opportunity to further and to incite violence and/or serious bodily harm in and to further his mission to to delegitimize and destroy the presidency of President Trump and destabilize American society and then reconstruct it to his own design, Defendant Obama, through Defendant OFA, acting in concert with his surrogates, agents and co-conspirators has signaled and called for his surrogates, agents and co-conspirators and followers to "protest" and effectively commit acts of violence, serious bodily injury, or death against persons who happen to hold a differing viewpoint.

45. Through his spokesperson, Defendant Obama tweeted that he was "heartened" by the protests, and acts of serious violence, and that these protests are "exactly what we expect to

see when American values are at stake.”<sup>24</sup> He went on to tweet that the “fundamentally disagrees” with President Donald Trump’s Executive Order.

46. As The Telegraph states, it is “unprecedented for former presidents to criticise [sic] their successors – and certainly not just a week and a half after they are sworn in.”<sup>25</sup>

47. As a result of Defendant Obama’s acting in concert with the other Defendants and his surrogates, agents, and co-conspirators to further and to incite violence, serious bodily harm, or death, disingenuously couched as encouragement to “protest,” surrogates, agents and co-conspirators all over the nation—including but not limited to those in this judicial district—are, in fact, furthering and committing and/or inciting death and violence—particularly at restricted security airports which are subject to terrorist attacks—in order to to delegitimize and destroy the presidency of President Trump and destabilize American society and the Trump presidency, who they see as an opponent of their violent aim to force Black separatism and supremacy and radical Muslim agendas over the nation. Indeed, radical Blacks and Muslims, incited by Defendant Obama, have now clearly joined forces yet again, stoked by a Black Muslim hostile, separatist, and supremacist ideology which views other races, ethnicities and religions as inferior to, hostile against, and opposed to their agendas.

48. Recently, in Seattle, furthered by the actions of Defendant Obama, his surrogates, agents and co-conspirators, a Black Lives Matter activist ranted to a large crowd gathered in

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<sup>24</sup> Dan Merica, *Obama ‘Fundamentally Disagrees’ With Trump’s Immigration Order*, CNN, Jan. 30, 2017, available at: <http://www.cnn.com/2017/01/30/politics/obama-donald-trump-travel-ban-statement/index.html>.

<sup>25</sup> Barney Henderson; Laura Hughes; Danny Boyle; Chris Graham, *Barack Obama Hits Out at Donald Trump, Warning ‘American Values’ Are at Stake*, The Telegraph, Jan. 31, 2017, available at: <http://www.telegraph.co.uk/news/2017/01/30/british-dual-citizens-will-now-allowed-travel-us-boris-johnson/>.

protest of the Executive Order, explicitly saying that “...**we need to start killing people.**”<sup>26</sup> She went on to expressly threaten and incite death to President Donald Trump, saying, “**First off, we need to start killing the White House. The White House must die.** The White House, your fucking White House, your fucking Presidents, they must go! Fuck the White House.”<sup>27</sup>

49. Similarly, on January 31, 2017, the U.S. Capitol Police reported that 47 people were arrested for illegally protesting inside of a Senate office building. The protestors “blocked the hallway” near Senator Orrin Hatch’s office.<sup>28</sup> These threatening “protests” were carried out in furtherance of Defendant Obama, his surrogates, agents and co-conspirators incitement to do violence and to undermine the presidency of Donald Trump and to create chaos in American society to further their agendas.

50. Many of these highly threatening and potentially deadly “protests” have occurred in or around the nation’s airports, similar to the January 6, 2017 mass shooting at Fort Lauderdale International Airport, where five people were killed and six others seriously injured.<sup>29</sup> The alleged gunman, Esteban Santiago, was reportedly influenced by ISIS. Santiago, who had converted to Islam and became a Muslim, admitted to having Islamic “terroristic thoughts.”<sup>30</sup>

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<sup>26</sup> Justin Caruso, *BLM Anti-Trump Protest in Seattle: ‘We Need to Start Killing People’*, Daily Caller, Jan. 30, 2017, available at: <http://dailycaller.com/2017/01/30/blm-anti-trump-protest-in-seattle-we-need-to-start-killing-people/>.

<sup>27</sup> *Id.*

<sup>28</sup> *The Latest: Senate Panel Delays Vote on Budget Nominee*, AP, Jan. 31, 2017, available at: <https://www.yahoo.com/news/latest-senate-dem-leader-oppose-8-cabinet-nominees-181513245.html>.

<sup>29</sup> Merrit Kennedy, *Fort Lauderdale Airport Shooting Suspect Pleads Not Guilty to 22 Counts*, NPR, Jan. 30, 2017, available at: <http://www.npr.org/sections/thetwo-way/2017/01/30/512467241/fort-lauderdale-airport-shooting-suspect-pleads-not-guilty-to-22-counts>.

<sup>30</sup> *Id.*

51. President Donald Trump has personally accused Defendant Obama of organizing the “protests” that have occurred since he took office, as well as the leaks of classified information from the White House to the press.<sup>31</sup>

52. When asked whether he believed Obama was involved in organizing the “protests,” President Donald Trump flat-out stated, No, I think he is behind it.... That’s just the way it is... You never know what’s exactly happening behind the scenes ... I think that President Obama’s behind it because his people are certainly behind it.”<sup>32</sup>

53. Defendant Obama issued a directive to OFA to organize “protests” after President Donald Trump won the Presidential election. “And last year, after Trump’s upset victory, [Defendant Obama] personally rallied OFA troops to ‘protect’ his legacy in a conference call. ‘Now is the time for some organizing,’ he said. ‘So don’t mope’ over the election results.”<sup>33</sup>

54. Defendant Obama even expressly stated that he would be joining OFA in its efforts to delegitimize President Donald Trump and cause civil unrest. “‘Understand that I’m going to be constrained in what I do with all of you until I am again a private citizen, but that’s not so far off,’ [Defendant Obama] said. ‘You’re going to see me early next year, and we’re going to be in a position where we can start cooking up all kinds of great stuff.’ Added the ex-president: ‘I promise you that next year Michelle and I are going to be right there with you, and the clouds are going to start parting, and we’re going to be busy. I’ve got all kinds of thoughts and ideas about it, but this isn’t the best time to share them.’”<sup>34</sup>

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<sup>31</sup> Lauren Gambino, *Donald Trump Accuses Obama of Orchestrating Protests Against Him*, The Guardian, Feb. 28, 2017, available at: <https://www.theguardian.com/us-news/2017/feb/28/donald-trump-accuses-barack-obama-orchestrating-protests-leaks>

<sup>32</sup> *Id.*

<sup>33</sup> *Id.*

<sup>34</sup> *Id.*



55. OFA, through a Facebook post, has explicitly called for its followers to violently “protest” in opposition of President Donald Trump’s policies.<sup>35</sup>

56. OFA has published a training manual “to anti-Trump activists that advises them to bully GOP lawmakers into backing off support for repealing ObamaCare, curbing immigration from high-risk Islamic nations and building a border wall.”<sup>36</sup>

57. The training manual instructs OFA’s followers to “go into halls quietly so as not to raise alarms, and ‘grab seats at the front of the room but do not all sit together.’”<sup>37</sup> “It also urges them to ask ‘hostile’ questions — while keeping ‘a firm hold on the mic’ — and loudly boo the GOP politician if he isn’t ‘giving you real answers.’”<sup>38</sup>

58. The training manual states that one of its main goals is to create negative publicity for Republican lawmakers. “‘Unfavorable exchanges caught on video can be devastating’ for Republican lawmakers, it says, when ‘shared through social media and picked up by local and national media.’”<sup>39</sup>

59. OFA partnered with another radical group called Indivisible to publish the training manual. Indivisible even resorted to physical violence in order to promote their radical, left-wing agenda when members assaulted Kathleen Staunton, the district director for Rep. Dana Rohrabacher, causing her to fall, hit her head and lose consciousness.<sup>40</sup>

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<sup>35</sup> Organizing for Action, *Take a Deep Breath. Then Take Action*, Facebook, Feb. 9, 2017, available at: <https://www.facebook.com/notes/organizing-for-action/take-a-deep-breath-then-take-action/618795201644660>

<sup>36</sup> Paul Sperry, *Obama Linked Activists Have a Training Manual*

<sup>37</sup> *Id.*

<sup>38</sup> *Id.*

<sup>39</sup> *Id.*

<sup>40</sup> *Rohrabacher Staffer, 71, Knocked Unconscious By Protesters Delivering Cards*, CBS Los Angeles, Feb. 25, 2017, available at: <http://losangeles.cbslocal.com/2017/02/15/rohrabacher-staffer-71-knocked-unconscious-by-group-delivering-valentines-day-cards/>

60. Defendant Obama has, conspicuously, not disavowed the acts and threats of serious violence carried out in response to his incitements.

61. Defendants, each and every one of them are now working in concert with the “protestors,” incited by Defendants, each and every one of them, and their surrogates, agents and co-conspirators, only a portion of which are set forth throughout this Complaint. Defendants and those surrogates, agents, and co-conspirators oppose President Donald Trump’s Executive Order in order to further their plan to to delegitimize and destroy the presidency of President Trump and to destabilize American society in order to rebuild it pursuant to their agendas.

**Defendants Soros and OSF**

62. Defendants Soros and OSF (which was founded by Defendant Soros) fund the violent and potentially deadly “protests” caused, furthered, and incited by each and every Defendant, working in concert with Black Lives Matter, and other related Muslim and other groups, to incite and further deadly violence and/or seriously bodily harm and injury with the intent to delegitimize and destroy the presidency of President Trump and to destabilize American society and reconstruct it to their own design.<sup>41</sup>

63. Defendant Soros is a billionaire financier who has funded, and continues to fund, numerous radical, left wing groups, including “ACORN, Apollo Alliance, National Council of La Raza, Tides Foundation, Huffington Post, Southern Poverty Law Center, Soujourners, People for the American Way, Planned Parenthood, and the National Organization for Women.” Soros is also a financial backer of “Media Matters for America”, a leftist, radical publication.<sup>42</sup>

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<sup>41</sup> Washington Times, George Soros Funds Ferguson Protests, Hopes to Spur Civil Action, <http://www.washingtontimes.com/news/2015/jan/14/george-soros-funds-ferguson-protests-hopes-to-spur/>

<sup>42</sup> Human Events, Top 10 Reasons George Soros is Dangerous, <http://humanevents.com/2011/04/02/top-10-reasons-george-soros-is-dangerous/>

64. Defendants Soros and OSF have, throughout the years, funded, and continues to fund, numerous pro-Muslim, anti-Israel groups, including but not limited to: Al Haq, Arab American Institute, GISHA, Global Exchange, I'lam, International Crisis Group, Lynne Stewart, Machsom Watch, Muslim Advocates, New Israel Fund, Palestinian Center for Human Rights, Prepare New York, and World Organization Against Torture.<sup>43</sup>

65. The “Women’s March” on Washington that took place shortly after President Trump took office, which was organized to delegitimize and destroy the presidency of President Trump, was essentially financed by Defendants Soros and OSF.<sup>44</sup> Defendants Soros “has funded, or has close relationships with, at least 56 of the march’s ‘partners,’ including ‘key partners’ Planned Parenthood...the National Resource Defense Council...MoveOn.org...[Al Sharpton’s] National Action Network....”<sup>45</sup> During this march, there predictably was much vandalism and people were assaulted and injured. Tens of those so called “protestors” are currently under criminal indictment in the District of Columbia.

66. Defendants, each and every one of them, have conspired and worked in concert with, among others, Defendants Soros and OSF in order to secure funding for his mission to delegitimize and destroy the presidency of President Trump and to destabilize American society and reconstruct it his own design.

67. Defendants Soros and OSF fund the violent and deadly “protests” furthered by Defendant Obama, Black Lives Matter, and other related groups, to incite and further deadly violence and/or seriously bodily harm and injury with the intent to delegitimize and destroy the

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<sup>43</sup> *Organizations Funded Directly by George Soros and his Open Society Foundations*, available at: <http://www.discoverthenetworks.org/viewSubCategory.asp?id=1237>

<sup>44</sup> Asra Q. Nomani, *Billionaire George Soros Has Ties to More Than 50 ‘Partners’ of Women’s March on Washington*, New York Times, Jan. 20, 2017, available at:

<http://nytlive.nytimes.com/womenintheworld/2017/01/20/billionaire-george-soros-has-ties-to-more-than-50-partners-of-the-womens-march-on-washington/>

<sup>45</sup> *Id.*

presidency of President Trump and to destabilize American society and reconstruct it to their own design.

68. Deray McKesson, a leader of Black Lives Matter, even lives in the home of Robin Wood, who is a board members of Defendant OSF.<sup>46</sup>

69. Defendants Soros and OSF have given at least \$33 million in one year to support various groups, such as Black Lives Matters, inciting and furthering deadly violence and/or seriously bodily harm and injury, with the intent to delegitimize and destroy the presidency of President Trump and to destabilize American society and reconstruct it to their own design.<sup>47</sup>

70. Defendants Soros and OSF have gone so far as to pay over 80 individuals and organizations to “protest” during the civil unrest that occurred in Ferguson, Missouri, in furtherance of the violent and hateful incitements to violence perpetrated Defendant Obama and Black Lives Matter.<sup>48</sup>

71. Defendants Soros and OSF, along with the other Defendants, are the driving forces and primary financial backers of the the ongoing conspiracy between each and every named Defendant. Without Defendants Soros and OSF’s financial backing, Defendants Obama, CAIR, Holder, and OFA, working in concert with Black Lives Matter, and other related groups, would be unable to incite and further deadly violence and/or seriously bodily harm and injury with the intent to delegitimize and destroy the presidency of President Trump and to destabilize American society and reconstruct it to their own design.

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<sup>46</sup> Cozy: BLM Leader Lives in Home Owned by Soros’ Open Society Board Member, <http://www.theamericanmirror.com/blacklivesmatter-leader-deray-lives-home-owned-by-soros-connected/>

<sup>47</sup> *supra* note 41

<sup>48</sup> Paul Joseph Watson, Leaked List Shows Ferguson Protesters Paid By Soros Front Group, InfoWars, May 19, 2016, available at: <http://www.infowars.com/leaked-list-shows-ferguson-protesters-paid-by-soros-front-group/>

### Defendant CAIR

72. Defendant CAIR is a radical Muslim group with ties to terrorism activities. Defendant CAIR has been placed, by the Government, on a list of un-indicted criminal terrorist co-conspirators in the Northern District of Texas.<sup>49</sup>

73. Defendant CAIR was created by the Muslim Brotherhood, “an Islamic supremacist organization that pioneered 20<sup>th</sup> century Islamic terrorism and sanctions violence against civilians.”<sup>50</sup> It “receives financial support from foreign powers who have also provided direct support to Osama bin Laden, al-Qaeda and Hamas” and “has solicited money from sponsors of terror and received financial support from convicted terrorists.”<sup>51</sup>

74. Defendant CAIR’s founders have gone so far as to praise “terrorists to Muslim audiences and said that suicide bombers are acting on behalf of Islam. At least 15 high-level CAIR staff members have been under federal investigation for ties to Islamic terror.”<sup>52</sup>

75. Defendant CAIR has even been listed by the United Arab Emirates as a proscribed terrorist organization—along with the Taliban, al-Qaeda, and Isis—despite the fact that UAE’s authorities “have a record of promoting Islamism...”<sup>53</sup> Defendant CAIR has repeatedly refused to denounce terrorist groups Hamas and Hezbollah, and is strongly linked with Hamas. In 1994, Defendant CAIR’s leader, Nihad Awad publicly declared his support for Hamas.<sup>54</sup>

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<sup>49</sup> *United States of America v. Holy Land Foundation for Relief and Development*, Crim. No: 3:04-0240, (N.D. Tx.).

<sup>50</sup> *The CAIR Challenge*, The Religion of Peace, available at: <http://www.thereligionofpeace.com/pages/site/cair-questions.aspx>

<sup>51</sup> *Id.*

<sup>52</sup> *Id.*

<sup>53</sup> Daniel Pipes, *Is CAIR a Terror Group?*, National Review, Nov. 28, 2014, available at: <http://www.nationalreview.com/article/393614/cair-terror-group-daniel-pipes>

<sup>54</sup> *Id.*

76. Defendant CAIR, working in concert with each and every Defendant, has worked to cause, incite, and further deadly violence and/or seriously bodily harm and injury by organizing violent and deadly “protests” with the intent to delegitimize and destroy the presidency of President Trump and to destabilize American society and reconstruct it to their own design.

77. Not coincidentally, Defendant CAIR was a major sponsor of the “Women’s March” which was organized in “protest” of President Trump’s election.<sup>55</sup>

78. After President Trump was elected on November 8, 2016, the leader of CAIR’s Los Angeles, CA chapter, Hussam Ayloush (“Ayloush”) called for the overthrow of the U.S. Government.<sup>56</sup> Ayloush tweeted “Al-Shaab-yureed isquat al-nizaam. (Arab Spring chant).”<sup>57</sup> This chant “was a slogan first used during the Tunisian revolution, which kicked off the Arab Spring, where dozens of... [moderate pro-American] Islamic nations were either toppled or faced serious street demonstrations. It was also the slogan during the overthrow of Egyptian leader Hosni Mubarak.”<sup>58</sup>

### **Defendant ACLU**

79. Defendant ACLU, working in concert and conspiring with each and every named Defendant, as well as Black Lives Matter and other related groups, has worked to cause, incite, and further deadly violence and/or seriously bodily harm and injury by organizing violent and potentially deadly “protests” with the intent to delegitimize and destroy the presidency of President Trump and to destabilize American society and reconstruct it to their own design.

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<sup>55</sup> Nomani, *supra* note 44.

<sup>56</sup> Kosar, *After Donald Trump’s Victory, Top Leader of CAIR Calls for Overthrow of U.S. Government*, The Political Insider, Nov. 15, 2016, available at: <http://thepoliticalinsider.com/donald-trumps-victory-top-leader-cair-calls-overthrow-u-s-government/>

<sup>57</sup> *Id.*

<sup>58</sup> *Id.*

80. Renowned political commentator and Fox News host Bill O'Reilly has labeled Defendant ACLU as a terrorist group, saying that it was "the most dangerous organization in the United States of America right now...second next to Al Qaeda."<sup>59</sup>

81. Defendant ACLU also has advocated and supported neo-Nazi American groups, such as occurred in Skokie, Illinois.<sup>60</sup>

82. Defendant ACLU raises money through what is in effect a racketeering enterprise, which is then used to fund and finance the ongoing conspiracy between each and every named Defendant to cause, incite, and further deadly violence and/or seriously bodily harm and injury by organizing violent and potentially deadly "protests" with the intent to delegitimize and destroy the presidency of President Trump and to destabilize American society and reconstruct it to their own design.

83. After President Trump issued the Immigration Order, Defendant ACLU raised \$24 million in donations in just one weekend, which is in stark contrast to the \$4 million per year that it generally raises.<sup>61</sup>

84. Defendant ACLU whips up hatred and then capitalizes on perceived "threats" and spins them in a fashion to maximize the amount of income that they can earn in the form of donations. In turn, Defendant ACLU uses those funds to cause, incite, and further deadly violence and/or seriously bodily harm and injury by organizing violent and potentially deadly "protests" with the intent to delegitimize and destroy the presidency of President Trump and to

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<sup>59</sup> Raphael Schweber-Koren, *O'Reilly on ACLU: "I think they're a terrorist group...I think they're terrorists"*, Mar. 3, 2005, available at: <http://mediamatters.org/research/2005/03/03/oreilly-on-aclu-i-think-theyre-a-terrorist-grou/132833>

<sup>60</sup> Geoffrey Stone, *Remembering the Nazis in Skokie*, Huffington Post, May 25, 2011, available at: [http://www.huffingtonpost.com/geoffrey-r-stone/remembering-the-nazis-in\\_b\\_188739.html](http://www.huffingtonpost.com/geoffrey-r-stone/remembering-the-nazis-in_b_188739.html)

<sup>61</sup> Natalie Musumeci, *ACLU Gets Record Donations After Trump's Immigration Ban*, Jan. 30, 2017, New York Post, available at: <http://nypost.com/2017/01/30/aclu-gets-record-donations-after-trumps-immigration-ban/>

destabilize American society and reconstruct it to their own design. This, in turn, fills the coffers of Defendant ACLU to an even greater extent.

85. Not coincidentally, Defendant ACLU is inextricably linked to, conspires, and works in concert with Defendants Soros and OSF (as well as the other Defendants)—the other source of funding for Defendants’ ongoing conspiracy—because Defendant ACLU itself receives significant funding from Defendants Soros and OSF.<sup>62</sup> In fact, in 2014, Defendants Soros and OSF gave \$50 million to Defendant ACLU.<sup>63</sup>

86. Defendant ACLU, as part of the ongoing conspiracy among each and every Defendant to destroy and delegitimize the presidency of President Trump, has taken active steps to do so—including the filing of a lawsuit seeking a ban on President Trump’s Immigration Order.<sup>64</sup>

87. Furthermore, Defendant ACLU was also a key sponsor of the “Women’s March” which was organized to further cause, incite, and further deadly violence and/or seriously bodily harm and injury by organizing violent and potentially deadly “protests” with the intent to delegitimize and destroy the presidency of President Trump and to destabilize American society and reconstruct it to their own design.<sup>65</sup> Indeed, such violence did occur, property was vandalized, persons assaulted, and tens of so-called “protestors” are currently under indictment pending trial and criminal sentences.

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<sup>62</sup> *supra* note 43.

<sup>63</sup> Donna Kay, *The ACLU Just Banned Trump’s Executive Order, and the Man Who Funded it Was Just Revealed*, Jan. 30, 2017, available at: <https://conservativedailypost.com/the-aclu-just-banned-trumps-executive-order-and-the-man-who-funded-it-was-just-revealed/>

<sup>64</sup> Max Greenwood, *ACLU Sues White House Over Immigration Ban*, The Hill, Jan 28, 2017, available at: <http://thehill.com/policy/national-security/316676-legal-groups-file-lawsuit-against-trump-administration-amid-refugee>

<sup>65</sup> Nomani, *supra* note 44.



**Defendant Holder**

88. Defendant Holder, working in concert with each and every named Defendant, as well as Black Lives Matter and other related groups, has worked to cause, incite, and further deadly violence and/or seriously bodily harm and injury by organizing violent and potentially deadly “protests” with the intent to delegitimize and destroy the presidency of President Trump and to destabilize American society and reconstruct it to their own design.

89. Defendant Holder served as the Nation’s 82nd Attorney General.

90. Defendant Holder used his position of authority and influence to condone, endorse, and ratify the hateful and violent message and actions perpetrated groups such as Nation of Islam and Black Lives Matter by improperly targeting law enforcement officers for investigation.

91. 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.

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

93. When the DOJ targeted the Seattle Police Department, for example, their letter stated that officers were engaging in “discriminatory practices subconsciously.” Crime skyrocketed in Seattle as a result of its consent decree with the police.<sup>66</sup>

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<sup>66</sup> “Obama, Holder, Sharpton Stoke Flames, Ferguson Officers Shot,” Breitbart, March 12, 2015

94. 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.<sup>67</sup>

95. Now, as a private citizen without any immunity, Defendant Holder continues to conspire and work with Defendant Obama (who he served under) and each and every named Defendant to cause, incite, and further deadly violence and/or seriously bodily harm and injury by organizing violent and potentially deadly “protests” with the intent to delegitimize and destroy the presidency of President Trump and to destabilize American society and reconstruct it to their own design. Defendant Holder was a private citizen at the time the causes of action arose herein and he is thus not immune from suit, as is also true of Defendant Obama.

## V. CAUSES OF ACTION

### FIRST CAUSE OF ACTION

#### *Assault*

96. Plaintiff repeats and re-alleges each and every allegation of the foregoing paragraphs as if fully set forth herein.

97. Each of the Defendants, themselves and by and through their surrogates, agents and co-conspirators as set forth above, has placed Plaintiff in apprehension of an imminent harmful or offensive contact resulting in serious bodily injury or death.

98. The Muslim “Protestor,” acting under the direction of Defendants, and in furtherance of Defendants’ and their surrogates, agents and co-conspirators’ incitement to

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<sup>67</sup> 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>

violence and/or death, acting in concert, threatened Plaintiff, who was placed in fear of imminent severe physical bodily harm and/or death.

99. Defendants, acting in concert with his surrogates, agents and co-conspirators of inciting, promoting and/or carrying out actions of violence against those who have differing opinions and have taken legal actions to try and thwart their hate-filled agendas, such as Plaintiff, were done with the intent to knowingly and purposefully place the Plaintiffs in fear of immediate and imminent severe bodily injury, physical danger, attacks, and/or execution, assassination, or death.

100. As a direct, foreseeable and proximate result of the conduct of Defendants, their surrogates, agents and co-conspirators, Plaintiff has suffered non-pecuniary damages in amounts to be proven at trial.

101. By reason of the wrongful conduct of Defendants, Plaintiff has 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, emotional distress, grief, anguish, loss of services, loss of society, and other mental and physical injuries.

**SECOND CAUSE OF ACTION**  
***Intentional Infliction of Emotional Distress***

102. Plaintiff repeats and re-alleges each and every allegation of the foregoing paragraphs as if fully set forth herein.

103. Each of the Defendants' acts, in concert with their surrogates, agents and co-conspirators of inciting and/or carrying out actions of violence were done with the intent to terrorize, threaten, intimidate, and frighten Plaintiff, as well as to actually commit acts of violence against them.

104. Defendants' acts, in concert with their surrogates, agents and co-conspirators of inciting, promoting and/or carrying out actions of violence 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.

105. 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 others similarly situated who oppose Defendants' discriminatory and harmful radical Black and pro-Muslim agendas and goals, 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.

106. Defendants, acting in concert with his surrogates, agents and co-conspirators conduct 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 others similarly situated with severe mental and emotional pain, distress, and anguish and loss of enjoyment of life.

107. By reason of the wrongful conduct of Defendants and those surrogates, agents and co-conspirators acting in concert with them, Plaintiff has 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.

108. Defendants, acting in concert with their surrogates, agents and co-conspirators undertook his actions willfully, wantonly, maliciously and with 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. Plaintiff seeks punitive damages in an amount sufficient to deter Defendants and their surrogates, agents, and co-conspirators from similar future wrongful conduct.

**PRAYER FOR RELIEF**

Plaintiffs demands that judgment be entered against Defendants for compensatory and actual damages because of their demonstrable physical and emotional injury to Plaintiff, punitive damages because of Defendant Obama's callous and reckless indifference and malicious acts, and attorney's fees, costs, an award in excess of \$10,450,000 million USD, punitive damages based at least on 5% of Defendants' combined net worth, and such other relief the Court may deem just and proper.

**JURY DEMAND**

Plaintiff respectfully demands a jury trial on all issues so triable.

Dated: March 2, 2017

Respectfully submitted,  
/s/ Larry Klayman  
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