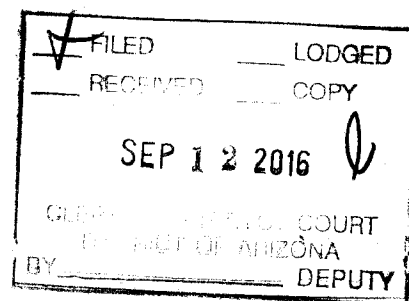


1 James Oliver Romine Jr. Pro Se Litigant
2 12494 Ironwood Dr.
3 Yuma, Arizona 85367
4 928-276-1844
5 jromine2445@gmail.com



6
7 **IN THE UNITED STATES DISTRICT COURT**
8 **FOR THE DISTRICT OF ARIZONA**

<p>9 10 JAMES OLIVER ROMINE JR. 11 Plaintiff 12 13 v. 14 JANE/JOHN DOE 1 - aka Steam User DemonSword, and 15 16 JANE/JOHN Doe 2 – aka Steam User Nathos 17 18 JANE/JOHN DOE 3 - aka Steam User Michoo Jones, and 19 20 JANE/JOHN DOE 4 - aka Steam User JDude330#HaeisBACK, and 21 22 JANE/JOHN DOE 5 - aka Steam User Toon Vlux, and 23 24 JANE/JOHN DOE 6 - aka Steam User brandino, and 25 26 JANE/JOHN DOE 7 - aka Steam User Gana, and 27 28 JANE/JOHN DOE 8 - aka Steam User Jon144, and</p>	<p>Case No.:</p> <p>CV-16-03092-PHX-ESW</p> <p>Original Complaint</p> <p>TRIAL BY JURY: No</p>
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JANE/JOHN DOE 9 - aka Steam User HGI, and JANE/JOHN DOE 10 - aka Steam User Karl Pilkington, and JANE/JOHN DOE 11 - aka Steam User Drackmore, and JANE/JOHN DOES 12 through 100 Defendants	
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JURISDICTION AND VENUE

1. The Plaintiff, James Oliver Romine Jr is a resident of the State of Arizona and a Citizen of the United States.
2. The Defendants, JOHN DOE's 1 through 100 are not known by name to the Plaintiff and of as yet undetermined are from undetermined locations.
3. This Court has diversity and subject matter jurisdiction over this action under 28 U.S.C §§ 1332. The Defendants are of unknown and diverse locations and the amount in controversy exceeds the sum of \$75,000 per section (a) (1).
4. Venue is proper under 28 U.S.C. § 1391 due to all defendant's actions being taken in a wide variety of locations and culminating in a directed and continual attack on The Plaintiff within The State of Arizona, Yuma County. As at least two Defendants are direct competitors to The Plaintiff

1 and sell products with regular and systematic frequency within The State of
2 Arizona Personal Jurisdiction also applies and action can be brought upon
3 the entire party within this Venue per sections (b) (2) and (b) (3).
4

5 5. Per 27 U.S.C § 1391 all defendants not resident in the United States may be
6 sued in any judicial district. Jurisdiction and venue is applied as in Sections
7 (b) (2) and (b) (3). Proper foreign service rules will be applied as
8 discovered by subpoena and this section appropriately amended with
9 related details.
10

11 6. **Jurisdiction minimum contacts:** International Shoe Co. v. Washington,
12 326 US 310 (1945) states: Any Defendant that sells merchandise which that
13 Defendant profits from in the State of Arizona through online sales these
14 Defendants create minimum contact requirements required for Diversity of
15 Citizenship to establish US District of Arizona jurisdiction. This includes
16 all competitors in this cause of action. Any competitor defendant that
17 achieves these minimum contacts establishes personal jurisdiction for the
18 entire party.
19
20
21

22 7. **Jurisdiction Harassment:** Harassment offenses can either be charged
23 either at the location they were performed or the location they were
24 received. The Defendants are from different States and through diversity
25 and this statute The US District Court of Arizona has Personal jurisdiction.
26

27 8. **Jurisdiction Stalking:** Stalking offenses can either be charged at the
28 location where they were performed or the location they were received. The

1 Defendants are from different States and through diversity and this statute
2 Personal Jurisdiction The US District Court of Arizona has jurisdiction.

3
4 **9. Jurisdiction Criminal Damage:** Per Arizona Statute 13-1602 defacing or
5 property damage of another person, tampering with the property of another
6 person to impair its function or value after repeated requests to stop these
7 actions and with damage in excess of \$10,000 by many times, this is a
8 Class 4 Felony. The Plaintiff asserts The Defendant's actions and efforts
9 have been repeated and aggressive for over a year without any respect for
10 The Plaintiff's wellbeing. The Plaintiff further asserts aggravated
11 circumstances should apply.
12

13
14 **10. Jurisdiction Criminal Impersonation:** Per Arizona Statute 13-2006 the
15 harassment group Digital Homicides Poop Games (now changed to
16 trashware) has imitated the Plaintiffs company bringing direct damage upon
17 The Plaintiff in the eyes of the public, The Distributor, and The Plaintiff's
18 peers. Criminal Impersonation is a class 6 felony and The Defendant's with
19 this use of name have spread damage to millions of individuals some of
20 which reside within The State of Arizona borders. This usage portrays to
21 the public that The Plaintiff supports harassment of others who are The
22 Plaintiff's peers which is the action The Defendant's perform upon other
23 developers on The Distributors Greenlight submission system. See
24 Attachment 1 which was spread over a 145 thousand user twitter channel
25 stating that The Plaintiff was suing his own group (the harassment group)
26
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1 when that is not The Plaintiff's group. The Plaintiff's name is shown in the
2 attachment. The Plaintiff alleges the entire group should be held
3 responsible for this act but The founder of the group, Jane/John Doe 8 – aka
4 Steam User Jon144 may only have sufficient involvement to support this.
5 The Plaintiff is not pressing the charge of impersonation for the company
6 but for the harassment and defamation caused due to that occurrence unless
7
8 The Court deems it is representable Pro Se.
9

10 **THE PARTIES TO THIS COMPLAINT**

11
12 **11. A. The Plaintiff**

13
14 12. Name James O. Romine Jr.

15 13. Street Address 12494 Ironwood Dr.

16 14. City and County Yuma, Yuma County

17 15. State and Zip Code Arizona 85367

18 16. Telephone Number 928-276-1844

19 17. E-mail Address jromine2445@gmail.com

20
21 **18. B. The Defendants**

22
23 19. JANE/JOHN DOES 1 through 11 and possible competitor JANE/JOHN

24 DOES 12 through 100 at this time are not known to be US Persons and

25 must be determined by subpoena of information to Steam / Valve's PC

26 Game distribution service. JANE/JOHN DOES 12 through 100 are under

27
28 discovery via subpoena for proper service of all parties after initial case

1 amendment and/or refileing. Only Competitors within JANE/JOHN DOES
2 12 through 100 in The Distributors market place are being considered for
3 addition as Defendants to this cause of action. Only competitor data is
4 being requested by subpoena except for those who have special interest in
5 the harassment group as shown below to determine which individuals
6 within the harassment group other than those named are harassing, stalking,
7 causing criminal damage, and interfering with the business of The Plaintiff.

8
9 JOHN DOE's profiles on the **Steam Distribution System, here forward**
10 **referred to as The Distributor**, currently listed as -

11
12 20. JANE/JOHN DOE 1 - aka Steam User Demonsword

13 <http://steamcommunity.com/id/demonswordgames>

14
15 21. JANE/JOHN DOE 2 – aka Steam User Nathos

16 [22. http://steamcommunity.com/id/nath1](http://steamcommunity.com/id/nath1)

17
18 23. JANE/JOHN DOE 3 - aka Steam User Michoo Jones

19 <http://steamcommunity.com/profiles/76561198034665115>

20
21 24. JANE/JOHN DOE 4 - aka Steam User JDude330#HaeisBACK

22 <http://steamcommunity.com/id/JDude330>

23
24 25. JANE/JOHN DOE 5 - aka Steam User Toon Vlux

25 http://steamcommunity.com/id/Dwarf_Ninjas

26
27 26. JANE/JOHN DOE 6 - aka Steam User brandino

28 [27. http://steamcommunity.com/profiles/76561198061553886](http://steamcommunity.com/profiles/76561198061553886)

28. JANE/JOHN DOE 7 - aka Steam User Gana

1 29. <http://steamcommunity.com/profiles/76561198001362759>

2 30. JANE/JOHN DOE 8 - aka Steam User Jon144

3 31. <http://steamcommunity.com/profiles/76561198056184566>

4 32. JANE/JOHN DOE 9 - aka Steam User HGI

5 http://steamcommunity.com/id/hgi_is_a_horrible_person

6 33. JANE/JOHN DOE 10 - aka Steam User Karl Pilkington

7 <http://steamcommunity.com/id/Zootch>

8 34. JANE/JOHN DOE 11 - aka Steam User Drackmore

9 <http://steamcommunity.com/id/drokan>

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14 **FACTUAL ALLEGATIONS**

15
16 35. All defendants are and have been involved in continual and repeated attacks
17 upon The Plaintiff by name and association repeatedly for from 1 month to
18 21 months some continue even past this initial complaints writing process.
19 These attacks include but are not limited to: repeated anonymous
20 harassment posting from between 10 to more than 2000 times per
21 Defendant for a combined effort of over 20 thousand postings on The
22 Distributors community and The Plaintiffs store page forums, Reddit,
23 Youtube, ask.fm, disqus and many other locations. Repeated direct usage of
24 The Plaintiff's Good Name, trade names Micro Strategic Designs, Victory
25 Games, et al which are sole proprietor further creates a direct link for self-
26
27
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1 representation in this case. These postings wrongly accuse and attack The
2 Plaintiff in a manner not limited to the below lettered items:

- 3 a. Impersonation false accusations of impersonation.
4
5 b. False accusations of theft
6
7 c. Conspiracy to vandalize and destroy personal property.
8
9 d. Continual criminal property damage for over a year.
10
11 e. Conspiracy to commit harassment
12
13 f. Harassment.
14
15 g. Stalking.
16
17 h. Conspiracy to commit cyber bullying
18
19 i. Cyber bullying
20
21 j. Taking advantage of the lack of moderation tools to commit
22 harassment.
23
24 k. Circumventing moderation tools to commit harassment by creating or
25 using other accounts to continue attacking.
26
27 l. Formation of a hate group for the purpose of interference with
28 business, product damage, and harassment.
m. Intentional tortious interference with contract with the purpose of
financial damage, emotional damage, future personal interests, and
personal entertainment.
n. Intentional tortious interference with contract for unjust enrichment
for those Jane/John Doe who are competitors and future competitors

1 for unjust enrichment by destroying a competitor in the market. This
2 includes both direct competitors in the market and Defendants with
3 for profit from game art, Youtube, and Twitch channels.
4

5 o. Repeated belittling of the Plaintiff in the eyes of The Plaintiff's
6 customer's peers, and business partners. This applies to harassment
7 and Stalking.
8

9 p. Repeated belittling and harassment of The Plaintiff's customers any
10 time they try to offer support both on forums and reviews.

11 q. Repeatedly mocking The Plaintiff attempting to defend himself from
12 Defamation and false statements in a Federal Court case.
13

14 36. The Plaintiff asserts that not only have The Defendant's interfered with
15 business with customers, The Distributor, but have also interfered with
16 business between The Plaintiff and Digital Homicide LLC The Plaintiff's
17 LLC and The Distributor. The Plaintiff submits products to Digital Homicide
18 LLC for publication as Digital Homicide LLC has the partner Agreement
19 with The Distributor. By continual interference with The Plaintiffs ability to
20 do business with Digital Homicide LLC and direct harassment of The
21 Plaintiff while attempting to perform his business with The Distributor all
22 defendants are filed on as stated below.
23
24
25

26 **37. Plaintiff is informed and believes and thereon alleges that, at all times**
27 **herein mentioned, each of the defendants sued herein was during listed**
28 **events and/or currently is a member of an organized hate and**

1 harassment group or assisted said hate and harassment group that
2 specifically formed on The Distributor to financially destroy and harass
3 The Plaintiff and other targeted developers. This hate and harassment
4 group, Digital Homicides Poop Games, was created from the name of
5 The Plaintiff's company Digital Homicide Studios LLC which is an
6 officially registered Arizona State LLC Company. The use of The
7 Plaintiff's company name by this group has caused public confusion as
8 to The Plaintiff being involved in these actions of harassment when no
9 such activity has ever occurred See Attachment 1. The Plaintiff asserts
10 that there is no discernible difference between The Plaintiff and Digital
11 Homicide Studios LLC any longer as The Plaintiff has been fully
12 exposed, attacked, and harmed by Good Name and trade name to the
13 public and The Distributor and destroyed financially with reputational
14 damage. Each Defendant acted on their own free will to conspire as a
15 group to direct actions against the Plaintiff including all of the
16 Complaint details listed herein by individual and with evidence attached
17 as related to the allegations. The Plaintiff also brings additional action
18 against all Defendants who prove to be competitors, as listed now in this
19 case and discovered upon subpoena, of The Plaintiff to be in violation of
20 the tortious action of interference of contract and unjust enrichment.

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**38. Two of the Defendants JANE/JOHN DOE 9 - HGI and JOHN DOE 1 -
Demonsword are currently known to be competitors as fact. It is**

1 expected most or all individuals anonymously named here are in some
2 way profiting, have profited, or intend to profit from the same market
3 that The Plaintiff is currently active in. The Plaintiff additionally asserts
4 that the term 'competitor' applies to any individual whom has direct
5 financial interest in the gaming industry. This includes Artists,
6 Youtuber's, Twitch Streamers, Game Developers, Artists, and Internet
7 Journalists/bloggers as all of these individuals have profit motive behind
8 their attacks.
9

10
11 **39. When faced with litigation and use of subpoena to discover if Defendants**
12 **are a competitor, the founder and leader of this harassment group**
13 **Jane/John Doe 8 – aka Steam User Jon144 immediately hid profile and**
14 **dropped the harassment group.**
15

16
17 **40. On August 22nd 2016, John Doe 1 – Demonsword created a Publishing**
18 **Company and put John Doe 1 – Demonsword's products under it in an**
19 **effort to protect them from this litigation. At the time of events taken**
20 **against The Plaintiff, Black Shell Media LLC was the publisher of John**
21 **Doe 1 – Demonsword's game Cycle of Tyrning and more information is**
22 **being subpoenaed to see if this company has additional contacts which**
23 **would create liability in this action.**
24

25
26 **41. The Plaintiff additionally asserts that all actions taken by The**
27 **Defendants were directed at The Plaintiff directly and in a harassing**
28 **manner.**

JANE/JOHN DOE 1 - DEMONSWORD

1
2 42. On February 12th, 2016 Jane/John Doe 1 - Demonsword accused The
3 Plaintiff of using sock puppets as a derogatory term. These tradenames are
4 legal business representations that embody sole proprietor characteristics.
5 The Plaintiff was using Trade Names to avoid an enormous group of
6 harassers, of which The Defendants make up the core. There is no legitimate
7 reason for The Plaintiff not to be able to use Trade Names especially in the
8 light of the harassment continually being aimed at The Plaintiff which
9 Jane/John Doe 1 – aka Demonsword takes part in. Jane/John Doe 1 – aka
10 Demonsword has harassed The Plaintiff, placed negative reviews on
11 products to cause financial damage and emotional and mental anguish, and
12 deteriorated the public view of The Plaintiff in the eyes of the public over
13 100 times in postings on multiple media outlets including Youtube, disqus,
14 and The Distributors forums.

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19 43. Jane/John Doe 1 - Demonsword is a known competitor in the Steam Market
20 place and may also be using other trade names to get products through
21 Greenlight and on the store front.

22
23 44. Jane/John Doe 1 - Demonsword has acted with full knowledge of others
24 harassing The Plaintiff and has harassed the Plaintiff willingly after attempts
25 to stop contact have failed. Jane/John Doe 1 – Demonsword now that his
26 product has launched has turned advocate for ‘attempting’ to minimize
27 harassment but the actions still have already taken place and done damage.
28

1 Jane/John Doe 1 – Demonsword has now formed a second group, Greenlight
2 Guardians, that interferes with competitors on a regular basis under the guise
3 of consumer advocacy while attempting to block those competitors from
4 market. As this Defendant has now been warned of impending lawsuit, this
5 Defendant has dropped group from Greenlight Guardians.
6

7
8 45. Jane/John Doe 1 - Demonsword has stalked the Plaintiff on multiple media
9 outlets including but not limited to, Steam, Youtube, and Disqus, using
10 controversy of his postings and The Plaintiff to promote his own games, one
11 of which is now on sale and a second of which has been accepted for
12 distribution. There may be more added after subpoena and amendment of this
13 complaint. See Attachment 2.
14

15
16 46. On April 13th 2016 Jane/John Doe 1 - Demonsword, a competitor in The
17 Plaintiff's market, purposefully posted a negative review on The Plaintiffs
18 game Starship: Novastrike to cause damage. Jane/John Doe 1 -
19 Demonsword links a Youtube review
20 <https://www.youtube.com/watch?v=Uqd1avAS7YE&feature=youtu.be>.
21

22 The review leads users to the Youtube video

23
24 47. This Youtube review falsely accuses the Plaintiff of stealing a font from
25 Disney which is plainly available for free use here -
26 <http://cooltext.com/Logo-Design-Starburst> and then falsely misrepresents
27 the game product by running it within an unsupported manner using a virtual
28 machine which can be starved for resources. Jane/John Doe 1 -

1 Demonsword's own business partner even said he had no problems running
2 the game. As the game does not lag as Jane/John Doe 1 - Demonsword states
3 in his Youtube review. The way the game was presented was malicious in
4 intent and purposefully done to cause product damage and depict The
5 Plaintiff as incompetent in The Plaintiff's business practice. **The theft**
6 **accusation is directed at The Plaintiff's good name only by association.**
7
8 The false representation of product may or may not apply to The Plaintiff
9 directly depending upon the judgement of The Court. Theft and defamation
10 of The Plaintiff apply due to use of The Plaintiff's name repeatedly
11 throughout Demonsword's postings.
12
13

14 48. In Jane/John Doe 1 – Demonsword's review contains 14 false accusations
15 of product bring broken are made. All of these accusations are caused by
16 Jane/John Doe 1 running the game on unsupported platform in a possibly
17 resource starved virtual machine. Not having a dedicated video card can also
18 cause 3d style graphics to cause performance issues which is a common issue
19 with virtual machine usage. The Plaintiff's name is used by Jane/John Doe 1
20 – Demonsword across the Steam forums dozens of times. It is plainly shown
21 in the video that Jane/John Doe 1 – Demonsword is not familiar with 3d
22 graphics or their limitations within virtual machines which do not have direct
23 access to video devices.
24
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JANE/JOHN DOE 2 - NATHOS

1 49. On September 26th of 2015, user Jane/John Doe 2 - Nathos states in
2 Attachment 3 under an article Specifically naming The Plaintiff by name and
3 by trade name multiple times suggesting that The Plaintiff has shady business
4 practices for making cheap and fast games for low price. It is suspected that
5 Jane/John Doe 2 - Nathos is a competitor in The Distributors marketplace.
6

7 50. On September 26th of 2015, Jane/John Doe 2 - Nathos states in Attachment
8 3 that The Plaintiff steals or buys cheap assets both being derogatory to game
9 value and to The Plaintiff directly, then goes further to state people are being
10 scammed when many customers actually make profit from many of the
11 games and get a game to play also. This is an accusation of theft and
12 derogatory comment toward business production and performance.
13
14

15 51. On September 26th 2015 Jane/John Doe 2 - Nathos states in Attachment 4
16 and 5 that The Plaintiff is changing his trade name back and forth between
17 trade names. This is a false statement. An individual at The Distributor was
18 changing the product's developer name multiple times and The Plaintiff was
19 returning it to the proper trade name as is legal to do. This sheds a light of
20 incompetence and indecision upon The Plaintiff when in fact a disagreement
21 was occurring between The Plaintiff and an employee of The Distributor.
22 This John Doe 2- Natho's post on The Distributor on The Plaintiff's forums
23 were deleted by himself as was The Distributors Moderators post above it
24 when the realization that nothing wrong had been performed by The Plaintiff.
25
26
27
28

Jane/John Doe 3 – Michoo Jones

1 52. On February 6th 2016 Jane/John Doe 3 - Michoo Jones falsely accuses The
2 Plaintiff of impersonation See Attachment 6, 7, and 8.

3 53. On February 17th, 2016 Jane/John Doe 3 - Michoo Jones falsely accuses
4 The Plaintiff of impersonation of a group of students in Britain that go by
5 the name Xenobyte Studios. The Plaintiff has already explained to
6 Jane/John Doe 3 – Michoo Jones 3 months’ prior the entire situation
7 regarding this and Jane/John Doe 3 - Michoo Jones continues to attack in
8 regards to it regardless of the truth. See Attachment 6, 7, and 8.
9

10 54. On February 17th, 2016 Jane/John Doe 3 - Michoo Jones falsely accused
11 The Plaintiff of creating jimflipsthebird and jimdoxeshimself tumblr
12 postings which were not The Plaintiff, See Attachments 6, 7, and 8.
13

14 55. On November 16th, 2015 Jane/John Doe 3 - Michoo Jones falsely accuses
15 The Plaintiff being aggressive towards users when The Plaintiff has been
16 continually subjected to harassment by several thousand users who have
17 confused free speech with the abuse of repeatedly post harassing and false
18 statements for in excess of a year as an attacking group effort with the
19 specific intent of putting The Plaintiff out of business. These users have
20 been asked as a group to stop several times.
21

22 56. On November 16th, 2015 Jane/John Doe 3 - Michoo Jones falsely accuses
23 The Plaintiff of deleting evidence that The Plaintiff was not even involved
24 in. See Attachments 6, 7, and 8.
25
26
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1 57. On November 16th, 2015 Jane/John Doe 3 - Michoo Jones falsely accuses
2 The Plaintiff of being a Youtube User called No-BS Gamer. See attachment
3 Attachment 6.
4

5 58. On November 16th, 2015 Jane/John Doe 3 - Michoo Jones falsely accuses
6 The Plaintiff of using the Trade Name Victory Games LLC (which would
7 be illegal use of a non-existing LLC) when infact The Plaintiff's Trade
8 name was Victory Games. See Attachments 6, 7, and 8.
9

10 59. On March 4th, 2016 Jane/John Doe 3 - Michoo Jones attempts to boost
11 harassment by attempting to call Mr. James Nicholas Stanton (AKA Jim
12 Sterling) to make a video on The Plaintiff's product Winged Knights and
13 Krog Wars in an effort to draw more crowd based harassment to the game
14 forum. See Attachment 10.
15
16

17 60. On November 16th, 2015 Jane/John Doe 3 - Michoo Jones falsely accuses
18 The Plaintiff of banning all users in a contest on the game The Slaughtering
19 Grounds. Only users who broke contest rules by attacking The Plaintiff
20 were banned. Proof of one of the contest winners is in Attachment 11.
21

22 61. From October 2015 through present, Jane/John Doe 3 - Michoo Jones has
23 engaged in continual harassment of the Plaintiff on The Distributors forums
24 through a barrage of over four hundred postings. Jane/John Doe 3 - Michoo
25 Jones engages in debate on harassment of The Plaintiff and other users who
26 are Steam Developers in efforts to push them from The Distributors
27 marketplace. The Plaintiff is subpoenaing information regarding this user to
28

1 discover if this user is also a competitor. On the last weekend Michoo Jones
2 was harassing he suddenly stopped posting after having posted over 30
3 times spamming two large comments across a dozen Greenlight Game
4 submissions. User has not been logged in for 72 days as of the time of this
5 writing (last day June 6th 2016). User may have been permanently banned
6 by The Distributor. Subpoena for this information is being requested. See
7 Attachment 12.
8
9

10 62. From October 2015 through present, Jane/John Doe 3 - Michoo Jones has
11 engaged in Cyberstalking across multiple media outlets not limited to,
12 Facebook, Youtube, and the Steam Forums. Michoo Jones created
13 Facebook Page -
14 [https://www.facebook.com/media/set/?set=a.122164791509635.10737827.122141084845339&typ](https://www.facebook.com/media/set/?set=a.122164791509635.10737827.122141084845339&type=3)
15 [e=3](https://www.facebook.com/media/set/?set=a.122164791509635.10737827.122141084845339&type=3) further trying to intimidate and do damage to The Plaintiff. This page
16 was immediately removed by Facebook upon request. The information
17 would need to be subpoenaed if needed, The Plaintiff did not get a copy
18 saved. See Attachment 9.
19
20
21

22 **Jane/John Doe 4 – Jdude330HaeisBack**

23 63. On January 7th, 2016 Jane/John Doe 4 - Jdude330HaeisBack falsely
24 accuses The Plaintiff of both stealing an engine to base the associated game
25 to and an image off of google images when the image is plainly for sale on
26 Shutterstock.com. Evidence of this statement is in Attachment 13.
27
28

1 64. From January 7 through present, Jane/John Doe 4 - Jdude330HaeisBack
2 has engaged in continual harassment of the Plaintiff on The Distributors
3 forums through over fifty postings. Jane/John Doe 4 - Jdude330HaeisBack
4 engages in debate on harassment of The Plaintiff and other Steam
5 Developers in efforts to push them from The Distributors marketplace. The
6 Plaintiff is subpoenaing information regarding this user to discover if this
7 user is also a competitor.
8
9

10 65. From January 7 through present, Jane/John Doe 4 - Jdude330HaeisBack
11 has harassed a potential customer of The Plaintiff as shown in Attachment
12 14. This potential customer was banned due to Jdude330 and his fellow
13 group member/harassers who were harassing at the time due to members
14 from the harassment group reporting the potential customer for harassment.
15 This user was attempting to clear up that nothing had been stolen and there
16 was nothing wrong with the game submission.
17
18

19 66. Jane/John Doe 4 - Jdude330HaeisBack has engaged in Cyberstalking on the
20 Steam Forums and is a member of a group dedicated to the harassment and
21 destruction of the Plaintiff.
22

23 **Jane/John Doe 5 – Toon Vlux**
24

25 67. On September 24, 2015 Jane/John Doe 5 - Toon Vlux falsely accuses The
26 Plaintiff of theft pirated assets while harassing. Evidence of this statement
27 is in Attachment 15.
28

1 68. On September 24th, 2015 Jane/John Doe 5 - Toon Vlux falsely accuses The
2 Plaintiff of threats against people which were performed by some other
3 party. The Defendant Jane/John Doe 5 - Toon Vlux accuses the Plaintiff of
4 theft, of being “sleezy”, of scamming people who *want* something, of
5 promising to continue harassment, of promising to stalk and find The
6 Plaintiff no matter where The Plaintiff tries to do business, That continued
7 false statements, which The Plaintiff has tried to emphasize are false, will
8 be reposted as if truth, and that The Plaintiff has no way to fight back, and
9 the onslaught will continue even through threat of lawsuit. See Attachments
10 Attachment 16 and Attachment 20.
11

12
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14 69. On June 3rd, 2016 Jane/John Doe 5 – Toon Vlux states that while no one
15 deserves to get harassed states that nothing has been done to make it stop.
16 This lawsuit now embodies that act to make it stop. Requests have been
17 made multiple times. The Defendant then states “To Fix and Destroy
18 digihom” – in essence to destroy The Plaintiff. Plaintiff’s name used
19 immediately after statement. See Attachment 17. The Plaintiff is
20 specifically named.
21

22
23 70. Jane/John Doe 5 - Toon Vlux continually changes user name and there is
24 only a 12 slot list available Toon Vlux has gone off the list but Attachment
25 18 shows name list linking user to postings.
26

27 71. On June 12, 2016 Jane/John Doe 5 - Toon Vlux encourages interference
28 with business when all The Plaintiff’s products have been unmarked.

1 Jane/John Doe 5 - Toon Vlux uses The Plaintiff's name again directly.

2 Jane/John Doe 5 - Toon Vlux falsely informs the public that The Games are
3 being taken down and put back up to remove flags when this is not the case.
4

5 Jane/John Doe 5 - Toon Vlux publicly belittles The Plaintiff in a harassing
6 and bullying manner and insults The Plaintiff's business effort in being
7 doomed to failure. See Attachment 17.
8

9 72. From May 2015 through present, Jane/John Doe 5 - Toon Vlux has
10 engaged in continual harassment of the Plaintiff on The Distributors forums
11 through over 100 postings. Jane/John Doe 5 - Toon Vlux engages in
12 harassment, encouragement of harassment, and debate on harassment of
13 The Plaintiff and other Steam Developers in efforts to push them from The
14 Distributors marketplace. The Plaintiff is subpoenaing information
15 regarding this user to discover if this user is also a competitor.
16
17

18 73. On May 11, 2016 Jane/John Doe 5 - Toon Vlux states The Plaintiff is
19 "nothing but a hack, a liar and a cheat". Jane/John Doe 5 - Toon Vlux
20 accuses of theft when in excess of forty thousand dollars have been spent
21 on production goods, equipment, and subscriptions. Jane/John Doe 5 -
22 Toon Vlux harasses insulting both The Plaintiff as a family person, The
23 Plaintiff's partner as a family person demeaning in a bullying and cruel
24 manner in the public eye. Jane/John Doe 5 - Toon Vlux states The Plaintiff
25 is a scam artist and will be forever doomed to an endless loop of being
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1 kicked out of the market in an attempt to cause despair and disdain for The
2 Plaintiff towards The Plaintiff's profession. See Attachment 19.

3 **Jane/John Doe 6 - brandino**

4
5 74. From April 2015 through present, Jane/John Doe 6 – Brandino with over
6 two thousand posts has repeatedly encouraged attacks upon The Plaintiff,
7 The Plaintiff's business, Business partner, customers, and performed
8 repeated attacks on The Plaintiff, The Plaintiff's business, Business partner,
9 customers, and business partners in an attempt to destroy The Plaintiff
10 financially and put The Plaintiff out of business. Specific statements to this
11 will be shown in attachments here as the causes of action. The primary
12 statement which has been repeatedly mentioned by Jane/John Doe 6 –
13 Brandino: "If Digital Homicide refuses to improve then we'll drive them off
14 Steam and I will never stop until James and Robert Romine are finished. I
15 also got a refund for this game so DH won't be getting any of my money
16 and they also can't delete this review so now they'll have to let me say what
17 I want to say about DH without getting censored." This Defendant has
18 passed beyond freedom of speech and for over a year directed harassment,
19 interference with business, and publicly defamed The Plaintiff. Jane/John
20 Doe 6 – brandino has had malicious intent to interfere with business and
21 continued to attempt to have The Plaintiff removed from The Distributors
22 platform which would put The Plaintiff out of business. Attachments 21
23
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1 and 22 shows Jane/John Doe 6 – brandino harassing two customers and The
2 Plaintiff. More examples are available.

3 75. On October 13, 2015, Jane/John Doe 6 – Brandino posted in multiple
4 Greenlight forums repeatedly in an attempt to destroy products, Jane/John
5 Doe 7 – Brandino posted over 50 times in 3-day time period around this
6 date attacking products. See Attachment 23.
7

8
9 76. On May 27th, 2015 Jane/John Doe 6 – Brandino purchased a copy of
10 Krogwars, played for 5 minutes which is the minimum time to leave a
11 review, then posted a scathing review towards The Plaintiff and The
12 Plaintiff's company continually belittling and depreciating the value of the
13 company with almost nothing to do about the game with only intent to do
14 damage to The Plaintiff. Jane/John Doe 6 – Brandino also attacks The
15 Distributor for even doing business with The Plaintiff. See Attachment
16 Attachment 24. Jane/John Doe 6 – Brandino then refunded the game. It is
17 important to keep in mind Jane/John Doe 6 – brandino has been attacking
18 for over a year at the date of this event.
19
20
21

22 77. On June 19, 2015, Jane/John Doe 6 – Brandino purchased Gnarltoof's
23 Revenge, played for 5 minutes which is the minimum time to leave a
24 review, then posted a scathing review towards The Plaintiff specifically
25 calling out by Good Name and last name. Jane/John Doe 6 – Brandino
26 belittles, interferes with business specifically asking others not to sell cards
27 or buy the game in an attempt to financially ruin the product and The
28

1 Plaintiff. Jane/John Doe 6 – Brandino goes further to belittle a defamation
2 case where The Plaintiff against an exceptionally large media outlet which
3 Jane/John Doe 6 – Brandino follows very closely and which is the primary
4 motivation to attack The Plaintiff. Jane/John Doe 6 – Brandino then goes
5 on to state he will be starting a petition to ban The Plaintiff’s company and
6 that ‘we’ will drive them off of The Distributor and that “I will never stop”.
7
8 Jane/John Doe 6 – Brandino then refunded the game. See Attachment 25. In
9 a further comment below the review Jane/John Doe 6 – brandino further
10 falsely accuses The Plaintiff of Stalking, Harassing, being rude to the
11 community, insulting community members. The copyright strike mentioned
12 to be false was done in an attempt to stop thousands upon thousands of
13 individuals coming from the media outlet and attacking a store forum page
14 while using The Plaintiff’s content in a video. Then Jane/John Doe 6 –
15 brandino states finally that he may do over the top style review youtube
16 channel in an excessive or exaggerated manner – which is done to cause
17 controversy at the expense of those who’s content he will use to do so. See
18 Attachment 26. The Plaintiff’s Good Name is directly used twice in
19 Attachment 25.
20
21
22
23
24

25 78. On June 2nd 2016, Jane/John Doe 6 – Brandino posted an announcement to
26 the harassment group “We Need Valve to ban Digital Homicide” which is
27 The Plaintiff’s company and would do direct damage to The Plaintiff.
28

Jane/John Doe 6 – Brandino states he has already sent two letters, countless

1 emails, and reports on profile and games, but Jane/John Doe 6 – Brandino
2 asks for more people to do the same in order to interfere with The
3 Plaintiff’s business and attempt to destroy. See Attachment 27.
4

5
6
7 79. On March 25th 2016, Jane/John Doe 6 – Brandino posted an announcement
8 stating “Listen, Digital Homicide is the whole reason this group exists so
9 we HAVE to stop them.” Jane/John Doe 6 – Brandino attempts to recruit
10 users to act to flag The Plaintiff’s games only for opinion with no
11 legitimate reason other than that opinion and Jane/John Doe 6 – Brandino’s
12 own personal hatred of The Plaintiff. In the comment section Jon144 states
13 “we can’t take anymore garbage”. Due to Jane/John Doe 6 – Brandino and
14 others attacks The Plaintiff’s production output has been reduced to less
15 than 5% of production capability and caused mass disorganization and
16 forced The Plaintiff to write this paperwork instead of making games. This
17 includes the “better games” these users supposedly want because their
18 attacks are continuous and interfere with proper financial establishment no
19 matter hard The Plaintiff works. The Plaintiff has put in over 11 thousand
20 hours in the past 2.75 years, legal study, legal paperwork, business effort,
21 model setup, and organization, and coding almost 1 million lines of #C
22 code. The Plaintiff put an enormous amount of work into Dungeons of
23 Kragmor released Jan 29 2016 and it was still attacked on launch day and
24
25
26
27
28

1 destroyed financially. At least one competitor immediately left a 5-minute
2 bad review on it without actually attempting to play it. This individual has
3 removed the review within the past month but the damage was done within
4 the first five hours on initial product launch. This mentioned competitor
5 may be discovered further by subpoena and if more involvement is
6 uncovered then will be added by amendment. See Attachment 27.
7

8
9 80. On July 2015 2016 (evidence only), Jane/John Doe 6 – Brandino posted
10 “Don’t worry, we have Jim Sterling to come to our rescue.” This indicates
11 collaboration with Jim Sterling who is a Defendant in another case The
12 Plaintiff has filed. These user’s direct information to Jim Sterling who then
13 makes a video to his hundreds of thousands of subscribers who come and
14 these users assist in harassment on The Plaintiff and The Plaintiff’s
15 products in an effort to destroy both. This has been ongoing for over a year
16 and a half. See Attachment 28.
17

18
19 81. On March 14th 2016, Jane/John Doe 6 – Brandino posted to the
20 hate/harassment group falsely stating that The Plaintiff’s bundle is vote
21 rigging when over 15 sites advertise their products in a similar manner. See
22 Attachment 29. This game directly asked for yes votes, and was greenlit, it
23 was made by one of The Plaintiff’s direct competitors, and now that
24 competitor may actually be a publisher now, not having to go through
25 Greenlight. Back To Basic Gaming creates gleam giveaways to attract
26 traffic to generate interest in their games in the same manner as The
27
28

1 Plaintiff. See Attachment 30. There is no legitimate purpose in the attacks
2 these all The Defendants have performed against The Plaintiff and they
3 have conspired to do damage to the Plaintiff.
4

5 82. On March 13th 2016, Jane/John Doe 6 – Brandino posted to the
6 hate/harassment group stating that The Plaintiff was “more likely to
7 become mass murderers than actually be a respected game devs”. Directly
8 attacking the Plaintiff’s mental stability while under continual harassment,
9 see Attachment 31.
10

11 83. From February 2015 through present, Jane/John Doe 6 – Brandino has
12 engaged in continual harassment of the Plaintiff on The Distributors forums
13 through over a thousand postings. Jane/John Doe 6 – Brandino engages in
14 efforts on harassment of The Plaintiff and other Steam Developers in
15 efforts to push them from The Distributors marketplace. The Distributors
16 system is setup as a conveyor belt it is not IF a game will make it but
17 WHEN. No votes slow or stop product entry into market and reports can
18 cause a product to be marked incompatible forcing the developer to remove
19 it. The harassment/hate group is encouraged to not only vote no but to
20 report games for no legitimate reason other than opinion basis which is not
21 what the reporting system is to be used for. The Plaintiff is subpoenaing
22 information regarding Jane/John Doe 6 – Brandino to discover if this user is
23 also a competitor. Jane/John Doe 6 – Brandino is also a leader and primary
24 harasser and organizer in the hate/harassment group.
25
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1 84. Jane/John Doe 6 – Brandino is committed malicious harassment through
2 statements of idiot, incompetent, stupid, and other mental comparisons of
3 The Plaintiff by name. Jane/John Doe 6 – Brandino’s perception is that The
4 Plaintiff is handicapped and belittles The Plaintiff as such, see Attachment
5 32 as one of over twenty examples.
6

7 85. Jane/John Doe 6 – Brandino has committed stalking for continued
8 harassment and tracking of The Plaintiff on multiple websites and forums,
9 for intent to do damage and in fact doing such damage to business,
10 community, and personal relations on a regular and prolonged basis
11 exceeding a year.
12
13

14 86. Jane/John Doe 6 – Brandino has performed interference with business
15 relations Steam Greenlight interference in over 60 games The Plaintiff has
16 submitted for publishing.
17

18 87. There are hundreds of more examples if any more direct evidence is
19 needed. Some may need subpoenaed from The Distributor due to products
20 having had to be removed from The Distributor from harassment issues.
21 There are also some from ban messages where The Plaintiff has had to
22 repeatedly ban from multiple forums, this user, who is not a customer, who
23 continually interferes and Jane/John Doe 6 – Brandino intends to keep
24 coming back until The Plaintiff is no longer in business. There are also
25 somewhere around a thousand other examples of this individual doing the
26
27
28

1 same actions against others, including via email. I have reported this issue
2 to The Distributor repeatedly yet nothing has been done.

3 88. On 9-4-2016 Jane/John Doe 6 – brandino posted again to The Plaintiff’s
4 game Operation Global shield much in the same manner as all the other
5 games. Jane/John Doe 6 – brandino then harassed main good reviewer of
6 the game specifically attacking The Plaintiff regardless of how good the
7 game was. The reviewer had stated the game was an excellent buy for the
8 price. See Attachment 33. The Plaintiff is now adding a request for a
9 permanent injunction / cease and desist order on Jane/John Doe 6 –
10 brandino’s accounts and ip address. In the comment section it can be seen
11 that Jane/John Doe 6 – brandino had accused the user of being an alt
12 account and then deleted the comment then continued on to try to convince
13 the user who had enjoyed the game that The Plaintiff is ‘horrible’ with bad
14 business practices.
15

16 89. As shown in Attachment 34 Jane/John Doe 7 – Gana posted a statement
17 showing involvement of Jane/John Doe 6 – brandino who interfered with A
18 business deal between a large community group and The Plaintiff’s LLC.
19 This interferes with business between The Plaintiff and the Plaintiff’s LLC
20 which The Plaintiff depends on for publication. This group votes as a whole
21 against The Plaintiff’s submitted games in an attempt to stop The Plaintiff
22 from doing business and the deal shown was essential for continuing to get
23
24
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1 traffic to The Plaintiff's games to publication. It is impossible to calculate
2 the amount of damage done by this event.

3 **Jane/John Doe 7 - Gana**

4
5 90. From March 2015 through Present, Jane/John Doe 7 - Gana has posted
6 over a hundred times in support of harassment and organizing to harass The
7 Plaintiff. Jane/John Doe 7 - Gana is also a leader in the hate/harassment
8 group. The Plaintiff is subpoenaing information regarding Jane/John Doe 7
9 - Gana to discover if this user is also a competitor. Jane/John Doe 7 - Gana
10 scours the Internet, The Distributor's forums, and The Plaintiff's Internet
11 Sites for information regarding business activity and provides that
12 information in detailed format to the harassment group for consumption via
13 attack. Jane/John Doe 7 - Gana acts as an "intelligence" organizer for the
14 group to make their attacks more efficient and ensure nothing is missed.
15 The Plaintiff warned of possible pending lawsuit a few times. Jane/John
16 Doe 7 - Gana has now not logged in for in excess of 4 weeks. See
17 Attachments 35 and 36.

18
19
20
21
22 91. Jane/John Doe 7 - Gana has stalked The Plaintiff continually tracking The
23 Plaintiff's activity and for posting The Plaintiff's personal Facebook link on
24 the harassment groups public forums (this must have later been removed by
25 a moderator or Jane/John Doe 7 - Gana and is beyond statute of limitations
26 at this point.
27
28

1 92. Jane/John Doe 7 - Gana tracks other methods of income of The Plaintiff
2 beyond The Plaintiff's games as it is an effort to track down all income
3 sources to destroy The Plaintiff in any way possible to stop The Plaintiffs
4 ability to do business. See Attachments 35 and 36.
5

6 93. Jane/John Doe 7 - Gana is a primary communicator on Disqus a common
7 communication tool to post on The Jimquisition, Jim Sterlings forum
8 locations. Attachment 37 shows a post about an email to Jim Sterling that
9 led to a host of videos, then several Jimquisition articles that ultimately cost
10 The Plaintiff well over a million dollars and caused massive public hate and
11 harassment upon The Plaintiff outside the harassment group. See
12 Attachment 38 showing another company posting a giveaway for traffic.
13 See Attachment 39 showing the game has been Greenlit and is for sale.
14 Another game called "Suits" gave out 25 thousand keys for vote traffic the
15 same week the plaintiff was destroyed and it was greenlit and now for sale
16 also. See Attachment 40 for information regarding a Back to Basics
17 Gaming (a competitor in lower cost games on The Distributor) where the
18 exact same giveaway methods are used. Back to Basics has recently been
19 getting harassed by this group also but has had less false report issues to
20 The Distributor and less interference with business to date than The
21 Plaintiff. All three of the games shown in this giveaway have been greenlit
22 and are for sale.
23
24
25
26
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Jane/John Doe 8 – Jon144

1 94. On January 8th, 2016 Jane/John Doe 8 - Jon144 falsely accuses The
2 Plaintiff of stealing clipart. The Plaintiffs name is shown three times in this
3 thread. Evidence of this statement is in Attachment 42.
4

5 95. On January 7th, 2016 Jane/John Doe 8 - Jon144 posts to the
6 hate/harassment group, which he is the main administrator for, an
7 announcement specifically stating “Everyone in this group should be
8 familiar with these developers. They are the reason that this group was
9 created. We are their true nemeses. It is our task to stop Digital Homicide
10 (aka Romino Brothers) at all costs.” This brings down an enormous attack
11 upon the products Greenlight pages. This post has been removed but The
12 Plaintiff already made a copy see Attachment 41.
13
14

15 96. On January 21st 2016, Jane/John Doe 8 – Jon144 posted a statement on a
16 developer’s submission stating “I’m really enjoying my popcorn.” This is
17 the general response and entertainment the harassers state as they gang
18 bang a target. The developer of Shooter Tactics, see Attachment 43,
19 resubmitted his game later to Greenlight and the attack suffered was said to
20 have given the older gentlemen a heart attack. One of the harassers of the
21 group, Mello_Online1, states in Attachment 44: “@Hagalz I highly doubt
22 that this gy(guy) can suffer a heart attack because of this, if that’s the case
23 then Digital Homicide should have died by now.” This reference is to The
24 Plaintiff should have *died* from the harassment being received while
25 referring to someone who may have just suffered a heart attack.
26
27
28

1 97. From January 2015 through Present, Jane/John Doe 8 - Jon144 has posted
2 over three hundred times in support of harassment and organizing to harass
3 The Plaintiff.
4

5 98. Jane/John Doe 8 - Jon144 is also the leader and founding member of the
6 hate/harassment group.
7

8 99. The Plaintiff is subpoenaing information regarding Jane/John Doe 8 -
9 Jon144 to discover if this user is also a competitor. In Attachment 42 it can
10 be seen that Jon144 has spent several years learning Game Maker Studios
11 and this was several years ago. It is suspected Jon144 may also have Unity
12 experience, is using other accounts to sell games on The Distributor, and
13 may be in the same price range competition as The Plaintiff.
14

15 100. On January 29 2016, Jane/John Doe 8 - Jon144 stated in Attachment
16 45 that The Plaintiff "took the money and left". That products budget was
17 destroyed by its initial launch discount being improperly released by forces
18 out of The Plaintiff's control. This almost completely destroyed a five-
19 month long work effort. This statement is misleading to The Plaintiff's
20 customers and to potential harassers being convinced to join the fray.
21

22 **Jane/John Doe 9 - HGI**
23

24 101. Jane/John Doe 9 - HGI has posted over one hundred times in
25 harassment and organizing to harass The Plaintiff. In Attachment 46 are
26 two posts. The first post showing interest as to competitor information. The
27 second post stating in response to user King's post that assisted suicide
28

1 should be easy to accomplish as there are plenty of people willing to help
2 kill The Plaintiff. The Plaintiff's name is several times in the thread.

3
4 102. Jane/John Doe 9 - HGI is suspected to be a competitor on The
5 Distributor. The user believed to have a company start up in London and is
6 may have multiple Greenlight accounts submitting products as a
7 competitor. The Plaintiff will attempt subpoena this information.
8

9 103. Jane/John Doe 9 – HGI posts The Plaintiffs good name and then two
10 posts later states that The Plaintiff will have legal tax issues if Trade Names
11 have not been reported. Trade Names do not need to be registered in
12 Arizona and work as sole proprietor. The entire discussion these users are
13 having is due to them not understanding that the field for company name is
14 a typed in field and is not automated. It is easy to make an error in these
15 fields when setting product to publish as there are a great deal of fields and
16 steps to perform. See Attachment 48 The Plaintiff designs, develops,
17 publishes, troubleshoots, markets, and supports his own games. Jane/John
18 Doe 9 – HGI's statement is defamatory and used in relation to The
19 Plaintiff's name.
20
21
22

23 104. There are 30 more postings from Jane/John Doe 9 – HGI including
24 harassing posts from forum moderation bans for breaking forum rules. This
25 user supported others in attempts to harass and put The Plaintiff out of
26 business.
27
28

1 105. On May 28 2016 Jane/John Doe 9 – HGI states two defamatory
2 statements in regards to rigging Greenlight (when it is common practice to
3 advertise for traffic) and then a double comment in regards to theft.
4
5 Torrents are free downloads and some individuals use torrents to freely
6 download paid assets which would be theft. Then HGI blatantly states theft.
7
8 See Attachment 49.

9 **Jane/John Doe 10 – Karl Pilkington**

10
11 106. Jane/John Doe 10 – Karl Pilkington is a leader of the harassment
12 group.
13

14 107. On September 23, 2015 Jane/John Doe 10 – Karl Pilkington accused
15 The Plaintiff by association via Good name and Trade Name association of
16 stealing art work created by laslof of deviant art. This artwork was for sale
17 on Shutterstock where the product license was purchased. It took over four
18 days for the artist to respond to inquiries but the defaming users took it
19 upon themselves to post false statements before acquiring fact. See
20
21 Attachment 50.
22

23 108. Jane/John Doe 10 – Karl Pilkington is a suspected competitor in the
24 market and has harassed and assisted in harassment of The Plaintiff and
25 hundreds of other developers primarily on the greenlight submission
26 system. The Plaintiff submits the entire Steam Community at
27
28 <https://steamcommunity.com/> and Greenlight system comment and forum

1 sections as an exhibit for this complaint. This section to be Amended after
2 Jane/John Doe subpoena.

3 109. Jane/John Doe 10 – Karl Pilkington has posted in excess of three
4 hundred times harassing and supporting harassment of The Plaintiff over a
5 15-month period.

6
7 110. Jane/John Doe 10 – Karl Pilkinton states that a customer of The
8 Plaintiff as being “you are the problem, at least a big part of it” as shown in
9 Attachment 51. This statement harasses The Plaintiff’s customer for liking
10 The Plaintiff’s product.

11
12
13 **Jane/John Doe 11 - Drackmore**

14 111. In Attachment 54 Jane/John Doe 11 – Drackmore states that The
15 Plaintiff is ‘threatening’ people and Drackmore gets a kick out of it. The
16 Plaintiff had specifically warned this entire group several times and dozens
17 of times to individuals to stop harassing and destroying The Plaintiff’s
18 products.

19
20 112. In Attachment 55 Jane/John Doe 11 – Drackmore states that
21 Operation: Global Shield “snuck” past greenlight and at 54%/48% it should
22 not have been greenlit. This is a false statement and many such vote percent
23 on games make it through every batch. The Plaintiff directly paid for
24 advertising to get traffic to this particular title approximately a year ago.
25 Five of the titles lost due to this groups harassment efforts were also
26 advertised with cash on the same site as Operation: Global Shield and
27
28

1 \$50,000 worth of keys were handed out for advertising traffic. All this was
2 lost when those products were lost from interference by the harassment
3 group.
4

5 113. In Attachment 56 Jane/John Doe 11 – Drackmore mentions what
6 The Plaintiff should be doing in Jane/John Doe 11 – Drackmore’s eyes. It is
7 these opinions that have been continually forced upon The Plaintiff in an
8 effort to control The Plaintiff’s business. Jane/John Doe 11 – Drackmore
9 then states he is answering questions ‘honestly’ when false information is
10 being given out. There are plenty of sales to justify The Plaintiff’s products.
11 Jane/John Doe 11 – Drackmore was stating that cards are the only reason
12 the games sell and that giving games away free for card revenue was the
13 only reason The Plaintiff was doing business. The truth of the matter is that
14 these individuals have forced The Plaintiff into the low price market
15 because The Plaintiff cannot devote large amounts of time to a game for
16 fear of it being destroyed every time by these harassers and other factors
17 related to the situation. The Plaintiff cannot charge a reasonable price for
18 higher effort work as the attacks by these harassers detract from its value
19 and create customer disinterest. Jane/John Doe 11 – Drackmore also states
20 he knows “it must steam you something fierce knowing you cannot
21 moderate this little section” when the truth is that The Plaintiff has not
22 wanted communication with this individual for many months and has stated
23 this fact repeatedly. Jane/John Doe 11 – Drackmore ‘gets a kick’ out of and
24
25
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1 prides himself on being able to frustrate, annoy, and destroy The Plaintiff at
2 every turn. As a group they are almost unstoppable. Each of the 1200+
3 individuals can comment on any greenlight and any game published. With
4 21 published games and at one point over 40 on greenlight this left over 73
5 thousand locations that The Plaintiff would have to look, and ban an
6 individual performing defaming, harassing, interfering, or attacking
7 statements on The Plaintiff. These individuals know the moderation tools
8 are insufficient to block harassment and take advantage of every avenue
9 open and when banned, sometimes even create a new account to continue
10 or use an alt. See Attachment 58.

11
12
13
14 114. On Attachment 59 Jane/John Doe 11 – Drackmore misleads others
15 with the statement that reviews and comments are disabled on Itch Io where
16 The Plaintiff sells bundles. \$10 of sales came from this sites traffic. The
17 Plaintiffs traffic directed over six hundred times this amount of sales to that
18 site generating income for itch that it would have never gotten on its own.
19 All of this traffic was from The Plaintiff’s community group which is made
20 up of people familiar with The Plaintiff. These harassers interfered with this
21 business arrangement and itch.io removed The Plaintiffs games from the
22 search engine making it more difficult for paying customers to find The
23 Plaintiff’s games.
24
25
26

27 115. In Attachment 60 it can be seen that Jane/John Doe 11 – Drackmore
28 shows tracking effort in attempting to discover how The Plaintiff managed

1 to get a recent game to published stage. It is Jane/John Doe 11 –
2 Drackmore’s objective to harass and interfere with the ability to get titles to
3 publication as much as possible which is the basis of this entire case.
4

5 116. Jane/John Doe 11 – Drackmore has posted in excess of a hundred
6 times in harassment and support of harassment of The Plaintiff. Jane/John
7 Doe 11 – Drackmore has displayed entertainment and personal satisfaction
8 at annoying and attempting to interfere with The Plaintiff’s business efforts.
9

10 **Group Digital Homicides Poop Games/Trashware**

11 117. As a group, all members of Digital Homicides Poop
12 Games/Trashware are in conspiracy to perform harassment against
13 developers who do not fit their personal opinion of what a video game
14 should be. By sheer number and negative votes these individuals as a group
15 can heavily delay and destroy a games ability to be brought to market. As
16 The Distributor is the primary location where starting developers can sell
17 their the harassers and attackers actions actually determine the worldwide
18 market for PC game distribution and what can make it to be for sale. The
19 fact that these individuals cannot accurately monitor all submissions and in
20 fact cannot battle certain community groups with large numbers of
21 supporters creates an unfair and biased entry to market in a manner that is
22 harassing and devastating to new and upcoming developers.
23
24
25
26

27 118. It is specifically stated in Attachment 52 by a developer considering
28 joining this group “Wouldn’t it be a kind of conflict if I’m an active

1 member in this group when I propose another game on Greenlight?” One of
2 the leaders “Tryyton” states “we have more devs in the group, don’t
3 worry”. This is most definitely a conflict of interest and any individual that
4 is a developer is at least twice as responsible for interference with business
5 as the other harassers in the harassment group.
6

7
8 119. In Attachment 53 it is shown that two of the leaders have a
9 discussion on keys for vote traffic and The Distributor has only stated that
10 it makes it “harder to determine” consumer interest. This has been left open
11 for individuals to use keys to do so and The Plaintiff has been singled out
12 by both The Distributor and this harassment group in attempts to block
13 business. The Distributor is a subsidiary of a competitor and some elements
14 within The Distributor have similar interests as this group.
15

16
17 120. With the above paragraphs The Plaintiff asserts there is no legitimate
18 purpose for this group, it has specifically stated its desire to put The
19 Plaintiff out of business and gathers forces to do deeds to meet that
20 purpose. As such any active member of this group that votes as a group
21 competitor or not a competitor is liable for the causes of actions stated in
22 this case. Per Agency and Vicarious liability stated below any employer,
23 agency, or publisher that has ties to any member of this group for
24 performing such acts shares equal liability.
25
26

27 121. Attachment 56 shows two posts of over 15 in regards to The
28 Plaintiff’s game Operation: Global Shield. The harassers state that The

1 Plaintiff is “sneaking titles past” and dodging red tape. This references the
2 harassers need to “intercept” to stop The Plaintiff from doing business and
3 the illusion that red tape is the problem and contributes to misinformation
4 these individuals spread to the public. It is not The Plaintiff’s responsibility
5 to inform these individuals of business dealings. The developer’s names
6 were used because a different contract was signed and no more titles will be
7 published under Digital Homicide LLC for specific business reasons.
8
9

10 122. As one example of dozens that are random individuals throughout
11 the group and could be individuals stated here on alternate accounts,
12 Attachment 56 shows a user stating that he was Denial of Serviced (DDOS)
13 by The Plaintiff after this user said something on The Plaintiff’s greenlight
14 submission. There is no possible way The Plaintiff could even know who
15 this user is, what their IP address is, or that The Plaintiff would even have
16 any reason to do such a thing.
17
18

19 123. It is important to note, that a majority of these posts are on The
20 Plaintiff’s forums. These are locations that The Plaintiff must go to check
21 on customer problems, fix requests, feature requests, and so on. These
22 individuals could speak about this anywhere else on the net or in their own
23 forum. Instead, as a group, they gather in their harassment group and direct
24 statements to The Plaintiff’s game forums and greenlight submissions to
25 both interfere with business and goad The Plaintiff repeatedly over 2000
26 times by individuals mentioned in this case and 20 thousand times by this
27
28

1 groups members and others assisting from their supporting Youtube
2 channel.

3
4 124. Hundreds of more examples of the above information are available
5 and if summary judgement is not achieved The Plaintiff will supply
6 significant amounts of additional evidence including some external site
7 information to give as clear a picture possible to The Court.
8

9 **ADDITIONAL EVIDENCE OF DEFENDANTS STATED FALSITIES**

10 125. Attachment 61 shows an image of Victory Games LLC used to
11 supposedly create a link to The Plaintiff as a supposed harasser. This entire
12 event was created by a random Internet troll and The Defendants and
13 multiple media outlets used it to blame on The Plaintiff.
14

15 126. Attachment 62 shows an image of Victory Games game submission
16 account used by The Plaintiff. Shown is the names that cannot be cleared
17 by the owner of the account. There is no Victory Games LLC present
18 showing proof that this account was never used for Darkhill Avengers
19 submission and that dozens of statements made by The Plaintiff were false.
20
21

22 127. Two large media outlets specifically spread these false statements of
23 harassment to put The Plaintiff into bad light and reverse this false
24 harassment accusation upon The Plaintiff. Attachment 61 is missing its vote
25 buttons in the circled red area. The year would not be shown where it is
26 underlined for a posting of a game during that year. The square area shows
27 LLC which was never on The Plaintiff's submission account. This is proof
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that someone has modified this image and all accusers did not ask for comment or find verified fact as to who's image and account it was before falsely accusing The Plaintiff.

AGENCY AND VICARIOUS LIABILITY

128. The Plaintiff asserts that all Defendants agencies, employers, and publishers whom supported via public representation and lack of action to deter The Defendants are therefore liable to The Plaintiff for the acts, negligence, malicious intent, and damage caused by that inaction and the actions of those Defendants. This is to include those Defendant's not yet named until discovery of Jane/John Doe involvement by subpoena. This section subject to amendment upon receiving Jane/John Doe subpoena information.

FIRST CAUSE OF ACTION: CONSPIRACY TO COMMIT

VIOLATION OF CIVIL RIGHTS

(All Defendants)

129. The Plaintiff incorporates all paragraphs.

130. In Violation of The Plaintiff's Civil Rights per 18 US Code 241 the Plaintiff demands action upon the Defendants limiting or elimination of The Plaintiff's right to communicate with the world, express or publish opinions (and The Plaintiff believes The Plaintiff's goods as a form of expression), the inability to speak publicly without fear of harassment, and limit access to the tools needed for the Plaintiff's livelihood. Defendants conspiring unlawfully

1 as two or more persons in disguise (anonymously) and on the highway
2 (Internet) with the intent to prevent or hinder The Plaintiff's right to exercise
3 the enjoyment of Constitutional Rights stated above. The listed punishment
4 under criminal law is a fine and up to 10 years imprisonment. The Defendants
5 have repeatedly entered Store Page Forums to cause damage not as customers
6 of The Plaintiff, just as a real life store has the right to refuse service and
7 keep a pleasant working and customer environment, The Plaintiff has the
8 right to do so on his product forums. The Defendant's groups stated goal is
9 to stop The Plaintiff from doing business and have The Plaintiff removed
10 from The Distributor and would entirely put The Plaintiff completely out of
11 business.
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15 131. 42 U.S.C. § 1985 section 3, also states that if 2 or more persons
16 depriving persons of rights or privileges, in this case right of due care, right
17 of not being subject to others bearing false witness, and the right to do
18 business, then The Plaintiff has right to damages resulting from those
19 person's actions. The Plaintiff has suffered emotional distress, financial loss
20 and damages, loss of reputation, and financial strife due to the Defendant's
21 actions and The Plaintiff is due restitution in an amount to be proven at trial
22 or summary judgement. Plaintiff also asserts the right to exemplary damages.
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26 **SECOND CAUSE OF ACTION: DISORDERLY CONDUCT**

27 **(All Defendants)**

28 132. The Plaintiff incorporates all paragraphs.

1 133. Under Arizona State Leg Statute 13-2904 Disorderly Conduct section
2 A. (2) Makes unreasonable noise (in the form of repeated posting). Section
3 A. (3). Uses abusive or offensive language or gestures to any person present
4 in a manner likely to provoke immediate physical retaliation by such person.
5 Section A (4) Makes any protracted commotion, utterance or display with
6 the intent to prevent the transaction of the business of a lawful meeting,
7 gathering or procession; in this case continually for over a year time. Section
8 B. stated disorderly conduct under each of these numbered items are
9 misdemeanors that have been committed over two thousand times in the
10 vicinity, directed at, and taking effect upon The Plaintiff, The Plaintiff's
11 business effort, and the general population. Noise being defined as: "a sound,
12 especially one that is loud or unpleasant or that causes disturbance." The
13 Plaintiff asserts that there is no difference between an online post and an
14 utterance by voice. The ACLU states: "If you exercise your free-speech
15 rights in violation of these rules, you may be excluded from the mall.
16 However, you should not be arrested for trespass under state law in an area
17 that's open to the public **unless you intentionally interfere with the**
18 **establishment's business**, for example, by obstructing **or intimidating its**
19 **customers.**" The harassment groups purpose has been specifically stated to
20 be to put The Plaintiff out of business. See Attachment 27.

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27 134. The Plaintiff has suffered emotional distress, financial loss and
28 damages, loss of reputation, and financial strife due to the Defendant's

1 actions and The Plaintiff is due restitution in an amount to be proven at trial
2 or summary judgement. Plaintiff also asserts the right to exemplary damages.

3 **THIRD CAUSE OF ACTION: STALKING**

4 **(All Defendants)**

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6 135. The Plaintiff incorporates all paragraphs.

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8 136. Under Arizona State Leg Statute 13-2916 Use of an electronic
9 communication to terrify, intimidate, threaten or harass Section A: It is
10 unlawful for any person with the intent to terrify intimidate, threaten, or
11 harass a specific person or persons to do any of the following: 1. Direct
12 obscene, lewd, or profane language or suggest any lewd or lascivious act to
13 the person in an electronic communication. 2. Threaten to inflict physical
14 harm to any person or property in any electronic communication. 3.
15 Otherwise disturb by repeated anonymous, unwanted or unsolicited
16 electronic communications the peace, quiet or right of privacy of the person
17 at the place where the communications were received - in this case the State
18 of Arizona. Any persons who violate this section is guilty of a class 1
19 misdemeanor and this has been performed by The Defendants in excess of
20 ten thousand times upon The Plaintiff. As shown on a per defendant basis
21 this cause of action applies to all Defendant's and is subject to amendment
22 after Jane/John Doe subpoenas are fulfilled.

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27 137. The Plaintiff has suffered emotional distress, financial loss and
28 damages, loss of reputation, and financial strife due to the Defendant's

1 actions and The Plaintiff is due restitution in an amount to be proven at trial
2 or summary judgement. Plaintiff also asserts the right to exemplary damages.

3 **FOURTH CAUSE OF ACTION: HARASSMENT**

4 **(All Defendants)**

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6 138. The Plaintiff incorporates all paragraphs.

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8 139. Arizona State Leg 13-2921 harassment section A. states A person
9 commits harassment if, with intent to harass or with knowledge that the
10 person is harassing another person, the person: (1) anonymously or otherwise
11 contacts, communicates or causes a communication with another person by
12 verbal, electronic, mechanical, telegraphic, telephonic or written means in a
13 manner that harasses. (2) Continues to follow another person in or about a
14 public place for no legitimate purpose after being asked to desist (3)
15 Repeatedly commits an act or acts that harass another person. (4) Surveils or
16 causes another person to surveil a person for no legitimate purpose. Per
17 Section C of this statute Section A is a class 1 misdemeanor and has been
18 performed by The Defendants from 10 to 2 thousand times each in the past
19 21 months. Section (D) lawful demonstration does not apply as some of The
20 Defendants are competitors with intent to profit and disparage goods and The
21 Plaintiff's good name in front of the public. Section (D) also does not apply
22 to those who posted repeatedly with intent to destroy and harass after being
23 asked to desist, who also interfered with legitimate customers who would
24 otherwise have enjoyed the experience and the games. A few posts a month
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would not have been enough for cause of action. Every game, every submission, and every business attempt of The Plaintiff is stalked, organize harassed, depreciated in value by negative review repeatedly when the users already have bias against the product, and The Plaintiff is belittled in the public eye.

140. The Plaintiff has suffered emotional distress, financial loss and damages, loss of reputation, and financial strife due to the Defendant's actions and The Plaintiff is due restitution in an amount to be proven at trial or summary judgement. Plaintiff also asserts the right to exemplary damages.

FIFTH CAUSE OF ACTION: CRIMINAL IMPERSONATION

(JANE/JOHN DOE 8 – AKA STEAM USER JON144

SUBJECT TO AMENDMENT)

141. The Plaintiff incorporates all paragraphs.

142. Arizona Leg. Statute 13-2006 states that a person commits criminal impersonation by assuming a false identity with the intent to defraud another. All competitors and leaders within the group Digital Homicides poop games , a group ran by John Doe Jon144 until he dropped the group after 20 months of harassment leadership, when he was warned of pending litigation, have taken part in the actions bringing this cause of action and have profited or attempted to profit in the marketplace by limiting The Plaintiff's product entry to market, direct product damage, and interference with business using the harassment group as an organizational hub to stage these attacks from.

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This charge also involves public damage to The Plaintiff for the public view of The Plaintiff as a supporter of harassment of other developers in the community. Evidence of this impersonation can be seen in Attachment 1 where this lawsuit was announced so that those being filed upon could seek legal counsel to defend their anonymity. These Internet users believed The Plaintiff was the owner of the group that was harassing The Plaintiff due to the usage of The Plaintiff's companies name. All Defendants conspired as a group with intent to have The Plaintiff banned, removed, and out of business.

143. This cause of action may not be representable by The Plaintiff except by The Plaintiff's ownership of 35% of Digital Homicide Studios LLC. This representation is left up to The Court. Cause of action dropped if The Court decides against.

144. The Plaintiff has suffered emotional distress, financial loss and damages, loss of reputation, and financial strife due to the Defendant's actions and The Plaintiff is due restitution in an amount to be proven at trial or summary judgement. Plaintiff also asserts the right to exemplary damages.

SIXTH CAUSE OF ACTION: TORTIOUS INTENTIONAL
INTERFERENCE WITH CONTRACTUAL RELATIONS WITH
THE DISTRIBUTOR
(All Defendants, subject to Amendment)

145. The Plaintiff incorporates all paragraphs.

1 146. At all times during The Defendants attacks upon The Plaintiff,
2 continual Intentional Interference with contractual relations took place and
3 is currently taking place as this complaint is written and will continue at any
4 time a new game is posted. The Defendant's interfere with the ability of The
5 Plaintiff to do business with The Distributor. Defendant's harass customers
6 of The Plaintiff, harass individuals who have interest in The Plaintiff's
7 products, and harass individuals who leave positive reviews on The
8 Plaintiff's products in an attempt to have these reviews removed. The more
9 times The Plaintiff attempted to remove postings, the more individuals or
10 secondary accounts would arrive to continue the onslaught. These actions
11 cause The Distributor to be less willing to do business with The Plaintiff.
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15 147. The Defendants send emails, reports, and post comments aimed
16 toward The Distributor to encourage The Distributor to not do business with
17 The Plaintiff.
18

19 148. The Plaintiff has suffered emotional distress, financial loss and
20 damages, loss of reputation, and financial strife due to the Defendant's
21 actions and The Plaintiff is due restitution in an amount to be proven at trial
22 or summary judgement. Plaintiff also asserts the right to exemplary damages.
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25 **SEVENTH CAUSE OF ACTION: TORTIOUS INTENTIONAL**
26 **INTERFERENCE WITH CONTRACTUAL RELATIONS WITH**
27 **DIGITAL HOMICIDE STUDIOS LLC**
28 **(All Defendants, subject to Amendment)**

1 149. The Plaintiff incorporates all paragraphs.

2 150. At all times during all causes of action, The Defendants interrupt The
3 Plaintiff's ability to do business with Digital Homicide Studios LLC in
4 attempts to publish product to market, sell product, deal with customers, and
5 profit in the free market.
6

7 151. The Plaintiff has suffered emotional distress, financial loss and
8 damages, loss of reputation, and financial strife due to the Defendant's
9 actions and The Plaintiff is due restitution in an amount to be proven at trial
10 or summary judgement. Plaintiff also asserts the right to exemplary damages.
11

12 **EIGHTH CAUSE OF ACTION: LIBEL PER SE**

13 **(All Defendants, subject to Amendment)**

14 152. The Plaintiff incorporates all paragraphs.

15 153. The defamatory statements and actions reach into the State of Arizona
16 directly aimed at The Plaintiff and cause damage to The Plaintiff and all other
17 users who have seen these assaults from that location.
18

19 154. Defendants making false statements procured liability in regards to
20 defamation while causing reputational damage and interference with
21 business.
22

23 155. The Plaintiff has suffered emotional distress, financial loss and
24 damages, loss of reputation, and financial strife due to the Defendant's
25 actions and The Plaintiff is due restitution in an amount to be proven at trial
26 or summary judgement. Plaintiff also asserts the right to exemplary damages.
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NINTH CAUSE OF ACTION: UNJUST ENRICHMENT

(ALL DEFENDANT COMPETITORS: JANE/JOHN DOE 1 AND 9

SUBJECT TO AMENDMENT)

156. The Plaintiff incorporates all paragraphs.

157. The Defendants under this cause of action have intentionally attacked The Plaintiff to further their own financial benefit by destruction of a competitor and have committed similar acts to dozens of other competitors in the market.

158. Competitor is defined as any Defendant with a financial interest in The PC Games market. This includes but is not limited to Youtubers, Game Developers, Defendants planning on entering the market in the future, Twitch streamers, and Artists.

159. The Plaintiff seeks damage equal to any benefit in the market The Defendants make within The Distributors market place.

160. The Plaintiff also prays for Court order blocking these competitors from doing business with The Distributor.

161. The Plaintiff has suffered emotional distress, financial loss and damages, loss of reputation, and financial strife due to the Defendant's actions and The Plaintiff is due restitution in an amount to be proven at trial or summary judgement. Plaintiff also asserts the right to exemplary damages.

TENTH CAUSE OF ACTION: RESTITUTION

(All Defendants)

1 162. The Plaintiff incorporates all paragraphs.

2 163. The Plaintiff pleads cause of action for restitution. The Defendants
3 actions caused direct damage to sales and destruction of property prior to
4 access to market that crippled The Plaintiffs financial capabilities during
5 peak market time opportunities.
6

7 164. The Plaintiff has suffered emotional distress, financial loss and
8 damages, loss of reputation, and financial strife due to the Defendant's
9 actions and The Plaintiff is due restitution in an amount to be proven at trial
10 or summary judgement. Plaintiff also asserts the right to exemplary damages.
11

12 **ELEVENTH CAUSE OF ACTION: NEGLIGENCE**

13 **(All Defendants)**

14 165. The Plaintiff incorporates all paragraphs.

15 166. At all times during the events and causes of action stated in this
16 complaint, The Defendants have shown reckless disregard and negligence
17 with regard to the damage caused to The Plaintiff, the public, The
18 Distributors community, and The Plaintiff's customers. The Defendant's
19 actions have caused financial, reputational, and emotional damage for in
20 excess of a year of continual assault.
21

22 167. The Plaintiff has suffered emotional distress, financial loss and
23 damages, loss of reputation, and financial strife due to the Defendant's
24 actions and The Plaintiff is due restitution in an amount to be proven at trial
25 or summary judgement. Plaintiff also asserts the right to exemplary damages.
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DAMAGES AND SELF REPRESENTATION FEES

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3 168. The Plaintiff incorporates all paragraphs.

4 169. Plaintiff seeks all damages legally available for the aforementioned
5 causes of action in an amount to be determined at trial or by and during
6 summary judgement. These damages are not limited to but include the below
7 (subject to amendment):
8

9 170. The damage depicted below is market evaluated according to average
10 provable product value at the time The Defendants assaulted the Plaintiff. All
11 administrator/owners of the harassment/hate group were aware of or should
12 have been aware of false accusation of theft, false accusation of
13 impersonation, and harassment issues and took no measures to curb these
14 issues other than basic statements that it should not be happening. These
15 administrator/group owners also took direct and repeated action harassing,
16 cyberstalking, and bearing false witness or encouraged others to do as a
17 group against The Plaintiff. Starship: Novastrike, M.A.S., Grimehz Journey,
18 Coastal Carnage, Bombing Run, Operation: Vile Strike were assaulted and
19 destroyed by The Defendants. The Defendants were the initial factor causing
20 this interference with business and should be held accountable for their
21 actions and the damages involved. These products were under Trade names
22 directly representing The Plaintiff as sole proprietor at the time damages.
23 Value per title high to low end \$18,000 at time of loss to \$5,000 current value
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1 each per year averaged to \$11,500. At 5 years for a total of \$517,500. All
2 titles listed above were attacked within the Greenlight System as submissions
3 by The Plaintiff before Digital Homicide Studios LLC took under contract.
4

5 171. For direct involvement and attack upon 42 games posted to Greenlight
6 in 2016, Low end value \$5,000 per title per year for 5 years for a total of
7 \$1,050,000. These 42 games were attacked within the Greenlight System as
8 submissions by The Plaintiff before Digital Homicide Studios LLC took
9 under contract.
10

11 172. For over 21 months of decreased production both from harassment,
12 interference with business, emotional and mental strife, and for competitive
13 reasons by some Defendants the loss of over forty titles that will never
14 come to exist at above value of \$5,000 per title per year for five years for a
15 total of \$1,000,000. This is a rough estimate as Jane/John Doe Interference
16 cannot be accurately determined until subpoena filings are completed, data
17 gathered is analyzed, and the complaint amended. All titles listed above
18 were attacked within the Greenlight System as submissions by The Plaintiff
19 before Digital Homicide Studios LLC took under contract.
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22 173. Continual business interference and product to market reduction
23 caused by repeated harassment, stalking, and interference of business by
24 The Defendants. Damage assessment to be completed during case work and
25 by The Court.
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174. An estimated 1500 hours that will be spent on Legal work to self-represent this case over the next three years which will be a detriment to The Plaintiff's chosen profession. The Plaintiff's work creates cash flows rather than hourly payments and as such has compounding value (and therefore loss) over time. With an estimated 4 product creation per month and 5 months' work lost dealing with self-representation for this case. An estimated loss over time restitution during critical market time is a minimum product lifetime loss estimate of \$500,000. This will be proven in trial or at time of summary judgement.

175. The Amount in Controversy:

176. Compensatory Damages: \$2,967,500

177. Emotional, reputational, and financial distress: \$5,000,000

178. Punitive damage request: \$10,000,000

179. Total: \$17,967,500

180. The Plaintiff also requests any other damages, reductions, or increases The Court deems proper in regards to this cause of action.

DEMAND FOR JURY TRIAL

The Plaintiff does not request trial by jury.

PRAYER

1 **WHEREFORE**, The Plaintiff, prays that the Court:

2 Enter judgement in The Plaintiff's favor against the Defendant's listed on cause of
3 actions 1 through 11. Below damage request is subject to amendment where more
4 individuals may be involved and damages could increase and/or spread across
5 more defendants.
6

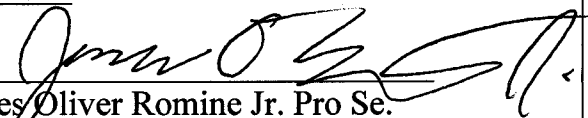
7 As a group this damage has been evenly weighed against The Plaintiff and for all
8 causes of action in regards to Compensatory damages resulting from loss of the
9 business capabilities to The Plaintiff: \$269,772.73 for each of the 11 Defendants.
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13 Emotional distress, Financial distress, and continual public humiliation at The
14 Plaintiff's detriment: \$454,545.46 for each of the 11 Defendants.
15

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17 A Punitive Damage request to the sum of \$909,090.90 per each of the 11
18 Defendants to deter future false statements, interference with business, and
19 harassment.
20

21
22 In the event any Defendant is outside of the United States, and the cause of action
23 against them is won or defaulted upon or a Defendant is unable to financially
24 repay the damages caused, The Plaintiff requests a Court Order that every account
25 said Defendant has on The Distributor is permanently removed as punishment for
26 the actions taken against The Plaintiff. This permanent removal will be considered
27 a full reimbursement of damages for that Defendant.
28

1 RESPECTFULLY SUBMITTED this September 12 2016

2 By: 
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